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Category: WIA and WP
Subject#: WIA and WP Discretionary Grant Quarterly Reporting
Source: Federal/State
Revise/Replace: N/A
Contact: Workforce Development Programs Director
Distribution: Managers, Workforce Development Staff, Workforce Region Directors, Fiscal
Colorado One-Stop System Policy Guidance Letter#: 08-06-WIA
Date: June 3, 2008

I. REFERENCE(S):

Title I of the Workforce Investment Act (WIA) of 1998; 20 CFR 665.200-220 and 667.300-410, WIA; Final Rules (August 11, 2000); Wagner-Peyser (WP) Act of 1933, as amended by Title III of the Workforce Investment Act (WIA) of 1998;

II. PURPOSE:

To provide policy and guidance to regions with regard to reporting requirements for WIA and WP discretionary grants, as well as set aside grants within WIA programs.

III. BACKGROUND:

The WIA regulations state, "All States and other direct grant recipients must report financial, participant and performance data in accordance with instructions issued by Department of Labor. Required reports must be submitted no more frequently than quarterly within a time period specified in the reporting instructions". In addition, "A State or other direct grant recipient may impose different forms or formats, shorter due dates, and more frequent reporting requirements on sub-recipients."

In the past, the Colorado Department of Labor and Employment (CDLE) and the Office of Workforce Development have issued Program Guidance Letters (PGLs) or individual grant solicitations, which have provided various guidelines on quarterly and closeout reports. Additionally, CDLE has disseminated a separate PGL containing the reporting requirements for WIA Set Aside grants. In order to streamline reporting mechanisms for all discretionary grants and set-asides, the guidance in this PGL and the attached report template are to be utilized for quarterly reporting, beginning with the first quarter of PY08 (July 1 through September 30, 2008). In addition, internal monitoring and Joblink reporting requirements for discretionary grants and set asides will be detailed in this PGL.

IV: POLICY/ACTION:

Starting with the 1st quarter of PY08, regions are required to utilize the attached template when reporting on discretionary and set aside projects. The template was designed to cover quarterly and closeout reporting, as well as follow-up reporting when there are grant activities that run beyond the normal period of performance. Instructions for use of the template are contained within the document (Attachment 1) and allow a region to skip any section that does not apply to a particular grant. Signature requirements are delineated on the final page of the document.

A. REPORTING REQUIREMENTS

1. **Quarterly Reporting**

Since discretionary grants meet specific goals that may differ from the standard reporting requirements, the quarterly report template provides the mechanism to address all goals identified in the grant scope of work and includes sections on the following:

- Project status;
- Performance measures data;
- Planned goals, and outcomes and services specific to the grant or project;
- Current and projected quarterly financial expenditures;
- Challenges met during the delivery of the grant project as it relates to the scope of work;
- Notable accomplishments of the grant project;
- Any grant modifications or supplemental information; and
- Additional information that is specific to the individual project.

2. **Closeout Reporting**

The grant closeout report requires providing information on the overall performance of the grant, including any accomplishments or challenges that occurred. This is in contrast to a quarterly report, which should focus on what happened in the most recent quarter. The region is responsible for writing a closeout report within 60 days of completion of the grant period of performance. This is concurrent with the financial closeout of the grant reported by the local financial manager per PGL 06-12-FI. In addition, the closeout report should include:

- Information on how the grant could be improved, sustained and/or replicated in the future; and
- Highlights of “best practices” applied to local workforce investment activities.
- Identification of any activities, outcomes, or benchmarks that will be tracked and monitored beyond the period of performance of the grant along with the dates and timelines for tracking.

3. **Follow-Up Reporting**

If a grant has activities that extend beyond the period of performance identified in the grant proposal, the region must track and report the final results using the report template. The region is responsible for submitting this **one-time** follow-up report within 30 days after all grant tracking

activities have ended. The follow-up report should contain all closeout report sections with any updates, and include a narrative discussing the final outcomes as a result of the tracking of grant activities beyond the period of performance. Examples of post-grant activities include:

- Tracking retention or wage gain
- Completion of a grant deliverable with partner resources after the grant period of performance
- Completion of a training program with non-grant resources such as WIA formula funding

B. REPORT SUBMISSION AND DEADLINES

Workforce Regions or Grantees are required to submit quarterly reports commencing with the first quarter of the project period of performance and concluding with a closeout report due within 60 days of project completion. If applicable, a workforce center or grantee is required to submit a follow-up report within 30 days of completing the identified follow-up activity and tracking.

NOTE: The closeout report can be used in place of the quarterly report for the last quarter of the period of performance.

REPORTING DUE DATES

Quarters:

July 1- September 30th

October 1 – December 31st

January 1 – March 31st

April 1 – June 30th

Closeout Report

Follow-Up Report

Due Date:

October 31st

January 31st

April 30th

July 31st

60 days after the period of performance ends

30 days after all grant activity & tracking has ended

All reports should be submitted electronically, by mail, or by fax to the region's WSS. Although original signatures are required on all reports, the documents may be scanned and attached to emails or faxed to the WSS.

Copies of reports for WIA discretionary grants awarded by the State Workforce Development Council are to be sent to the Office of Workforce Development.

C. INTERNAL MONITORING AND JOBLINK RESPONSIBILITIES

Discretionary and Set Aside grants require an internal monitoring and oversight process, separate from the formula programs, which tracks and reports on the activities and outcomes, expenditures, and partner contributions. In general, CDLE recommends that regions designate a lead for each grant to fulfill these tracking and reporting responsibilities and is also available for discussions with the region's WSS regarding grant start up, implementation, closeout, and any issues that may arise.

The grant lead is also responsible for ensuring that Joblink is utilized for recording and tracking grant activities related to clients, as follows:

- A unique Joblink program code (and sub code if appropriate) is identified for

- each grant that has client services, and agreed upon by the region and the WSS
- All grant participants are enrolled in Joblink using the grant's program code and a case file is established for each participant, which contains eligibility and other relevant documentation
 - All client services provided with grant or grant partner resources are entered in Joblink
 - All grant participants are exited within 60 days after the completion of the grant period of performance
 - All performance outcomes are entered in Joblink
 - All follow-up activities are entered in Joblink, and
 - At a minimum, the Activity Summary (AS) Report is used to track quarterly progress of the grant. Additional Joblink reports can be utilized, as appropriate.

D. STATE MONITORING RESPONSIBILITIES

Monitoring of grant performance will be conducted by the WSS as part of the annual compliance monitoring and the quarterly program review processes. The WSS will use the Joblink AS report to review the progress of the grant and determine if a grant is meeting its client services goals. The WSS may utilize additional reports to identify client and outcomes based goals that may not appear on the AS report, such as targeted populations.

E. RECAPTURE OF FUNDS

The WSS will utilize the State Financial Reporting System in conjunction with the quarterly reports to determine whether a grant is meeting its expenditure goals. Once the next-to-last quarter of the grant period of performance is completed, CDLE reserves the right to evaluate the likelihood that a grantee will spend 100% of grant funds, and will also make a determination as to whether all or part of the remaining grant funds will be recaptured prior to the end of the grant period and utilized for other purposes. This policy is being initiated as a direct result of the recent \$8.7 million rescission of under spent WIA funds, and the return of more than \$600,000 in local funds to the state within the last three program years.

Note: For WIA 10% grants, the State Workforce Development Council will be consulted before a decision is made regarding recovery of funds. For set aside grants, regions may be allowed to transfer under spent funds back to the formula program (rather than having to return funds) depending on the expiration date of the funds.

V. IMPLEMENTATION DATE:

July 1, 2008

VI. INQUIRIES:

Please direct all inquiries to your WSS at Workforce Development Programs.

Thomas J. Looft, Director
Workforce Development Programs

Attachment 1: WIA and WP Discretionary Grant Quarterly Reporting Template