

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION SCSEP
	CORRESPONDENCE SYMBOL OWI DNPPTA
	DATE March 17, 2023

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 10-22

TO: SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM
GRANTEES

FROM: BRENT PARTON 
Acting Assistant Secretary

SUBJECT: Program Year (PY) 2022 Information Technology (IT) Implementation and Support Funding for Senior Community Service Employment Program (SCSEP) State, Territorial, and National Grantees

- Purpose.** To announce the availability of \$ 9,500,000 to assist SCSEP state, territory, and national grantees with IT implementation and support costs related to the Department of Labor transition and implementation of the new Grantee Performance Management System (GPMS) case management tool. These grants will be funded through SCSEP recaptured funds.
- Action Requested.** To apply for PY 22 IT Implementation and Support Grant funds, SCSEP grantees must follow the instructions in this TEGL and submit all documents to [grants.gov](https://www.dhs.gov/grants.gov) by April XX, 2023.
- Summary and Background.**
 - Summary-** The Employment and Training Administration (ETA) went live with GPMS July 1, 2022, creating a new case management tool to modernize service delivery and data validation for the SCSEP program. ETA anticipates, however, that SCSEP grantees may face additional administrative and program costs to implement this system in its first year. To help grantees cover these implementation and support costs, ETA is making available this one-time funding, authorized under Section 517(c) of the Older Americans Act (OAA) (42 U.S.C. 3056o(c)) and the Further Consolidated Appropriations Act, 2020 (P.L. 116-94). The grant period of performance will be 12 months, with an anticipated start date of June 30, 2023; however, ETA encourages grantees to spend these funds earlier in the period of performance, since such investments may expedite the success of a grantee's transition to GPMS. ETA will award all IT Implementation and Support Grants by June 30, 2023.

RESCISSIONS None	EXPIRATION DATE Continuing
----------------------------	--------------------------------------

b. Background- Section 517(c) of the Older Americans Act (OAA) provides that “...the Secretary [of Labor] may recapture any unexpended funds for the program year, and re-obligate such funds within the 2 succeeding program years for—(1) incentive grants to entities that are State grantees or national grantees under section 502(b); (2) technical assistance; or (3) grants or contracts for any other activity under this title.” Additionally, the Further Consolidated Appropriations Act, 2020 (P.L. 116-94) provides that SCSEP funds appropriated in that year “may be recaptured and re-obligated in accordance with section 517(c) of the OAA.” In accordance with OAA section 517(c)(3), ETA is making a portion of the PY 2020 recaptured funds available for obligation during PY 2022 for grants that will cover the IT-related costs explained in this TEGL.

4. Information Technology Implementation and Support Funding Opportunity.

a. Eligibility- Eligible applicants for this grant opportunity are current PY 22 SCSEP grantees (states, territories, and national grantees) selected as award recipients under FOA-ETA-20-09, *Senior Community Service Employment Program (SCSEP) National Grants for Program Year (PY) 2020*.

b. Grant Activities- SCSEP recipients may use this funding for:

- 1) additional personnel;
- 2) technology-related supplies;
- 3) technology-related equipment;
- 4) contractual costs related to IT and data support; and/or
- 5) other costs (which must be allowable under SCSEP regulations and 2 CFR 200) related to transitioning to and implementing the new GPMS case management system.

c. Availability of Funds and Application Review and Award- The Department expects to have available approximately \$9.5 million of recaptured federal SCSEP funding. The Department intends to re-obligate this funding amongst all 77 existing grantees, pending grantees’ interest and submission of applications meeting the requirements of this TEGL. We encourage all SCSEP grantees to ask for the maximum amount they need to fully implement the model. Applicants must submit a justification for the funding request based upon their need for the funds. However, when determining this need, applicants must consider the size and scope of the previous SCSEP base award. As a baseline point of reference, we consider a request of 1 – 2 percent of the PY22 federal grant award (with proper justification) as likely appropriate for most, if not all, recipients. However, we recognize new systems create certain fixed costs, so for smaller SCSEP awards, we will award no less than \$150,000, regardless of how much the amount exceeds the general target of 1 – 2 percent.

Final award amounts are subject to the availability of funds. If the cumulative funding requested by all applicants exceeds the amount of funds available, all grant awards will be reduced proportionately. Conversely, if the cumulative requests are lower than the

total available amount or if additional funds become available, grant awards may be increased proportionately. If ETA does not receive responsive applications, it may request applicants, whose applications were deemed non-responsive, to resubmit a revised application for reconsideration, depending on the availability of funding. The Department may negotiate funding levels and program elements. Selected awardees will receive special conditions of award requiring the revision of the SF-424 and budget documents should there be discrepancies between funding requests and actual award amounts.

To receive this implementation funding, applicants must meet all requirements described in this TEGL, and submit a responsive application that addresses the grant application components outlined in this document, as well as in Attachments I and II. If an applicant omits any of the documents, or substantially fails to address the requirements of one or more of such documents, ETA will deem their application non-responsive and ineligible for funding consideration. ETA encourages applicants to submit quality final applications before the deadline. If an applicant submits multiple versions of an application, ETA will consider the latest submitted application to be the official submission.

d. Grant Application Requirements- To achieve greater efficiency, and as part of ETA's ongoing effort to streamline the grant award process, grantees must submit the following items through Grants.gov at [grants.gov](https://www.grants.gov):

- 1) An electronically signed copy of an SF-424 - Application for Federal Assistance (OMB Control No. 4040-0004).
- 2) An SF-424A - Budget Information Form – Non-Construction Programs (OMB Control No. 4040-0006).
- 3) A Budget Narrative that fully explains the projected costs reflected in each line item of the SF-424A (see Attachment I for instructions).
- 4) A Project Narrative (see Attachment 2 for instructions).

e. Grants.gov Submission Process- Applicants must submit the application package through [Grants.gov](https://www.grants.gov). Applicants who need to register with Grants.gov may do so at the following hyperlink: [grants applications](https://www.grants.gov/grants-applications). Registration is a one-time process; applicants with a Grants.gov account do not need to register again. To submit the required application package, applicants must:

- 1) Select the *Search Grants* tab on the Grants.gov homepage.
- 2) Under the section, *Basic Search Criteria*, enter the Funding Opportunity Number: ETA-TBD.
- 3) Select the link to the applicable Opportunity Number provided in the search results.
- 4) Select the *Package* tab.
- 5) Under the *Actions* column, select *Apply*.

An electronically submitted SF-424 through Grants.gov constitutes the official signed document and must reflect the total amount requested in item #18, Estimated Funding. Item #11 must include the Catalog of Federal Domestic Assistance Number, 17.235. ETA encourages application submission as soon as possible; however, applications must be received by 11:59 PM EST on April 17, 2023. This submission process may, at times, be complicated and time-consuming. As such, the Department strongly encourages applicants to initiate the process as soon as possible to allow time to resolve unanticipated technical problems.

Applicants must supply a Unique Entity Identifier (UEI) on the SF-424. If your entity is registered with the System for Award Management (SAM) SAM.gov, your UEI has already been assigned and is viewable under your entity record. Organizations not registered with SAM.gov can obtain more information about a UEI at www.sam.gov. Before submitting, applicants must also ensure their registration with SAM.gov. Applicants may find instructions for registering with SAM at <https://www.sam.gov>. An awardee must always maintain an active SAM registration with current information during which it has an active Federal award or an application under consideration. To remain registered in the SAM database after the initial registration, entities must review and update the registration at least every 12 months from the date of initial registration. Failure to register with SAM and maintain an active account will result in Grants.gov rejecting the application submission.

For technical issues encountered during application submission, applicants may call 800-518-4726 or 606-545-5035 to speak to a Customer Support Representative or emailsupport@grants.gov. The Contact Center is open 24 hours a day, seven days a week, but closes on federal holidays.

- f. **Administrative and Program Costs-** Subpart H of the SCSEP regulations define the functions and activities that constitute administrative and program costs at 20 CFR 641.856 and at 20 CFR 641.864, respectively. Administrative costs include both personnel and non-personnel costs and both direct and indirect costs. Also note that section 641.859 provides special rules governing the classification of SCSEP administrative and program costs. Given that this additional funding is separate from the Senior Community Services Employment Program (SCSEP) base funds, proposed expenditures for this grant are *not* required to meet the 13.5 percent administrative cost limits as required by formula provided in Section 506 of the Older Americans Act of 1965 (OAA), as amended, 42 USC §3056d, and operate on a PY basis, from July 1 through the following June 30.
- g. **Other Award Considerations-** At its discretion, ETA intends to fund applicants who adequately demonstrate eligibility and meet the application requirements set out in this TEGL. ETA may elect to award a grant with or without discussions with the applicant. Should a grant be awarded without discussions, the award will be based on the applicant's signature on the SF-424, including an electronic signature, which constitutes a binding offer by the applicant.

NOTE: The Department will determine if the applicant had any restriction on spending for any ETA grant due to adverse monitoring findings within the past three years. Depending on the severity of the findings, the Grant Officer may elect to not provide the applicant a grant award or to impose conditions on the award.

All applications deemed to be complete and responsive by the Grant Officer will go through a risk review process. Before making an award, ETA will review information available through any OMB-designated repository of government-wide eligibility qualification or federal integrity information, such as the Federal Awardee Performance and Integrity Information System (FAPIIS), and “Do Not Pay.” Additionally, ETA will comply with the requirements of 2 CFR Part 180 (Government-wide Debarment and Suspension (Non-Procurement)). This risk evaluation may incorporate results of the evaluation of the applicant’s eligibility (application screening), or the quality of its application (technical review). If ETA determines that an entity is responsible and an award will be made, special conditions that correspond to the degree of risk assessed may be applied to the award. Risk-related criteria evaluated include:

- Financial stability.
- Quality of management systems and ability to meet the management standards prescribed in the Uniform Grant Guidance.
- History of performance. The Applicant’s record in managing awards, cooperative agreements, or procurement awards, if it is a prior recipient of such Federal awards, including timeliness of compliance with applicable reporting requirements, and if available, the extent to which any previously awarded amounts will be expended prior to future awards.
- Reports and findings from audits performed under Sub-part F – Audit Requirements of the Uniform Grant Guidance (2 CFR 200.500 –2 CFR 200.520) or the reports and findings of any other available audits and monitoring reports containing finds, issues of non-compliance, or questioned costs; and
- The applicant’s ability to effectively implement statutory, regulatory, or other requirements imposed on recipients.

The selection of an organization as a recipient does not constitute approval of the grant application as submitted. Before the actual grant is awarded, the Department may negotiate with an applicant regarding such items as program components, staffing and funding levels, and administrative systems in place to support grant implementation. If the negotiations do not result in a mutually acceptable submission, the Grant Officer reserves the right to terminate the negotiations and decline to fund the application. The Department reserves the right to not fund any application related to this TEG.

h. Grantee Performance Reporting Requirements-

- a. **Financial Reports.** All ETA award recipients are required to report financial data on the ETA-9130 Financial Report. ETA-9130 reports are due no later than 45 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 9130 for the last quarter of the period of performance must be submitted no later than 120 calendar days after the quarter ends. See 2 CFR 200.344.

Note: **On April 3, 2023**, ETA is replacing its legacy E-Grants Grantee Reporting System (GRS) by transitioning to the Payment Management System (PMS) for grant recipient submission of the quarterly ETA-9130 financial reports. PMS is operated by the U.S. Department of Health and Human Services (HHS). Please see Training and Employment Notice No. 16-22 for additional information.

- b. **Performance Reports.** Since these funds are specifically for IT implementation and support, ETA is not asking for separate additional performance reports on employment outcomes of participants. However, grantees that receive these funds should provide status updates on activities that the funds support in their quarterly narrative reports, both how these funds are used and the status of any larger activity to which the funds are contributing. Grantees should continue to submit program performance reports for their base grants.
- i. **Paperwork Reduction Act (PRA) Statement-** The Department notes that a federal agency may not conduct or sponsor a collection of information, nor is the public required to respond to a collection of information, unless the Office of Management and Budget (OMB), under the PRA, approves it, and it displays a currently valid OMB Control Number (44 U.S.C. 3507). SCSEP Performance Data Collection Approval (Office of Management and Budget No. 1205-0040) (expiration date November 30, 2024).

Also, notwithstanding any other provision of law, no person shall be subject to penalty for failing to comply with a collection of information if the collection of information does not display a currently valid OMB Control Number (44 U.S.C. 3512). 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. Public reporting burden for this collection of information is estimated to average 20 hours per response, including time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information.

Send comments about the burden estimated or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, to the attention of the Departmental Clearance Officer, 200 Constitution Avenue, NW, Room N-1301, Washington, D.C. 20210. Comments may also be emailed to: DOL_PRA_PUBLIC@dol.gov.

Please do not return your grant application to this address. Send only comments about the burden caused by the collection of information to this address. Send your grant application to the sponsoring agency as specified earlier in this announcement. The information being collected through this Training and Employment Guidance Letter is

for the purpose of awarding a grant. This information is required to be considered for this grant.

- j. **Notice of Grant Award**- ETA will issue a notice of grant award with new grant numbers and obligation amounts.

5. **Inquiries**. Questions regarding this guidance should be directed to Grant Specialist Flowers.Jeannette@dol.gov.

6. **References**.

- Older Americans Act (42 USC 3056, et seq.), as amended through Public Law 116-131 (March 25, 2020);
- Further Consolidated Appropriations Act, 2020 (P.L. 116-94) (September 30, 2020);
- TEGL 17-20, Senior Community Services Employment Program -*Updated Guidance on Priority of Service, Durational Limits, and State Plan Submissions* (April 15, 2021);
- Coronavirus Aid, Relief, and Economic Security Act of 2020 (CARES Act), Pub. L. 116-136 (March 27, 2020);
- TEGL 17-16, Infrastructure Funding of the One-Stop Delivery System (January 18, 2017);
- Workforce Innovation and Opportunity Act (WIOA), Pub. L. 113-128, Sec. 121, Funding of One-Stop Infrastructure;
- Paperwork Reduction Act of 1995, Pub. L. 104-13 (May 22, 1995);
- SCSEP Performance Data Collection Approval (Office of Management and Budget No. 1205-0040) (expiration date November 30, 2024);
- OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule, 78 FR 78589 (December 26, 2013), published at 2 CFR Part 200;
- TEGL 12-06, Revised Income Inclusions and Exclusions and Procedures for Determining Senior Community Service Employment Program (SCSEP) Eligibility (December 28, 2006);
- VOW (Veterans Opportunity to Work) to Hire Heroes Act of 2011, Pub. L. 112-56 (November 21, 2011);
- Federal Poverty Guidelines, Federal Register 87 FR 3315 (January 21, 2022); or HHS website at <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>.

7. **Attachments**.

- Attachment I: Budget Narrative Instructions
- Attachment II: Program Narrative Instructions

**Program Year (PY) 2022 Information Technology (IT) Implementation and
Support Funding for Senior Community Service Employment Program
(SCSEP)**

Budget Narrative Instructions

Applicants must provide a detailed Budget Narrative that fully explains the costs identified on each line item of the SF-424A Budget Information Form. See the required information and related guidance below.

- a. Personnel:** List all staff positions working on the proposed grant project by title (both current and proposed), including the roles and responsibilities. For each position give the annual salary, the percentage of time devoted to the project, and the amount of each position's salary funded by the grant. This line item does include personnel hired by the sub-grantee to provide data entry, migration, and management of the case management tool.
- b. Fringe Benefits:** Provide a breakdown of the amounts and percentages that comprise fringe benefit costs such as health insurance, FICA, retirement, etc.
- c. Travel:** For grant staff only, specify the purpose, number of staff traveling, mileage, per diem, estimated number of in-state and out-of-state trips, and other costs for each type of travel.
- d. Equipment:** Identify each item of equipment you expect to purchase that has an estimated acquisition cost of \$5,000 or more per unit (or if your capitalization level is less than \$5,000, use your capitalization level) and a useful lifetime of more than one year (see 2 CFR 200.1 for the definition of Equipment). List the item, quantity, and the unit cost per item. Items with a unit cost of less than \$5,000 are supplies, not "equipment." Additionally, please note the following:
 - a. Information technology systems are defined as computing devices, ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources. [2 CFR 200.1]
 - b. Computing devices are defined as machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or 'peripherals') for printing, transmitting, and receiving, or storing electronic information. [2 CFR 200.1]
 - c. While the definition of information technology systems includes computing devices, such devices with a per-unit acquisition cost of less than the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000 are classified as supplies, not equipment.
 - d. Procurement requirements for grant recipients are contained in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal

Awards (Uniform Guidance) at 2 CFR 200.317 - .326. ETA does not approve or disapprove the procurement method used by the recipient, provided it is consistent with the requirements in the Uniform Guidance (2 CFR 200.317-.326). By their signature on the Grant Agreement, the recipient has accepted these conditions and assured their compliance with appropriate procurement requirements.

- e. All equipment purchases require prior approval by a Grant Officer. Applicants should provide accurate estimates for proposed equipment expenditures in the application for this grant; however, the initial award of the IT Implementation and Support Grants does not constitute prior approval of the identified equipment costs. Selected awardees for these grants must submit a subsequent modification seeking prior approval, which must include additional documentation for the Grant Officer to determine allowability of the proposed costs. 2 CFR 2900.16 requires this request to “be submitted not less than 30 days before the requested action is to occur.” Selected awardees must consult their Federal Project Officer regarding the information required for the equipment modification request.
- e. **Supplies:** Identify in the detailed budget the projected cost of supplies, per category (e.g., general office supplies, desks/chairs, laptops/printers, other specialty items). Except for general office supplies, list the item, quantity, and the unit cost per item. Supplies include all tangible personal property other than “equipment.” (See 2 CFR 200.1 for the definition of Supplies.)
- f. **Contractual:** Under the Contractual line item, delineate contracts and subawards separately. Contracts are defined according to 2 CFR 200.1 as a legal instrument by which a non-federal entity purchases property or services needed to carry out the project or program under a federal award. A subaward, also defined under 2 CFR 200.1, means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. For each proposed contract and subaward, specify the purpose and activities to be provided, and the estimated cost.
- g. **Construction:** Construction costs are not allowed, and this line must be left as zero. Minor alterations to adjust an existing space for grant activities (such as altering a space to accommodate IT equipment) may be allowable. We do not consider this as construction, and you must show the costs on other appropriate lines such as Contractual.
- h. **Other:** Provide clear and specific detail, including costs, for each item so that the Grant Officer may determine whether the costs are necessary, reasonable, and allocable. List items, such as stipends or incentives, not covered elsewhere.
- i. **Indirect Costs:** If you include an amount for indirect costs (through a Negotiated Indirect Cost Rate Agreement or De Minimis) on the SF-424A budget form, then include one of the following:

- a. If you have a Negotiated Indirect Cost Rate Agreement (NICRA), provide an explanation of how the indirect costs are calculated. This explanation should include which portion of each line item, along with the associated costs, are included in your cost allocation base. Also, provide a current version of the NICRA.

or

- b. b) If you intend to claim indirect costs using the 10 percent de minimis rate, please confirm that your organization meets the requirements as described in 2 CFR 200.414(f). Clearly state that your organization does not have a current negotiated (including provisional) rate, and is not one described in 2 CFR 200, Appendix VII(D)(1)(b).

Applicants choosing to claim indirect costs using the de minimis rate must use Modified Total Direct Costs (see 2 CFR 200.1 below for definition) as their cost allocation base. Provide an explanation of which portion of each line item, along with the associated costs, are included in your cost allocation base. Note that there are various items not included in the calculation of Modified Total Direct Costs. See the definitions below to assist you in your calculation.

Modified Total Direct Cost (MTDC) [2 CFR 200.1] means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and subawards and subcontracts up to the first \$25,000 of each subaward or subcontract (regardless of the period of performance of the subawards and subcontracts under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward and subcontract more than \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs. Participant support costs are defined below.

Participant Support Costs [2CFR 200.1] mean direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects.

The following link contains information regarding the negotiation of Indirect Cost Rates at DOL: [indirect cost rates](#).

Note that the SF-424, SF-424A, and Budget Narrative must include the entire federal grant amount requested. Do not show leveraged resources on the SF-424 and SF-424A. You should describe leveraged resources in the Budget Narrative. Applicants should list the same requested federal grant amount on the SF-424, SF-424A, and Budget Narrative. If minor inconsistencies are found between the budget amounts specified on the SF-424, SF-424A, and the Budget Narrative, DOL will consider the SF-424 the official funding amount requested.

Attachment II

Program Year (PY) 2022 Information Technology (IT) Implementation and Support Funding for Senior Community Service Employment Program (SCSEP)

Program Narrative Instructions

All grantees must provide a program narrative that concisely covers the areas below. Justify the request for IT implementation and support funds by providing evidence of the following. Ensure that these descriptions are consistent with the information in your Budget Narrative. Include:

- a. A detailed description of the activities planned on how the funds will be spent directly on GPMS transition functions.
- b. A description of how the funds will improve the effectiveness of the transition to GPMS related to hiring, training, data migration, data validation, hardware or software technologies and equipment to implement the new system most effectively.
- c. Information related to the temporary hiring or contracting of personnel needed to facilitate the data migration, data connectivity, and/or other tasks related to GPMS implementation.
- d. Justification for the purchase of supplies such as computers or other hardware to upgrade outdated equipment incompatible with the new case management tool and proportionate to the size of the grantee program.
- e. Justification for the purchase of any equipment or ancillary supplies needed by the grantee to fully implement the GPMS case management tool, and in accordance with the statutes and laws governing SCSEP grants.
- f. A schedule to monitor and audit grant funds along with assurances funding will be spent only on administrative and program costs related to GPMS transition and implementation.
- g. A financial status report is required at the time all funds have been expended or the grant period has expired. On the financial status report grantees must include any qualitative outcomes not directly supported by final expenditures.