

October 6, 2022

Board of County Commissioners
Clackamas County

Members of the Board:

Approval of a Revenue Agreement with the U.S. Department of Labor for Homeless Veterans' Reintegration Program. The first year of funding is \$197,469, to be renewed annually for up to 3 years for a total of \$851,055. Funding through U.S. Department of Labor.
No County funds are involved.

Purpose/Outcome	The Children, Family and Community Connections (CFCC) Division of Clackamas County requests approval of a HVRP grant agreement to help veterans achieve stable employment with a focus on obtaining high-quality career outcomes for veterans experiencing homelessness and other barriers. The funding will allow for an additional Workforce staff to meet the demand for program services. The award is distributed through year-long agreements that are renewed annually for up to three years.
Dollar Amount and Fiscal Impact	First year of funding: \$197,469 Total approved funding over three years: \$851,055. No County fund involved.
Funding Source	U.S. Department of Labor through the Veterans' Employment and Training Services Catalog of Federal Domestic Assistance (CFDA) 17.805; Funding Opportunity: FOA-VETS-22-01
Duration	July 1, 2022-June 30, 2025
Previous Board Action/Review	BCC Approval to Apply: 3/17/22 BCC Issues: 10/4/22
Strategic Plan Alignment	1. Grow a Vibrant Economy - Provide customized employment services to individuals with barriers to employment, and business partners, so they can obtain and retain meaningful employment through a successful job placement. 2. Ensure safe, healthy and secure communities by helping homeless veterans get off the streets and achieve a safer, healthier and more stable quality of life.
Counsel Review	Reviewed and approved by County Counsel: 9/14/22: AN
Procurement Review	Was the item processed through Procurement? No. Revenue Grant Agreement
Contact Person	Adam Freer 971-533-4929
Contract No.	H3S # 10845

BACKGROUND:

The Children, Family & Community Connections Division of the Health, Housing and Human Services Department requests the approval of a Grant Agreement to fund the Homeless Veterans Reintegration Program (HVRP) to expand and enhance Clackamas County Veterans' Workforce Program. The Veteran's Workforce program has been successfully providing services to Veterans for over 10 years helping veterans, with multiple barriers, achieve stable employment. Current resources are insufficient to meet the demand for services.

The total award over the three year program period is \$851,055. This will be distributed through one-year contracts that are renewed annually. The first year of funding is \$197,469. (Note that the original proposal included a match, but the funder preferred having that amount removed from the final budget.)

RECOMMENDATION:

Staff recommends the Board approval of this Agreement and authorization for Tootie Smith, Board Chair, to sign on behalf of Clackamas County.

Respectfully submitted,

Rodney A. Cook

Rodney A. Cook, Director
Health, Housing & Human Services



**U.S. DEPARTMENT OF LABOR
Veterans Employment and
Training Service (DOL/VETS)**

**NOTICE OF
AWARD (NOA)**

Under the authority of the *Title 38 of United States Code Sections 2021, 2021A and 2023*, this grant or agreement is entered into between the above named **Grantor Agency** and the following named **Awardee**, for a project entitled - **Homeless Veterans Reintegration Program (HVRP)**

Name of Awardee:
County of Clackamas, Oregon
2051 KAEN RD.
SUITE 470
OREGON CITY, OREGON 97045-4035

Federal Award Id. No. (FAIN): HV-38342-22-60-5-41
CFDA #: 17.805 - Homeless Veterans Reintegration Program
Amount: \$197,469.00
EIN: 936002286
DUNS #: 096992656

Accounting Code: 1653-2022-2901642222BD202201640006225HVRPN500005VET005HVRP1-590911-410043---

Payment Management System DOC#: HV38342HV2

The Period of Performance shall be from **July 01, 2022 thru June 30, 2025**.
Total Government's Financial Obligation is **\$197,469.00** (unless other wise amended).

Payments will be made under the Payments Management System, and can be automatically drawn down by the awardee on an as needed basis covering a forty-eight (48) hour period.
In performing its responsibilities under this grant agreement, the awardee hereby certifies and assures that it will fully comply with all applicable Statute(s), and the following regulations and cost principles, including any subsequent amendments:

Uniform Administrative Requirements, Cost Principles, and Audit Requirements:
2 CFR Part 200; Uniform Administrative Requirements, Cost Principles, and Audit Requirements; Final Rule
2 CFR Part 2900; DOL Exceptions to 2 CFR Part 200;

Other Requirements (Included within this NOA):

Condition(s) of Award (if applicable)
Federal Award Terms, including attachments

Contact Information
The Grant Officer Technical Representative (GOTR) assigned to this grant is Tonja Pardo. Tonja Pardo will serve as your first line point of contact and can be contacted via e-mail- pardo.tonja@dol.gov. If your GOTR is not available, please call your Regional Office at 415-625-7900 for assistance.

The awardee's signature below certifies full compliance with all terms and conditions as well as all applicable Statues(s), grant regulations, guidance, and certifications.

Signature of Approving Official - **AWARDEE**

Signature of Approving Official - **DOL / VETS**

Tootie Smith, Clackamas County Board Chair

See SF-424 for Signature

No Additional Signature Required

Lynn Fraga, June 02, 2022
Grant Officer

TERMS AND CONDITIONS
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Part A: General Award, System for Award Management and Uniform Guidance

A.1 Compliance and the Order of Precedence

The recipient of this Federal award will assure that they will fully comply with the rules and requirements specified in the award document. Program requirements may be found in the Funding Opportunity Announcement (FOA), statutes, Executive Orders, government-wide regulations, agency regulations, agency policy guidance, and the terms outlined in the award document. The list below identifies the hierarchy of authority.

The following order of precedence applies to your activities under this federal award. In the event of any inconsistency between the terms and conditions of this Notice of Award (NOA) and other requirements, consult the below order:

1. Title 38 of United States Code (U.S.C.), Sections 2021, 2021A, 2022, 2023.
2. Title 42 United States Code (U.S.C.), Section 11302 (103).
3. Other applicable Federal statutes.
4. Consolidated Appropriations Act 2022 (Public Law 117-103) dated March 15, 2022.
5. Implementing Regulations.
6. Executive Orders and Presidential Memoranda.
7. The Office of Management and Budget (OMB) Guidance, including the Uniform Guidance at 2 CFR (Code of Federal Regulations) parts 200 and 2900.
8. The U.S. Department of Labor (DOL) or Veterans' Employment and Training Service (VETS), and Employment and Training Administration (ETA) directives.
9. Terms and conditions of this award.

Notice of Award The funds provided under this Notice of Award (NOA) must be expended according to all applicable Federal statutes, regulations and policies, and the applicable provisions in the appropriations act(s). The funds shall be obligated and expended via a NOA award modification. These obligations and expenditures may not exceed the amount awarded by the NOA modification unless otherwise modified by the VETS.

By drawing down funds, your organization as the award recipient agrees to the provisions of 2 CFR 200.521, 2 CFR 2900.20, and 2 CFR 2900.21 and is subject to having its award removed as a result of an ALJ decision. As part of this process, the Grant Officer will provide instructions on transition and closeout to both the newly selected grant recipient and to the grant recipient whose positions is affected, or which is being removed

A.2 Funding Opportunity Announcement

The Funding Opportunity Announcement (FOA) and any amendments found at <https://www.grants.gov/web/grants/view-opportunity.html?oppId=335998> are hereby incorporated into this NOA. Award recipients are bound by the authorizations, restrictions, and requirements contained in the FOA. Therefore, the expenditure of funds by the award recipient certifies that your organization has read and will comply with all the parts that are contained in the NOA.

A.3 Approved Statement of Work

This project's narrative is the approved Statement of Work (SOW). It has been included as Attachment D. If there is any inconsistency between the project narrative and the program statute, appropriation, regulations, Executive Orders, Uniform Guidance, and DOL or VETS directives, the order of precedence (as described in Section 1. above) will prevail.

A.4 Grant Officer Technical Representative or Point of Contact (POC)

The DOL/VETS Grant Officer Technical Representative (GOTR) for this award is:

Name: Tonja Pardo
Telephone: 503-947-1491
E-mail: Maas.Tonja@dol.gov

The individual named above is not authorized to change any of the terms or conditions of the award or approve prior approval requests. Any changes to the terms or conditions or prior approvals must be approved by the Grant Officer through the use of a formally executed award modification process.

A.5 Unique Entity Identifier Requirements

Starting on or near April 4, 2022, the DUNS Number will be replaced by a new, non-proprietary identifier requested in and assigned by [SAM.gov](https://sam.gov). This new identifier is called the Unique Entity Identifier (UEI), or the Entity ID. To learn more about SAM's rollout of the UEI, please visit the U.S. General Service Administration (GSA), [Unique Entity Identifier Update webpage](#).

If the grant award or cooperative agreement recipient is authorized to make subawards under this award, then the recipient:

1. Must notify potential subrecipients that no entity (see definitions below) may receive a subaward from the grant award recipient until the entity has provided its UEI to the recipient.
2. May not make a subaward to an entity unless the entity has provided its UEI to the grant or cooperative agreement recipient. Subrecipients are not required to obtain an active SAM registration but must obtain a UEI.

A.6 System for Award Management

System for Award Management (SAM) is the official federal system that collects, validates, stores, and disseminates business information about the federal government's trading partners in support of contract awards, grants, and electronic payment processes.

A SAM registration is required for an entity to be able to apply for federal awards, to request modifications to existing awards, and to enable them to closeout expiring awards. See [Training and Employment Notice \(TEN\) 18-17](#) for additional guidance.

Unless the award recipient is exempt from this requirement under 2 CFR 25.110, the grant award or cooperative agreement recipient must maintain current information in the SAM. This includes information on the recipient's immediate and highest-level owner and

subsidiaries, as well as on all of the recipient's predecessors that have been awarded a Federal contract or Federal financial assistance within the last three years, if applicable, until the award recipient submits the final financial report required under this Federal award or receive the final payment, whichever is later.

DOL advises grant award recipients and other awardees of Federal awards such as cooperative agreements registered in SAM to review their registration information, particularly their financial information and points of contact. Assistance is available by contacting the Federal Service Desk at [FSD.gov](https://www.fsd.gov). Grant award or cooperative agreement recipients should contact the Office of the Chief Evaluation Officer (OCFO) at DBPIGrants@dol.gov if they find that payments have been paid to a bank account other than their registered bank account.

DOL routinely checks the validity of a grant or cooperative agreement award recipient's SAM registration and verifies that the recipient is not included on the excluded parties list before making an award or approving a modification to an existing award. Failure to have an active SAM registration can delay award recipients from receiving their initial award or requested modifications to their existing awards.

DOL further encourages award recipients to review the expiration date of their SAM registration and begin the renewal process well in advance, to ensure that their registration remains valid. If the award recipient has not logged in and updated its entity registration record within at least the past 365 days, its record will expire and go into inactive status. Timely renewal will ensure that the award recipient can continue to request and receive modifications to their existing grants, as well as apply for new funding opportunities. Further, the EIN numbers must remain active until the award closeout process is fully completed.

A.7 Uniform Guidance Revisions

The Office of Management and Budget issued revisions to 2 CFR parts 25, 170, 183, and 200 (the Uniform Guidance) on August 13, 2020, and February 22, 2021 (technical correction). These revisions became effective November 12, 2020, except for the amendments to 2 CFR 200.216 and 200.340, which were immediately effective on August 13, 2020. The award recipient must operate in compliance with these revised regulations. Please note that the section numbering in the Uniform Guidance has changed in some instances, and this terms and conditions document has been updated accordingly.

A.8 For-Profit Entities, Foreign Entities, and Profit

For-profit and foreign entities are included in the definition of Non-Federal Entity (NFE) for DOL awards, per DOL's OMB-approved exception found at 2 CFR 2900.2. These entities, along with all other recipients of Federal awards, must comply with the Uniform Guidance found at 2 CFR parts 200 and 2900. The regulation at 2 CFR 2900.2 defines Non-Federal Entity as a state, local government, Indian tribe, institution of higher education (IHE), for-profit entity, foreign public entity, foreign organization or nonprofit organization that carries out a Federal award as a recipient or subrecipient.

The recipient is prohibited from earning a profit resulting from the implementation of this cooperative agreement. As directed in 2 CFR 200.400(g), non-Federal entities may not earn or keep any profit resulting from Federal financial assistance unless explicitly authorized in the Federal Award Terms. Additionally, the provision on profit only applies to WIOA Title 1 programs at 20 CFR 683.295.

A.9 Subawards

A *subaward* means an award provided by a *Pass-Through Entity* (PTE) to a subrecipient for the subrecipient to carry out part of a Federal award received by the PTE. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the PTE considers a contract.

The provisions of the Terms and Conditions of this award will be applied to any subrecipient under this award. The recipient is responsible for monitoring the subrecipient, ensuring that the Terms and Conditions are in all subaward packages and that the subrecipient complies with all applicable regulations and the Terms and Conditions of this award (2 CFR 200.101(b)).

A.10 Vendor/Contractor Defined

The term “contractor,” sometimes referred to as a vendor, is a dealer, distributor, merchant or other seller providing goods or services that are required to implement a Federal program (see 2 CFR 200.1). These goods or services may be for an organization's own use or for the use of the beneficiaries of the Federal program. Additional guidance on distinguishing between a subrecipient and a contractor (vendor) is provided in 2 CFR 200.331. When procuring contractors for goods and services, DOL/VETS recipients and subrecipients must follow the procurement requirements found at 2 CFR 200.320 (except states, pursuant to 2 CFR 200.317), which calls for free and open competition.

A.11 Technical Assistance, Resources, and Information

The National Veterans’ Technical Assistance Center (NVTAC). NVTAC, <https://nvtac.org/> provides training and technical assistance on veterans’ homelessness issues to grantees, employers, veteran service organizations, and agency partners. VETS expects HVRP grantees to participate in NVTAC training and technical assistance activities during the course of their grant award. Grantees may request training and technical assistance based on their needs. There is no cost to HVRP grantees for NVTAC services.

The U.S. Department of Labor's Veterans' Employment and Training Service (VETS) established the National Veterans' Training Institute (NVTI) to provide specialized training and professional skills enhancement of State Workforce Agencies, Homeless Veterans’ Reintegration Program grants and other veteran service provider staff.

The NVTI training focuses on improving employment services for veterans through a professional skills-development program. The training curriculum is designed to ensure that participants are trained in competencies that meet customers' needs. Attendees have access to a dedicated portal that contains course materials, discussion groups and other related course

content and references. The portal provides ongoing reference and community of practice support to participants who have completed NVTI training. There is no cost to HVRP grantees to attend scheduled NVTI trainings at www.NVTI.org.

Additional resources, training, and information to assist the award recipient are located on the ETA website, [Resources webpage](#) and on the Grants Application and Management collection page on [WorkforceGPS.org](#). [SMART training](#) is a technical assistance initiative sponsored by DOL/ETA to assist its grant and cooperative agreement recipients and subrecipients in improving its program/project operations through effective grants management. Please take some time to review the training modules which are focused on:

Strategies for sound grant management that include:

- Monitoring,
- Accountability,
- Risk mitigation and
- Transparency.

These four themes are woven throughout the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, also known as the Uniform Guidance (2 CFR Part 200 and 2 CFR Part 2900). The 508-compliant PowerPoints of the modules may be found on [WorkforceGPS.org](#) at the [Resource](#) page.

A.12 Monitoring, Technical Assistance, and Additional Specific Conditions of Award

All grant and cooperative agreement award recipients, including states and territories managing the Unemployment Insurance programs, are subject to 2 CFR 200.208, *Specific conditions*, which indicates that the Federal awarding agency may adjust specific award conditions as needed. A specific condition is based on an analysis of the following factors:

1. Based on the criteria in §200.206, *Federal awarding agency review of risk posed by applicants*;
2. The applicant or recipient's history of compliance with the general or specific terms and conditions of a Federal award;
3. The applicant or recipient's ability to meet expected performance goals as described in 2 CFR 200.211; or
4. A responsibility determination of an applicant or recipient.

Additional Federal award conditions may include items such as the following:

1. Requiring payments as reimbursements rather than advance payments;
2. Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given performance period;
3. Requiring additional, more detailed financial reports;
4. Requiring additional project monitoring;
5. Requiring the non-Federal entity to obtain technical or management assistance; or

6. Establishing additional prior approvals.

Grant and cooperative agreement award recipients may be required to obtain technical or management assistance through an established provider/contractor that has been selected or hired by DOL/VETS that may include in-person or remote assistance.

A.13 Evaluation, Data, and Implementation

Grant and cooperative award recipients must cooperate during the implementation of a third-party evaluation. This means providing DOL/VETS or its authorized contractor with the appropriate data and access to program operating personnel and participants in a timely manner.

A.14 Program Requirements

The FOA contains the program requirements for this award.

Part B: Indirect Costs, Budget and Cost Share (Match)

B.1 Indirect Cost Rate and Cost Allocation Plan

Indirect (facilities & administrative (F&A)) costs mean those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. Direct costs, by contrast, can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Identification with the Federal award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect (F&A) costs of Federal awards.

If the DOL serves as the Federal Cognizant Agency (FCA) for the award recipient, then the grant and cooperative agreement award recipient must work with DOL's Cost & Price Determination Division (CPDD), which has delegated authority to negotiate and issue a Negotiated Indirect Cost Rate Agreement (NICRA) or Cost Allocation Plan (CAP) on behalf of the Federal Government. More information about the DOL's CPDD is available at [DOL's Cost & Price Determination Division \(CPDD\)](#) website. This website has guidelines to develop indirect cost rates, links to the applicable cost principles, and contact information. The CPDD also has [Frequently Asked Questions](#) to provide general information about the indirect cost rate approval process and due dates for provisional and final indirect cost rate proposals.

If a new NICRA is issued during the award's period of performance, it must be provided to DOL within 30 days of issuance. Funds may be re-budgeted as necessary between direct cost categories as long as it is consistent with the Budget Flexibility term within this agreement, grant requirements, and DOL regulations on prior approval. However, the total amount of the award will not be increased. Please select either 1, 2, or 3.

- 1. (a) A federally approved NICRA or federally approved CAP covering a portion of the grant period of performance is attached. Regarding only the NICRA:
 - Indirect Rate approved %: _____
 - Type of Indirect Cost Rate (i.e. Provisional/Predetermined/Fixed): _____
 - Allocation Distribution Base: _____
 - Current beginning and ending period applicable to rate: _____

(b) Election of 10% De Minimis Rate

The award recipient does not have a current negotiated (including provisional) rate and may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. A governmental department or agency unit that receives more than \$35 million in direct Federal funding must submit its indirect cost rate proposal to its cognizant agency for indirect costs and cannot request a de minimis rate. This methodology must be used consistently for all Federal grant awards until such time as the grant award or cooperative agreement recipient chooses to negotiate for an indirect cost rate, which the award recipient may apply to do at any time. See 2 CFR 200.414(f) for more information on use of the de minimis rate. Please be aware that incurred indirect type costs (such as top management salaries, financial oversight, human resources, payroll, personnel, auditing costs, accounting and legal, etc. used for the general oversight and administration of the organization) must not be classified as direct costs; these types of costs are recovered as part of charging the de minimis rate.

Estimated Indirect Costs for 1.a. and 1.b. must be identified on the SF-424A budget form.

- 2.
 - (a) The provided NICRA or CAP approved by the FCA does not cover a portion of the period of performance, or Indirect costs are being claimed on the SF-424A; however an
 - (b) indirect cost rate proposal or CAP has not yet been submitted for approval to the FCA.

URGENT NOTICE: Estimated indirect costs have been specified on the SF-424A, Section B, Object Class Category “j”, however only \$[N/A] will be released to support the indirect costs in the absence of a NICRA or CAP approved by the FCA. The remaining funds which have been awarded for Indirect Costs are restricted and may not be used for any purpose until the recipient provides a signed copy of the NICRA or CAP and receives documentation stating that the restriction is lifted by the Grant Officer. Upon receipt of the NICRA or CAP, the Grant Officer will issue a grant modification to the award to remove the restriction on those funds.

As the grant or cooperative agreement award recipient, the recipient must submit an indirect cost rate proposal or CAP. If the FCA for indirect costs is DOL, these

documents should be submitted to the DOL's Cost & Price Determination Division (CPDD). Otherwise, they should be submitted to the grant award recipient's FCA. Alternatively, the award recipient may request the de minimis rate if eligible (see section b. above). In addition, the recipient must notify the GOTR that the documents have been submitted to the appropriate FCA.

If the award recipient does not submit a NICRA proposal within 90 days of award, they will be limited to the de minimis rate of 10% of Modified Total Direct Costs (MTDC).

- ☒ 3. The award recipient elected to exclude indirect costs from the proposed budget. Please be aware that incurred indirect costs (such as top management salaries, financial oversight, human resources, payroll, personnel, auditing costs, accounting and legal, etc. used for the general oversight and administration of the organization) must not be classified as direct costs; these types of costs are indirect costs. Only direct costs, as defined by the cost principles contained in the Uniform Guidance will be charged. If indirect costs are misclassified as direct costs per the guidelines at 2 CFR 200.412, such costs may become disallowed through an audit or compliance review conducted by a Federal staff person.

B.2 Indirect Cost Rate – FINAL Federal Financial Report

All grant and cooperative agreement award recipients with an approved NICRA or de minimis rate must report indirect costs on their **FINAL** SF-425 Federal Financial report. If an award recipient has a NICRA and a CAP, only the indirect costs tied to the NICRA are reported on the SF-425 Report.

B.3 Budget - Approved

The grant award recipient's budget documents are attached in this NOA. The documents are: 1) the SF-424, included as Attachment A; 2) the SF-424 A, included as Attachment B; and 3) the Budget Narrative, included as Attachment C. The grant award recipient must confirm that all costs are allowable, reasonable, necessary, and allocable before charging any expense. Pursuant to 2 CFR 2900.1, the approval of the budget as awarded does not constitute prior approval of those items specified in 2 CFR part 200 and 2 CFR part 2900 or as a part of the grant award as requiring prior approval. The Grant Officer is the only official with the authority to provide such approval.

Any changes to the budget that impact the Statement of Work (SOW) and agreed upon outcomes or deliverables will require a request for modification and prior approval from the Grant Officer.

If the period of performance will include multiple budget periods, subsequent budget periods are subject to the availability of funds, program authority, satisfactory performance, and compliance terms and conditions of the Federal award.

B.4 Budget Flexibility

Award recipients are not permitted to make transfers that would cause any funds to be used for purposes other than those consistent with this Federal program. Any budget changes that

impact the SOW and agreed upon outcomes or deliverables require a request for modification and approval from the Grant Officer.

As directed in 2 CFR 200.308(f), for programs where the Federal share is over the Simplified Acquisition Threshold (SAT) (currently \$250,000), the transfer of funds among direct cost categories or programs, functions, and activities is restricted such that if the cumulative amount of such transfers exceeds or is expected to exceed 10% of the total budget as last approved by the Federal awarding agency, the recipient must receive prior approval from the Grant Officer. Any changes within a specific cost category on the SF-424(a) do not require a grant modification unless the change results in a cumulative transfer among direct cost categories exceeding 10% of total budget. It is recommended that the assigned Federal point of contact review any within-line changes to the award recipient's budget prior to implementation to ensure they do not require a modification.

For programs where the Federal share of the project is below the SAT of \$250,000, recipients are not required to obtain the Grant Officer's approval when transferring funds among direct cost categories.

Part C: Funds Management and Special or Temporary Restrictions

C.1 Funds – Payment Management System (PMS)

Upon receipt of a NOA, in order to draw funds from the U.S. Department of Health and Human Services (HHS) [Payment Management System \(PMS\)](#), an active account must be established. To establish an account, award recipients must complete an SF-1199A and PMS Access form (shown as the PMS/FFR User Form on the [PMS website](#)). DOL/VETS is responsible for completing portions of the SF-1199A and submitting the completed SF-1199A to the Division of Payment Management, which operates PMS. Federal award recipients do not need to complete these forms if they already have an account with PMS.

C.2 Funds - Return & Refunds

DOL/VETS does not accept paper checks for any type of returned funds. For active grants, all returns of funds are to be submitted electronically through the PMS operated by the HHS via the same method as a drawdown. For grants that have been cancelled or are expired (typically older than five years), incoming payments, including returns and recoveries to DOL, must be made via the [Pay.gov](#) website.

If there are questions regarding the return of funds, or your organization no longer has access to PMS, contact the OCFO via email at: DBPIGrants@dol.gov for further assistance.

Part D: Costs - Limitations, Items, and Restrictions

D.1 Consultants

For the purposes of this grant award, the ETA's Grant Officer has determined that fees paid to a consultant who provides services under a program shall be limited to \$750.00 a day (representing an eight-hour workday). Such costs must be reasonable, allocable, and

allowable to the program. Any fees paid in excess of this amount cannot be paid without prior approval from the Grant Officer.

D.2 Equipment

The grant award recipient(s) must submit a request to purchase equipment and receive **prior approval** from the Grant Officer as defined in the Uniform Guidance at 2 CFR 200.1. A request for purchasing equipment will be reviewed and approved in a modification to the award. Prior approval is required only when the per unit's acquisition cost is \$5,000 or more regardless of the non-Federal entity's capitalization threshold. Equipment purchases must be made in accordance with 2 CFR 200.313 or 2 CFR 200.439.

Being awarded this grant **does not** automatically mean that the equipment specified in the approved budget or SOW is approved by the Grant Officer. If not specified above, the recipient must submit a detailed list describing the purchase to the GOTR for review within 90 days of the NOA date. The recipients are strongly encouraged to submit requests for equipment purchase as early as possible in the grant's period of performance with as many planned pieces of equipment as possible.

Recipients may not purchase equipment during the last year of the period of performance or the last year of full program service delivery (not follow up activities), whichever comes first. If any approved acquisition has not occurred prior to the last funded year of performance, approval for that item is rescinded.

D.3 Pre-Award Costs

All costs incurred by the award recipient prior to the start date specified in the grant award issued by the Department are **incurred at the recipient's own expense**.

D.4 Program Income

The Addition method as described in 2 CFR 200.307 must be used in allocating any program income generated for this award. The award recipient must expend all program income prior to drawing down any additional funds as required at 2 CFR 200.305(b)(5) and 2 CFR 200.307(e). Any program income found remaining at the end of period of performance must be returned to VETS. In addition, the award recipient(s) must report program income on the quarterly financial report using the applicable ETA-9130 or SF-425 reports.

D.5 Supportive Services & Participant Support Costs

When supportive services are expressly authorized by a program statute, regulation, or FOA, this award waives the prior approval requirement for participant support costs as described in 2 CFR 200.456. Costs must still meet the basic considerations at 2 CFR 200.402 – 200.411. Questions regarding supportive services and participant support costs should be directed to the GOTR who is assigned to the award.

D.6 Travel

This award waives the prior approval requirement for domestic travel as contained in 2 CFR 200.475. For domestic travel to be an allowable cost, it must be necessary, allowable,

reasonable, allocable and conform to the non-Federal entity's written policies and procedures. All travel must also comply with Fly America Act (49 USC 40118), which states in part that any air transportation, regardless of price, must be performed by, or under a code-sharing arrangement with, a U.S. Flag air carrier if service provided by such carrier is available.

D.7 Travel – Foreign

Foreign travel is not allowable except with prior written approval from the Grant Officer through the process described in 2 CFR 200.407 and 2 CFR 2900.16. All travel, both domestic and Grant Officer approved foreign travel, must comply with the Fly America Act (49 USC 40118), which states in part that any air transportation, regardless of price, must be performed by, or under a code-sharing arrangement with, a U.S. Flag air carrier if service provided by such carrier is available.

D.8 Travel – Mileage Reimbursement Rates

Pursuant to 2 CFR 200.475(a), all award recipients must have policies and procedures in place related to travel costs; however, for reimbursement on a mileage basis, this Federal grant award cannot be charged more than the maximum allowable mileage reimbursement rates for Federal employees. Mileage rates must be checked annually at GSA's [Privately Owned Vehicle \(POV\) Mileage Reimbursement Rates webpage](#) to ensure compliance.

D.9 Conferences and Conference Space

Conferences sponsored in whole or in part by the award recipient are allowable if the conference is necessary and reasonable for the successful performance of the Federal Award. The award recipients are urged to use discretion and good judgment to ensure that all conference costs charged to the grant are appropriate and allowable. For more information on the requirements and the allowability of costs associated with conferences, refer to 2 CFR 200.432. Recipients will be held accountable to the requirements in 2 CFR 200.432. Therefore, costs that do not comply with 2 CFR 200.432 will be questioned and may be disallowed.

D.10 Hotel-Motel Fire Safety

Pursuant to 15 U.S.C. 2225a, the recipient must ensure that all space for conferences and conventions or training seminars funded in whole or in part with federal funds complies with the protection and control guidelines of the Hotel and Motel Fire Safety Act (P.L. 101-391, as amended). Recipients may search the [Hotel-Motel National Master List](#) to see if a property is in compliance, or to find other information about the Act.

Part E: Reporting, Audit, and Closeout

E.1 Reports

All VETS grant award recipients are required to submit quarterly financial and narrative progress reports for each grant award as described in the following:

1. **Quarterly Financial Reports.** Grant award recipients are required to report

quarterly financial data on the SF-425 report, which are due no later than 30 calendar days after the end of each specified reporting quarter. Reporting quarter end dates are March 31, June 30, September 30, and December 31. A final financial report must be submitted no later than 30 calendar days after the quarter ends and the closeout SF-425 report must be submitted no later than 120 calendar days after the grant period of performance ends. See 2 CFR 200.344. A closeout report will be submitted during the closeout process.

The instructions for accessing both the online financial reporting system and the HHS PMS can be found in the transmittal memo accompanying this NOA.

E.2 Federal Funding Accountability and Transparency Act (FFATA or Transparency Act)

Applicable to grants and cooperative agreements:

1. Reporting of first-tier subawards.
 - a) *Applicability.* Unless the award recipient is exempt as provided in paragraph [4.] of this award term, the award recipient must report each action that equals or exceeds \$30,000 in Federal funds for a subaward to a non-Federal entity or Federal agency (see definitions in paragraph [5.] of this award term).
 - b) *Where and when to report.*
 - I. The Federal entity or Federal agency must report each obligating action described in paragraph [1.a.] of this award term to [FSRS.gov](https://www.fsr.gov).
 - II. For subaward information, the recipient must report no later than the end of the month following the month in which the obligation was made. (For example, if the obligation was made on November 7, 2010, the obligation must be reported by no later than December 31, 2010.)
 - c) *What to report.* The award recipient must report the information about each obligating action that the submission instructions posted at [FSRS.gov](https://www.fsr.gov) specify.
2. Reporting total compensation of recipient executives for non-Federal entities.
 - a) *Applicability and what to report.* The award recipient must report total compensation for each of their five most highly compensated executives for the preceding completed fiscal year, if—
 - I. the total Federal funding authorized to date under this Federal award is equal to or exceeds \$30,000 and is subject to the Transparency Act, as defined in 2 CFR 170.320;
 - II. in the preceding fiscal year, the recipient received—
 - (A) 80% or more of the annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined in 2 CFR 170.320 (and subawards); and
 - (B) \$25,000,000 or more in annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined in 2 CFR 170.320 (and subawards); and
 - III. The public does not have access to information on the compensation of the executives through periodic reports filed under section 13(a) or 15(d)

of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or Section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the [U.S. Security and Exchange Commission \(SEC\) total compensation filings](#))

- b) *Where and when to report.* The award recipient must report executive total compensation described in paragraph [2.a.] of this award term:
 - a. As part of your registration profile at [SAM.gov](#).
 - b. By the end of the month following the month in which this award is made, and annually thereafter.
3. Reporting of Total Compensation of Subrecipient Executives.
 - a) *Applicability and what to report.* Unless the recipient is exempt as provided in paragraph [4.] of this award term, for each first-tier non-Federal entity subrecipient under this award, the award recipient shall report the names and total compensation of each of the subrecipient's five most highly compensated executives for the subrecipient's preceding completed fiscal year, if—
 - I. in the subrecipient's preceding fiscal year, the subrecipient received—
 - (A) 80% or more of its annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined in 2 CFR 170.320 (and subawards); and
 - (B) \$25,000,000 or more in annual gross revenues from Federal procurement contracts (and subcontracts), and Federal financial assistance subject to the Transparency Act (and subawards); and
 - II. The public does not have access to information on the compensation of the executives through periodic reports filed under Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or Section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the [SEC total compensation filings](#))
 - b) *Where and when to report.* The award recipient must report subrecipient executive total compensation described in paragraph [3.a.] of this award term:
 - I. To the recipient.
 - II. By the end of the month following the month during which the recipient makes the subaward. For example, if a subaward is obligated on any date during the month of October of a given year (i.e., between October 1 and 31), the grant recipient must report any required compensation information of the subrecipient by November 30 of that year.
4. Exemptions.

If, in the previous tax year, the award recipient had gross income, from all sources, under \$300,000, the recipient is exempt from the requirements to report:

 - a) Subawards; and
 - b) The total compensation of the five most highly compensated executives of any subrecipient.
5. Definitions.

For purposes of this award term:

- a) *Federal Agency* means a Federal agency as defined in 5 U.S.C. 551(1) and further clarified by 5 U.S.C. 552(f).
- b) *Non-Federal Entity* means all of the following, as defined in 2 CFR part 25:
 - I. A Governmental organization, which is a State, local government, or Indian tribe;
 - II. A foreign public entity;
 - III. A domestic or foreign nonprofit organization; and
 - IV. A domestic or foreign for-profit organization.
- c) *Executive* means officers, managing partners, or any other employees in management positions.
- d) *Subaward*:
 - I. This term is used as a legal instrument to provide support for the performance of any portion of the substantive project or program for which the grant recipient received this award and that the grant recipient as the recipient award to an eligible subrecipient.
 - II. The term does not include the grant award recipient's payment to a contractor, as defined in 2 CFR 200.331, for property and services needed to carry out the project or program.
 - III. A subaward may be provided through any legal agreement, including an agreement that the grant recipient or a subrecipient considers a contract.
- e) *Subrecipient* means a non-Federal entity or Federal agency that:
 - I. Receives a subaward from the grant award recipient under this award; and
 - II. Is accountable to the grant recipient for the use of the Federal funds provided by the subaward.
- f) *Total compensation* means the cash and noncash dollar value earned by the executive during the recipient's or subrecipient's preceding fiscal year and includes the following (for more information see 17 CFR 229.402(c)(2)):
 - I. *Salary and bonus.*
 - II. *Awards of stock, stock options, and stock appreciation rights.* Use the dollar amount recognized for financial statement reporting purposes with respect to the fiscal year in accordance with the Statement of Financial Accounting Standards No. 123 (Revised 2004) (FAS 123R), Shared Based Payments.
 - III. *Earnings for services under non-equity incentive plans.* This does not include group life, health, hospitalization or medical reimbursement plans that do not discriminate in favor of executives and are available generally to all salaried employees.
 - IV. *Change in pension value.* This is the change in present value of defined benefit and actuarial pension plans.
 - V. *Above-market earnings on deferred compensation which is not tax-qualified.*
 - VI. Other compensation, if the aggregate value of all such other compensation (e.g., severance, termination payments, value of life insurance paid on behalf of the employee, perquisites, or property) for the executive exceeds \$10,000.

E.3 Integrity and Performance Matters – FAPIIS

1. If the total value of the currently active grants, cooperative agreements, and procurement contracts from all Federal awarding agencies exceeds \$10,000,000 for any period of time during the period of performance of this Federal award, then the award recipient during that period of time must maintain the currency of information reported to the System for Award Management (SAM) that is made available in the designated integrity and performance system (currently the Federal Awardee Performance and Integrity Information System (FAPIIS)) about civil, criminal, or administrative proceedings described in Paragraph 2 of this award term and condition. This is a statutory requirement under Section 872 of Public Law 110-417, as amended (41 U.S.C. 2313). As required by Section 3010 of Public Law 111-212, all information posted in the designated integrity and performance system on or after April 15, 2011, except past performance reviews required for Federal procurement contracts, will be publicly available.
2. Proceedings about which the award recipient must report. Submit the information required about each proceeding that:
 - a. Is in connection with the award or performance of a grant, cooperative agreement, or procurement contract from the Federal Government;
 - b. Reached its final disposition during the most recent 5-year period; and
 - c. Is one of the following:
 - I. A criminal proceeding that resulted in a conviction, as defined in Paragraph 5. of this award term;
 - II. A civil proceeding that resulted in a finding of fault and liability and paying a monetary fine, penalty, reimbursement, restitution, or damages of \$5,000 or more;
 - III. An administrative proceeding, as defined in Paragraph 5. of this award term, that resulted in a finding of fault and liability and grant recipient payment of either monetary fine or penalty of \$5,000 or more or a reimbursement, restitution, or damages in excess of \$100,000; or
 - IV. Any other criminal, civil, or administrative proceeding if:
 - (A) It could have led to an outcome described in Paragraph 2.c.I, II, or III of this award term;
 - (B) It had a different disposition arrived at by consent or compromise with an acknowledgment of fault on the grant recipient's part; and
 - (C) The requirement in this award term to disclose information about the proceeding does not conflict with applicable laws and regulations.
3. Reporting procedures. Enter in SAM, Entity Management area (formerly CCR), or any successor system, the FAPIIS information that SAM requires about each proceeding described in Paragraph 2 of this award term. The award recipient does not need to submit the information a second time under assistance awards that were received if the recipient already provided the information through SAM (formerly CCR) because the recipient was required to do so under Federal procurement contracts that the recipient was awarded.

4. Reporting frequency. During any period of time when the award recipient is subject to the requirement in Paragraph 1 of this award term, the award recipient must report FAPIIS information through SAM no less frequently than semiannually following the initial report of any proceedings for the most recent 5-year period, either to report new information about any proceeding(s) that the award recipient has not reported previously or to affirm that there is no new information to report.
5. Definitions. For purposes of this award term:
 - a. Administrative proceeding means a non-judicial process that is adjudicatory in nature in order to make a determination of fault or liability (e.g., SEC Administrative proceedings, Civilian Board of Contract Appeals proceedings, and Armed Services Board of Contract Appeals proceedings). This includes proceedings at the Federal and State level. It does not include audits, site visits, corrective plans, or inspection of deliverables.
 - b. Conviction, for purposes of this award term, means a judgment or conviction of a criminal offense by any court of competent jurisdiction, whether entered upon a verdict or a plea, and includes a conviction entered upon a plea of nolo contendere.
 - c. Total value of currently active grants, cooperative agreements, and procurement contracts includes —
 - I. Only the Federal share of the funding under any award with a recipient cost share or match; and
 - II. The value of all options, even if not yet exercised.

E.4 Audits

Organization-wide or program-specific audits must be performed in accordance with Subpart F, the Audit Requirements of the Uniform Guidance. DOL award recipients that expend \$750,000 or more in a year from any Federal awards must have an audit conducted for that year in accordance with the requirements contained in 2 CFR 200.501. OMB's approved DOL exception at 2 CFR 2900.2 expands the definition of 'non-Federal entity' to include for-profit entities and foreign entities. As such, for-profit and foreign entities that are recipients/subrecipients of a DOL award must adhere to the Uniform Guidance at 2 CFR 200, including Subpart F. Audits of direct award recipients that are for-profit and foreign entities must be submitted directly to: USDOL ETA-OGM, Attn: Audit Resolution, 200 Constitution Ave NW, Room N-4716, Washington, DC 20210. All other audit reports are submitted through the Federal Audit Clearinghouse

The recipient is prohibited from earning a profit resulting from the implementation of this cooperative agreement. As directed in 2 CFR 200.400(g), non-Federal entities may not earn or keep any profit resulting from Federal financial assistance unless explicitly authorized in the Federal Award Terms. Additionally, the provision on profit only applies to WIOA Title 1 programs at 20 CFR 683.295

E.5 Audit Submission Deadline Extension Related to COVID-19

In [OMB Memorandum M-20-17](#), OMB offered an extension of Single Audit submission deadlines for fiscal years ending June 30, 2020 to allow recipients and subrecipients a responsible transition to normal operations. This flexibility was extended through December 31, 2020 by [OMB Memorandum 20-26](#).

In [OMB Memorandum M-21-20](#), Appendix 3, Item IX, OMB has offered an additional extension of Single Audit submission deadlines for fiscal years ending June 30, 2021. Award recipients and subrecipients that have not yet filed their single audits with the Federal Audit Clearinghouse as of March 19, 2021, that have fiscal year-ends through June 30, 2021, may delay the completion and submission of the Single Audit reporting package, as required under 2 CFR 200.501 (Audit Requirements), to six (6) months beyond the normal due date. This extension does not require individual recipients and subrecipients to seek approval for the extension by the cognizant or oversight agency for audit; however, recipients and subrecipients should maintain documentation of the reason for the delayed filing.

E.6 Closeout/Final Year Requirements

At the end of the grant period, the award recipient will be required to close the grant with the VETS. The grant and cooperative agreement award recipient will be notified approximately 15 days prior to the end of the period of performance that the closeout process will begin when the period of performance ends. See ETA's [Grant Closeout](#) webpage for further information on the closeout process. The recipient's responsibilities at closeout may be found at 2 CFR 200.344. During the closeout process, the award recipient must be able to provide documentation for all direct and indirect costs that are incurred. For instance, if an organization is claiming indirect costs, the required documentation is a NICRA or CAP issued by the award recipient's FCA. For those approved to utilize a de minimis rate for indirect costs, the grant agreement or cooperative agreement is sufficient documentation. Not having documentation for direct or indirect costs will result in costs being disallowed and subject to debt collection.

The only liquidation that can occur during closeout is the liquidation of accrued expenditures (NOT obligations) for goods and/or services received during the period of performance specified in this award (NOA) (2 CFR 2900.15).

Part F: National Policy and Restrictions

F.1 Architectural Barriers

The Architectural Barriers Act of 1968, 42 U.S.C. 4151 et seq., as amended, the Federal Property Management Regulations (see 41 CFR 102-76), and the Uniform Federal Accessibility Standards issued by the U.S. General Services Administration (GSA) (see 36 CFR 1191, Appendixes C and D) set forth requirements to make facilities accessible to, and usable by, the physically handicapped and include minimum design standards. All new facilities designed or constructed with grant support must comply with these requirements.

F.2 Domestic Preferences for Procurements

As appropriate and to the extent consistent with law, the non-Federal entity should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products). The requirements of 2 CFR Part 200.322 must be included in all subawards including all contracts and purchase orders for work or products under this award.

F.3 Drug-Free Workplace

The Drug-Free Workplace Act of 1988, 41 U.S.C. 702 *et seq.*, and 2 CFR 182 require that all award recipients receiving awards from any Federal agency maintain a drug-free workplace. The award recipient must notify the awarding office if an employee of the recipient is convicted of violating a criminal drug statute. Failure to comply with these requirements may be cause for suspension or debarment.

F.4 Flood Insurance

The Flood Disaster Protection Act of 1973, as amended, 42 U.S.C. 4001 *et seq.*, provides that no Federal financial assistance to acquire, modernize, or construct property may be provided in communities in the United States identified as flood-prone, unless the community participates in the National Flood Insurance Program and flood insurance is purchased within 1 year of the identification. The flood insurance purchase requirement applies to both public and private applicants for the DOL support. Lists of flood-prone areas that are eligible for flood insurance are published in the Federal Register by FEMA.

F.5 Intellectual Property Rights

The Federal Government reserves a paid-up, nonexclusive and irrevocable license to reproduce, publish or otherwise use, and to authorize others to use for federal purposes: the copyright in all products developed under the grant, including a subgrant or contract under the grant or subgrant; and any rights of copyright to which the grant award recipient, subrecipient or a contractor purchases ownership under an award (including but not limited to curricula, training models, technical assistance products, and any related materials). Such uses include, but are not limited to, the right to modify and distribute such products worldwide by any means, electronically or otherwise.

Federal funds may not be used to pay any royalty or license fee for use of a copyrighted work, or the cost of acquiring by purchase a copyright in a work, where the DOL/VETS has a license or rights of free use in such work, although they may be used to pay costs for obtaining a copy which is limited to the developer/seller costs of copying and shipping.

If revenues are generated by selling products developed with grant funds, including intellectual property, these revenues are considered as program income. Program income must be used in accordance with the provisions of this grant award and 2 CFR 200.307.

The following language must be on all workforce products developed in whole or in part with grant funds:

“This workforce product was funded by a grant awarded by the U.S. Department of Labor (DOL)’s VETS. The product was created by the recipient and does not necessarily reflect the official position of DOL/VETS. DOL/VETS makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information, including any information on linked sites and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability, or ownership. This product is copyrighted by the institution that created it.”

F.6 Promoting Equitable Delivery of Government Benefits and Equal Opportunity

The Department of Labor (Labor) seeks to affirmatively advance equity, civil rights and equal opportunity in the policies, programs, and services it provides. Therefore, consistent with Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, grant and cooperative award recipients must execute the terms and conditions of their award in a manner that advances equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. This extends to all award activities including, but not limited to, service delivery, selection of subrecipients and contractors, and procurement of goods and services. Government programs are designed to serve all eligible individuals. As an expectation, Labor’s award recipients should make the goods and services they provide widely available with the goal of effectively serving a diverse population of eligible individuals; fairly, justly, and impartially in administering the grant award. Award recipients are encouraged to engage in contracting and subcontracting for goods and services related to performing the terms and conditions of their grants in such a way to achieve equity.

The term “equity” means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

The term “underserved communities” refers to populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life, as exemplified by the list in the preceding definition of “equity.”

F.7 Personally Identifiable Information

The award recipient(s) must recognize and safeguard Personally Identifiable Information (PII) except where disclosure is allowed by prior written approval of the Grant Officer or by court order. Award recipients must meet the requirements in [TEGL No. 39-11, Guidance on the Handling and Protection of PII](#).

F.8 Publicity

Pursuant to P.L. 117-103, Division H, Title V, Section 503, the award recipient is not authorized to use any funds provided under this award—other than for normal and recognized executive–legislative relationships—for publicity or propaganda purposes, for the preparation, distribution or use of any kit, pamphlet, booklet, publication, electronic communication, radio, television, or video presentation, designed to support or defeat legislation pending before the Congress or any state or local legislature or legislative body, except in presentation to the Congress or any state or local legislature itself, or designed to support or defeat any proposed or pending regulation, administrative action, or order issued by the executive branch of any state or local government, except in presentation to the executive branch of any state or local government itself.

F.9 Telecommunications Prohibition

Award recipients must adhere to 2 CFR 200.216 - Prohibition on certain telecommunications and video surveillance services or equipment (effective August 13, 2020).

Award recipients, including grant and cooperative agreements, and subrecipients are prohibited from obligating or expending loan or grant funds to:

- Procure or obtain;

- Extend or renew a contract to procure or obtain; or

- Enter into a contract (or extend or renew a contract) to procure or obtain equipment, services, or systems that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system. As described in Public Law 115-232, section 889, covered telecommunications equipment is telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities).

For the purpose of public safety, security of government facilities, physical security surveillance of critical infrastructure, and other national security purposes, video surveillance and telecommunications equipment produced by Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities). Including telecommunications or video surveillance services provided by such entities or using such equipment and telecommunications or video surveillance equipment or services produced or provided by an entity that the Secretary of Defense, in consultation with the Director of the National Intelligence or the Director of the Federal Bureau of Investigation, reasonably believes to be an entity owned or controlled by, or otherwise connected to, the government of a covered foreign country.

In implementing the prohibition under Public Law 115-232, section 889, subsection (f), paragraph (1), heads of executive agencies administering loan, grant, or subsidy programs shall prioritize available funding and technical support to assist affected businesses, institutions and organizations as is reasonably necessary for those affected entities to transition from covered communications equipment and services, to procure replacement equipment and services, and to ensure that communications service to users and customers is

sustained. See Public Law 115-232 (section 889) and 2 CFR 200.471 for additional information.

F.10 Veterans' Priority Provisions

The Jobs for Veterans Act (Public Law 107-288) requires award recipients to provide priority 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 the DOL. The regulations implementing this priority of service can be found at 20 CFR Part 1010. In circumstances where an award 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 award 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. Award recipients must comply with the DOL guidance on veterans' priority. ETA's [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.

F.11 Waste, Fraud and Abuse

No entity receiving federal funds may require employees or contractors of such entity seeking to report fraud, waste, or abuse to sign internal confidentiality agreements or statements prohibiting or otherwise restricting such employees or contractors from lawfully reporting such waste, fraud, or abuse to a designated investigative or law enforcement representative of a Federal department or agency authorized to receive such information.

F.12 Whistleblower Protection

All employees working for contractors, grantees/ grant recipients, subcontractors, subgrantees/ subrecipients, and recipients of cooperative agreements working on this Federal award are subject to the whistleblower rights and remedies established at 41 U.S.C. 4712. The award recipient shall inform its employees and applicable contractors and subrecipients, in writing, in the predominant language of the workforce, of employee whistleblower rights and protections under 41 U.S.C. 4712, as described in section 3.908 of the Federal Acquisition Regulation. The award recipient shall insert the substance of this clause in all subawards and contracts over the Simplified Acquisition Threshold.

F.13 Executive Order 12928 - Historically Black Colleges and Universities and other Minority Institutions such as Hispanic-Serving Institutions and Tribal Colleges and Universities

Pursuant to Executive Order (EO) 12928, the award recipient is strongly encouraged to provide subcontracting/subgranting opportunities to Historically Black Colleges and Universities and other Minority Institutions such as Hispanic-Serving Institutions and Tribal Colleges and Universities; and to Small Businesses Owned and Controlled by Socially and Economically Disadvantaged Individuals.

F.14 Executive Order 13043 - Increasing Seat Belt Use

Pursuant to EO 13043, Increasing Seat Belt Use in the United States, dated April 16, 1997, the award recipients are encouraged to adopt and enforce on-the-job seat belt policies and programs for their employees when operating company-owned, rented, or personally owned vehicles.

F.15 Executive Order 13166 - Improving Access to Services for Persons with Limited English Proficiency

As clarified by EO 13166, Improving Access to Services for Persons with Limited English Proficiency, dated August 11, 2000, and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI, award recipients must take reasonable steps to ensure that LEP persons have meaningful access to programs in accordance with [DOL's Policy Guidance on the Prohibition of National Origin Discrimination as it Affects Persons with Limited English Proficiency](#), 68 FR 32289 (May 29, 2003). Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. Award recipients are encouraged to consider the need for language services for LEP persons served or encountered both in developing budgets and in conducting programs and activities. For assistance and information regarding your LEP obligations, go to [LEP.gov](#).

F.16 Executive Order 13513 - Federal Leadership On Reducing Text Messaging While Driving

Pursuant to EO 13513, Federal Leadership On Reducing Text Messaging While Driving, dated October 1, 2009, award recipients and subrecipients are encouraged to adopt and enforce policies that ban text messaging while driving company-owned or -rented vehicles or government-owned vehicles (GOV), or while driving privately-owned vehicles (POV) when on official Government business or when performing any work for or on behalf of the Government. Award recipients and subrecipients are also encouraged to conduct initiatives of the type described in section 3(a) of this order.

F.17 Executive Order 14005 - Ensuring the Future Is Made in All of America by All of America's Workers

Pursuant to EO 14005, Ensuring the Future Is Made in All of America by All of America's Workers, the award recipient agrees to comply with all applicable Made in America Laws (as defined in the EO), including the Buy American Act at 41 USC sections 8301-8305. For the purposes of this award, the grant and cooperative award recipient is required to maximize the use of goods, products, and materials produced in, and services offered in, the United States, in accordance with the Made in America Laws. No funds may be made available to any person or entity (including as a contractor or subrecipient of the award recipient) that has been found to be in violation of any Made in America Laws.

“Made in America Laws” means all statutes, regulations, rules, and Executive Orders relating to Federal financial assistance awards or Federal procurement, including those that refer to “Buy America” or “Buy American,” that require, or provide a preference for, the purchase or

acquisition of goods, products, or materials produced in the United States, including iron, steel, and manufactured goods offered in the United States. Made in America Laws include laws requiring domestic preference for maritime transport, including the Merchant Marine Act of 1920 (Public Law 66-261), also known as the Jones Act.

F.18 Salary and Bonus Limitations

Pursuant to P.L. 117-103, Division H, Title I, Section 105, award recipients and subrecipients shall not use funds to pay the salary and bonuses of an individual, either as direct costs or as indirect costs, at a rate in excess of Executive Level II. The Executive Level II salary may change yearly and is located on the [OPM.gov](https://www.opm.gov) website. The salary and bonus limitation does not apply to contractors (vendors) providing goods and services as defined in 2 CFR 200.331. Where States are recipients of such funds, States may establish a lower limit for salaries and bonuses of those receiving salaries and bonuses from subrecipients, taking into account factors including the relative cost-of-living in the State, the compensation levels for comparable State or local government employees, and the size of the organizations that administer Federal programs involved including VETS programs. See [TEGL 5-06](#) for further clarification.

F.19 Harassment Prohibited

The grant recipient and any subrecipients are prohibited from engaging in harassment of an individual based on race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, based on citizenship status or participation in any WIOA Title I-financially assisted program or activity. Harassing conduct of this type is a violation of the nondiscrimination provisions of WIOA and of 29 CFR Part 38.

Unwelcome sexual advances, requests for sexual favors, or offensive remarks about a person's race, color, religion, sex, national origin, age, disability, political affiliation or belief, or citizenship or participation, and other unwelcome verbal or physical conduct based on one or more of these protected categories constitutes unlawful harassment on that basis(es) when:

Submission to such conduct is made either explicitly or implicitly a term or condition of accessing the aid, benefit, service, or training of, or employment in the administration of or in connection with, any WIOA title I-financially assisted program or activity; or

Submission to, or rejection of, such conduct by an individual is used as the basis for limiting that individual's access to any aid, benefit, service, training, or employment from, or employment in the administration of or in connection with, any WIOA Title I-financially assisted program or activity; or

Such conduct has the purpose or effect of unreasonably interfering with an individual's participation in a WIOA Title I-financially assisted program or activity creating an intimidating, hostile or offensive program environment.

Harassment because of sex includes harassment based on gender identity or sexual orientation; harassment based on failure to comport with sex stereotypes; and harassment based on pregnancy, childbirth, and related medical conditions. Sex-based harassment may include harassment that is not sexual in nature but that is because of sex or where one sex is targeted for the harassment.

F.20 Intellectual Property, Open Licensing Rights, and the Bayh-Dole Act

As required at 2 CFR 2900.13, any intellectual property developed under a discretionary Federal award process must be licensed under an open license, which allows subsequent users to copy, distribute, transmit and adapt the copyrighted work and attribute the work in the manner specified by the recipient.

All small business firms, and non-profit organizations (as defined in the link below, and including Institutions of Higher Education) must adhere to the Bayh-Dole Act, which requirements are provided at 37 CFR 401.3(a) and at [Bayh-Dole Act Required ETA Grant Term](#). To summarize, these requirements describe the ownership of intellectual property rights and the government's nonexclusive, nontransferable, irrevocable, paid-up license to use any invention conceived or first actually reduced to practice in the performance of work under this grant award. These requirements are in addition to those found in the Intellectual Property Rights term above.

F.21 Procurement

The Procurement Standards found in the Uniform Guidance at 2 CFR 200.318-327 require all grant award recipients and subrecipients to conduct procurement transactions in a manner that promote practical, open, and free competition. The award recipient's description in the SOW of a specific entity that will provide goods or services does not constitute approval or justification of sole-source procurement from this entity.

The Uniform Guidance (at 2 CFR 200.317) requires States (as defined in 2 CFR 200.1) to follow the same procurement policies and procedures it uses for non-Federal funds. The State must comply with 2 CFR 200.321, 200.322, and 200.323 and ensure that every purchase order or other contract includes any clauses required by 2 CFR 200.327.

Part G: National Prohibitions and Other Restrictions

G.1 Contracting with Corporations with Felony Criminal Convictions Prohibited

The award recipient may not knowingly enter into a contract, memorandum of understanding, or cooperative agreement with, make a grant to, or provide a loan or loan guarantee to, any corporation that was convicted of a felony criminal violation under any Federal law within the preceding 24 months.

G.2 Contracting with Corporations with Unpaid Tax Liabilities Prohibited

The award recipient may not knowingly enter into a contract, memorandum of understanding, or cooperative agreement with, make a grant to, or provide a loan or loan guarantee to, any corporation that has any unpaid Federal tax liability that has been assessed, for which all judicial and administrative remedies have been exhausted or have lapsed, and that is not being paid in a timely manner pursuant to an agreement with the authority responsible for collecting the tax liability.

G.3 Trafficking in Persons Prohibited

1. This part establishes a government-wide award term for grants and cooperative agreements to implement the requirement in regard to Trafficking in persons.

a. *Provisions applicable to a recipient that is a private entity.*

I. The award recipient, the award recipient's employees, subrecipients under this award, and subrecipients' employees may not—

(A). Engage in severe forms of trafficking in persons during the period of time that the grant award is in effect; or

(B). Procure a commercial sex act during the period of time that the award is in effect; or

(C). Use forced labor in the performance of the award or subawards under the award.

II. DOL/VETS as the Federal awarding agency may unilaterally terminate this award, without penalty, if the award recipient or a subrecipient that is a private entity —

(A). Is determined to have violated a prohibition in paragraph a.I of this award term; or

(B). Has an employee who is determined by the agency official authorized to terminate the award to have violated a prohibition in paragraph a.I of this award term through conduct that is either—

i. Associated with performance under this award; or

ii. Imputed to you or the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR Part 180,

“OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement),” as implemented by our agency at 2 CFR Part 2998.

b. *Provision applicable to a recipient other than a private entity.* DOL/VETS as the Federal awarding agency may unilaterally terminate this award, without penalty, if a subrecipient that is a private entity—

I. Is determined to have violated an applicable prohibition in paragraph a.I of this grant award term; or

II. Has an employee who is determined by the agency official authorized to terminate the award to have violated an applicable prohibition in paragraph a.I of this grant award term through conduct that is either—

(A). Associated with performance under this award; or

(B). Imputed to the subrecipient using the standards and due process for imputing the conduct of an individual to an

organization that are provided in 2 CFR part 180, “OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement),” as implemented by our agency at 29 CFR Part 98.

c. *Provisions applicable to any recipient.*

I. The award recipient must inform DOL/VETS immediately of any information the award recipient receives from any source alleging a violation of a prohibition in paragraph a.1 of this grant award term.

II. DOL/VETS right to terminate unilaterally that is described in paragraph a.II or b of this section:

(A). Implements section 106(g) of the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7104(g)), and

(B). Is in addition to all other remedies for noncompliance that are available to DOL/VETS under this grant award.

III. The award recipient must include the requirements of paragraph a.I of this award term in any subaward the award recipient make to a private entity.

d. *Definitions.* For purposes of this award term:

I. “Employee” means either:

(A). An individual employed by the grant award recipient or a subrecipient who is engaged in the performance of the project or program under this award; or

(B). Another person engaged in the performance of the project or program under this grant award and not compensated by the grant recipient including, but not limited to, a volunteer or individual whose services are contributed by a third party as an in-kind contribution toward cost sharing or matching requirements.

II. “Forced labor” means labor obtained by any of the following methods: the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

III. “Private entity”:

(A). Means any entity other than a State, local government, Indian tribe, or foreign public entity, as those terms are defined in 2 CFR 175.25.

(B). Includes:

i. A nonprofit organization, including any nonprofit institution of higher education, hospital, or tribal organization other than one included in the definition of Indian tribe at 2 CFR 175.25(b).

ii. A for-profit organization.

IV. “Severe forms of trafficking in persons,” “commercial sex act,” and “coercion” have the meanings given at section 103 of the TVPA, as amended (22 U.S.C. 7102).

G.4 Health Benefits Coverage for Contraceptives

Federal funds may not be used to enter in to or renew a contract which includes a provision for prescription drug coverage unless the contract also includes a provision for contraceptive coverage. This requirement does not apply to contracts with 1) the religious plans Personal Care's HMO and OSF Health Plans, Inc. and 2) any existing or future plan if the carrier for the plan objects to such coverage on the basis of religious beliefs.

In implementing this section, any plan that enters into or renews a contract may not subject any individual to discrimination on the basis that the individual refuses to prescribe or otherwise provide for contraceptives because such activities would be contrary to the individuals' religious beliefs or moral convictions. Nothing in this term shall be construed to require coverage of abortion or abortion related services.

G.5 Health Benefits Coverage for Abortions Restricted

Pursuant to P.L. 117-103, Division H, Title V, Section 506 and 507, Federal funds may not be expended for health benefits coverage that includes coverage of abortions, except when the pregnancy is the result of rape or incest, or in the case where a woman suffers from a physical disorder, physical injury, or physical illness, including a life-endangering physical condition caused by or arising from the pregnancy itself that would, as certified by a physician, place the women in danger of death unless an abortion is performed. This restriction does not prohibit any non-Federal entity from providing health benefits coverage for abortions when all funds for that specific benefit do not come from a Federal source. Additionally, no funds made available through this grant award may be provided to a State or local government if such government subjects any institutional or individual health care entity to discrimination on the basis that the health care entity does not provide, pay for, provide coverage of, or refer for abortions.

G.6 Fair Labor Standards Act Amendment for Major Disasters

Pursuant to P.L. 117-103, Division H, Title I, Section 108, the Fair Labor Standards Act of 1938 (FLSA) will apply as if the following language was added to Section 7 (the Maximum Hours Worked Section). This language specifically relates to occurrences of a major disaster (as declared or designated by the state or federal government) and are applied for a period of two years afterwards. The language is as follows:

“(s)(1) The provisions of this section [maximum hours worked] shall not apply for a period of 2 years after the occurrence of a major disaster to any employee—
(A) employed to adjust or evaluate claims resulting from or relating to such major disaster, by an employer not engaged, directly or through an affiliate, in underwriting, selling, or marketing property, casualty, or liability insurance policies or contracts;
(B) who receives from such employer on average weekly compensation of not less than \$591.00 per week or any minimum weekly amount established by the Secretary, whichever is greater, for the number of weeks such employee is engaged in any of the activities described in subparagraph (C); and (C) whose duties include any of the following:

- (i) interviewing insured individuals, individuals who suffered injuries or other damages or losses arising from or relating to a disaster, witnesses, or physicians;
 - (ii) inspecting property damage or reviewing factual information to prepare damage estimates;
 - (iii) evaluating and making recommendations regarding coverage or compensability of claims or determining liability or value aspects of claims;
 - (iv) negotiating settlements; or
 - (v) making recommendations regarding litigation.
- (2) The exemption in this subsection shall not affect the exemption provided by section 13(a)(1) [of the FLSA].
- (3) For purposes of this subsection—
- (A) the term ‘major disaster’ means any disaster or catastrophe declared or designated by any State or Federal agency or department;
 - (B) the term ‘employee employed to adjust or evaluate claims resulting from or relating to such major disaster’ means an individual who timely secured or secures a license required by applicable law to engage in and perform the activities described in clauses (i) through (v) of paragraph (1)(C) relating to a major disaster, and is employed by an employer that maintains worker compensation insurance coverage or protection for its employees, if required by applicable law, and withholds applicable Federal, State, and local income and payroll taxes from the wages, salaries and any benefits of such employees; and
 - (C) the term ‘affiliate’ means a company that, by reason of ownership or control of 25% or more of the outstanding shares of any class of voting securities of one or more companies, directly or indirectly, controls, is controlled by, or is under common control with, another company.”

G.7 Lobbying/Advocacy Restricted

Pursuant to P.L. 117-103, Division H, Title V, Section 503, no federal funds may be used to pay the salary or expenses of any grant recipient, or agent acting for such recipient, related to any activity designed to influence the enactment of legislation, appropriations, regulation, administrative action, or executive order proposed or pending before the Congress or any state government, state legislature or local legislature or legislative body, other than for normal and recognized executive–legislative relationships or participation by an agency or officer of a state, local or tribal government in policymaking and administrative processes within the executive branch of that government.

G.8 Blocking Pornography Required

Pursuant to P.L. 117-103, Division H, Title V, Section 520, no Federal funds may be used to maintain or establish a computer network unless such network blocks the viewing, downloading, and exchanging of pornography.

G.9 Privacy Act

No funds can be used in contravention of 5 U.S.C. 552a (the Privacy Act) or regulations implementing the Privacy Act.

G.10 Procuring Goods Obtained Through Child Labor Prohibited

Pursuant to P.L. 117-103, Division H, Title I, Section 103, no Federal funds may be obligated or expended for the procurement of goods mined, produced, manufactured, or harvested or services rendered, in whole or in part, by forced or indentured child labor in industries and host countries identified by the DOL prior to December 20, 2019. DOL has identified these goods and services at ILAB's [List of Products Produced by Forced or Indentured Child Labor](#) webpage.

G.11 Promotion of Drug Legalization Restricted

Pursuant to P.L. 117-103, Division H, Title V, Section 509, no Federal funds shall be used for any activity that promotes the legalization of any drug or other substance included in Schedule I of the schedules of controlled substances established under Section 202 of the Controlled Substances Act except for normal and recognized executive-congressional communications or where there is significant medical evidence of a therapeutic advantage to the use of such drug or other substance or that federally sponsored clinical trials are being conducted to determine therapeutic advantage.

G.12 Public Communications – Certain Information Requirement

Pursuant to P.L. 117-103, 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:

1. The percentage of the total costs of the program or project which will be financed with Federal money;
2. The dollar amount of Federal funds for the project or program; and
3. 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 term are separate from those in 2 CFR Part 200 and, when applicable, both must be complied with.

G.13 Purchase of Sterile Needles or Syringes Restricted

Pursuant to P.L. 117-103, Division H, Title V, Section 526, no Federal funds shall be used to purchase sterile needles or syringes for the hypodermic injection of any illegal drug.

Part H: Attachments

H.1 Attachment A: SF-424

H.2 Attachment B: SF-424A

H.3 Attachment C: Budget Narrative

H.4 Attachment D: Statement of Work

H.5 Attachment E: Negotiated Indirect Cost Rate Agreement

Attachment A: SF-424

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text" value="03/01/2022"/>	4. Applicant Identifier: <input type="text" value="Clackamas, County of"/>	
5a. Federal Entity Identifier: <input type="text" value="9-699-2656"/>	5b. Federal Award Identifier: <input type="text" value="CFDA"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="County of Clackamas, Oregon"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="93-6002286"/>	* c. Organizational DUNS: <input type="text" value="0969926560000"/>	
d. Address:		
* Street1: <input type="text" value="2051 Kaen Rd."/>	Street2: <input type="text" value="Suite 470"/>	
* City: <input type="text" value="Oregon City"/>	County/Parish: <input type="text" value="Clackamas"/>	
* State: <input type="text" value="OR: Oregon"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="97045-4035"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Health, Housing & Human Svcs"/>	Division Name: <input type="text" value="Children Fam & Comm Connection"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Dr."/>	* First Name: <input type="text" value="Adam"/>	
Middle Name: <input type="text"/>	* Last Name: <input type="text" value="Freer"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="Division Director"/>	
Organizational Affiliation: <input type="text" value="County of Clackamas"/>		
* Telephone Number: <input type="text" value="971-533-4929"/>	Fax Number: <input type="text"/>	
* Email: <input type="text" value="afreer@clackamas.us"/>		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Veterans Employment and Training Service

11. Catalog of Federal Domestic Assistance Number:

17.805

CFDA Title:

Homeless Veterans' Reintegration Program

*** 12. Funding Opportunity Number:**

FOA-VETS-22-01

* Title:

Homeless Veterans' Reintegration Program (HVRP), Incarcerated Veterans' Transition Program (IVTP), and the Homeless Female Veterans' and Veterans' with Children Program (HFVWC) (referred to collectively as HVRP)

13. Competition Identification Number:

FOA-VETS-22-01

Title:

Homeless Veterans' Reintegration Program (HVRP), Incarcerated Veterans' Transition Program (IVTP), and the Homeless Female Veterans' and Veterans' with Children Program (HFVWC) (referred to collectively as HVRP)

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

County of Clackamas Oregon-Veterans' Workforce Services

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="197,469.00"/>	\$197,469 <i>KM</i>
* b. Applicant	<input type="text" value="669,606.00"/>	<i>ASF</i>
* c. State	<input type="text" value="67,800.00"/>	<i>ASF</i>
* d. Local	<input type="text" value="0.00"/>	
* e. Other	<input type="text" value="0.00"/>	
* f. Program Income	<input type="text" value="0.00"/>	
* g. TOTAL	<input type="text" value="1,974,695.00"/>	\$197,469 <i>KM</i>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- Yes
- No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed:

Attachment B: SF-424A

BUDGET INFORMATION - Non-Construction Programs

OMB Number: 4040-0006
Expiration Date: 02/28/2022

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Homeless Veteran Reintegration Program (HRVP)	17.805	\$ <input type="text"/>	\$ <input type="text"/>	\$ 197,469.00	\$ 209,219.00 ASF	\$ 197,469 480,682.00 <i>KM</i>
2.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
4.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
5. Totals		\$ <input type="text"/>	\$ <input type="text"/>	\$ 197,469.00	\$ 209,219.00 ASF	\$ 197,469 480,682.00 <i>KM</i>

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1)	(2)	(3)	(4)	
	Homeless Veteran Reintegration Program (HRVP)				
a. Personnel	ASF \$ 67,836.00 100,000.00	\$	\$	\$	\$ 161,226.00
b. Fringe Benefits	ASF 52,261.00 100,500.00				136,583.00
c. Travel	6,574.00				6,574.00
d. Equipment	0.00				0.00
e. Supplies	ASF 10,175.00 100,000.00				29,600.00
f. Contractual	20,000.00				20,000.00
g. Construction	0.00				0.00
h. Other	ASF 40,623.00 100,000.00				126,698.00
i. Total Direct Charges (sum of 6a-6h)	ASF 197,469.00 400,000.00				\$ 480,681.00
j. Indirect Charges					\$
k. TOTALS (sum of 6i and 6j)	ASF 197,469 480,681.00	\$	\$	\$	\$ 197,469 480,681.00 KM
7. Program Income	\$ 0.00	\$	\$	\$	\$ 0.00

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SECTION C - NON-FEDERAL RESOURCES

(a) Grant Program		(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS
8.	Homeless Veteran Reintegration Program (HRVP)	\$ 200,212.00 ASF	\$ 57,000.00 ASF	\$	\$ 200,212.00 ASF
9.					
10.					
11.					
12. TOTAL (sum of lines 8-11)		\$ 200,212.00	\$ 57,000.00	\$	\$ 200,212.00

SECTION D - FORECASTED CASH NEEDS

	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$ 197,468.00	\$ 49,367.00	\$ 49,367.00	\$ 49,367.00	\$ 49,367.00
14. Non-Federal	\$ 200,212.00 ASF	\$ 57,000.00 ASF	\$ 57,000.00 ASF	\$ 57,000.00 ASF	\$ 57,000.00 ASF
15. TOTAL (sum of lines 13 and 14)	\$ 197,469 480,680.00	\$ 200,212.00 ASF	\$ 200,212.00 ASF	\$ 200,212.00 ASF	\$ 200,212.00 ASF

SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT

(a) Grant Program		FUTURE FUNDING PERIODS (YEARS)			
		(b) First	(c) Second	(d) Third	(e) Fourth
16.	Homeless Veteran Reintegration Program (HRVP)	\$ 310,268.00	\$ 343,318.00	\$	\$
17.					
18.					
19.					
20. TOTAL (sum of lines 16 - 19)		\$ 310,268.00	\$ 343,318.00	\$	\$

SECTION F - OTHER BUDGET INFORMATION

21. Direct Charges: 851055	22. Indirect Charges: 0
23. Remarks:	

Attachment C: Budget Narrative

BUDGET NARRATIVE**a. Personnel**

Title	Roles & Responsibilities	Annual Salary	% of Time on Project	Cost Funded by Grant	Leveraged Amount
<i>Current</i> Veterans' Job Developer 1	Outreach, Intensive Case Management, Partner coordination	\$64,832	100	\$0	\$64,832
<i>Current</i> Veterans' Job Developer 2	Outreach, Intensive Case Management, Partner coordination	\$57,114	100	\$28,557	\$28,557
<i>Proposed</i> Human Services Coordinator 1	Support with data collection and entry, reporting, outreach and event support, marketing and communications	\$57,114	50	\$28,557	\$0
<i>Current</i> Workforce Manager	Contract management, staff hiring and supervision, partner coordination, problem solving	\$107,219	10	\$10,722	\$0
Total Salaries in <u>Year 1</u>				\$67,836	\$93,389

Clackamas County has funded the *Veterans' Job Developer 1* position for over 10 years and are expected to continue funding the position through the grant period. These funds are shown as fully leveraged.

The County recently received a small grant from the state toward the *Veterans' Job Developer 2* position, and we are currently in the hiring process. The funding is expected to be exhausted by December 31, 2022. Therefore, grant funding is needed to continue this position beginning halfway through the first year. The full cost of the position would be needed for years 2 and 3. This applies to both Salaries and Fringe Benefits.

b. Fringe Benefits

Staff	Health/ Dental	Pension (PERS)	Disability	Life Insurance	Statutory (FICA, Soc Sec)	Cost Funded by Grant	Leveraged Amount
<i>Current</i> Veterans' Job Developer 1	\$33,486	\$21,803	\$240	\$120	\$5,611	\$0	\$61,260
<i>Current</i> Veterans' Job Developer 2	\$23,298	\$17,524	\$240	\$120	\$4,943	\$23,063	\$23,063
<i>Proposed</i> Human Services Coordinator 1	\$23,298	\$17,524	\$240	\$120	\$4,943	\$23,063	\$0
<i>Current</i> Workforce Manager	\$22,454	\$29,228	\$240	\$384	\$9,053	\$6,136	\$0
Total Fringe Benefits in Year 1						\$52,261	\$84,323

Similar to other public entities, Clackamas County seeks to attract and maintain talented staff by offering competitive compensation packages. Because it cannot pay salaries that compete with the private sector, benefits tend to be the generous side. The County covers traditional fringe as well as the full contribution to the Public Employee Retirement System pension required by the State of Oregon for all public employees.

c. Travel

Purpose	Number Travelling	Mileage/ Local Travel (per person)	Per Diem (per person)	Airfare (per person)	Lodging	Cost Funded by Grant
DOL Training Event	2	\$50	\$355	\$350	\$1032	\$3,574
Local Travel to outreach events, in-state meetings and conferences	3	\$1,000				\$3,000
Total Travel in Year 1						\$6,574

At this point, the only anticipated out-of-state travel would be the required travel to Washington D.C. required by the funder. In-state travel is difficult to predict. Most do not require overnight stays, but can be completed within a day. Therefore, only mileage is included.

d. Equipment

None.

e. Supplies

Item	Quantity	Unit Cost	Cost Funded by Grant	Leveraged Amount
Office Supplies (per person)	3	\$200	\$300	\$300
Computer Equipment (per person)	3	\$3,000	\$3,000	\$6,000
Supplies for Clients (work clothes, tools, etc.)	70	\$250	\$4,375	\$13,125
Communications materials (brochures, event table materials)	1	\$2,500	\$2,500	\$0
Total Supplies in Year 1			\$10,175	\$19,425

As mentioned, the costs of the services provided by Job Developer 1 is fully covered by the County and the services provided by Job Developer 2 are covered for the first 6 months by a state grant. In years 2 and 3, the services provided by JD2 will be charged to the HVRP grant. Those served by the CFCC Workforce Unit often require a number of other supports in order to reach employment stability like work clothes, work boots, tools to do the work, etc. Grant funds have been allocated for these purposes to make sure veterans are set up for success in the program.

f. Contractual

Contractor	Purpose	Cost Funded by Grant
National Association of Mental Illness (NAMI) Oregon	Mental and behavioral health services	\$20,000
Total Contractual in <u>Year 1</u>		\$20,000

The need of veterans for mental and behavioral health services to help stabilize them in preparation for employment has become increasingly clear. NAMI Oregon provides these services and peer support *specifically for veterans*. The number of clients choosing to accept this service and the amount of services provided is expected to increase over the course of the project as the relationship with the contractor develops and the value of their services becomes clearer.

g. Construction

None.

h. Other (Training costs)

Item	Quantity	Unit Cost	Cost Funded by Grant	Leveraged Amount
Employment training fees and associated costs	25	\$3000	\$18,750	\$56,250
Rent & Utilities (per person)	2.6 FTE	\$2,900	\$4,350	\$4,350
Allocated Costs (for County Services – Finance, HR, etc.; per person)	2.6 FTE	\$16,984	\$25,476	\$25,476
Total Other (Training Costs) in <u>Year 1</u>			\$40,622	\$86,076

As mentioned, the costs related to Job Developer 1 are fully covered by the County and the costs related to Job Developer 2 are covered for the first 6 months by a state grant. The Human Services Coordinator 1 will work half time on the grant and the Program Manager will

work 10% of her time, resulting in a total of 1.1 FTE covered by the grant in year one and 1.5 FTE covered by the grantee and a state grant. In years 2 and 3, costs associated with 1.6 FTE will be charged to the grant and 1.0 FTE leveraged.

Clackamas County does not have a negotiated indirect rate. Because the cost can vary widely across the 22 departments, it has chosen to itemize the administrative costs rather than request more indirect than is required. These costs are included in this Other category.

The “Fast Track” training program is expected to increase the volume of veterans receiving vocational training in years 2 and 3. Costs include training costs, books and supplies, transportation and often licensing or certification.

i. Indirect Costs

Clackamas County does not have a negotiated indirect rate. Because the cost can vary widely across the 22 departments, it has chosen to itemize the administrative costs rather than request more indirect than is required. These are included under Other.

Attachment D: Statement of Work

3. Project Narrative

a. Statement of Need

1.i. Population Category/Service Area

Clackamas County Children, Family & Community Connections (CFCC) program will serve **Category 1 (HVRP)**, homeless veterans. The service area is Clackamas County, Oregon, in the southeast corner of the Portland-Vancouver-Hillsboro, OR-WA Metropolitan Service Area (PVMSA). Categorized as “urban”, Clackamas County has vast rural and wilderness areas.

The Veterans by Name Registry maintained by Clackamas County CoC and HVRP Rapid Rehousing identified 69 houseless veterans as of February 16, 2022. The majority (54%) have some form of disability (substance abuse, mental illness, and/or physical). Compared to housed veterans, homeless veterans have more infectious diseases (HIV, Hep B/C).¹

Easter Seals Oregon is a HVRP recipient, planning for 225 enrollments in three HUD CoC within the PVMSA listed in Table 1 (includes FIPS and CoC numbers). In their service area, 75% of homeless veterans are located in Multnomah County, which encompasses the City of Portland, and is where their office is located.² It is CFCC’s experience that Easter Seals lacks the capacity to provide the intensive case management needed to gain Clackamas veterans stable employment. While CFCC consistently reaches out to Easter Seals Oregon when serving local homeless veterans, their support is generally limited to purchasing needed work items. Easter Seals focuses on the urban Multnomah and Washington counties with greater numbers of homeless veterans centrally located in shelters. In Clackamas County homeless veterans are scattered throughout

¹ Clackamas County Health, Housing & Human Services, *Health & Safety Impact Review, Transitional Shelter Community for Veterans, June 2017*, S. B. Kertesz, 2016; Noska, 2017; Balshem, 2011; Alliance, 2015.

² U.S. Census QuickFacts, Multnomah County, Oregon, 2020.

suburbs and remote locations, like the national forest.

Table 1: Eastern Seals Oregon HVRP Service Area³,

CoC Name	FIPS Code	CoC#	Homeless Veterans ⁴
Portland, Gresham/ Multnomah County	42051	OR-501	492
Hillsboro, Beaverton/ Washington County	41067	OR-506	84
Clackamas County	41005	OR-507	69 ⁵
Total Service Area Homeless Veterans			645
Easter Seals Oregon Planned Enrollments			<225>
Unservd Homeless Veterans			420

1.ii. Planned Number of Eligible Veteran Annual Enrollments

CFCC will serve at least 75 veterans in year one, and 80 veterans in subsequent years. Most county residents are White, non-Hispanic (81%); 5% Asian; 9% Hispanic. CFCC’s Veteran Services clients are more diverse than the county or state with fewer White (72%) and more Black (25%) than the county (89% and 1.2% respectively) or state (87% and 1.8% respectively).⁶

1.iii. Estimated Sheltered/Unsheltered Veterans Experiencing Homelessness

Since 2015, HUD CoC estimates for homeless veterans and veterans living in shelters is trending upward.⁷ CFCC estimates there over 80 veterans experiencing homelessness at any given time in the county, based on the CoC maintained Veterans by Name list, the 2020 Point-in-Time (PIT) count, and staff work with law enforcement, the Forest Service, and homeless outreach staff.

1.iv. Labor Market Information (LMI)

Job growth and labor force numbers continue to increase, but the education and experience required by regional employers increasingly does not reflect job seekers. From 2017 to 2027, the

³ FOA FY22 Attachment-A: HVRP Grantee list.

⁴ HUD Continuum of Care, local estimates of veteran homelessness, <https://www.huduser.gov/portal/sites/default/files/xls/2011-2020-PIT-Veteran-Counts-by-CoC.xlsx>, 2/19/2022.

⁵ Veteran’s By Name List, Continuum of Care & HVRP Rapid Rehousing, Feb. 2022

⁶ U.S. Census Quick Facts, Clackamas County, 2020; CFCC Annual Veteran’s Services Report, 2021

⁷ HUD Continuum of Care, local estimates of veteran homelessness, <https://www.huduser.gov/portal/sites/default/files/xls/2011-2020-PIT-Veteran-Counts-by-CoC.xlsx>, 2/19/2022.

projections for in-demand sectors were the strongest in software/IT (26% increase), health care (24%), and construction (21%).⁸ The largest growing sectors are leisure and hospitality, retail trade, educational and health services, professional and business services, and construction.⁹

1.v.Factors Contributing to Service Area Veteran Homelessness/Need for HVRP

Seven percent of Oregonians are veterans, yet veterans make up 10% of Oregon's homeless.¹⁰ Local veterans report poverty, lack of support networks, limited employment opportunities, housing availability and affordability, as contributing factors. The median rent in Clackamas County increased by 85% from 2010 to 2021; studio apartments increased 102%.¹¹ Of the local veterans who served in Iraq and Afghanistan, 44% report difficulties readjusting and multiple health related problems after their return, including traumatic brain injuries (TBIs); 20% experiencing concussions, a mild form of TBI.¹² Veterans engaging in CFCC Veterans Workforce Program experience multiple, complex barriers: 50% live with disabilities; 13% have substance use disorders; 38% justice system involvement, and 63% report housing instability/homelessness.

1.vi. Unemployment & Poverty Rates

The most recent jobs report indicates 6,946 are unemployed, a rate of 3.1%., representing a significant change from the record high of 13.8% in April 2020. Since then Clackamas County has added back 20,200 jobs with 62% of growth in leisure and hospitality, retail trade, and health care services; year-over-year increase in October was 6.2%.¹³ The poverty rate is 6.6%.¹⁴

⁸ State of the Workforce Report, 2018, Columbia-Willamette Workforce Collaborative.

⁹ Oregon Employment Department, October 2021, Current Employment Estimates. Salem.

¹⁰ Oregon Department of Veteran's Affairs-OHCS Joint Legislative Report on Veterans Housing (Dec. 2020).

¹¹ Clackamas County Economic Indicators, November 2021, <https://www.clackamasworkforce.org/our-impact/trends-data-and-annual-reports/>, accessed 2/22/2022.

¹² <https://thesciencebehindit.org/what-are-the-biggest-problems-facing-veterans-returning-home-from-conflict/>

¹³ Ibid.

¹⁴ U.S. Census Quick Facts, Clackamas County, Oregon, 2020

b. Expected Outcomes and Outputs

See *Attachment B-VETS-700 Planned Goals Chart*.

c. Project Design

The proposed project expands and strengthens the County’s Veterans Workforce currently providing comprehensive case management and wrap around services to ensure veterans have all of the supports, education and training they need to be stably employed. This highly-collaborative approach has evolved over 10 years in response to veterans’ needs and enjoys high rates of job placements (68%) and sustainability (95% after three months). This proposal adds a 1.0 FTE Veteran Job Development Specialist (for a total of 2.0 FTE) to increase program capacity, increase outreach, data collection and service coordination and integration. An added 0.5 FTE Human Services Coordinator provides increased outreach and communications support, partnership development, data collection, entry and reporting. This increased staff capacity allows 3 critical program improvements. 1) Adds a mental health navigation component that connects veterans in the employment program with mental health care and behavioral health services (e.g., suicide prevention, substance use disorder treatment), greatly improving the veteran’s ability to obtain employment and enjoy stability in their employment. 2) Develop more streamlined employment pathways for specific high-demand profession that meet veteran’s unique needs. 3) Creates a Fast Track training curriculum for county departments and employees to better serve veterans.

(i) Outreach, Recruitment, and Engagement

Outreach, recruitment and engagement are strengths of the existing program. CFCC Veterans’ Job Developer, Ken Bietschek has built a strong rapport with veterans and staff by maintaining a consistent presence at the Veterans Village weekly, over several years. He’s a consistent fixture at the Village resulting in a continually full caseload. He has also developed strong, working

relationships with a wide range of service providers, training programs, and businesses by being highly responsive to referrals and requests, participating in key local networks and collaborations, and investing time to meet with people to develop and maintain strong personal connections.

The CFCC office is located in the heart of Oregon City where many homeless congregate. Just last week Ken discovered that a gentleman sitting outside the office was a homeless veteran. He immediately activated his network to secure the man's housing and other basic needs, and already has him on track towards employment.

The CFCC office is intentionally located directly across the street from the County's Corrections Department. Program staff have worked closely for decades to serve people transitioning out of incarceration. Corrections often sends clients across the street to CFCC, or call directly for staff to come meet with clients there. Another unit of CFCC offers a law enforcement diversion program where homeless individuals arrested for possession of illegal substances or intoxication may trade treatment for jail time. The Housing Authority which coordinates the HUD CoC Coordinated Entry and CFCC are in the same department; CFCC is the Housing Authorities designated employment services provider.

CFCC strives to meet clients where they are, frequently meeting with clients in the community. Staff are fully equipped to meet clients virtually which some clients prefer, but most homeless veterans lack access to technology and/or the skills to connect. With added staffing CFCC will significantly increase online and in-person outreach to clients and other providers.

CFCC serves under-represented populations; CFCC veterans are more racially diverse than the state and county populations. CFCC is proud to be one of the first public entities in Clackamas County to hire a BIPOC-led Equity Consultant organization to conduct a thorough analysis of all programs and internal practices to ensure CFCC is culturally-responsive, and promotes equity and

anti-racism to the fullest extent possible, and identify areas service delivery can be improved to increase equity. The Equity Action Plan will be completed prior to the start of this funding.

The county Equity and Inclusion Officer is actively working with HR to overhaul its recruitment and retention practices to ensure they promote equity. HR recruits through culturally-specific media outlets and provides an additional 5% pay for bi-lingual staff. The County prohibits making academic degrees mandatory for most positions, and focuses instead on skills needed to complete the job because barriers continue to prevent many students of color and low-income students from accessing and obtaining college degrees.

(ii) Intake and Assessment

The CFCC Workforce Program has implemented in-person, virtual, socially-distanced, and hybrid models for intake and assessment. Workforce staff meet in the veteran's preferred environment or provide transportation to safe, secure and private locations reducing entry barriers. In-person and virtual services are available at CFCC's Employment Training Center, public locations close to the veteran's current shelter, referring partner locations, and Veteran's Village. Staff often accompany the Veteran Service Officer, housing case manager, vocational rehabilitation case worker or other referral partner for purposes of an introduction and 'warm hand off' when preferred by the veteran. Partners are encouraged to meet veterans at CFCC's Employment Training Center to conduct intakes and assessments.

The CFCC Employment Training Center is located next to a public transit center and at a major thoroughfare with on-site parking. It is handicap accessible, adapted for social distancing with intake stations, a private interview space, and multiple computer work stations. Many veterans experience barriers to technology and are simply more comfortable meeting in person. During the

pandemic CFCC's workforce staff held 530 socially distanced in-person client visits at its 'COVID safer' on-site Employment Training Center.

The Workforce Specialist meets individually with the veteran to complete a comprehensive intake and Pre-employment Assessment. This serves as the foundation for veteran-centered employment case planning. Staff use procedures reviewed and adapted by the equity project to ensure full and equal participation, and address racial bias. The intake process collects necessary information to determine eligibility, and provides an in-depth evaluation to identify career interests, job training needs, and related support services needed for the participant to meet their employment goals. The process includes self-assessment of basic skills, literacy, educational attainment and barriers, work experience, interests, public benefits, medical and disability considerations (substance abuse, mental/physical health, learning disabilities), criminal background, family composition, housing circumstances, childcare needs, transportation needs, cultural and religious considerations, and short- and long-term needs. The intake also includes a PTSD Checklist (Civilian Version) and a Master Application.

(iii) Employment and Job Training

Job Search Training is conducted in the CFCC Employment Training Center, a dedicated job search facility, open multiple convenient hours each week and by appointment. There are classrooms and space for individualized hands-on instruction. There are computer workstations where job seekers practice their job search training and receive personalized assistance.

Classroom instruction is reinforced with individual activities that include developing a Master Application to collect information on education, training, certifications, past employment including military occupational specialties, and unpaid volunteer work. The veterans will create a profile in the State of Oregon Employment Department iMatchSkills (iMS) secure employment

database, designed to connect job seekers with career education, training and employment. Creating an iMS profile ensures the veteran is matched and eligibility verified for WIOA training programs, paid on-the-job training, apprenticeships and education to leverage federal, state, and local education and job training program resources. CFCC staff provide navigation and connection to WIOA job training opportunities available with partner programs located at WorkSource Clackamas (local AJC). Among the many WorkSource Clackamas partners is Clackamas Community College for adult basic education and career technical training. WIOA eligible training programs focus on employment opportunities that add value and impart relevant, sought-after skills for key business sectors in the region such as technology, manufacturing, healthcare and construction. CFCC has a long standing partnership with the Oregon Department of Vocational Rehabilitation to fast track enrollment and share/leverage career training costs.

The Oregon Career Information System (CIS) is used for veterans interested in career exploration activities. CIS removes barriers in obtaining specific career information and requirements, allowing veterans to use an interactive process for reviewing careers that match their skills and interests. This system provides accurate, up to date comprehensive information on requirements for specific careers such as, required education, licensure, certificate-level programs, apprenticeships, length and type of training required for specific careers, average salary information, and number of job openings for each career within the region per year.

The veteran and the Workforce Specialist will develop a client-centered Career Plan or formal employment and job-training plan. The Career Plan incorporates components of the Master Application, iMS profile, career interests (including Oregon CIS), and discussions with the veteran. Short- and long-term goals will be developed, with dates of expected completion of each goal. Goals will include connection and referral to other services and programs designed to help

the participant achieve self-sufficiency, such as those described in the next section. The Career Plan will be reviewed and updated frequently to address any newly identified barriers or changes. Updates to case plans will be noted in the Workforce Specialist's case noting system. Veterans will learn about specific industry training requirements, finding businesses with current job openings, while receiving assistance with building a quality resume, interview practice and critique, and continued employment barrier reduction coaching from a Workforce Specialist.

Under this program, CFCC will develop "Fast Track" training curricula to train county staff and potential employers on how to better support veterans navigate the behavioral health system, enhance support wrap-around services, and increase veteran's successful and sustainable job placements. The "Fast Track" training programs are expected to increase the volume of veterans receiving vocational training.

(iv) Linkages and Support Services

Clackamas County has a robust approach to meeting the needs of veterans; CFCC serves as the employment services arm of the County's veteran's services. The CFCC Workforce Unit has operated traditional and specialized workforce programs for more than 40 years assisting individuals who require additional advocacy and navigational support and linkage to the larger system of supports and services for veterans, designed specifically for individuals experiencing barriers to employment including housing insecurity. Team members are experienced and adept at helping program participants navigate the various programs and systems. The team works closely with the programs such as the HUD CoC (providing coordinated housing access registry and placement services), Clackamas County Social Services Division (providing Veteran Service Officers, HUD VASH vouchers and the SSVF program to provide rapid rehousing), Housing Authority of Clackamas County (HACC), all of which are located within the same County

department. CFCC has a streamlined referral process with Clackamas County Community Corrections parole and probation officers for assisting veterans reentering the community post-incarceration. The team also partners with domestic violence shelters.

The CFCC team is racially and ethnically diverse and includes individuals who share lived experience with veterans in the program, increasing their collective understanding of issues facing veterans. Several members of the team are graduates of CFCC programs. Staff maintain relationships with area non-profits addressing homelessness, including Central City Concern (housing, peer support, addiction services); Cascadia's The Royal Palm (transitional housing for people with mental illness); Immigrant and Refugee Community Org. (culturally-specific services, employment, family reunification); Home Forward (housing, mental health, employment support); and Bridges to Change (transitional housing post incarceration and/or SUD treatment programs).

CFCC's Veteran employment program provides co-case management with other veteran specific service providers including housing, social services, vocational rehabilitation, and coordinate wrap-around services with veteran specific organizations such as Tools for Troops, Fort Kennedy, local VFWs and more. Service components include an assessment designed to provide immediate stability by accessing wrap around services and supports like access to transportation (low-income fare pass), cell phone (Lifeline program) and food assistance (SNAP benefits). Wrap-around services include registration with Clackamas County Coordinated Housing Access, access to housing assistance programs and meeting with a workforce specialist mental health navigator.

CFCC's Workforce Program features peer support for individuals needing navigational services to access mental health evaluations and/or support for substance use disorder and recovery. NAMI Multnomah (National Alliance on Mental Health) is being contracted by CFCC to provide veteran specific Peer Support Specialist services. NAMI Multnomah engages Veterans,

military service members, and their family members using veterans with lived experience in providing peer support for veterans with current behavioral health needs. Peer support is provided in a confidential setting; participants express themselves free of judgment and find hope.

(v) Employer Engagement

CFCC's Workforce Specialists have well established relationships with local businesses and employers, connecting with 184 employers in 2021 during the pandemic. Staff meet with employers to assess working conditions and discuss their needs, providing information pertinent to the business on County programs, underutilized tax credits, and other hiring incentives.

CFCC has a direct relationship with Clackamas County's Economic Development Department and routinely receives information on new and growing county employers. This relationship provides direct internal connection for outreach to assess the employers' talent needs, work environment, and other factors relevant to candidate placement. CFCC participates in the "needs and leads" weekly updates provided by the Oregon Employment Department Regional Business Services; the Clackamas Coordinated Business Services Team and Clackamas Workforce Partnership Business Goal Advisory Group which includes area Chambers of Commerce, multiple city and county economic development departments, workforce training partners like TechHire, the community/vocational college, and committed business partners. The groups are collaborating on a "Quality Jobs Initiative" and a "Good Jobs Challenge" to support businesses with developing strategies to effectively recruit, retain, and train talented employees. Such networking opportunities help CFCC Workforce Staff identify employers offering quality jobs that provide wage progression, safe and healthy workplaces, continuing education, including degree programs, telework, mentoring and coaching and caregiver supports.

CFCC has long standing relationships with trade and apprenticeship organizations including

Oregon Tradeswomen, Pacific Northwest Carpenters Institute, Cement Masons, IBEW Local 48, HVAC trade unions, and businesses paying a prevailing wage such as skilled journey level tree trimmers. Veterans interested in paid apprenticeship employment receive assistance in completing the application and additional training to increase the applicant's ranking score for the apprenticeship program of their choice. CFCC Workforce Specialists attend specialized workshops to master the art of applying for public employment, tailoring application materials to obtain an interview. They maintain relationships with hiring managers in local government offices who hire candidates enrolled in CFCC programs.

(vi) Reaching Historically Marginalized Veterans.

CFCC's Workforce Programs were designed to prioritize historically marginalized communities and serve individuals with barriers to employment. The current Veterans' Job Developer is well connected with both veteran-specific and other social service agencies, known as a resource for connecting veterans to housing and employment services. He is well known to local veteran service organizations, housing case managers, and local law enforcement and regularly conducts outreach visits to veteran centers, veteran specific organizations and community partners to promote awareness of the program. He gives presentations at the local VFW, the County's Veterans Advisory Council and participates in the monthly homeless 'Veteran by Name' case management meetings. He also organizes and participates in activities designed to reach historically excluded and disadvantaged veterans, including 'stand-downs'.

CFCC has a well-established referral partnership with Clackamas County Community Corrections for veterans on parole and/or probation, offering expungement services for individuals eligible for this service. CFCC provides training and connection to serving individuals experiencing mental health conditions, trauma and those at risk of suicide.

As noted above, CFCC has engaged an equity consultant to review its to conduct a thorough analysis of all of our programs, including the outreach program, to ensure they are culturally-responsive and promote both equity and anti-racism to the fullest extent possible. CFCC's Employment and Training Lab meets ADA requirements for accessibility. Services can be provided virtually if the participant prefers virtual service as an accommodation. Workforce Specialists meet program participants in the community and at other locations as needed. Staff regularly assist individuals with disabilities including PTSD, TBI and other cognitive and learning disabilities, and coordinate service with Vocational Rehabilitation.

(vii) Reaching Underserved Communities

The CFCC team is racially and ethnically diverse and includes individuals who share lived experience with veterans in the program, increasing their collective understanding of issues facing the clients. Several members of the team are graduates of CFCC programs. Clackamas County provides employment services in virtually any language, including American Sign Language, via contracted real-time video translation through a smartphone app. Bilingual Spanish-English speakers are also on staff. CFCC provides information and resources to veteran service providers and organizations not located in the service area. Program staff frequently provide connection and resources for veterans residing outside of the County to service providers in their region. Veterans with connections to Clackamas County residing in neighboring areas served by CFCC programs. Veterans traveling through Clackamas County are also served.

(viii) Employment Adjustment Services

CFCC Workforce Specialists provide both pre and post hire assistance for veterans to assist with the adjustment process. Staff discuss company culture, work environment, and complete transportation planning prior to the start of employment. Staff work with the veteran and the hiring

manager to ensure candidates complete necessary pre-employment processes and have appropriate work attire including footwear, all required tools and other work items prior to their first day of employment. The Workforce Specialist makes regular contact to ensure participant job success (weekly check in during the first two weeks; monthly for 3 months; quarterly or more frequently, for the first 12 months). Employers are encouraged to reach out to the Workforce Specialist to request additional supports and coaching for the veteran when issues arise. Veterans are provided a guide to success in the workplace and opportunities to discuss their concerns and problem solve.

d. Organizational, Administrative, and Fiscal Capacity

CFCC Division houses the Workforce Program has provided highly customized and client-centered employment services to vulnerable residents of Clackamas County for 40+ years. The CFCC Workforce Unit operates traditional and specialized workforce assistance, helping individuals who require additional advocacy and navigational support. The County has been funding the Veterans' Workforce Program since FY11-12. They received their first grant from the State of Oregon to serve this population that funds a temporary increase in staffing to meet the growing demand for services. The County funding, which covers 1.0 FTE and service costs is expected to continue. The state funding must be renewed each biennia.

Clackamas County government has been serving the community for over 178 years. Its budget of just over \$1 billion per year, includes approximately \$200 million in grants. The County has well-developed policies and procedures that incorporate multiple layers of administrative and fiscal controls to ensure that it manages county taxpayer funds well and is fully compliant with all federal and state statutes. Contracts are vetted at the unit, division, and department before being submitted to the County Administration for presentation to the elected Board of County Commissioners for ultimate approval.

Established internal controls include approval of invoice by program staff and their manager before they are reviewed and processed by Finance. Managers are allowed to approve invoices up to \$5000 above which, Division Director approval is required. The County's Veterans Job Developer, has over 10 years of experience serving veterans. Workforce Manager, Jennifer Harvey, has over 20 years of business-related experience, including an MBA. Dr. Adam Freer, CFCC Division Director, has a doctorate in public administration, 10 years of experience managing federal grants and 18 years of experience managing publicly funded contracts.

The Workforce Unit receives half of its funding through grants, and CFCC receives 80% of its funding through grants. Consequently, the program team has extensive experience implementing programs, data collection and reporting. The Workforce Unit is also in the process of establishing and transitioning to a new, customized client database with robust data collection and reporting capabilities. The new Human Services Coordinator will allow for more robust tracking and reporting, including capturing all of the desired post-exit data.

e. Past Performance – Programmatic Capability

CFCC has not received HVRP, HFVWC, or IVTP grant funding. The most similar grant is for SNAP Training & Employment Program (STEP) funded through an ongoing, federally funded grant from the Oregon Department of Human Services, Office of Self-Sufficiency. STEP provides employment services for low-income families receiving SNAP benefits. See *Attachment F- Chart of Past Performance* to review performance data.

Applicant Name: Clackamas County Department of Health, Housing & Human Services
Population Category: HVRP <input checked="" type="checkbox"/> HFVWC <input type="checkbox"/> IVTP <input type="checkbox"/>
State(s)/Territory Covered by Proposed Service Delivery Area: Clackamas County, Oregon
Service Delivery Area(s)- Clackamas County, Oregon
<p><i>Purpose of the Project:</i> Clackamas Children, Youth, and Families Connection (CFCC) Veteran Workforce Program has over 40 years of experience providing employment services, including 10 years serving veterans. The proposed project expands capacity of the Veteran’s Workforce Program to provide needed career exploration, job placement services, career training, support, and comprehensive, veteran-centered, intensive case management to Clackamas County homeless veterans to enable securing good jobs in stable, high-demand occupations.</p>
<p>Activities to be Funded by the Grant</p> <p>Personnel (Salary & Fringe): 1.0 FTE Veteran Job Development Specialist increases program capacity and outreach, while improving service coordination, integration within County services, and data collection; 0.5 FTE Human Services Coordinator 1 supports increased outreach, communications support, partnership development with local businesses and service providers, and data collection, data entry, and reporting.</p>
<p>Expected Outcomes of the Project: Enroll 75 participants in year 1; place 21 in transitional or permanent housing; place 39 into employment with an average hourly wage of \$19.15; for an overall placement rate of 74%. Employment rate after exiting program in Q2: 47.2% and Q4: 32.1%. Job placement rate for episodic homeless veterans: 67%.</p>
<p>Intended Beneficiaries of the Project: Homeless Veterans</p>

ATTACHMENT G: SUGGESTED ABSTRACT TEMPLATE, cont.

Subrecipient/Activities: NAMI (National Alliance on Mental Illness) Multnomah will engage veterans, military service members, and their family members in veteran-specific programing, training, and support groups: Veteran Behavioral Health Peer Support Specialist (VBHPSS) Services; Veteran-Specific Peer-to-Peer Recovery Classes; Veteran-Specific Peer Connections Support Group; Veteran-Specific Peer Support Specialist Training; First Step Peer Support; and Homefront and Family Support Groups.
New or Previous HVRP Grantee (check the option that applies): New <input checked="" type="checkbox"/> Previous <input type="checkbox"/>
<i>Previously funded applicants only - Grant Number: N/A</i>
HUD Continuum of Care (CoC) Name: Clackamas County CoC
HUD Continuum of Care (CoC) Associated Number: OR-507
Name of local American Job Center (AJC): Worksource Clackamas
Funding Request Year 1 Total: \$197,469 Year 2 Total: \$310,268 Year 3 Total: \$343,318



United States Department of Labor
Veterans' Employment & Training Service
Summary of Proposed Goals by Quarter & Overall for the Project

FIPS Finder

Geographic Coverage Area(s):
Clackamas County, OR (41005);
Funding Amount:
851,055.00
Applicant Name:
Clackamas County

OMB Approval 1293-0014 Expires 6/30/2023
Homeless Veterans' Reintegration Program (HVRP)

Grantee State:	
OR	Oregon

Planned Measures	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Total
# of Participants Enrolled	15	20	20	20					75
# Placed in Transitional or Permanent Housing	3	6	6	6					21
# Placed into Employment	6	11	11	11					39
Average Hourly Wage at Placement	19.15	19.15	19.15	19.15					19.15
Placement Rate Overall (rate = employed/exited)	75.0%	73.3%	73.3%	73.3%					74%
# Exited	8	15	15	15					53
# Earned Wages in the 2nd Full Quarter After Exit			4	6	7	8			25
Employment Rate in the 2nd Quarter After Exit			50.0%	40.0%	46.7%	53.3%			47.2%
Median Quarterly Earnings in the 2nd Quarter After Exit			7,300.00	7,300.00	7,300.00	7,300.00	Remember to enter overall >>>		7,300.00
# Earned Wages in the 4th Full Quarter After Exit					2	4	5	6	17
Employment Rate in the 4th Quarter After Exit					25.0%	26.7%	33.3%	40.0%	32.1%
Episodic Homeless - # Enrolled	5	10	10	10					35
Episodic Homeless - # Exited	3	6	6	6					21
Episodic Homeless - # Placed into Employment	2	4	4	4					14
Placement Rate - Episodic Homeless	66.7%	66.7%	66.7%	66.7%					67%

Public Burden Statement - According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1293-0014. The time required to complete this information collection is 1 hour per response, including the time to review instructions, search existing data sources, gather the data needed, and complete and review the information collection. The obligation to respond is required to obtain or retain a benefit (38 U.S.C. 2021 and 2023). If you have any comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: U.S. Department of Labor, Veterans' Employment and Training Service, 200 Constitution Avenue, N.W., Washington, D.C. 20210.

Attachment F: Chart of Past Performance

Applicants must provide data from a previous project that is similar in size, scope, and relevance to the grant they are applying for: HVRP, HFVWVC, or IVTP.

Name of Previous Grantor Organization: Oregon Department of Human Services, Office of Self-Sufficiency (using USDA funds)				
E-mail Address: John.Briscoe@ohadhs.state.or.us				
Telephone Number: 503.947.5389				
Project Title: SNAP Training & Employment Program (STEP)				
Description: Provide Employment & Training services for those receiving SNAP (Supplemental Nutrition Assistance Program) benefits				
Grant Number: 165175				
Type of Population Served: Low-income, unemployed				
Total Number of Participants Served by the Project: 127				
Project Period of Performance (Start and End Date): October 1, 2020 – September 30, 2021				
Performance Goals				
Metric	Performance Indicator (Goal)	Performance Outcome	Performance Outcome / Performance Goal	Percentage Rate of Actual Achievement
1. Number of Participants Enrolled	100	127	127/100	127%
2. Placement rate overall	<i>No target required</i>	107	107/127	84%
3. Average hourly wage at placement	<i>No target required</i> HVRP target: 80% of median = \$16.80 90% of median = \$18.93	\$17.16	\$17.16/\$21.04	82%
4. Percentage of program participants who are in unsubsidized employment in the first quarter after exit from the program.	<i>No target required</i> HVRP target for 2 nd quarter: 41%	68	68/107	64%
5. Median quarterly	<i>No target required</i>	\$8,636	\$8,636/ \$4,180	207%

earnings of program participants who are in unsubsidized employment in the first quarter after exit from the program	HVRP target for 2 nd quarter: \$4,180			
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Oregon

Kate Brown, Governor

Employment Department

875 Union St. NE

Salem, Oregon 97311

503-947-1394

TTY-TDD 711

www.Employment.Oregon.gov

Dr. Adam Freer, Director
Veteran Workforce Program
Clackamas County Children, Family & Community Connections
112 11th St.
Oregon City, OR 97045



RE: Letter of Recommendation for Homeless Veteran Reintegration Program (HVRP) Application


Dear Dr. Freer,

I'm writing this letter in support of your grant application to the U.S. Department of Labor's for a **Homeless Veteran Reintegration Program (HVRP) grant** to increase employment opportunities and employment stability for veterans. For over 10 years, Clackamas County's Veteran Workforce Program plays a critical role in supporting veterans in need of training and employment with intensive case management and customized career plans. It is my understanding that you intend to add a full-time Workforce Specialist to your staff. We fully support you increasing your program capacity, to address identified gaps in services, and build program sustainability.

WorkSource is a designated America Job Center (AJC). We provide a "one-stop shop" for training, education, and employment services for Clackamas County residents that provides free training, education, and employment services to residents aged 14 or older who can legally work in the United States. WorkSource is a partnership of state agencies and community based organizations working together under one roof to provide training, education and employment services for Clackamas County residents.

Thank you for considering funding this critical program.

Sincerely,

Tracy Calderon 
Clackamas Area Manager

Oregon Employment Department

971-673-6457

Tracy.K.CALDERON@employ.oregon.gov

COVER SHEET

- New Agreement/Contract
- Amendment/Change/Extension to _____
- Other _____

Originating County Department: _____

Other party to contract/agreement: _____

Description:

After recording please return to: _____

- County Admin
- Procurement

If applicable, complete the following: _____

Board Agenda Date/Item Number: _____