



REAL GRANTEE GUIDE



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SECTION 1 – PARTNERSHIP MANAGEMENT

1.1 PROGRAM PURPOSE

Real Skills for Youth, Real Pathways RI and Real Jobs RI (together, the REAL programs) are a suite of dynamic workforce and economic development programs that bring together employers, workers, training providers, and community members to foster sustainable and resilient career opportunities for Rhode Island’s youth and labor force and address the complex and evolving needs of the state’s employers. The REAL programs connect critical funding opportunities and infrastructural assistance to industry-led partnerships made up of employers, educators, training providers, and community-based organizations (Partnerships). Developed by the Rhode Island Department of Labor and Training (DLT or Department) and the Governor’s Workforce Board Rhode Island (GWB), these programs form the backbone of the state’s worker training initiatives.

The purpose of the Real Skills for Youth program is to create strategic partnerships among schools, youth-serving organizations, industry, and others to develop and implement high-quality paid work-based learning experiences and career readiness programming for youth.

The purpose of the Real Pathways RI program is to create community-based partnerships to address employers’ workforce needs, advance the skills of Rhode Island workers, grow the state’s economy, and increase sustainable employment opportunities for working families.

The purpose of the Real Jobs RI program is to create industry-led partnerships to address employers’ workforce needs, advance the skills of Rhode Island workers, grow the state’s economy, and increase sustainable employment opportunities for working families

1.2 KEY PARTNERSHIP ROLES

Within each Partnership, specific entities and individuals should be identified to fulfill key roles, as follows:

LEAD APPLICANT

- Serves as the main point of contact; the liaison between the Partnership and DLT;
- Serves as the gatekeeper, vetting partners’ proposed projects;
- Implements approved projects and monitors performance;
- Handles all non-fiscal paperwork and performance reporting;
- May, but need not, be the Convener; and

- May, but need not, be the Fiscal Agent.

CONVENER

- Maintains a working relationship with employers/partners;
- Convenes partners and stakeholders as needed;
- Leads conversations and balances the interests of all parties; and
- Obtains and acts on stakeholder feedback.

FISCAL AGENT

- Has the capacity to maintain fiscal records and manage funds;
- Handles all fiscal paperwork for the Partnership;
- Receives and disburses funds to appropriate parties; and
- Communicates with DLT fiscal staff as needed.

The Lead Applicant must select a primary contact person for day-to-day interactions with other Partnership members and DLT/GWB.

1.3 KEY CONTRACT DOCUMENTS

The REAL programs operate much like the cooperative agreement model used in several areas of the Federal Government, with Grant Advisors working closely with Partnerships to help achieve successful outcomes. Once Partnerships are selected through the competitive solicitation process, there are two (2) key contract document types that must be fully executed:

AWARD AGREEMENT

- Establishes the Partnership and the terms of the relationship between the GWB/DLT and Partnership;
 - For the **Real Jobs** program, the performance period is typically three (3) years with an option to extend for an additional two (2) years;
 - For the **Real Pathways** program, at present, the performance period is typically one (1) year with an option to renew for an additional two (2) years;
 - For the **Real Skills** program, at present, the performance period is one (1) year;
- Gives the Partnership the ability to submit funding requests for proposed projects during the performance period; and
- Does not have an associated dollar amount or a specific scope of work.

ADDENDUM

- Outlines the terms of a specific project and has an associated funding amount; and
- Each Addendum contains the following sections/appendices:
 - Appendix A (Scope of Work);
 - Appendix B (Budget);
 - Appendix C (Invoicing Schedule).

The DLT/GWB implemented an e-signature process for new contract documents in 2019. Partnerships can expect to receive Adobe Sign envelopes to execute contracts, as well as contract status updates, from: DLT.Contracts@dlt.ri.gov.

1.4 ASSIGNMENT OF A GRANT ADVISOR

Your Partnership has been assigned a Grant Advisor who will be available to support your Partnership throughout the duration of the Award Agreement, answer questions about operational issues, help you connect to additional partners and other public workforce development programs, and provide technical assistance to ensure you meet your deliverables and performance outcomes. Site visits may be scheduled to observe training or Partnership meetings and to assist in resolving any challenges that may be affecting performance.

NAME	PROGRAM	ROLE	EMAIL
Pauline Abetti	Real Skills	Program Director	Pauline.Abetti@dlt.ri.gov
Julissa Polanco	Real Skills	Grant Advisor	Julissa.Polanco@dlt.ri.gov
Robert Kalaskowski	Real Pathways	Program Director	Robert.Kalaskowski@dlt.ri.gov
Alyssa Alvarado	Real Jobs	Program Director	Alyssa.Alvarado@dlt.ri.gov
Julie O'Connell	Real Jobs	Grant Advisor	Julie.OConnell@dlt.ri.gov
Jessica Mayernik	Real Jobs	Grant Advisor	Jessica.Mayernik@dlt.ri.gov
Laura Hastings	Real Jobs	Grant Advisor	Laura.Hastings@dlt.ri.gov
Keith Murray	Real Jobs	Grant Advisor	Keith.Murray@dlt.ri.gov
Sarah Bramblet	Real Jobs	Grant Advisor	Sarah.Bramblet@dlt.ri.gov
Stephen Ackerman	All Programs	Fiscal Liaison	Stephen.Ackerman@dlt.ri.gov

1.5 COMPLETING THE PARTNERSHIP 'COMPREHENSIVE PLAN'

***This section does not presently apply to the Real Skills for Youth program**

As described in the Award Agreement, Partnerships are asked to complete a 'Comprehensive Plan' within the first year of funding. In simple terms, this document describes what the Partnership believes it can accomplish over time. The Comprehensive Plan should set forth the

Partnership’s vision for how it will address the workforce needs identified in its application and should lay out parameters for assessing success. Grant Advisors can provide technical assistance in completing the Comprehensive Plan. This plan will play an important role in how the DLT/GWB funds future Partnership activity.

1.6 ‘PITCH’ PROPOSALS – APPLYING FOR ADDITIONAL FUNDS

***This section does not presently apply to the Real Skills for Youth Program**

After initial approval by DLT/GWB, Partnerships are authorized to apply for additional grant funds to build, expand, or replicate training programs and other workforce solutions, and/or grow and enhance the Partnership’s capacity within a sector.

The DLT/GWB has developed an administrative process through which Partnerships may apply for additional funds. This process is known as a “PITCH” (shorthand for ‘Proposed Investments in Training, Capacity, and Hiring activities’). Partnerships interested in applying for additional funds should complete the **PITCH APPLICATION FOR ADDITIONAL FUNDING** and submit it to their Grant Advisor with the required supporting documents.

All PITCH proposals will be evaluated in light of the aims and vision of the associated program. Among other factors, Partnerships’ performance in meeting their proposed goals and outcomes will be considered. Additional funding will also be contingent on the availability of funds and must be expended in compliance with the terms of the Award Agreement.

Final approval for each proposal shall be determined by the Director of the Department of Labor and Training, based on evaluator comments and other factors and considerations such as geographic distribution, industry diversity, economic and workforce labor data, the potential for state and sector economic growth, and populations served.

PITCH Proposals must be submitted a minimum of thirty (30) days in advance of the start of the desired funding period. The most successful PITCH proposals will be those discussed in detail with a Grant Advisor prior to submission. This will facilitate the assessment of available resources and provide for a more seamless evaluation process.

All requests for additional funding, and resulting decisions, will be posted on the Real Jobs RI and Governor’s Workforce Board websites, respectively, to promote program transparency.

1.7 AWARD MODIFICATIONS

Situations may arise that necessitate a change to the terms of either the Award Agreement or a related Addendum. Partnerships are required to discuss potential changes with their Grant Advisor, who will prepare a **Modification**, if appropriate. Partnerships making unauthorized changes to their approved activities or budget risk having disallowed costs. Disallowed costs cannot be paid with grant funds.

Approved budgets are subject to a ten (10) percent line item flexibility for all non-personnel expenditures without a modification, except where otherwise indicated. All other modifications must be approved by the DLT/GWB and fully executed by DLT/GWB and Partnership prior to the effective date of the change.

1.8 PERFORMANCE EVALUATION

The Department of Labor and Training and Governor's Workforce Board utilize multiple mechanisms to evaluate the performance of the REAL programs and related Partnerships and projects. These mechanisms include:

PARTICIPANT/PERFORMANCE REPORTING

- All Partnerships are required to report on participant outcomes, activities, deliverables, and other grant-related items.
 - Depending on the activity, this may be done through a Participant Outcome Report, Participant Service Report, Narrative Report, or other reporting vehicle approved by the Grant Advisor.
- Performance will be tracked and compared against targets as articulated within the Scope of Work section of each Addendum.
 - Insufficient progress may result in interventions.
- Performance data will inform public-facing Program Reports, which are made available on a regular basis on DLT and GWB websites.

PROGRAM SURVEYS

- For many activities focused on training delivery, the DLT/GWB may seek to obtain additional qualitative data (such as participant and/or employer experiences and satisfaction).
- The Partnership may be asked to have participants, employers, or other partners complete Program Surveys at the end of training. This information, along with quantitative data, help show the full scope and performance of activities.

ACTIVE CONTRACT MANAGEMENT (Check-In Meetings)

- Grant Advisors will schedule check-in meetings with Partnerships to monitor progress on the Partnership's activities and objectives.
 - Performance targets will be clearly articulated within the Scope of Work section of each Addendum.
- Partnerships should be prepared to include key personnel and Partnership members in check-in meetings, as appropriate.

DLT STAT

- DLT STAT is a collaborative problem-solving tool in which program staff, stakeholders and decision makers look at real-time program performance data.
- Partnerships may be invited to attend these meetings or contacted to provide additional data ahead of a STAT meeting.

INDEPENDENT EVALUATIONS

- DLT has partnered with several third-party organizations including the University of Rhode Island, the Harvard Kennedy School of Government, and Johns Hopkins University to evaluate the performance and impact of the REAL programs.
- Visits and interviews with our evaluation partners should be anticipated.
- Such evaluations help to better inform program management, while highlighting the impactful and innovative work of the REAL programs.

Performance evaluation is vital to the success of the REAL programs; cooperation and assistance in these activities is a required and important component of a Partnership's involvement in these programs.

1.9 COMMUNICATIONS, MEDIA AND BRANDING

For media events, releases, interviews (live or print), or press inquiries related to your Partnership's DLT-funded projects, please inform the DLT Communications team by contacting Angelika Pellegrino at Angelika.Pellergino@dlt.ri.gov. The Communications team is available to help amplify messaging and to serve as a resource to achieve the shared mission of the REAL programs.

An electronic version of the following documents will be distributed to Partnerships:

- Event Request Form
- DLT Media Release (for participants)
- Logos

EVENTS

- If you would like to invite Governor Raimondo to an event your Partnership is hosting; please contact Angelika Pellegrino at the address above to submit the request to the Governor's Office.
- Requests should be sent at least four (4) weeks in advance, when possible.

MATERIALS AND MESSAGING

- Any press releases, newsletters, promotional flyers, or other materials announcing or providing information about grant-funded activities must include the following language:

"This project was funded in whole or in part by funds received from the Rhode Island Department of Labor and Training/Governor's Workforce Board RI" or when appropriate, "A proud partner of Real Jobs RI/Real Pathways RI/Real Skills for Youth." If you are uncertain which phrase to use, contact Angelika Pellegrino at the address above.
- When appropriate, the Grantor's logo should be affixed to media.
- Partnership-specific logos and/or branding is encouraged but should include either the applicable REAL program logo as part of the image or a tagline that indicates that the entity is a REAL Partnership.
 - Materials for affixing the appropriate logo or tagline will be distributed to Partnerships electronically.
- Please allow at least twenty-four (24) hours for a quote from DLT/GWB for press releases.

TWITTER

- Please be sure to mention and follow us on Twitter: @RealJobsRI, @RIDLT and @GWB_RI.

1.10 INFORMATION EXCHANGE SESSIONS AND PROGRAM EVENTS

Information Exchange Sessions and program events will be scheduled as appropriate to share information and demonstrate new programs/services, disseminate best practices and/or review performance. Partnerships are required to attend these sessions; scheduling conflicts should be communicated promptly to a Grant Advisor and every effort will be made to accommodate where possible.

SECTION 2 – PARTICIPANT MANAGEMENT

2.1 PARTICIPANT ENROLLMENT

Any participant, whose training is funded, in whole or in part, by the REAL programs, must enroll in the relevant program. Enrollment is required for the following reasons:

- The DLT/GWB is leveraging several different state and federal funding sources to help pay for training, which means that detailed participant data must be collected;
- Real Skills, Real Pathways and Real Jobs are performance-driven programs that seek to track outcomes for participants and ensure training is having the intended impact; and
- The DLT/GWB seeks to maximize investment and provide value to workers, employers, and the state. Participant information is crucial to determining that value.

The REAL programs will be transitioning to online enrollment in Summer 2019. There will be a transition period where some Partnerships will still be using paper enrollment forms. Partnerships should follow the appropriate process below based on the advice of their Grant Advisor:

PAPER ENROLLMENT

***This section does not presently apply to the Real Skills for Youth program**

- Paper enrollment packages must be distributed to all selected participants and completed in their entirety (including supporting documentation).
- Enrollment Packets must be provided to the Grant Advisor (the Partnership is responsible for secure storage until delivery to the Grant Advisor).
- The Lead Applicant should maintain a list of all participants.

ONLINE ENROLLMENT

***This section does not presently apply to the Real Skills for Youth Program**

- Please refer to the **DLT Data Management System Training Guide** for instructions on how to enroll participants in training using the online self-enrollment system.
- Partnerships will need to provide participants with an activity code to access the online enrollment form and enroll in an activity. For instructions on how to access the activity code, refer to the DLT Data Management System Training Guide.
- All participants will need access to a computer or mobile device with internet (laptop, desktop, tablet, smartphone).

YOUTH ENROLLMENT

- For activities exclusively targeted to Youth, participants typically do not need to enroll directly, whether by paper or online.
 - Partnerships should consult their Grant Advisor if they are unsure whether an activity meets this criterion.
- Partnerships will fill out the applicable sections of the **Youth Activities Program Report** template (Career Exploration or Work-Based Learning) and email the information to their Grant Advisor using a secure transfer link.
 - Career Exploration activity data is reported on an aggregate basis, and Work-Based Learning activity data on an individual basis.

Individual enrollment is **not** required for events or programs that are not designed to benefit any one particular participant such as a ‘career awareness’ event or an ‘industry open house.’ Any reporting requirements for these types of activities will be outlined in the Addendum. Please consult your Grant Advisor if you have any questions.

2.2 PARTICIPANT STATUS UPDATES AND OUTCOME REPORTING

As noted in Section 2.1, the DLT/GWB is transitioning to a web-based participant enrollment and management system through which Partnerships can assist participants in filling out online enrollment forms and update participant status and outcomes. Partnerships will be provided resources and guides to assist in this new process. The outcome reporting interface is currently under development and is scheduled for release in August 2019. Until such time, Partnerships are expected to report specific participant outcomes, dates, and statuses to their Grant Advisor in a manner consistent with each Addendum. For Youth Activities, Partnerships will provide participant status updates and outcome reporting through the Youth Activities Program Report template. Accurate and timely reporting on outcomes is required of all Partnerships.

2.3 PARTICIPANT JOB ENTRY

Partnerships are required to submit employment information for each participant who enters employment through or as a result of the Partnership’s programming. Partnerships must provide the participant’s date of hire, employer information, job title, and wage information. The form must be submitted electronically. Partnerships will not receive credit for placement of a participant unless this requirement is met.

No participant shall be used to provide services normally provided by temporary, part-time or seasonal workers or through contracting such services out or to fill full-time vacancies.

2.4 INFORMATION SECURITY

It is the policy of the State of Rhode Island and DLT/GWB to safeguard the security, confidentiality, and integrity of personal information and personal data of the public. This includes information and data that is handled, collected, used, stored, processed, disposed, or disseminated by a Partnership.

Partnerships may need to collect personal information from individuals enrolled in training as well as other potentially confidential or proprietary information from employer partners. It is expected that Partnerships will regard electronic data and other manually maintained records on individual persons, employers, and others as confidential in nature, to be held in trust, and will protect and cause to be protected such data against unauthorized disclosure and/or use. These data may include, but are not limited to: name, address, social security number, telephone number, age, sex, ethnic background, wage, employment, tax information, user name, logon identification numbers, passwords, or any other information gathered either from individuals or from other partners that is personal or confidential in nature.

Partnerships are expected to ensure that they will:

- Collect only personal information and data reasonably needed to accomplish legitimate purposes;
- Securely store and protect personal information and data against unauthorized access, destruction, use, modification, disclosure and loss;
- Share personal information and data only on a need to know basis;
- Protect the security of social security numbers and dispose of any documents containing them in an appropriate and secure manner;
- Destroy personal information and data as soon as it is no longer needed or required to be maintained under state or federal law or the terms of your Award Agreement, Addendum, these Guidelines or otherwise indicated by DLT/GWB; and
- Address administrative, technical, and physical safeguards.

If you become aware of any event that involves unauthorized use, disclosure, or destruction of personal or confidential information, you are required to notify the DLT/GWB immediately and impose additional measures to avoid an additional breach of security.

2.5 YOUTH ACTIVITIES

For all activities involving youth, the following additional assurances are required.

- Activities conducted under this agreement will be for the primary benefit and learning of the participant and will contribute to the positive development of participant's career readiness skills.
- All work-based learning activities will be conducted in a safe manner with proper supervision.
- All staff working directly with youth in programs funded under this grant will obtain a state background check from the Bureau of Criminal Identification (BCI) of the Rhode Island Attorney General and Partnership will review and maintain copies of the report of all such checks.

Additionally, Partnerships engaging in youth work-based learning activities must maintain the following enrollment and reporting procedures:

- A process for enrollment of youth, including obtaining participant consent to the use and disclosure of personal data and information in furtherance of the objectives and goals of the REAL programs.
- A process for termination and replacement (if appropriate) of youth.
- Process and documentation for dealing with worksite incidents, as applicable.

Finally, Partnerships agree to have the following documents on file for all participants engaged in work-based learning:

- Copy of a signed attestation and acknowledgment indicating that the enrollee understands and agrees that their personal information collected, as well as participation and performance data and any other relevant information provided by the enrollee to the Partnership, shall be collected and stored and may be transmitted to GWB or another agency for use in tracking program outcomes. This attestation and acknowledgement must be signed by the enrollee, or where under the age of eighteen (18), the enrollee's parent or guardian with the following language: *"I agree that the information on this form, as well as information collected during my participation in the program, may be transmitted to the DLT/GWB or other agencies to track short- and long-term outcomes as determined by DLT/GWB or affiliates."*
- Timesheet/attendance record to keep track of participant hours and tasks, whether at worksite or in classroom.
- Payroll registers and/or signed stipend receipts, and employment eligibility and verification, as applicable.
- Photo/media release with parent/guardian signature if under eighteen (18), including permission for state agencies to use and share photos and other media.
- For internships with outside employers, signed worksite agreement between Partnership, participants, parent/guardian if under eighteen (18), and employers outlining the expectations of the participant's workplan and supervisory schedule, and

evaluations as required by the Lead Applicant or other program partner. In the signed agreement, employers must also agree to:

- Maintain records and prepare reports on the participant as prescribed by the Partnership;
- Observe and comply with applicable safety and health standards, and Workers Compensation and the Child Labor Laws of Rhode Island and the Federal Government;
- Maintain sufficient general liability insurance for tort claims protection;
- Ensure that the experiences shall not reduce current employees' work hours, displace current employees or create a lay-off of current employees, replace the work of employees who have experienced layoffs, impair existing contract or collective bargaining agreements, and/or infringe upon the promotional opportunities of current employees;
- Ensure that the experiences are intended to increase work readiness skills of participants and not impact the profit margin of a for-profit company; and
- Allow the Partnership and/or duly authorized representatives to visit the premises to observe work place conditions, observe work place activities, and follow up with the participant.

The Fiscal Agent entity can expect to receive payment within approximately three (3) weeks of each Invoice/Expenditure Report submittal. After each payment is issued, the Fiscal Agent will receive an accounting of the remaining balance by line item for the related project. If any costs incurred cannot be reimbursed due to an issue of allowability, or insufficient supporting documentation, the Fiscal Agent will be notified in writing.

3.2 SUPPORTING DOCUMENTS

As indicated in the section above, supporting documents must be attached to each Invoice/Expenditure Report submitted. The following chart has examples of supporting documents and is not exhaustive.

EXPENSE TYPE	SUPPORTING DOCUMENTS
Consulting/Contracted Personnel	Copy of itemized receipt or invoice
Curriculum Development	Copy of itemized receipt or invoice; personnel activity tracking sheet may also be allowed
Equipment Purchase/Rental (when allowed)	Copy of itemized receipt, invoice, or lease
Marketing & Advertising Costs	
Office Supplies & Materials	
Postage & Mailings	
Publication/Print/Copying	
Space/Facility Rental	
Telephone & Communications	
Tuition Payments	
Training Materials	
Participant Stipends or Cash Assistance	
Participant Transportation Assistance	Copy of itemized receipt or invoice and signed documentation receipt by the participant
Personnel Compensation (Salary and Fringe)	1) REAL program personnel activity tracking sheet; OR 2) Timesheets or general ledger payroll records that provide reasonable assurance that the time being charged to the grant is accurate, allowable, and properly allocated
Travel	Itineraries and proof of travel and related expenditures
Wages Paid to Participants	Timesheets or general ledger payroll records

Partnerships may use the **Statement of Personnel & Internal Staff Services** as documentation of personnel salary and fringe costs. Partnerships may utilize their own internal records as backup if the records:

- Are supported by a system of internal controls that provide reasonable assurance that the time being charged to the grant is accurate, allowable, and properly allocated.
- Are incorporated into the official records (payroll records or journals) of the entity.
- Are reasonably reflective of the total activity for which the employee is compensated.
- Encompass both grant-funded activities and all other activities compensated on an integrated basis.
- Support the distribution of the employee's salary or wages among specific activities if the employee works on grant-related and non-grant related activities.
- Comply with already-established accounting policies and practices of the organization.

3.3 ALLOWABLE COSTS

The following is a list of *generally* allowable and unallowable costs. The REAL programs are flexible and aim to provide Partnerships and the sectors they represent with the resources they need to grow and thrive. For that reason, we encourage Partnerships to be innovative. Partnerships should check with their Grant Advisor regarding any questionable costs before a purchase is made. This list is general guidance; it is not exhaustive.

- **Advertising and public relations** – Allowable *if related to the award* (contact Grant Advisor).
- **Advisory Boards/Councils** – Unallowable as a direct cost; allowable as an indirect cost.
- **Alcoholic beverages** – Unallowable.
- **Audit services** – Allowable as an indirect cost.
- **Bad debts** – Unallowable.
- **Bonding costs** – Allowable.
- **Compensation (personnel services)** – Allowable.
- **Compensation (fringe benefits)** – Allowable.
- **Conferences** – Allowable *if related to the award* (contact Grant Advisor).
- **Contingency provisions** – Allowable.
- **Contributions and donations** – Unallowable.
- **Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements** – Unallowable.
- **Depreciation** – Allowable as an indirect cost.
- **Employee health and welfare costs** – Allowable.
- **Entertainment costs** – Unallowable.
- **Equipment and other capital expenditures** – Allowable as an indirect cost.

- **Fines, penalties, damages and other settlements** – Unallowable.
- **Fundraising and investment management costs** – Fundraising costs are unallowable; investment management costs associated with pensions, self-insurance etc. are allowable as an indirect cost.
- **Gains and losses on disposition of depreciable assets** – Unallowable except for those assets originally purchased with grant funds.
- **Goods or services for personal use** – Unallowable.
- **Idle facilities and idle capacity** – Unallowable.
- **Insurance and indemnification** – Allowable.
- **Intellectual property** – Contact Grant Advisor.
- **Interest** – Contact Grant Advisor.
- **Lobbying** – Unallowable.
- **Losses on other awards or contracts** – Unallowable.
- **Maintenance and repair costs** – Contact Grant Advisor.
- **Materials and supplies costs, including costs of computing devices** – Allowable.
- **Meals and food** – Allowable if *related to the successful performance of the grant*. Partnerships should minimize meal costs and low-cost options should always be considered.
- **Memberships, subscriptions, and professional activity costs** – Allowable if *related to the successful performance of the grant* (contact Grant Advisor).
- **Organization costs (i.e., Incorporation costs, associated legal fees)** – Unallowable.
- **Participant support costs** – Allowable with prior approval (contact Grant Advisor).
- **Plant and security costs** – Allowable.
- **Professional service costs** – Allowable.
- **Proposal costs** – Allowable as an indirect cost.
- **Rearrangement and reconversion costs** – Allowable as an indirect cost.
- **Recruiting costs** – Allowable.
- **Specialized service facilities** – Allowable as an indirect cost.
- **Taxes** – Allowable (however, back taxes and associated fines/penalties are unallowable).
- **Termination costs** – Contact Grant Advisor.
- **Training and education costs** – Allowable.
- **Transportation costs** – Allowable (mileage reimbursement will be set at the state rate).
- **Travel costs** – Allowable if *related to the successful performance of the grant*. Partnerships should minimize travel costs and lower-cost options must always be the first option.

SECTION 4 –MONITORING

4.1 OVERVIEW

DLT/GWB requires that organizations receiving Grant funds:

- Have the fiscal and programmatic systems needed to meet all relevant grant requirements;
- Meet the terms outlined in the Award Agreement/Addendum;
- Provide quality services to program participants;
- Expend Grant funds only for allowable purposes;
- Have all required approvals, licenses, and/or certifications;
- Comply and are in good standing with all legal and regulatory requirements; and
- Meet fiscal and programmatic requirements as required by specific state and federal programs.

The DLT/GWB will oversee and support Partnerships in complying with these requirements in several ways, including, but not limited to:

- Reviews of program-related documents and reports;
- Site visits to meet with program staff, partners and participants; and
- Fiscal, system and program monitoring.

4.2 PROJECT RECORD REVIEW

Grant Advisors will review each Partnership's project records to determine whether:

- Partnership is on track with respect to the program timelines, outcomes, and other deliverables outlined in the Grant Agreement;
- Data entry is up to date and free of errors; and
- Partners, particularly employers, are engaged in the manner to which they have committed.

4.3 PROGRAM SITE VISITS

At different points throughout the project, your Grant Advisor may request an opportunity to meet with your staff, partners, or participants. The purpose of these visits is to help the Grant Advisor gain a better understanding of the project and address any concerns or questions that may have arisen. Timely and effective cooperation with the Grant Advisor is required for continued participation in the REAL programs, as it will allow the Grant Advisor and DLT/GWB

the opportunity to best understand your project and activities and identify and assist in addressing any challenges that may present.

4.4 EXPENDITURE DOCUMENTATION REVIEW

Partnerships must submit documentation of expenditures for review by program staff and Department fiscal specialists. Failure to maintain and provide the required documentation as required will result in the following progressive corrective action:

1. No reimbursement of undocumented expenses.
2. Full audit of Partnership's REAL program.
3. Suspension of Partnership's participation in the relevant REAL program and all future disbursements for a period of time determined by DLT/GWB.
4. Termination of the Award Agreement and mandatory return of disbursed funds.

4.5 COMPREHENSIVE MONITORING AND REVIEW

Beyond the support and general oversight provided by Grant Advisors, the DLT/GWB may also conduct an on-site comprehensive monitoring of Partnerships' fiscal and operational systems, as well as an in-depth review of program delivery, including case management, instruction, support services, and job placement.

The DLT/GWB will notify Partnerships if their Grant is identified for a monitoring review and will work with the Partnership to schedule a date(s) for this review. Monitoring will be performed by appropriate DLT staff, including fiscal, program, and legal specialists. Grant Advisors will not be part of the monitoring team. Reviews will include several components, all of which need not be completed on the same day:

FISCAL

- The monitoring team will review all documents and records related to a sample of invoices and sub-grants.
- If an independent audit or report from a previous monitoring visit identified any material findings, the monitoring team will review relevant documents and records and interview staff to determine whether your organization has addressed the findings satisfactorily.

OPERATIONAL SYSTEMS

- The monitoring team will review the following policies and procedures for compliance with state and federal standards and will interview staff and review a sample of records to assess your organization's compliance with them:
 - Procurement;
 - Audit and audit resolution;
 - Budget controls;
 - Cash management;
 - Cost allocation; and
 - Other internal and fiscal controls.

PROGRAM

- DLT/GWB staff may conduct the following activities:
 - Observing a class or other instructional activities;
 - Interviewing an instructor;
 - Interviewing a case manager, where applicable;
 - Interviewing a participant; and
 - Other programmatic review.
- At the time of the scheduled monitoring visit, the team will review (as applicable):
 - Case files for a sample of participants pulled from the database;
 - OJT agreements;
 - Participant selection policy;
 - Support services policy;
 - Stipend policy (if applicable); and
 - Any other relevant MOU's, policies or agreements.

At the end of this process, a report will be provided to the Partnership on the status of the comprehensive monitoring and review.

4.6 RECORD RETENTION

Unless otherwise required by statute, regulation or policy, Partnerships are required to retain and maintain all records and documents relating to the Grant for a minimum period of four (4) years after payment by the DLT/GWB of the final invoice or provision of a final report, whichever is later, and must make records available for inspection and audit with prior written notification and during regular working hours. If any litigation, claim, audit, or similar review or legal action is started before the expiration of the four-year period, the records must be retained until all litigation, claims, audit findings, etc. involving the records have been resolved and final action has been taken.



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