



MoWINS List of Frequently Asked Questions Fiscal—2014



This FAQ provides a learning resource for MoHealthWINS and MoManufacturingWINS (referred to below as “grant”) practitioners. **Be sure to consult your respective grant lead and current [USDOL FAQs](#) to see if there are any specific issues particular to a grant.** This FAQ is updated periodically, with new information noted, and supersedes any previous FAQs. Email dawn.busick@mccatoday.org or liz.roberts@mccatoday.org with questions or suggestions for new items.

FO1. According to the MOU with our WIB, if eligible individuals have barriers to educational attainment, supportive services may be provided. It is my understanding that the MoHealthWINS grant pays tuition for participants. Does it also pay for Supportive Services, such as childcare and transportation, or does eligibility for the MoHealthWINS grant mean participants can be eligible for Supportive Services paid for by the WIB through its WIA Adult, Dislocated Worker and Youth program contracts?

FA1. Actually, tuition is specifically prohibited under the MHW grant. The students receive the benefit of instruction because the grant pays for the instructor fees and other items identified in your budget, such as program supplies, etc., but the grant cannot pay for tuition. Another item that is specifically prohibited under the grant is “supportive services”. Please refer to page 9 of the original SGA for the wording on the prohibition on tuition and page 22 for the exact wording on supportive services. To summarize: “Grantees may not use grant funds to provide supportive services to individuals who are served through these grants. Supportive services include services such as transportation, child care, dependent care, housing, and needs-related payments.” Each local WIB would have to determine what (if any) supportive services they could provide to each individual (based on their own circumstances), so you will want to work closely with them.

FO2. We are working on developing a tuition waiver eligibility agreement that students would have to sign prior to beginning their MHW tuition waived coursework. We are hoping that this will keep students accountable to completing their coursework. Per the grant, are we allowed to bill students a percentage of the waived tuition and fees if they drop their MHW waived courses? We were thinking we could possibly follow the college’s refund policy and bill accordingly. We are only brainstorming and not sure if we want to go this route, but wanted to get your feedback.

FA2. You would not want to reinstate a tuition charge for dropping the course, as the instructor fees were paid with grant funds and the students will also be counted as program participants if they meet the attendance criteria guidelines sets forth in the FAQ guidance letter from DOL. You could apply some type of penalty or miscellaneous charge, if desired.

FO3: Can we move funds from year to year and make minor staffing changes, such as interchanging full time and part time employees?

FA3: The budget needs to reflect your current situation, which is likely to change over time and as each partner gains a better understanding of their needs. In detail, you claim what you have to spend yearly, however the Lead Grant Institution, OTC, watches the total comprehensive grant award so it is not necessary to make sure that each consortium college spends exactly what was estimated for each of the three program years, as long as each college stays within their overall program budget.

It was noted in one of the DOL webinars that they would allow a change in personnel between full time and part time positions. However, a change of even \$1 in the personnel and fringe benefit line items (as well as the indirect cost line item) requires a budget modification, so if practical you would want to keep these to a minimum over the term of the grant. DOL also wants to be notified if any personnel changes could impact the scope of your program. The other line items do allow for a 20% variance, but those would also require a budget modification if you exceed the variance or need to move funds between line items. These changes refer to the total amounts in each line for all consortium members, so we do have some flexibility at this point, but you will want to keep these guidelines in mind over the term of the grant.

FO4: We have budgeted both administrative costs at 8% of our overall budget to cover the grant administration and then we also have 8% indirect costs budgeted. Are we ok to leave the administrative costs in the grant as long as we stay within our totals?

FA4: You may leave the administrative costs within the grant as long as you stay within the 8% total administrative cap. For colleges that have both direct and indirect costs included in their budget, this 8% cap applies to both direct and indirect costs. These costs might be allocated with part in the direct cost line items and part within indirect costs. Colleges that do not have an indirect cost rate would have a cap of 8% for administrative costs within the direct line items. The 8% cap applies across the entire budget. Our reimbursement form will ask each consortium partner to identify all administrative costs as they are requested for reimbursement, breaking them out between direct and indirect cost line items as applicable.

In addition, we will need clear documentation for any administrative costs charged. This might be as simple as payroll reports for an administrative employee or additional calculations to provide clear support for how you arrived at the amount that is being charged as administrative costs.

FO5: Which colleges will be able to charge indirect costs to this grant?

FA5: If you have an approved indirect cost rate, then you can claim indirect costs on this grant. OTC will need a copy of your approved indirect costs rate. If you do not have an approved indirect cost rate, then you cannot claim these costs on this grant. If you do not have an approved indirect rate, you had the option to move these funds during the budget modification so they should now be incorporated into your direct expense line items.

FO6: Will there be a specific form to use to request reimbursement or do we prepare and submit an invoice? What is the timeline and procedure for payment? To whom do we submit our financial reimbursement requests or other financial information?

FA6: Payments will be made on a cost-reimbursement basis on the MHW Reimbursement Request Form posted on *mohealthwins.org*. Requests may be submitted as often as monthly, but no less frequently than quarterly. They must be received by OTC by the 15th of the month following the activity period for which reimbursement is requested to allow sufficient time for processing and payment within the first five business days of the month following actual receipt of the completed reimbursement request. For example, December expenses would need to be submitted by January 15th for processing during January and a corresponding direct deposit made to the partner's bank account within the first five business days of February. Reimbursement requests received by OTC after the 15th of the month would be processed and paid during the following business cycle. For example, a request for December that is not received in the OTC offices until January 16th would not be paid until the first five business days of March.

Each consortium partner will supply electronic copies of supporting documentation that is adequate as defined by the financial policies of the institution and applicable local, state and federal policies, with adherence to the most restrictive of these policies.

OTC will complete desktop monitoring for each reimbursement request received. Original and additional supporting documentation should be maintained on site and readily available for on-site monitoring as needed by OTC, the Federal Program Officer, or any other authorized representatives.

The preferred method for submission would be to copy both Chasity Daniels and Betty Denson at OTC. That way we can be sure that you are receiving a quick response in case either is out of the office.

FO7: How do we know if you have received all of the documents and information requested, such as direct deposit forms, audits, indirect cost rate letters, etc.?

FA7: We set up a tracking system to make sure that all items were received from our initial request and contacted members individually if we needed additional documentation. It is up to each member to make sure that OTC has

updates on all of these items, including copies of any changes in policies on travel or procurement, as well as updated audits and indirect cost rates during the term of the grant.

FQ8: How do we show personnel time that is to be billed to the TAACCCT Grant?

FA8: OTC will need a completed monthly time and effort report to justify personnel costs that are being allocated to the grant. If you have a form that you are currently using for other federal grants, this should be acceptable as long as it provides all of the detail needed for the TAACCCT grant. OTC has provided two templates for time and effort reports, one which would be used for an employee tracking time on an hourly basis and the other for an employee reporting on a percentage basis. These are both posted on the MCCA MoHealthWINs web portal.

FQ9: What items can be included under Outreach expenses?

FA9: DOL addressed this issue in one of their webinars, noting that this is an area that is “allowable with conditions”. This type of expense can be allowable under the right circumstances, but you need to make sure that you are carefully following their guidelines. Outreach and any related advertising needs to be very specific in scope and intent; for example, outreach/advertising to applicants to fill personnel vacancies required as part of the grant or outreach to make contact with participants for the programs specifically funded under the grant. You cannot be promoting the college or programs in general; you need to have a convincing argument that the outreach is needed to help satisfy the requirements of the grant as outlined in your Statement of Work. Please see the Fact Sheet on Education and Outreach Costs for more detail on outreach expenses.

FQ10: Are we allowed to have students take General Education courses not funded by MHW and not charge or prorate to the grant?

FA10: Yes, these students would use their other financial aid assistance programs to fund, i.e. Pell, WIA, TAA, etc. Please see the MHW Financial Aid Assistance Guidance Tool on the webportal.

FQ11: If we are willing to let the MHW students into an existing general education course and not charge back to the grant, is this allowable? Our line of reasoning is that we are paying the instructor anyway so if we have a certain number in the class we will come out okay and it may be more trouble than it is worth in tracking and prorating.

FA11: Yes, if no expenses are being charged back to the grant, this is acceptable. We are only tracking and collecting data on the grant supported programs of study. Any student may take additional programs of study outside of the grant utilizing other types of financial aid assistance.

FQ12: Can we pay for service contracts under this grant, i.e. distance learning contracts with service providers?

FA12: The nature of the contract is important in determining whether a distance learning contract with a service provider is an allowable expense under this grant. Sub-grants are prohibited under TAACCCT, while sub-contracts are allowable. One important distinction between the two relationships is whether the service provider is carrying out a major programmatic function of the grant or is providing ancillary services in support of the program. For example, a subject matter expert could provide support for the development of new curriculum, but the consortium partners have the responsibility to meet the goals and objectives of the program. Please refer to Attachment A on page 37 of your Grant Agreement for further clarification on the distinction between sub-grants and sub-contracts. If you are still uncertain as to whether or not the service contract would meet the requirements, we will be happy to forward your question to our Federal Project Officer for approval.

FQ13: Are eligible students' textbooks and class supplies allowed on the grant or do we just waive their tuition and they are responsible for required books and supplies? What about fees for special courses and other related fees?

FA13: You have the choice of either scenario with the grant. Required student textbooks and class supplies can be charged to the grant directly if you have budgeted for them in your approved grant budget, or they can be the student's responsibility. It is only tuition and related lab fees that the college cannot charge and collect. If the fees are tied to a specific course (which would be the case with lab fees), and the course is being taught by an instructor

who is grant-funded, then you cannot charge the student for the fees. However, you can charge the student for common fees such as parking fees, infrastructure fees, IT fees, etc. Common fees are those that would be charged to the student for the mere fact that they are a student, not related to coursework that is at least partially funded through the grant.

FQ14: How can we combine Pell grants and/or WIA funding with the grant?

FA14: Work closely with your Financial Aid Office and your local Workforce Investment Board to make sure that any additional funding is used correctly. Please be sure it is understood that students are not paying tuition for these courses and that any additional assistance is not a duplication of services.

FQ15: Could you provide some clarification on why tuition is not an eligible expense?

FA15: The consultant who worked with the MoHealthWINS Lead Team in preparing the application for this grant recommended that we proceed with the direct-cost method when determining eligible costs for this grant. The direct-cost method implies that expenses for instruction of the grant-related courses and necessary supplies for these courses would be directly charged to the grant. By using the direct-cost method, if tuition were to be charged for these courses it would create program income. Due to the tracking and reporting requirements involved with program income, the Lead Team also elected not to charge tuition for these grant-related courses; therefore, no program income would be created.

The Solicitation for Grant Application (SGA) also includes wording that discusses tuition in Section I, Part C-Allowable Activities (see attached). Please refer to page 9 of the SGA, which states: "Unallowable activities include the use of grant funds to pay the costs of tuition..."

FQ16: Would any students be using scholarships to take the classes in the TAACCT programs?

FA16: Tuition cannot be charged for classes in the TAACCT program; therefore, there would be no scholarships.

FQ17: If we are not charging tuition, how do we enroll them into the college system?

FA17: One method would be for the setting on the section level of the class to indicate what charges can be charged.

FQ18: If we are offering a class that contains TAACCT program participants and also contains other students, how would we allocate costs to charge to the grant?

FA18: Your instructor costs would be allocated between the college and the grant through a time and effort report. Detailed records will be required. If you are prorating the instructor's salary, then you would charge tuition to non-eligible students only. Proration would also be needed for shared class materials. Lab fees could also be charged to non-eligible students that are in the same class as students that are eligible participants in the grant.

FQ19: Is the grant funded with ARRA funds?

FA19: No, this grant is not ARRA funding. It will require regular grant programmatic and financial accounting, but it is not subject to the additional ARRA-specific reporting.

FQ20: Do I need to get approval for software purchases that are over \$5,000?

FA20: Software is normally considered to be supplies unless you are actually paying someone outside of your organization to develop the code for the software, in which case it would probably be a contractual expense. In either case, since the software is not considered equipment, the \$5,000 threshold does not trigger the requirement for formal, written approval from DOL. As always, just be sure to follow the most restrictive procurement guidelines that apply to the purchase.

FQ21: We want to purchase books that would be retained by the school or laptops (with the option of e-books) for students to use during the course of the program, with the school maintaining ownership. These purchases would fit within the scope of our current approved budget and statement of work. Do we need special approval from the Department of Labor to purchase these items?

FA21: Equipment that has a unit cost below the \$5,000 threshold (including any additional costs that are capitalized by your institution) does not require special approval from DOL. Even though you will be ordering several laptops and the TOTAL will exceed \$5,000, it is the unit cost (plus any other miscellaneous related costs that your institution considers part of the total cost of the equipment) that established the \$5,000 base. Although some agencies discourage the purchase of multiple laptops (as opposed to just those needed for program staff), our Federal Project Officer viewed this as an appropriate expense for the intent of this grant. It is also important that you have indicated that this purchase is included in your approved grant budget and aligns with your approved SOW.

FQ22: How do we do a sole source purchase under this grant?

FA22: A sole source purchase will need to be approved by DOL. This is a time-consuming process, and there is a good chance that the purchase will not be approved, as it is hard to prove that competitive procurement has taken place if the purchase is not released for bids. Your bid can contain as many restrictions as you need in order to meet your requirements, as long as you do not identify name brands. You will want to follow the most restrictive of all applicable procurement requirements. Even though there may be only one vendor that can meet the requirements and chooses to bid, this action will help provide assurance that we are receiving the best price possible and allowing all qualified vendors the opportunity to bid.

FQ23: We understand that we need to include the "federal funding message" disclaimer on all "grant deliverables". Do we need to include this on training materials that are shared between the consortium partners and may be accessible through shared websites, but will not be officially released to the public? Is there also wording that is required for any equipment that would have a public presence, such as mobile or training labs?

FA23: The "federal funding message" disclaimer: "This workforce solution was funded by a grant awarded by the U.S. Department of Labor's Employment and Training Administration. The solution was created by the grantee and does not necessarily reflect the official position of the U.S. Department of labor. The Department of Labor makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information, including any information on linked sites and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability, or ownership." must be included on all work developed in whole or in part with grant funds, including its incorporation in the license. The language needs to be included in its entirety on any written external document or information distributed to students and the public. There is no requirement of a minimum font (although it should obviously be readable), and labels are acceptable. The disclaimer does not need to be included on training materials that are shared between the consortium partners and may be accessible through shared websites, but will not be officially released to the public

The language is not normally required on regular equipment. However, if the equipment will have a visible public marketing presence (such as the mobile lab), the wording along with the grant logo should be added. Please see the MHW Communications Policy.

FQ24: What meal charges are allowable for the MHW grant?

FA24: The number one rule for any grant-funded expense would be: is it "necessary"? This type of expense is a gray area and needs to be fully documented (meeting or event Agenda, attendee sign in sheets, etc) and well justified for grants, as opposed to what is common relationship development in the business world. OMB Circular A-21 covers meals under "Meetings and Conferences: Cost of meetings and conferences, the primary purpose of which is the dissemination of technical information, are allowable. This includes costs of meals, transportation, rental of facilities, speakers' fees, and other items incidental to such meetings or conferences. But see section J.17, Entertainment costs." "Entertainment costs: Costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals,

lodging, rentals, transportation, and gratuities) are unallowable.” You need to be careful that you are not crossing the line, and that line can be subject to different interpretations.

If you are having a formal meeting for “dissemination of information”, you should document why it was necessary to provide meals, include the Agenda, sign in sheets or at least attendance log, and related documentation to be prepared to defend your case that meals were a “necessary” expense. For example, did the participants have to travel to the meeting and was there dissemination of information during the meal period? It would be very hard to defend why it is necessary to purchase lunch or other food to discuss the grant or other related business with someone local and even more difficult to defend why it is necessary to purchase meals for staff members. You might be able to justify discussing the grant over lunch with an out of town consultant with limited availability, but everything is subject to review from DOL. Allowability can vary based on the agency and the oversight monitor, or even among two staff members from the same agency.

Of course, when you are in travel mode your own meal expenses are allowable, but that is covered under the regulations for travel. Even then, you have to follow the more restrictive of federal, state, or your own institutional policies – just as you do for all grant expenses. The bottom line is that you should not charge anything that you cannot strictly defend as “necessary”, be prepared to show how the expense contributes to the outcomes of the grant, and know that if your case is not strong enough for DOL, you need to be prepared to repay those expenses.

FQ25: Can we use MHW grant funds to purchase stress balls, t-shirts, candy, or other items to give to students during recruiting events?

FA25: This is an area where we need to apply the guidelines of "reasonable and necessary". First check your SOW and approved grant budget to determine if these were planned allowable grant activities. Although these are common items at recruiting events and may even be funded through other grants, our field office has advised us that the cost of these items must be weighed against other expenditures that would provide direct benefit to students, which is where the focus of the grant should be. You also need to be careful that you do not cross the line from "outreach", which is allowable, into general "marketing", which is not allowable. Again please refer to the MHW grant Communication Policy for appropriate usage of logo and federal disclaimer language.

FQ26: Is out-of-state travel for accreditation training and curriculum development for Rad Tech an allowable expense under travel line item?

FA26: Yes, if this expense is consistent with your latest approved SOW and budget narrative.

FQ27: We have funds that are additional in salary. I would like to hire a part-time assistant for the office to help with filing, testing, and general intake process. Is that allowable under the grant?

FA27: The addition of FTEs must be approved by the grant office, so you need to submit a formal budget modification, including the respective grant accountant.

FQ28: Is there anything that disallows consortium college full-time faculty from teaching grant-funded sections as part of their regular load?

FA28: No. If a full-time instructor is teaching a grant-funded class as part of his or her load, then a percentage of his/her salary can be charged to the grant. For example, if a full-time instructor is teaching 15 credit hours and three of those hours are for a grant funded class, then 20% of his/her salary for that semester can be charged to the grant.

The grant will not pay for overtime, but will pay overload for a faculty member to teach a grant funded class. For example, if a full-time instructor is teaching a full load of 15 credit hours, and also teaching an additional three credit hour class that is funded by this grant, those additional three credit hours can be charged to the grant at the overload rate.

FQ29: Can a participant access MoHealthWINs grant funds and TRA benefits concurrently?

FA29: No. Trade Act will only approve/fund one program. If a customer wants to enroll in a MoHealthWINs program and Trade Act-funded degree at the same time, he/she will be responsible for funding one or the other, or obtaining other funding.

FQ30: Provided we have available funds in our budget, would CAEL's Career and Education Advisor Certification be an allowable expense for a MoWINs Retention Specialist?

FA30: Yes, professional development for grant implementers is an allowable cost.

FQ31: Can grant funds be used to pay for internship participant payroll?

FA31: No, the June, 2013 DOL TAACCCT Round 3 FAQ states, "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."

FQ32: **MoMan co awardees only:** Can a college mix a MoManufacturingWINs course/class with non-grant-eligible tuition-paying students?

FA32: STLCC, the Lead Host Institution for MoManufacturingWINs, is allowing schools to mix classes, but have told them they must provide supporting documentation on how they're pro-rating costs and providing a class roster that identifies who is a grant participant and who's not. If Colleges do not provide this information, then the expenses will be disallowed.

FQ33: Can a consortium college contract with a high school tech-program teacher to teach a non-credit college program (salary only, no benefits)?

FA33: Yes.

This workforce solution was funded by a grant awarded by the U.S. Department of Labor's Employment and Training Administration. The solution was created by the grantee and does not necessarily reflect the official position of the U.S. Department of labor. The Department of Labor makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information, including any information on linked sites and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability, or ownership.