

Dislocated Worker Training (DWT) National Emergency Grant (NEG) Frequently Asked Questions

Eligible Participants

Question 1: Priority must be given to those who are defined as long-term unemployed. Does this mean that everyone served must meet this definition?

Answer: No. **Priority must be given to the long-term unemployed and to those who have been profiled as likely to exhaust Unemployment Insurance (UI) benefits.** While this is not an absolute eligibility criterion, the Employment and Training Administration (ETA) will be ensuring that this priority is being adhered to through monitoring of the Workforce Investment Act Standardized Record Data (WIASRD), per Section 6 of Training and Employment Notice (TEN) 38-12. It should also be noted that page 3 of the TEN indicates, "...applications should describe the outreach, systems, processes and partners that will be used to identify eligible dislocated workers, especially those who are long-term unemployed," so this will be a factor considered in evaluating applications/determining DWT NEG awards.

Question 2: Incumbent workers are not eligible, but what about those who are under employed or working part-time for the purpose of income maintenance? Would the State's definition of a dislocated worker apply here?

Answer: Yes, the state's definition of a dislocated worker would apply, as long as it is consistent with the "dislocated worker" definition in the Workforce Investment Act (WIA) and the definition used for determining eligibility of individuals under the state's Dislocated Worker (DW) formula program; however, it should be noted that these dislocated workers are not likely to fit into the priority population. **Priority must be given to long-term unemployed dislocated workers and to those who have been profiled as likely to exhaust Unemployment Insurance (UI) benefits.**

Question 3: What is the definition of "long-term unemployed?"

Answer: Per page 3 of TEN 38-12, the state must provide a long-term unemployed definition in its application. At a minimum, the state's long-term unemployed definition must be based on individuals having been unemployed for a minimum of 27 weeks; however, the state may further define the population it intends to serve within the subset of the long-term unemployed (i.e., the state plans on serving those that have been unemployed for 36 weeks or longer, etc.)

Question 4: The TEN establishes 27 weeks as the minimum for meeting the "long-term unemployed" criteria, but allows states to self-define a subset of that population. Does that mean only 27 or more weeks, or can the state define a subset to be less than 27 weeks?

Answer: 27 weeks is the minimum for the state's long-term unemployed definition for this project; individuals must have been unemployed for a minimum of 27 weeks. The definition cannot include workers who have been unemployed **for less than 27 weeks**, but the state may choose to target individuals who have been unemployed longer than 27 weeks.

Question 5: From what point is long-term unemployed determined?

Answer: The individual's date of separation should be used to determine the length of time an individual has been unemployed.

Allowable Costs

Question 1: Since there can be no expenditures on the Core and Intensive Services line of the Project Operator portion of the Planning Form, is the expectation that all local staff (case management) costs must be covered from formula Dislocated Worker (DW) funds?

Answer: Yes, see pages 4 and 5 of TEN 38-12.

Question 2: Will supportive services and needs-related payments (NRPs) be allowable?

Answer: No, per page 4 of TEN 38-12, these services should be provided to DWT NEG participants through co-enrollment in the DW formula program.

Question 3: Are costs such as tools, equipment, books, supplies, testing and license fees, mileage, lodging and per diem costs required to attend and complete training and obtain certification allowable expenditures on the Training line of the Planning Form?

Answer: Tools, equipment, books, supplies, and testing and license fees are allowable uses of DWT NEG funds. Any supportive services, including, but not limited to, mileage, lodging, and per diem costs are not allowable uses of DWT NEG funds. These should be covered by DW formula funds or other leveraged resources within the parameters set for those funds (see pages 4 and 5 of TEN 38-12.)

Question 4: Can grant funds be used for paid work experience and internships when combined with occupational training?

Answer: Yes, while work experience and internships are normally considered intensive services, grant funds can be used for paid work experience and internships **only when combined with occupational training**.

Question 5: Combined state and local administrative costs are capped at 10 percent, but the TEN does not specifically limit the state's share at 1.5 percent. Does this mean the state administrative cap normally applied to NEGs (1.5 percent) does not apply to DWT NEGs?

Answer: Correct, the normal NEG administrative cap of 1.5 percent at the grantee level does not apply to these awards. However, states must describe how the available funding for both administrative and program activities will be distributed/split between the state and local project operators, per page 4 of TEN 38-12.

Question 6: Is it expected that a portion of the 10 percent administrative costs are also intended to support staffing necessary to establish work-based learning, OJT and apprenticeship opportunities for participants?

Answer: No, administrative costs should not be used to pay for program costs, only administrative activities should be charged to the up to 10 percent available for administrative costs.

Question 7: Do DWT NEGs allow access to funds at the local level for staff costs associated with training activities?

Answer: The intent of DWT NEGs is to provide critical training services that lead to employment, which is the reason the full range of WIA services are not permitted under the DWT NEGs (core, intensive and supportive services, including NRPs, are to be paid by DW formula funds/co-enrollment in other programs).

Thus, other fund sources should pay for staff time for participant assessments, eligibility determinations, referrals to training, and placement/job referral activities after training.

However, it is recognized that there are also program costs that are directly related to the provision of training, such as:

- Outreach to employers specifically to promote an On-the-Job Training (OJT) for a specific participant
- Negotiating terms of a specific OJT with an employer including the training plan, hours of training, starting wage, and reimbursement
- Monitoring the progress of the participant while in the OJT
- Assisting participants with the enrollment process for class size or Individual Training Account (ITA) training
- Monitoring the progress of the participant while in class size or ITA training

While it would also be desirable for these costs to be paid with DW formula funds to the extent possible, it is understood that this will not always be feasible. Therefore, funds may be included in “Other” for this purpose, as described on page 26 of the DWT NEG electronic application system (eSystem) User Guide:

http://www.doleta.gov/layoff/DWT_User_Guide/DWT_User_Guide.pdf. However, these costs should be kept to a minimum to enable the vast majority of the funds to be spent on training services.

On-the-Job Training (OJT)

Question 1: OJT NEG contracts could only be done where there had been no layoffs in a year. Is this the same for DWT NEGs?

Answer: Yes, with the exception of the definition of prolonged unemployed, the requirements for OJT NEGs apply to OJT under DWT NEGs, as discussed on page 5 of TEN 38-12.

Question 2: For the OJT NEGs we were unable to write contracts with city or county governments. Is this the case for DWT NEGs?

Answer: Yes, page 4 of TEN 38-12 states that employers eligible for OJT reimbursement under DWT NEGs would be limited to private-nonprofit and (other) private sector employers. This does not include public sector entities such as city or county governments.

Question 3: Would apprenticeships be treated (financially) like OJTs with employer reimbursement?

Answer: Yes. Partnership with Registered Apprenticeship (RA) is encouraged and the on-the-job component of RA would be treated like any other OJT under the DWT NEG. **However, states must keep in mind that this does not override the prohibition on the use of DWT NEG funds for incumbent worker training.**

Question 4: Is the reimbursement rate for OJTs 50 percent?

Answer: Not necessarily. If the state has an approved sliding scale waiver under its DW formula program, it may request to apply it to any DWT NEG award the state may receive. Further, per page 5 of TEN 38-12, the parameters associated with OJT NEGs in Training and Employment Guidance Letter (TEGL) 4-10 applies to any OJT opportunities offered under DWT NEGs. TEGL 4-10 also contains language on the sliding scale employer reimbursement. If the state wishes to have sliding scale reimbursement flexibility under its DWT NEG, it should include in the narrative that is submitted with the application that it would like this flexibility, per either the state’s approved waiver, or TEGL 4-10, whichever is the case.

High-Demand Occupations

Question1: Instructions have referenced both high-demand occupations and high-demand industries, is there a distinction between these terms? Should training be specific to an occupation versus an industry?

Answer: In the context of DWT NEGs, there is not really a distinction. The intent is to identify occupations for which there is a demand so the participant can earn an industry-recognized credential upon completion of the training to enable them to enter unsubsidized employment.

Performance

Question 1: For credential attainment—would those need to be obtained by June 2015?

Answer: While it is definitely desirable that the outcomes be attained/achieved within the grant's period of performance, the final participant outcomes for DWT NEGs will not be captured until they complete all WIA services and are reported as exited in the Workforce Investment Act Standardized Record Data (WIASRD) file, as is the case with all NEG participants.

Question 2: If states are to use performance parallel to the DW formula program, will there be any consideration of exemption/flexibility for credential rate given the emphasis on OJT and similar learning/training models?

Answer: Per the "Performance and Fiscal Reporting for DWT NEGs" section of TEN 38-12, individuals in OJT should not be included in the employment and credential attainment measure, nor is credential attainment required to be a part of OJT. See page 7 and page 4, respectively, of TEN 38-12, for more information.

Application Process

Question 1: How long should the narrative be? The TEN just says "brief."

Answer: While there was no minimum or maximum limit to the length of the narrative indicated in the TEN, the narrative should be long enough to sufficiently address the information requested in Section 4 of TEN 38-12, so reviewers have a clear picture of the how the state will implement each of the components requested in the application.

Question 2: Can a state apply for less than \$500,000?

Answer: Yes, a state can apply for less than \$500,000 if it feels it can only effectively administer an amount less than \$500,000 and can clearly demonstrate that a smaller award would still make a substantial impact on the targeted population.

Question 3: Does the applicant have to submit Project Operator Forms for the local areas that will serve as Project Operators?

Answer: No, the application only requires one Project Operator Form to be completed with the State's information. See page 18 of the DWT NEG eSystem User Guide for more information: http://www.doleta.gov/layoff/DWT_User_Guide/DWT_User_Guide.pdf.

Question 4: How soon will the NEG eSystem be available to accept DWT NEG applications?

Answer: The NEG eSystem has been available to accept DWT NEG applications since May 28, 2013, the date of the issuance of TEN 38-12. See the DWT NEG eSystem User Guide for details on how to submit an application that passes the system edit checks: http://www.doleta.gov/layoff/DWT_User_Guide/DWT_User_Guide.pdf.

Question 5: It has been recommended that the narrative not include specific numbers of participants or exact dollar values, but the TEN asks how funding for administrative and program activities will be split/distributed between the states and local operators.

Answer: As it is possible that awards could be made that are smaller than was requested, it is recommended that the project narrative not list specific dollar amounts that would then have to be revised later, but rather describe proportionally how funds will be split. For example, if an applicant requests \$6,000,000 and receives an award of \$3,000,000, references to spending "\$4,000,000 on work-based learning to serve 1,000 participants" would have to be changed in a future modification request, whereas a more general description, such as "approximately 50 percent of the funds will be spend on work-based learning at an average cost of \$4,000 per participant" may not have to be revised later.

Dislocation Event

Question 1: The TEN does not mention a specific dislocation event or a date for the layoffs; what layoff information is needed to justify the need for DWT NEG funding?

Answer: DWT NEG's are intended to address the widespread scope of smaller layoffs across the country, combined with the high numbers of long-term unemployed. The Acting Secretary has recognized the impact of these smaller layoffs across the nation as a significant dislocation event. Thus, the DWT NEG application process does not require states to provide information about a specific dislocation event. See page 16 of the DWT NEG eSystem User Guide for more information on how to address this issue: http://www.doleta.gov/layoff/DWT_User_Guide/DWT_User_Guide.pdf.

Question 2: The TEN references workers from smaller layoffs and recognizes these layoffs as a significant dislocation event. Will workers be required to complete surveys for DWT NEG's?

Specifically, will workers not captured by current statewide Rapid Response activities be required to complete surveys?

Answer: No. Per page 3 of TEN 38-12, the state must describe the outreach, systems, processes, and partners that will be used to identify eligible dislocated workers, especially those who are long-term unemployed, to be enrolled in the proposed DWT NEG. This serves a similar purpose to the provision of Rapid Response and survey information for traditional event-based NEGs. Additionally, since priority must be given to the long-term unemployed and to those who have been profiled as likely to exhaust UI benefits, it is likely that the state has already been in contact with many of the planned participants through their participation in other reemployment activities.

Question 3: Is there an expectation that DWT NEG projects will target smaller layoffs?

Answer: No, individuals who meet the eligibility criteria for this project (dislocated workers, with a priority given to the long-term unemployed and to those who have been profiled as likely to exhaust UI benefits) are eligible to be served regardless of the size of the layoff that made them a dislocated worker.

Eligible Training Providers

Question 1: Individual Training Accounts (ITAs) are not specifically mentioned in the TEN; are ITAs allowable?

Answer: Yes, it is expected that ITAs will be the primary vehicle for non-work-based training. All the parameters normally associated with ITAs, including the training program being on the state's Eligible Training Provider List (ETPL), apply to ITAs offer under DWT NEGs.

Coordination with Complementary Activities

Question 1: The TEN asks applicants to provide information about how the proposed NEG will be coordinated with complementary activities. Does this coordination pertain to the reference on Reemployment Eligibility Assessment (REA)/Reemployment Services (RES) and suggest targeting dislocated workers who have already participated in REA and RES activities?

Answer: Yes, the DWT NEG funds must be coordinated with these and other services relevant for helping the long-term unemployed become job ready and reconnect to the labor market. See page 3 of TEN 38-12 for additional information.

Post Award Requirements

Question 1: What would be the post-award requirements for a DWT NEG? Will a Project Operating Plan (POP) still be required?

Answer: As DWT NEGs are a NEG, a POP will still be required to be sent to the appropriate Regional Office; however, an implementation plan, as was required with the OJT NEGs, will not be required for DWT NEGs.

Question 2: Who can be Project Operators?

Answer: For purposes of the initial application, only the state should be listed as a Project Operator, per Question 3 under the Application Process Q&As above. However, after the award, states may select additional project operators. Traditionally, project operators for NEGs are Local Workforce Investment Boards (LWIBs). Other entities may also be project operators provided that appropriate procurement methods are followed.