

# TRADE ADJUSTMENT ASSISTANCE COMMUNITY COLLEGE AND CAREER TRAINING (TAACCCT) GRANT PROGRAM

## FREQUENTLY ASKED QUESTIONS

Updated June 7, 2013 – Look for **NEW!**

Updated June 20, 2013 – Look for **NEW!**

Updated July 2, 2013 – Look for **NEW!**

### LIST OF QUESTIONS

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**NEW** Q: What if State or Federal laws or regulations change during the course of grant implementation and affect how Employment Results Scorecards can be implemented?

**NEW** Q: Section II.B of the SGA states that the final 12 months of the period of performance is limited to gathering information and data for reporting outcome measures and completing the requirements for the third-party evaluation and that during this period, grantees should not incur costs for any other activities such as program development and instructor salaries. Can Single-State Consortium Applicants also incur costs related to implementing the Employment Results Scorecard in the final 12 months of the grant?

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Q: May an eligible institution apply as the Lead Institution for both a single institution application and a consortium application?

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Q: Are institutions funded under the FY 2012 TAACCCT grants eligible to apply?

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Q: Can our TAACCCT grants be used to pay public workforce system partners for services provided?

#### FUNDING

Q: How long will funded grantees have to implement their projects?

Q: As two kinds of proposals will be funded (individual applications and consortia applications) will these come from two "pots" of funding or will all proposals be funded from the same source based on points alone?

Q: The SGA states that, "The Department intends to fund grants ranging from \$2,372,400 million to \$2,750,000 million for individual applicants and up to \$25 million for consortium applicants." Are the funding figures per year of the project?

Q: Will DOL fund projects that are similar or the same as those funded under the FY 2011 or FY 2012 projects?

#### OTHER

Q: Does every institution that is a part of a consortium application have to provide evidence of partnering with their respective local workforce system partner?

Q: What obligations do grantees have for continuing the TAACCCT-funded program after the grant period has expired?

Q: Even though the SGA states that the technical proposal must be double-spaced, can tables be single spaced?

Q: Do the attachments described in Section IV.B.4 (Attachments to the Technical Proposal) count in the overall page count for the application?

Q: Will ETA review draft grant applications before the deadline?

Q: Will grant applications be reviewed upon receipt?

## FREQUENTLY ASKED QUESTIONS AND ANSWERS

### NEW FEATURES OF THE TAACCCT ROUND 3 COMPETITION

**Q: What are some of the new features of the FY 2013 grant competition?**

A: The Department of Labor (the Department) intends to award grants of \$2,372,500 to \$2,750,000 million each to individual applicants from each State, the District of Columbia, and Puerto Rico (for a total of approximately \$150 million).

In addition, the Department intends to award grants of up to \$25 million to consortium applicants that propose programs that will impact TAA-eligible workers and other adults across a state, region or regions, industry sector or cluster of related industries.

The FY 2013 SGA requires applicants to address six core elements regardless of applicant type or project focus. The core elements are: 1) Evidence-Based Design; 2) Stacked and Latticed Credentials; 3) Transferability and Articulation of Credit; 4) Advanced Online and Technology-Enabled Learning; 5) Strategic Alignment; and 6) Alignment with Previously-Funded TAACCCT Projects.

The FY 2013 SGA introduces certain application “pre-conditions.” In order to be considered for funding, all applicants must provide documentation that demonstrates evidence of the following institutional policy and program components: 1) Employer Engagement; 2) Use of Labor Market Information (LMI); and 3) Third-party evaluation plans. In addition, eligible institutions within a single state, submitting applications as a single-state consortium, must provide a plan for developing an employment results scorecard while those institutions submitting applications as a multi-state consortium must submit a continuous improvement plan for developing such a scorecard. To help ensure applications are complete prior to submission, the FY 2013 SGA includes three different SGA Checklists, which can be found in Appendix K for single institution applicants, Appendix L for multi-state consortium applicants, and Appendix M for single-state consortium applicants.

**Q: Will sequestration impact the TAACCCT Round 3 competition?**

A: As a result of sequestration, the total amount of funding available in the FY 2013 TAACCCT competition has been reduced by 5.1 percent, compared with funding in the FY 2011 and FY 2012 competitions. In FY 2013, a total of \$474.5 million will be available. In order to meet the legislative requirement that all States receive 0.5 percent of the total available funds, each State will receive award(s), either as a single institution or as a member of a consortium, of not less than \$2,372,500 million.

### EMPLOYMENT RESULTS SCORECARD

**NEW Q: Why does the TAACCCT solicitation ask consortia to provide a plan explaining how they will develop an Employment Results Scorecard?**

A: Clear and understandable information about program results is vital to individuals who are deciding among postsecondary programs. The Administration supports a “know-before-you-go” approach to postsecondary education and hopes to build on efforts like the College Scorecard to help students make better decisions about which programs would be the best use of their time and resources. TAACCCT represents a substantial investment in community colleges throughout the country, and the Department is committed to leveraging this investment to advance the goal of helping students better understand the value of training programs.

**NEW Q. What performance information must Single-State Consortium Applicants provide on the Employment Results Scorecard? What flexibility do applicants have in aligning the information on the scorecards with existing measures and reporting requirements?**

A: As described in Section III.D.1.b of the SGA, the scorecard that is developed and implemented by Single-State Consortium Applicants must contain the following five metrics.

1. Annual graduation rate of program completers by program;
2. Employment rate of program completers by program;
3. Employment retention rate of completers, one year following program completion, by program;
4. Average earnings of completers, one to three years following program completion, by program; and
5. Transfer rate for programs that have facilitating transfers as a substantial part of their mission.

In addition, Section VI.C of the SGA includes information about the reporting requirements. Note that reporting information for outcomes and outcome definitions can be found in Appendix F.

While the aforementioned TAACCCT reporting requirements have established standard definitions for a variety of outcome categories, the SGA does not establish standard definitions for the scorecard metrics above. For example, in an effort to streamline burden and to increase relevance of performance information collected by institutions, applicants could align two of the scorecard metrics above – Employment rate of program completers by program and Employment retention rate of completers, one year following program completion, by program – with similar measures in the TAACCCT reporting requirements described in Appendix F.

Similarly, applicants may also align any of the metrics above with other program's measures and/or reporting requirements (such as programs funded by the U.S. Department of Education or others) where the scorecard metrics and other program measures/requirements appear to be measuring the same or a very similar outcome.

Both examples are optional; We encourage applicants to consider an approach that is appropriate and suitable, to the extent the performance information for the scorecard is compatible with how metrics are defined, established and in use by other programs.

**NEW Q: What if State or Federal laws or regulations change during the course of grant implementation and affect how Employment Results Scorecards can be implemented?**

A: Single-State Consortium Applicants are expected to submit an Employment Results Scorecard plan that represents their best attempt to address the pre-condition requirements given their current knowledge of State and Federal laws or other circumstances. The Department recognizes that State laws and regulations differ and may sometimes affect the availability of data in the States in which consortium applicants propose to serve participants. The Department also recognizes that changes in law, regulation, or other factors could require applicants to adjust or modify the specific strategies they plan to take to meet the core scorecard requirements, and anticipates that it would work with grantees to make those adjustments and modifications as appropriate. The Department and its partner, the Department of Education, are committed to helping States and local leaders facilitate the sharing of data across programs and agencies, to the extent legally permitted, and are working to provide additional information and resources that will help TAACCCT consortia grantees, working with their relevant State agencies, to address any challenges to accessing and linking data necessary for scorecard implementation.

**NEW Q: Section II.B of the SGA states that the final 12 months of the period of performance is limited to gathering information and data for reporting outcome measures and completing the requirements for the third-party evaluation and that during this period, grantees should not incur costs for any other activities such as program development and instructor salaries. Can Single-State Consortium Applicants also incur costs related to implementing the Employment Results Scorecard in the final 12 months of the grant?**

A: Single-State Consortium Applicants should plan to produce a scorecard at least one time before the end of the grant period of performance, according to the proposed plan outlined in the response to this precondition. Grantees may engage in Scorecard activities during the 4th year of the grant, if appropriate, based on this proposed plan.

**NEW Q: What external resources are available for consortia applicants for developing Scorecards and Scorecard Workplans?**

A: Consortia applicants may also refer to these publications for additional information on using labor market information and unemployment insurance wage data:

- The Aspen Institute, "A Guide for Using Labor Market Data to Improve Student Success." <http://www.aspeninstitute.org/sites/default/files/content/upload/AspenGuideforUsingLaborMarketData.pdf>
- Achieving the Dream. "Using Unemployment Insurance Wage Data to Improve Program Employment Outcomes: A Technical Assistance Guide for Community and Technical Colleges."

[http://achievingthedream.org/resource/using\\_unemployment\\_insurance\\_wage\\_data\\_to\\_improve\\_program\\_employment\\_outcomes\\_a\\_technical](http://achievingthedream.org/resource/using_unemployment_insurance_wage_data_to_improve_program_employment_outcomes_a_technical)

**NEW Q. What is the Wage Record Interchange System (WRIS) 2?**

A: The Wage Record Interchange System (WRIS) 2 is a voluntary arrangement among states and ETA that has been established to facilitate the preparation of Aggregate Statistical Reports and analysis to satisfy the reporting and performance requirements for certain Federal or state training and education programs and to allow aggregate data for research and evaluation of those programs to be made available through state workforce agencies while maintaining the confidentiality of personally identifiable information.

WRIS 2 extends the WRIS voluntary state data sharing model to required One-Stop career center partner programs not under the jurisdiction of the Department of Labor, as well as programs the Workforce Investment Act of 1998 defines as “additional” partners whose participation in One-Stop delivery system is appropriate but not mandatory.

There are 30 states and one territory currently participating in WRIS 2, including, Arizona, Arkansas, Delaware, Florida, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Jersey, North Carolina, Oklahoma, Oregon, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, and Wyoming.

More information on WRIS2 can be found at: [http://www.doleta.gov/performance/wris\\_2.cfm](http://www.doleta.gov/performance/wris_2.cfm)

**NEW Q. How can I find out more information about the Statewide Longitudinal Data System (SLDS) or Workforce Data Quality Initiative (WDQI) Grant, including whether my State was awarded a grant?**

A: More information about the Statewide Longitudinal Data Systems (SLDS) Grant Program can be found at: [http://nces.ed.gov/programs/slds/about\\_SLDS.asp](http://nces.ed.gov/programs/slds/about_SLDS.asp)

Workforce Data Quality Initiative (WDQI) Grant Recipients can be found at:  
<http://www.doleta.gov/performance/workforcedatagrants09.cfm>

## NEW STUDENT CONSENT PROTOCOL

### **NEW Q: What is does the SGA say about the student consent protocol?**

A: Section III.D.1.b and Section III.D.1.c (pages 28 and 29) of the SGA indicate that the “student consent protocol” is a possible means of obtaining student data to address the requirements of the precondition for single-state consortium applicants and for multi-state consortium applicants.

Specifically, the precondition states that:

- A) Single-state consortium applicants must identify methods for obtaining the data necessary to create an employment results scorecard (Section III.D.1.b). The SGA indicates that in obtaining and sharing personally identifiable information (PII) from student records, developing and implementing a student consent protocol may be one avenue for legally obtaining the necessary data.
- B) Multi-state consortium applicants are required to submit a plan that explains how consortium members will work toward developing an employment results scorecard (Section III.D.1.c). Applicants should discuss options for obtaining data on student outcomes, including a feasibility study for implementing student consent protocols across each consortium institution.

### **NEW Q: What is a student consent protocol?**

A: A student consent protocol is a means of obtaining prior written consent from students before postsecondary institutions disclose personally identifiable information (PII) from students’ education records. According to the Family Educational Rights and Privacy Act (FERPA) regulations in 34 CFR 99.30, students must provide written consent prior to the disclosure of this information, unless an exception to the requirement of consent applies, as described in 34 CFR 99.31.

Under FERPA, the consent must be signed and dated by the student and the consent must:

- A) Specify the records that may be disclosed;
- B) State the purpose of the disclosure; and,
- C) Identify the party or class of parties to whom the disclosure may be made.

Institutions have used consent protocols to obtain student information necessary to calculate institution transfer rates and match wage records to calculate employment, earnings, and retention rates.

### **NEW Q: What is one scenario where a student consent protocol may not be necessary?**

A: Under FERPA, education authorities authorized by State or local law to evaluate their programs (e.g., a state’s Higher Education Governing Board) may disclose PII from students’ education records without consent to another entity (e.g., the state’s Workforce Agency) as their authorized representative for the purpose of auditing or evaluating a Federal or State supported education program (e.g., TAACCCT). The requirements for disclosing PII from education records under this exception are specified and explained in the Department of Education guidance document “Guidance on Reasonable Methods and Written Agreements.”

In turn, the Workforce Agency would link the student information to their earnings data and provide information back to the education authority for use in completing the employment results scorecard for the institution(s). The nature and extent of the information that the Workforce Agency will be able to return back to the education authority will depend on Federal, State, and local laws governing the disclosure of workforce data (i.e., whether the data can be returned as individual-level linked records, or as aggregate results broken down by program/cohort) as well as the entity seeking the match.

### **NEW Q: There are a number of different legal requirements governing sharing of education and workforce data. Where can we find assistance regarding data sharing?**

A: Successfully linking students’ data with workforce data is a process that requires navigating a complex framework of legal requirements and restrictions, including FERPA, Department of Labor regulations, and State and local laws.

The Department of Education has issued a number of guidance documents, FAQs, and other resources to assist the education community in understanding the requirements of FERPA. These resources are available via the Department of Education’s website at: <http://ptac.ed.gov>. The Department of Education’s Privacy Technical Assistance Center offers technical assistance to state education agencies, local education agencies,

and institutions of higher education on issues relating to the privacy, security, and confidentiality of student records. Questions on these topics may be sent to [privacyTA@ED.GOV](mailto:privacyTA@ED.GOV). In addition, the U.S. Departments of Education and Labor expects to release joint guidance this fall that will also help to clarify how education and labor data may be shared and linked in a manner that is compliant with both sets of laws. To be notified when this guidance has been released, please join the PTAC email listserv by sending a blank email to: [subscribe-ptac@lyris.edlistservs.org](mailto:subscribe-ptac@lyris.edlistservs.org). Questions about requirements and restrictions of state or local laws governing the sharing or use of State Unemployment data should be addressed to the agency administering unemployment in your State. To find contact information for those states, please visit: <http://www.servicelocator.org/OWSLinks.asp>.

## ELIGIBILITY

### **Q: Are territories eligible to apply for TAACCCT grants?**

A: Yes. Educational institutions in the U.S. territories are eligible if they offer programs that can be completed in not more than two years and are accredited by an agency or association recognized by the U.S. Department of Education. However, applications from institutions not located in the 50 States, the District of Columbia, and Puerto Rico will not have certified TAA for Workers participants and may not be eligible for the full 10 points in Section V.A.1.i of the SGA.

### **Q: Are community college districts or system offices eligible institutions? Can they be the Lead Institution?**

A: No. Community college districts or systems are not eligible applicants and cannot be the Lead Institution for a consortium application. Eligible applicants are institutions of higher education that offer programs that can be completed in not more than two years and are accredited by an agency or association recognized by the U.S. Department of Education. A database of institutions that are accredited by bodies recognized by the U.S. Department of Education can be found at <http://ope.ed.gov/accreditation/>. Applicants are strongly encouraged to check this Web site, as the Department will reference this database in determining an applicant's accreditation to ensure its eligibility.

### **Q: May an eligible institution be a Lead Institution of one consortium application and also be a Member Institution (non-Lead Institution) of another consortium application?**

A: Yes. As stated in Section III.D of the SGA, "Eligible institutions may submit one application to serve as a Grantee Institution in response to this SGA, either as a single eligible applicant or as the Lead Institution in a consortium application. However, eligible institutions may submit an application as a single eligible institution, and also serve as a member of a consortium in one or more consortium applications in which they do not serve as the Lead Institution."

### **Q: May an eligible institution apply as the Lead Institution for both a single institution application and a consortium application?**

A: No. An eligible institution cannot submit more than one application to be a Lead Institution for a TAACCCT Round 3 grant. As stated in Section III.D.2 of the SGA, "Eligible institutions may submit one application to serve as a Grantee Institution in response to this SGA, either as a single eligible applicant or as the Lead Institution in a consortium application."

### **Q: Are institutions funded under a TAACCCT Round 1 grant eligible to apply?**

A: Yes. As stated in Section III. A of the SGA, "Eligible institutions previously funded under TAACCCT SGA/DFY PY 10-03 (Round 1) either as a single institution or through a consortium application may apply as a single institution or as a Lead or Member Institution in a consortium application under this SGA." Applicants should note that the Department does not intend to fund the continuation of existing TAACCCT projects. However, both TAACCCT Round 1 Grantee Institutions and other eligible applicants can propose projects that expand or enhance previously-funded TAACCCT projects in a new way, such as: enhancing a classroom-based program of study for online or hybrid delivery; adding stackable education and/or training credentials to an existing program of study; and enhancing a program of study to be delivered in an accelerated format. .

### **Q: Are institutions funded under the FY 2012 TAACCCT grants eligible to apply?**

A: Eligible institutions previously funded as a Lead Institution under either a single institution or consortium application through TAACCCT SGA/DFY PY 11-08 (Round 2) *may not* apply as a single institution or as a Lead Institution in a consortium application under this SGA; however, they may participate in a consortium application as a Member Institution.

### **Q: Are community colleges the only entities eligible to apply for TAACCCT grants?**

A: No. As stated in Section III.A. of the SGA, "Eligible institutions are institutions of higher education as defined in Section 102 of the Higher Education Act of 1965 (20 U.S.C. 1002) which offer programs that can be completed in not more than two years. They include public, proprietary, or other nonprofit educational institutions. Generally, such institutions of higher education include 2-year and 4-year colleges and universities, Historically Black Colleges and Universities, Tribally Controlled Colleges and Universities, Hispanic-

serving Institutions, and Asian American and Native American Pacific Islander-serving Institutions.” Eligible institutions must be accredited, as of the closing date of the SGA, by a nationally recognized accrediting agency or association that has been recognized by the U.S. Department of Education. A database of institutions that are accredited by agencies and associations recognized by the U.S. Department of Education can be found at <http://ope.ed.gov/accreditation/>.

**Q: Could an eligible institution that belongs to a system of colleges apply as the lead of a consortium that includes members of the same college system?**

A: Yes. If the individual colleges meet the eligibility requirements in Section III.A of the SGA, then 3 or more of those eligible colleges could apply as a consortium. One of those colleges must be the Lead Institution of the consortium, which has overall fiscal and administrative responsibility for the grant.

## **SERVING TAA-ELIGIBLE WORKERS**

**Q: What is the TAA for Workers Program?**

A: The Trade Adjustment Assistance Program (referred to in this FAQ as the “TAA for Workers program”) is a federal program that provides a path for employment growth and opportunity through aid to US workers who are in a group of workers that the Department has certified as trade-affected because foreign trade was an important cause of their actual or threatened job loss. The TAA for Workers program seeks to provide these trade-affected workers with opportunities to obtain the skills, resources, and support they need to become reemployed. The program provides benefits and services that are available to individual workers and are administered by the states through agreements between the Secretary of Labor and each state Governor. More information about the TAA for Workers program can be found at <http://www.doleta.gov/tradeact>.

**Q: What types of TAACCCT programs would be approved for TAA-funded training?**

A: The TAA for Workers program pays for tuition and other costs for eligible workers in approved training programs. Typically, the TAA for Workers program helps workers to receive training in industries and occupations that can lead to high skilled, high wage jobs that can be found in one or more geographical areas. Applicants are encouraged to contact their State TAA Coordinators for detailed information about the training needs of TAA participants and approvable programs specific to their local area. A list of TAA representatives can be found at <http://www.doleta.gov/tradeact/contacts.cfm>.

**Q: Are there educational or training programs that would not be approved for TAA-eligible workers?**

A: According to the Department’s regulations, a state may approve training for TAA-eligible workers in any program that would reasonably lead to employment of that worker with an employer following completion of the program, assuming that the other regulatory (and statutory) criteria for approval of training have been met: there is no suitable employment available for the worker, the worker would benefit from appropriate training, the worker is qualified to undertake and complete such training, and such training is suitable for the worker and available at a reasonable cost that the TAA for Workers program will cover. Programs that are designed to lead solely to self-employment or employment as an independent contractor, for example, are not approvable. However, program participants are not prohibited from starting a new company provided that the credentials and certifications obtained could also lead to employment with an employer.

**Q: How can my institution develop or offer entrepreneurship education or training programs that would be suitable for TAA-approved training?**

A: Entrepreneurship as a strategy is broader in scope than a particular program resulting in a “Certificate of Entrepreneurship,” or similar credential, or a particular employment outcome such as a start-up business, which would not be suitable for participants in the TAA for Workers program. The development of an entrepreneurship program should be done in consideration of a broader spectrum of possible career pathways. For example, a mixed “Financial Services and Entrepreneurship” program would be within the parameters required for TAA-eligible workers to be approved for this training and also provide participants the possibility of employment with an existing firm in the financial services sector.

**Q: If my institution offers entrepreneurship education or training programs, would TAA-eligible workers be able to pay for that training with their benefits under the TAA for Workers program?**

A: TAA-eligible workers who wish to receive TAA benefits are not prohibited from enrolling in an entrepreneurship program. Determinations of individual eligibility for the TAA for Workers program and approval of TAA-funded training will continue to be made by the relevant cooperating State agency in accordance with the requirements of Section 236(a)(1) of the Trade Act. Since any participant may choose to enroll in a TAACCCT-funded program (subject to that particular institution's enrollment criteria), any participant would be allowed to enroll in an entrepreneurship program, including TAA-eligible workers. However, if the entrepreneurship program does not meet the approval criteria for TAA-funded training, the TAA-eligible participant would have to seek alternate sources of funding for their enrollment in this course offered through the TAACCCT program.

**Q: As a component of the entrepreneurship education and training program, we are proposing to assist program participants to start their own businesses. Are program participants in a TAACCCT funded entrepreneurship program allowed to start new businesses?**

A: Program participants in any TAACCCT funded programs are not prohibited from starting a new company using non grant-funds. Applicants should note that programs offered or developed using TAACCCT funds should lead to credentials and certifications that could also lead to employment with an employer.

## **PARTICIPANTS AND OUTCOMES**

**Q: Can TAACCCT grants serve workers who are not TAA-eligible workers?**

A: As Section III.D.3 of the solicitation states, "There are no eligibility requirements for specific populations that are eligible to be served through the TAACCCT grants that will be funded through this SGA. The intent of this SGA is to fund projects that expand and improve the ability of eligible institutions to provide education and training programs that are suitable for a diverse population of workers eligible for training under the TAA for Workers program, as well as a broad range of other adults such as women or minorities who may be underrepresented in high-demand fields. However, successful applicants must give priority of enrollment to workers eligible for training under the TAA for Workers program."

**Q: Do participants need to be tracked beyond the 36-month grant period?**

A: Yes. The period of performance of the grants is 48 months, although all programs must be developed and offered and all funds spent on program development and delivery within the first 36 months of the grants. During the final 12 months of the grant, successful applicants will be expected to track and report all outcome measures for all program participants and complete the requirements for the third-party evaluation for the project, including the submission of the final report, which is due at the end of that 12-month period. These are the only allowable activities during the last 12 months of the grant. Grantees are not expected to track participants after the period of performance ends.

## **INTELLECTUAL PROPERTY RIGHTS**

**Q: If a grantee purchases a ready-made solution from a vendor (such as an online training module), would this become part of the open source materials for this grant even if it was not developed with grant funds?**

A: Only work that is developed by the grantee with the grant funds is required to be licensed under the CCBY license. Pre-existing copyrighted materials licensed to, or purchased by the grantee from third parties, including modifications of such materials, remain subject to the intellectual property rights the grantee receives under the terms of the particular license or purchase. In addition, works created by the grantee without grant funds do not fall under the CCBY license requirement.

## **ALLOWABLE COSTS**

**Q: Can a participant's tuition, books, fees, and other personal expenditures required to attend a TAACCCT-funded program be charged to the grant?**

A: No. As stated in Section IV.E on of the solicitation, "Unallowable activities include the use of grant funds to pay the costs of a participant's tuition (including scholarships), books, fees, and other personal expenditures;

incentive payments for participants such as performance-based cash bonuses; WIA supportive services; wages of participants (including the wages of students participating in co-operative education programs, Registered Apprenticeship, on-the-job training, work-based training, or internships) and stipends for wage replacement of participants; the purchase of real property; and construction. Applicants should ensure they do not propose the unallowable activities listed above. Some of these activities may duplicate services and benefits provided to TAA-eligible workers, adults who receive Unemployment Insurance or adults who participate in WIA programs. For example, TAA-eligible participants in TAACCCT-funded programs are entitled to TAA benefits, including tuition and related necessary and approved expenses such as books, tools, academic fees, travel or transportation expenses, and subsistence expenses. Applicants may not use grant funds to supplant other funding sources they are currently using to fund existing activities.”

**Q: Can our TAACCCT grants be used to pay public workforce system partners for services provided?**

A: Yes. According to Section III.B on of the solicitation, “It is allowable to contract with Workforce Investment Boards, American Job Centers (also known as One-Stop Career Centers), and their partners to provide staff-assisted or customized participant tracking and job placement services for individuals that will be impacted by the TAACCCT grants, and for costs related to implementing data sharing agreements.” In addition, grant funds may be used for the costs of program development using subject matter experts such as from the state workforce agency and labor market and economic research entities to inform and assist in curriculum design.

## FUNDING

**Q: How long will funded grantees have to implement their projects?**

A: As stated in Section II.B of the SGA, “The period of performance is 48 months, with an anticipated start date of October 1, 2013. This performance period includes all necessary implementation and start-up activities. Applicants must plan to fully expend grant funds during the period of performance while ensuring full transparency and accountability for all expenditures. Awards made under this announcement are subject to the availability of Federal funds. All programs must be developed and offered within the first 36 months of the period of performance, with grant funds allocated for program development and delivery expended during that time. DOL expects that grantees will begin enrolling participants in education and training programs no later than 18 months after the date of grant award. The final 12 months of the period of performance is limited to gathering information and data for reporting outcome measures and completing the requirements for the third-party evaluation; during this timeframe, grantees should not incur costs for any other activities, such as program development and instructor salaries.”

**Q: As two kinds of proposals will be funded (individual applications and consortia applications) will these come from two “pots” of funding or will all proposals be funded from the same source based on points alone?**

A: The Department intends to fund grants ranging from \$2,372,500 to \$2,750,000 million to single institution applicants, totaling up to \$150 million across 50 states, the District of Columbia, and Puerto Rico. This allows the Department to award 54-63 grants to single institutions, potentially funding more than one per state. In addition, the Department intends to fund grants of up to \$25 million to consortium applicants, for a total of approximately \$324 million.

**Q: The SGA states that, “The Department intends to fund grants ranging from \$2,372,400 million to \$2,750,000 million for individual applicants and up to \$25 million for consortium applicants.” Are the funding figures per year of the project?**

A: No, the funding amount is not per year. It is for the entire period of performance, which is up to 48 months (including the 12-month evaluation and data collection period).

**Q. Will DOL fund projects that are similar or the same as those funded under the FY 2011 or FY 2012 projects?**

A: All applicants must reach out to organizations that received funding under the FY 2011 or FY 2012 TAACCCT SGA (as appropriate) to help decrease duplication and strengthen geographic reach, and should coordinate efforts where possible. This engagement could include sharing information, lessons learned, and program content; sharing technological innovations; developing transferability and articulation agreements; and working together to standardize credentials. By reducing duplication, applicants will be making the best

use of TAACCCT funds. Please note, however, that the Department does not intend to fund the continuation of previously-funded TAACCCT projects.

## **OTHER**

### **Q: Does every institution that is a part of a consortium application have to provide evidence of partnering with their respective local workforce system partner?**

A: As stated in Section I.B.5 of the SGA, Applicants must align their programs with at least four types of key stakeholders in each of the communities represented: (i) Governors; (ii) employers and industry; (iii) the public workforce system; and (iv) philanthropic organizations, business-related and other non-profit organizations, community-based organizations, and labor organizations.”

Section I.B.5.iii provides examples of partnership, “This engagement could include the workforce partner identifying, assessing, and referring appropriate candidates for education and training, including TAA-eligible workers; helping applicants access and use labor market information in developing training programs and course offerings; connecting workers with employers; providing supportive services to TAACCCT participants, where appropriate; and tracking TAACCCT TAA program participants as they re-enter the workforce. Applicants must provide evidence that at least one workforce system partner(s) is committed to being involved in the project.”

### **Q: What obligations do grantees have for continuing the TAACCCT-funded program after the grant period has expired?**

A: As stated on Section V.A .3 of the SGA, “Because the Department does not intend to fund the continuation of projects funded, applicants should consider project strategies that will have a lasting impact, and must plan to sustain effective innovations developed under this program after the grant period ends. As indicated in Section V.A.3.ii, applicants must describe how they will use data to determine which strategies and activities were effective and explain how they would integrate effective practices into core programs to enact broader institutional improvements.”

### **Q: Even though the SGA states that the technical proposal must be double-spaced, can tables be single spaced?**

A: Yes. It is permissible to use single spacing in tables. However, please do not use this flexibility to exceed the page limits as stated in Section IV.B.3, which allow 30 pages for single institution applications and 45 pages for consortia applications.

### **Q: Do the attachments described in Section IV.B.4 (Attachments to the Technical Proposal) count in the overall page count for the application?**

A: No. As stated in Section IV.B.3 of the SGA, “The Technical Proposal for single applications is limited to 30 double-spaced single-sided 8.5 x 11 inch pages with 12-point text font and 1-inch margins. For applications from consortia of eligible institutions, the Technical Proposal is limited to 45 double-spaced, single-sided, 8.5 x 11 inch pages with 12-point text font and 1 inch margins.” As stated in Section IV.B.4 of the SGA, “Only those attachments listed below as required attachments will be excluded from the page limit for the project narrative.”

### **Q: Will ETA review draft grant applications before the deadline?**

A: No. Applicants should not submit draft grant applications, and the Department will not review draft grant applications.

### **Q: Will grant applications be reviewed upon receipt?**

A: No. Technical review panels will convene after the closing date of the SGA. The closing date for this SGA for Single Institution Applications is June 18, 2013, and for Consortium Applicants is July 3, 2013.

## **NEW!** System for Award Management (SAM) Registration Issues

The Employment and Training Administration (ETA) has received several communications regarding reported difficulties with TAACCCT applicant registration in the System for Award Management (SAM).

SAM is operated by the General Services Administration, and is used by ETA and other Federal agencies. In accordance with the TAACCCT SGA, “failure to register with SAM and maintain an active account, as identified in Section IV.B.1” is a deficiency listed that will deem an application non-responsive and cause it to not be reviewed. Section IV.B.1 of the SGA states, “all applicants, including consortium members, must register with the System for Award Management (SAM) before submitting an application.

A grantee must maintain an active SAM registration with current information at all times during which it has an active Federal award or an application under consideration.” Applicants are also encouraged in the SGA to initiate the completion of SGA requirements well in advance of applicable deadlines, so as to have ample time to complete the requirements. Grants.gov will not accept an electronic application submission without the active SAM registration information for the individual applicant or for the Lead Institution in the case of a consortium application.

The communications regarding several TAACCCT applicants have indicated that the applicants have experienced delays in completing registration. ETA has followed up regarding these communications with SAM staff, who have indicated that there may have been some delays in the processing of registrations in the recent past, which could impact the electronic submission of the application.

The TAACCCT SGA states that applications can be timely submitted electronically “or in hard copy by mail or . . . hand delivery.” (SGA, Section IV.C). The SGA further invites applicants to contact the identified Grants Management Specialist with any technical questions. (SGA, Section VII). As per ETA practice, applicants may submit relevant documentation regarding technical issues they encounter in the application process. Thus, applicants may submit information with their application documenting difficulties in registering or renewing their SAM account. This information will be taken into consideration in determining the applicant’s responsiveness to the SGA. However, in the absence of a well-documented SAM operating issue or another extenuating circumstance of similar significance completely beyond the control of the applicant, ETA cannot relax SGA requirements.