



MoWINS Grants List of Frequently Asked Questions Programmatic—2014



This FAQ provides a learning resource for MoHealthWINS and MoManufacturingWINS (referred to below as “grant”) practitioners. This FAQ is updated periodically, with new information noted, and supersedes any previous FAQs. Email dawn.busick@mccatoday.org or mike.waltman@mccatoday.org with questions or suggestions for new items.

PQ1. In reference to veteran priority—does that priority apply to active duty potential participants as well?

PA1. USDOL [Training and Employment Guidance Letter \(TEGL\) 10-09](#) includes the definition of “veteran” and explains that priority of service is required for DOL funded training programs. If the online course is DOL funded it would be covered. The definition of veteran appears to exclude individuals on active duty who have not been discharged for other than dishonorable reasons previously. (See also [MHW Participant Eligibility Guidance](#) and [20 CFR part1010](#)).

PQ2. Are out-of-state participants eligible for this program?

PA2. According to USDOL, there are no residency requirements in providing grant services. With that said, if you have a participant that will need financial aid to fund the non-grant supported costs, this may come into play. For example, with WIA funding, most LWIBs have residency priority of service policies, these support their training funds for their customers who reside within their local workforce areas. We suggest you reach out to the WIB in the neighboring state the participant resides in and see if they want to enter into an MOU or at a minimum grant approval of your grant programs of study so their customers can attend. Crowder College and OTC have some similar arrangements with Northwest Arkansas, if you want to contact your peer(s) about specifics.

PQ3. Would this eligibility guidance also apply to international students?

PA3. Missouri’s USDOL FPO advises against enrolling any participants that are not allowed to legally work and who will not support the success of the grant or consortium colleges’ performance in meeting the grant goals and priorities. As for program eligibility, there is some question whether the student would even meet the low skilled definition, and would definitely not meet the unemployed or underemployed definitions. Logistical issues also arise: If the college enrolls a participant knowing up front he/she will not gain employment in this country during the life of this grant, how then would the college exit this participant? With seats and funding limited, DOL advises it is in the best interest for the success of the grant to enroll candidates that can be expected to attain gainful employment with our employer partners during the life of the grant. That said, if a student attains citizenship, enrollment in the program should be considered if there is enough time left in the grant for him/her to exit as a completer.

PQ4. Who covers the cost of grant promotional outreach materials? What about those that will be distributed statewide, i.e., to Career Centers?

PA4. This is a good opportunity to emphasize the *partnership* component of the grants. As part of the original grant proposal, each college committed to contribute to program implementation in various ways, financially and otherwise. Three colleges budgeted for ‘outreach and education’ as part of their in-kind/offers as a consortium partner and would therefore be obligated to fund statewide outreach materials that are agreed upon by the consortium. Fyi, each college’s specific commitment is spelled out in its respective grant Abstract, all of which are posted on the grant Technical Assistance webpage. Another grant partner you may wish to approach is the regional WIBs who also committed to partner on education and outreach materials and efforts in their April 2011 letter of commitment and support for the grant. See your specific MOU with your regional WIBs.

PQ5. How do you handle a program applicant who is an ex-offender? Can felons receive grant-funded training for jobs where prescription drugs, health records, etc. would be used, i.e., Digital Literacy or the Maintenance Programs?

PA5. This grant does not prohibit felons, or citizens charged with misdemeanor convictions who are serving probation, from participating. However, colleges can and should develop enrollment policies that reflect program of study requirements, such as drug testing and background checks. Colleges should confer with local grant employer partners to make sure the training aligns with their labor force needs/personnel requirements, as well as state licensing requirements.

PQ6. Which grant partner is required to keep participant eligibility documentation?

PA6. This depends on location of determination: The enrolling college is required to maintain the grant eligibility documentation for students that they determine eligible on their respective campus, while the partner Missouri Career Center is required to maintain the grant eligibility documentation for students that they determine eligible at their location. Obviously, sharing of information is encouraged, within the confidentiality policies and defined within each WIB partner MOU the college engages with.

PQ7: When will we receive formal program guidance from USDOL?

PA7: As the grant offices receive technical guidance these will be immediately forwarded to each consortium community college Lead Point of Contact. Some technical guidance may support statewide teleconferences/webinars to ensure compliance. Updates are continuously shared via documents like this FAQ, the grant websites, newsletters, and email notifications.

PQ8: What is the role of the Lead Researcher?

PA8: The role of the Lead Researcher will be to design a data collection system, train college staff on the use of the system, establish timelines for the data collection, and analyze and assess data pertaining to student participants, training programs and other grant strategies. John Cosgrove, of Cosgrove and Associates, has already started working with the Project Director and Project Lead Team to address these issues.

PQ9: What is the plan for communicating with all of the partners?

PA9: The grant office created the web portal www.mccatoday.org/technicalassistance as the central repository of grant technical assistance resources, such as documents, policies, FAQs, college grant abstracts, and informational presentations. A grant Communications Director maintains this information, and is responsible for creating grant newsletters, press releases and informational one-pagers and distributing them to all consortium partners through email, web posting, and social media. Additionally, the grant office staff routinely conduct site visits throughout the state to offer further technical assistance and participate in relevant conferences. The first statewide grant summit in March, 2012 and the 2012 MCCA Convention provided all grant partners the opportunity to learn, share, and participate in key program implementation processes and policies related to grant performance, strategies, partner collaborations, referral processes for participants, and many other grant implementation components.

PQ10: What program changes and/or clarifications have been made so far?

PA10: In January, 2012 we addressed a DOL modification request on curriculum development disallowed costs, further explanation on how tutorial services would be rendered, corrected project time line, quantitative measures applied to the overall outcome measures, progress measures, implementation measures, and budget modifications.

Tutoring services are allowable only as enhanced or expanded services; the grant funds cannot be used to supplant funding for existing tutoring services. Each consortium member was asked to review the services in their budget and make sure that they were in compliance with this requirement.

There was also clarification on the issue of curriculum development. Some consortium members moved budget funding to reflect the fact that the curriculum development was being completed by staff and should be classified as personnel costs, while other clarified that contract costs were for the use of subject matter experts to provide ancillary services for curriculum development.

PQ11: Can we start filling positions that were added as part of our budget modification? What about other expenses related to project activities?

PA11: We have not yet received approval from DOL on the new budget proposal submitted. It was clarified at the TAACCCT conference that partners that did not have a change in the scope of their project could expend funds at this time. However, changes to the scope of your project will need approval from the DOL Program Officer. You can start the preliminary process of posting the position and interviewing applicants, but you would want to wait until you have approval for budget changes if the changes affect the scope of your project before you make an offer.

You can also make other purchases as long as they do not involve a change in the scope of your budget that would need to be approved by DOL and are not other expenditures that need to be pre-approved by the Federal Project Officer (i.e., equipment of \$5,000 or over; renovation expenses, etc.). Please keep in mind that if you are hiring instructors, The grant Project Director has estimated that classes may not be ready to go until fall; therefore, an instructor with no class must have a sufficient amount of work available to justify amounts being charged to the grant now. We are still waiting on approvals of equipment from January, so if you still have equipment that needs to be purchased, you will want to allow sufficient time for approval. Please e-mail the OTC office with details on your proposed equipment purchase and they will forward to the FPO. Estimated costs can be accepted for submission. You can proceed with the bidding process, but please do not award the bid or purchase this equipment until you have received the required approval from DOL.

The grant modification and equipment request attained USDOL approval on May 24, 2012 with grant leads advised to proceed with new hires and equipment purchases.

PQ12: When can we begin accepting students into the grant-funded programs?

PA12: The grant office anticipates to have a participant eligibility style guide distributed no later than April 2012. Once programs have been developed in consultation with employer and WIB engagement, WIA approved and/or CBHE approved, then the grant funded programs are deemed ready for target population enrollment.

A participant eligibility guidance tool was distributed May 2012, modified and redistributed in Oct. 2012, and is housed out on the web portal, please reference as needed.

PQ13: We are planning a Health Care Portal for our all prospective students to go through if they are interested in any of the Health Services careers. Plans are underway to offer a three week transitions course boot camp for these students. Once they complete the three week course many of the students will go through a semester of introductory HS coursework preparing them for an actual program of study. Once they have finished the semester they may end up in a grant funded program such as HIM or they may go to a program not funded under MHW, i.e. OTA, EMT, etc. We would track these students as participants through the MHW funded three week portal, the MHW health services introductory semester. If they choose a program not funded under MHW, do we continue to count them as a participant and track their progress and credentialing?

PA13: If the grant is funding development of the Health Care Portal where students/participants will be served through health care industry interest assessments, etc., then yes, each will be counted as a participant served. This was noted in one of the DOL Webinars from December. We will continue to keep them in the total served count.

Further clarification was included in the TAACCCT FAQ issued by DOL on Jan. 18, 2012: “The purpose of the grants is to develop programs and materials that are suitable for the diverse population of workers eligible for training under the TAA for Workers program, however, anyone can benefit from the programs and materials developed. A participant in TAACCCT is an individual who 1) meets the criteria that grantees used to identify who “participants” are in their statements of work (SOW); and 2) who enters or enrolls in a “grant-funded” program that was developed, delivered, offered, or improved in whole or in part by grant funds, or a course that is part of such a program, and who attends the program or course more than once. Students that try out a course during the “add/drop period” at the beginning of a semester and don’t remain enrolled after the “add/drop” period is over would not be counted as participants.”

The preliminary reporting examples show several separate categories to capture data on unique participants served, program completers, credit hours completed, etc. This should allow us to include a participant that dropped or exited a field/category.

PQ14: Can our current students enter into a MHW funded program and become a participant?

PA14: Yes, but only if they meet the eligibility requirements as defined in our Statement of Work. We expect further clarification to be released very soon from USDOL.

Please reference the Participant Eligibility Guidance Tool on the web portal under Technical Assistance, Programmatic Documents.

PQ15: If the students fail a course or program what happens? Are they allowed to stay in the MHW program and repeat courses or change to a different program funded under MHW?

PA15: This will depend on the student and the school grant-funding levels. If your funds allow for repeat students in programs and they remain as eligible participants, the guidelines don’t appear to prohibit this. Each school might want to evaluate their policy in light of our participant outcome requirements and demand for services. Several factors might need to be weighed, including the likelihood for a successful outcome if the student repeated the class, whether this class was a crucial component of a larger program of study for the student, whether another student would not be able to participate if this student was allowed to repeat the class, how this would impact our overall outcome measures, etc.

PQ16: We understand that the grant is for unemployed, underemployed, disadvantaged, and trade act students. Have we defined underemployed or disadvantaged? This will make a difference to our numbers. Several of our students fit into more than one of these categories.

PA16: Yes, the grant is for unemployed, underemployed, disadvantaged, and trade act students. DOL did release some preliminary guidance on this topic; however, we are still waiting for the final guidance. We expect this to be approved and released very soon.

The grant Executive Advisory Steering Committee modified and approved the grant Participant Eligibility Guidance in Sept. 2012 which modified both the low skilled and the TAA participant definitions for eligibility.

PQ17: Do the programs need approval before they can begin?

PA17: Yes. They must be approved as an ‘[Eligible Training Provider](#)’ posted on the State of Missouri’s [jobs.mo.gov](#) website and/or accredited agency/board.

PQ18: How often do we need to track enrollment?

PA18: You would need to track students on a monthly basis for the salary allocations, if applicable. The role of the Cosgrove and Associates will be to perform the data collection and assessment functions required under the grant. Grant participants will be identified as they begin a grant-funded program and tracked through the life of the grant. These data collections and assessment configurations will require input from all grant partners (Community College, WIBs, Employers, etc.) and according to USDOL guidance. Please keep in mind participant cohorts and the comparison cohorts all have data elements and performance measures that will need to be tracked throughout their grant related activities.

PQ19: With accelerated programs, are we lowering our standard for completion?

PA19: No, this initiative simply provides alternative educational access delivery methods to speed up the process for students to attain completion timely. The grant supports accelerated progress for low skilled and other workers to increase success rates for students with basic skills deficiencies by redesigning developmental education, mitigating the need for developmental courses, and/or improving student services that improve retention. For the purpose of this grant, developing and implementing contextualized learning that combines basic skills with specific career knowledge, improving student services such as career counseling, tutoring, and job placement services. Please see the [grant work plan \(MoHealthWINs Tech Proposal Part 2\)](#) where priorities 1 and 2 address this.

PQ20: Does the grant fund supportive services for participants in need of transportation to classes?

PA20: No, supportive services are a disallowed activity and cost. Those participants in need should be referred to their regional Missouri Career Center for assistance. This is a good example/opportunity for making holistic service delivery 'seamless,' minimizing complexity, burden, and complication where possible.

PQ21: Can participant case notes be digital?

PA21: Yes, participant case notes can be either hard copy paper files or electronic participant student record files. Please refer to the [October 2012 Participant Documentation Guidance issuance](#) on the grant web portal.

PQ22: Can colleges require completion of the FAFSA for grant applicants?

PA 22: No, because some MHW programs are noncredit and noncredit programs of study do not require FAFSAs. FAFSA completion is also not required for TAA (Trade Act) participants, who receive \$15,500 in training support.

PQ 23: For the registration documentation that we need for the grant, when we are asking gross monthly earnings is this just the student or the entire household?

PA 23: Individual student/participant income.

PQ 24: What is the period of performance for MoManufacturingWINs?

PA 24: From the SGA: "The period of performance for these grant awards will be 48 months from the effective date of the grant. Applicants may propose a period of grant performance that is less than 48 months if it is reasonable and appropriate to the project timeline, deliverables, and proposed award amount. The performance period includes all necessary implementation and start-up activities, program development and enhancement, evaluation implementation and analysis, and pre- and post-program services. 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. ETA expects that grantees will begin enrolling participants in education and training programs no later than approximately 12-18 months after the date of grant award. The final 12 months of the period of performance should be limited

to gathering information and data for reporting outcome measures, as discussed in Section V.A.4, and completing the requirements for the third-party evaluation, as discussed in Section V.B. Grantees must ensure that all expenditures are made with full transparency and accountability.”

PQ 25: What is the difference between completion and exit for MoManufacturingWINS?

PA 25: From TAACCCT Round 2, FAQ #2: APR - AMENDED JULY 8, 2013: “Completion is defined as having earned all of the credit hours or formal award units needed for the award of a degree or certificate in a program of study. Exit refers to a lack of enrollment at the college and can include formal withdrawal, expulsion, graduation, and other reasons (e.g., the student suddenly stops attending, etc.). Students in a program with stacked credentials are counted as completers after earning the first credential, however, they are not counted as exiters until they leave or graduate or stop attending for other reasons. Completion versus exit affects when to count students as having entered employment if they get a job before leaving the college.”

Example from Cosgrove and Associates: **Let’s look at the OUTCOMES MEASURES:**

| | |
|-----------|--|
| B.1 | Total unique participants served CAN BE COUNTED HERE ONE TIME |
| B.2 | Total number of participants who have completed a TAACCCT-funded program CAN BE COUNTED HERE ONE TIME |
| B.2a | Total Number of Incumbent Workers Who Have Completed a Grant-Funded Program of Study CAN BE COUNTED HERE ONE TIME ONLY IF THE PARTICIPANT IS AN INCUMBER WORKER |
| B.3 | Total number of participants still retained in their pos or another TAACCCT-funded program |
| B.4 | Total Number Retained in Other Education Program(s) |
| B.5 | Total Number of Credit Hours Completed |
| B.5a | Total Number of Students Completing Credit Hours |
| B.6 | Total Number of Earned Degrees/Certificates HERE IS WHERE YOU COUNT MULTIPLE CREDENTIALS BY THE SAME COMPLETER... |
| B.6 .a. | Total number of participants earning credentials CAN BE COUNTED HERE ONE TIME |
| B.6 .a.1. | a. less than one year certificate |
| B.6 .a.2. | b. one year certificate |
| B.6 .a.3. | c. two year degree |
| B.7 | Total Number Enrolled in Further Education After Program of Study Completion |
| B.8 | Total Number Employed After Program of Study Completion |
| B.9 | Total Number Retained in Employment After Program of Study Completion |
| B.10 | Total number of those participants employed at enrollment (for purposes of this reporting, “incumbent workers”) who receive a wage increase post-enrollment |

New as of Sept. 4, 2013:

PQ 26: In an open enrollment MoWINS program, if a non-veteran student is determined grant eligible and registers for that course, can their seat be “bumped” by a veteran who comes along later during the registration season?

PA 26: No. Veterans’ priority of service only applies as long as seats are open in that course. Once a non-veteran is approved for funding, accepted or enrolled (registered) for training, he/she cannot be “bumped” by a veteran.

PQ 27: How do multiracial participants indicate race/ethnicity in registration?

PA 27: See “More Than One Race” option below. Colleges must update MoHealthWINS and MoManufacturingWINS enrollment/intake forms to use USDOL’s Race/Ethnicity categories:

- Hispanic/Latino
- American Indian or Alaskan Native
- Asian
- Black or African American
- Native Hawaiian or Other Pacific Islander
- White
- More Than One Race
- Not Specified

PQ28: Does USDOL’s new “privacy statement” have to be included on MoWINS intake/registrations?

PA28: Yes! Colleges must include the following Privacy Statement on all MoWINS applications, paper and on-line:

In accordance with the Privacy Act of 1974 (Public Law No. 93-579, 5 U.S.C. 552a), you are hereby notified that the Department of Labor is authorized to collect information to implement the Trade Adjustment Assistance Community College and Career Training Program under 19 USC 2372 – 2372a. The purpose for collecting this information is to administer the program and evaluate participant progress. Providing this information, including a social security number (SSN) is voluntary; failure to disclose a SSN will not result in the denial of any right, benefit or privilege to which the participant is entitled.

PQ29: Is Selective Service Registration a Requirement to Receive Services Through a TAACCCT Grant?

PA.29: Enrollment in selective service is not required by the TAACCCT grant in order for a student to receive services under that grant. Please be advised, however, that educational institutions offering benefits or assistance under Title IV of the Higher Education Act, such as Pell Grants, may be required to monitor student compliance with the selective service registration requirement through regulations issued by the Secretary of Education.

Because the use of grant funds to pay for tuition and scholarships are not allowable costs for the TAACCCT grants, grantees should be cognizant that students will often need to access Federal financial assistance to access TAACCCT-funded programs and courses. Grantees should note that ETA encourages them to offer Federal financial assistance, as needed and available, to support students that enroll in TAACCCT-funded programs and courses.

PQ30: What about MMW participants who are getting their NCRC and intrusive support, but did not move on into one of the program of studies. Should staff complete a participant file for those students, as with MoHealthWINS?

PA30: Yes, as to students who complete the MMW or MHW application, and deemed eligible to enroll, then intrusive student support begins along with Portal activities such as the NCRC and/or Digital Literacy, but do NOT move into in a grant supported program of study, the participant was deemed eligible and enrolled at the college to engage in portal programs and services. A participant file is created using this logic the students described in the above scenario would be enrolled in MMW or MHW Portal Program (Program Code = 5).

PQ31: Would a veteran who failed pre-admission drug screening still be given priority seating in a course?

PA31: If the pre-admission drug screening is a requirement of the course, and the veteran does not pass the drug screening, than the veteran does not meet the course requirement and priority of service would not apply. If the pre-admission drug screening is a requirement for admission to the college, and the veteran does not pass the drug screening, than the veteran would not be eligible for admission into the college, and priority of service would not apply.

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.