

WORKFORCE INNOVATION AND OPPORTUNITY ACT
(Authorized under Public Law 113-128)

GRANT SIGNATURE SHEET

Funded under Title : 1

Type: WIOA -Youth

Grant #: 20Y603C4-UWIB

Modification #: ORIGINAL

Administrative Entity:

Spartanburg County
 366 North Church Street
 PO Box 5666
 Spartanburg, SC 29304
Telephone #: (864) 596-2528

Grantee Name and Address:

USC Upstate ACHIEVE Program
 Office of Sponsored Awards Mgt.
 1600 Hampton Street
 Columbia, SC 29208
Telephone #: (803) 777-8749

Spartanburg County, hereinafter called the Administrative Entity, having entered into an Agreement with the Upstate Workforce Board to administer funds received pursuant to Title I of the Workforce Innovation and Opportunity Act; hereinafter referred to as WIOA or the Act, desires to engage the Grantee identified above, to implement part of this program. The Grant consists of the Cover/Signature Sheet, Contract Budget, Program Statement of Work, and Terms and Conditions.

- A. **Type of Grant -** Cost Reimbursement
 B. **Grant Period -** 08/01/20 to 06/30/21
 C. **Activity -** Out of School Youth Program
 D. **Number of participants to be served -** 85 (to include 21 carryover)
 E. **Effective Date-** August 1, 2020
 F. **Grant Amount by Category** – 100% of this grant is provided by Federal funding.

Youth Program Funds	\$ 465,400.00
TOTAL GRANT AMOUNT	\$ 465,400.00

**UPSTATE WORKFORCE BOARD
YOUTH BUDGET SUMMARY**

Project Name	USC UPSTATE ACHIEVE PROGRAM
Grant #:	20Y603C4-Upstate Workforce Board (UWB)
	August 1, 2020--June 30, 2021
	<u>TOTAL BUDGET</u>
Staff Salaries & Fringe Benefits (including staff for WBL)	\$ 294,986.52
Indirect Costs	\$ 24,710.88
Operating Expenses	\$ 50,224.30
Instructional Training and Supportive Services	\$ 74,478.30
Work Based Learning (excluding staff cost)	\$ 21,000.00
TOTAL GRANT COST	\$ 465,400.00

All budgets are considered OUT OF SCHOOL unless otherwise indicated.

YOUTH STAFF & INDIRECT COST - BUDGET SUMMARY

PROJECT Name USC UPSTATE ACHIEVE PROGRAM

Grant #: 20Y603C4-Upstate Workforce Board (UWB) July 1, 2020--June 30, 2021

WIOA STAFF SALARIES AND FRINGE BENEFITS					
STAFF SALARIES					
Position Title	Salary Per Month	% of Time	No. of Months	TOTAL AMOUNT	
Director	\$4,599.00	100%	11	\$	50,589.00
Career Readiness Coordinator	\$4,160.00	100%	11	\$	45,760.00
Career Readiness Specialist (Cher/Union)	\$3,987.00	100%	11	\$	43,857.00
GED Classroom Instructor (30 hr/wk)	\$2,990.00	100%	11	\$	32,890.00
Certification/Prog Asst (30 hr/wk)	\$2,145.00	100%	11	\$	23,595.00
Van Dr (PT)	\$878.00	100%	11	\$	9,658.00
Van Dr (PT)	\$878.00	100%	11	\$	9,658.00
TOTAL WIOA SALARIES				\$	216,007.00
FRINGE BENEFITS:					
FICA	\$ 216,007.00	X	7.65%	\$	16,524.54
Workmens Comp.	\$ 216,007.00	X	0.60%	\$	1,296.04
Health		X		\$	18,195.83
Ret/Pension (pt employees opt out)	\$ 196,691.00	X	21.81%	\$	42,898.31
Unemployment Insurance (Federal)	\$ 216,007.00	X	0.03%	\$	64.80
TOTAL FRINGE BENEFITS				30.09% \$	78,979.52
TOTAL SALARIES AND FRINGE BENEFITS				\$	294,986.52
INDIRECT COST:					
Salaries/Fringe	RATE	8.00%	X	\$294,986.52	= \$ 23,598.92
Op Exp	RATE	8.00%	X	\$13,899.50	= \$ 1,111.96
TOTAL IDC				(IDC rate for Op Exp is based on total minus Premises Rent.)	
				\$	24,710.88
Indirect cost must be based on a rate approved by an appropriate federal agency. A copy of the approved indirect rate must be submitted to the Upstate WB Office annually.					
TOTAL SALARIES, FRINGES, AND INDIRECT COST				\$	319,697.40

See Work Based Learning (WBL) Budget Sheet for specifics on WBL breakout

YOUTH OPERATING EXPENSES

PROJECT Name: **USC UPSTATE ACHIEVE PROGRAM**
 Grant #: **20Y603C4** 8/1/20--6/30/21

OPERATING EXPENSES		COST PER	NUMBER OF	TOTAL
OBJECT NAME:	MONTH	MONTHS	AMOUNT	
1. Office Supplies	\$ 300.00	11	\$3,300.00	
2. Other Communications	\$ 120.00	11	\$1,320.00	
3. Postage	\$ 5.00	11	\$55.00	
4. Staff Travel (mileage) (See Professional Dev)			\$0.00	
5. Premises Rent/Phones/Other	\$ 9,081.20	4	\$36,324.80	
6. Fire and Security			\$0.00	
7. Utilities/Other Costs			\$0.00	
8. Expendable Equipment			\$0.00	
9. Contracted Staff			\$0.00	
10. Advertising/Printing/Outreach	\$ 72.73	11	\$800.00	
11. Janitorial			\$0.00	
12. Insurance/Service Agreement	\$ 29.50	11	\$324.50	
13. Professional Development	\$ 145.45	11	\$1,600.00	
14. Drug Test			\$0.00	
15. Building Maintenance			\$0.00	
16. Non- Expendable Equipment (computers)			\$5,100.00	
17. Memberships			\$0.00	
18. Consulting/Training/Contractual	\$ 700.00	2	\$1,400.00	
TOTAL OPERATING EXPENSES			\$50,224.30	

\$ 50,224.30
 lease \$ 36,324.80
 IDC \$ 13,899.50

YOUTH DIRECT TRAINING SERVICES AND SUPPORTIVE SERVICES

Project name: USC UPSTATE ACHIEVE PROGRAM
 Grant #: 20Y603C4--Upstate Workforce Board 8/1/20-6/30/21

EDUCATION/TRAINING	
1. Tuition	\$ -
2. Books	\$ -
3. Other Training Expenses (please specify)	\$ -
4. Occupational Classroom Training	
Advanced Skills Training--Forklift, Healthcare	11,000.00
Driver's Education	5,000.00
GED Fees/Other Fees	5,000.00
Financial Literacy	-
4. Expendable Tools/Equipment	
TOTAL INSTRUCTIONAL TRAINING	\$ 21,000.00
SUPPORTIVE SERVICES	
A. Transportation (Specify by Line Item)	
1. Fuel	\$ 42,978.30
2. Maintenance	\$ 7,015.87
3. Other (Insurance on Vans)	\$ 5,462.43
4. Van Purchase (state fleet)	\$ 3,500.00
	\$ 27,000.00
B. Child Care	\$ 1,500.00
C. Other Training Activities (Specify by Line Item)	
1. Field Trips/L&L/Workshops/Food	\$ 9,000.00
2. Supplies/Materials/Work Clothing	\$ 500.00
3. Youth Incentives	\$ 5,000.00
4. Graduation (included with Food/Supplies/Materials)	\$ 3,500.00
5. Youth Leadership and Mentoring	
TOTAL SUPPORTIVE SERVICES	\$ 53,478.30
Total Supportive Services and Instructional Training	\$ 74,478.30

YOUTH WORK BASED LEARNING

Project name:	USC UPSTATE ACHIEVE PROGRAM	
Grant #:	20Y603C4	August 1, 2020--June 30, 2021

Participant Wages/Slipends/OJTs/Pre-Apprenticeships/Job Shadowing					Total
Job Shadowing					\$ 17,500.00
Work Readiness Training					\$ -
Instructional Training DIRECTLY Related to Work Based Learning Activity					\$ -
On-the-Job Training					\$ 3,500.00
Total					\$ 21,000.00
STAFF COST FOR WORK BASED LEARNING					Total
Position	%	Salary Amt	Fringe Amt	IDC Amt	Total
Career Readiness Coordinator	40%	\$ 18,304.00	\$ 5,507.67		\$ 23,811.67
Career Readiness Spec	45%	\$ 19,735.65	\$ 9,970.15		\$ 29,705.80
Director	30%	\$ 15,176.70	\$ 5,951.85		\$ 21,128.55
Prog Asst/Cert Spec	10%	\$ 2,359.50	\$ 709.97		\$ 3,069.47
Instructor	15%	\$ 4,933.50	\$ 2,177.08		\$ 7,110.58
TOTAL		\$ 60,509.35	\$ 24,316.72	\$ -	\$ 84,826.07
TOTAL WORK BASED LEARNING COST					\$ 105,826.07
PERCENTAGE OF WORK BASED LEARNING BASED OFF TOTAL PROGRAM ALLOTMENT (not grant amount)					
		\$ 105,826.07	+	499,740.00	X
		Total Work Based Learning	Total Youth Program Allotment	100%	21.18%
					TOTAL (%)
SALARY COSTS LISTED ABOVE ARE INCLUDED IN STAFF BUDGET FORM					

STATEMENT OF WORK

PY20
20Y603C4
ORIGINAL

For the purpose of this Grant, entered into by the Spartanburg County, hereinafter referred to as the Upstate Workforce Board, and University of South Carolina-Upstate, hereinafter referred to as the Grantee, the following WIOA activities shall be conducted in the Upstate Workforce Area. USC-Upstate shall provide WIOA services as outlined in this grant pursuant to provisions and regulations of the Workforce Innovation and Opportunity Act (WIOA).

1.0 PROGRAM DESCRIPTION

The Grantee will operate a comprehensive, youth basic skills, pre-employment/work maturity skills and employment program designed to serve 85 WIOA eligible youth ages 16-24 who are school dropouts in need of obtaining a GED certificate or out-of-school youth who need upgrading in basic skills, gaining basic employment competencies, and finding and retaining employment, and/or attending a post-secondary educational institution. The program will serve youth from Spartanburg, Cherokee and Union counties.

ACHIEVE will serve youth with one or more of the required barriers to employment: unemployed, offender, runaway/foster care/homeless, disabled, pregnant/parenting and/or no driver's license. ACHIEVE serves the hardest-to-serve in Spartanburg, Cherokee and Union Counties, with strong supportive services including transportation and childcare.

While GED studies and basic skills upgrade are a main part of the Program, intensive work readiness to identify career pathways to include occupational skills and post-secondary for gainful employability is the driving force. ACHIEVE seeks to raise community awareness and civic responsibility through leadership development skills, partnering with various community agencies to deliver the Program design, "recognizing that it is through the holistic development of an individual that relatively permanent changes in life style, goal orientation and futuristic thinking occur" (Mission Statement, 1979).

Referrals are made from local school guidance and administration, government agencies, such as but not limited to the Department of Juvenile Justice, Department of Social Services, SC Works, the Flexible Learning Center (Whitlock), Mental Health and the many participants that have received ACHIEVE's services in the past and know needy family or friends.

ACHIEVE's mission, program design, goals and objectives all focus specifically on the Upstates socially and economically vulnerable youth. A high school guidance counselor says, "These young adults and teens need continued support and often a little 'push' to continue their education, similar to a high school setting. Without ACHIEVE, no other programs would be available in Spartanburg County to offer these services to our former students."

Strong partnerships have been developed over the years; we have numerous letters of support from schools and agencies (provided upon request) stating ACHIEVE's valuable services for their at-risk youth. ACHIEVE also utilizes volunteers to assist in running the program, such as volunteers from AARP and college students.

Perhaps one of ACHIEVE's greatest assets to serve is our co-location with SC Works Spartanburg in the Spartanburg Community College Downtown campus. SC Works and ACHIEVE serve the job-needy population of Spartanburg, so our services complement each other in various ways. Being located on the SCC campus allows ACHIEVE students' easier access the enrollment process to enter college.

Graduation is held for GED recipients at USC Upstate where family, friends, school officials, etc. come to celebrate the accomplishment.

Once the needs of the youth/older youth are determined in Objective Assessment and documented in the ISS, comprehensive services are individually crafted and offered using the 14 required youth elements as the directive.

Fourteen Required Youth Elements – The Grantee will offer programs that make the following services available to their participants. Each activity/program must be recorded in SCWOS as they become applicable to each client. The grantee shall use the appropriate and designated activity codes to initiate participants into training activities in the South Carolina Works Online Service System:

14 Required Youth Elements and Associated Activity Codes

(Activity code numbers and durations may change with the implementation of WIOA in SCWOS)

The Grantee will offer programs that make the following services available to their participants. A memorandum of agreement (MOA) will be completed with all partners providing any of fourteen elements not provided by the Grantee. A detailed list of partnering agencies with contact information will be provided to the Upstate Workforce Board annually (no later than the end of the first quarter of the program year). Each activity/program must be recorded in SCWOS as each becomes applicable to each client:

- 1.1 Tutoring and study skills leading to the completion of the GED**--Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.

The Grantee will provide GED program and basic skills upgrading program for school dropouts or those that lack basic skills. Participants will receive classroom and individualized instruction in reading, writing, and math skills. Students assessed to be on the GED route shall continue with the training until they achieve a functional grade level high enough for the General Education Development Exam (GED), and he/she will be scheduled to take the GED exam. Should the participant not pass the GED, they will return to the program for further instruction in weak areas until they are ready to retake the examination. GED instruction will be held at least 4 days a week for 4 hours per day.

This activity must be recorded on the South Carolina Works Online Service Activity Record using Code 406, 414 and/or 433 as applicable. Actual start and end dates must be reflected on attendance records. 433 will be opened for all participants on the GED track. 406 and/or 414 will be opened as applicable by its definition. (See Youth Activity Code Definitions.)

1.2 Youth Alternative Secondary School Services-- Alternative secondary school services, or dropout recovery services, as appropriate

The Grantee will provide educational opportunities at the ACHIEVE Program facilities to eligible youth. Alternative education opportunities should include student/participant tutoring, study skills training, and other instruction, leading to the completion of a GED.

These programs should increase the basic education or promote the development of basic academic skills of the participant and should prepare the individual for further training, future employment, or retention in school. Progress should be noted in the ISS for each new activity or specific training event.

This activity must be in the South Carolina Works Online Service Activity Record using the appropriate activity code. Actual start and end dates must be reflected on attendance records.

1.3 Occupational Skills Training – Occupational skill training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in demand industry sectors or occupations in the local area involved, if the local board determines that the programs meet the quality criteria described in section 123.

The Grantee will provide appropriate individuals with occupational, vocational, or entrepreneurial training that is relevant to local Labor Market Information (LMI). Occupational training provided under the Youth Program, to the extent feasible, will include opportunities to apply knowledge and skills relating to academic subject to the world of work. Youth ages eighteen (18) and older may be referred to the SC Works Upstate Center for co-enrollment as an adult to receive an ITA voucher for occupational skills training.

The Grantee will provide vocational training through courses they offer such as Advanced Computer Training or may be offered as a partnership with Spartanburg Community College and other training providers in the local area. Each participant will be given the opportunity to choose from several trade curriculums, the best course of study related to their area of interest. The Grantee will be responsible for the setup and implementation of this program component. Upon completion of the course, the participant will receive a certificate of completion from the training provider regardless of whether or not they receive GED. The certificate is awarded in recognition of an individual's attainment of measurable technical or occupational skills necessary to gain employment or advance within an occupation. These technical or occupational skills must be based on standards developed or endorsed by employers.

An Occupational Skills Training certificate will be included in the Attainment of a Degree or Certificate Measure that has been approved by the DOL definition of a degree/certificate. This activity must be recorded with a SCWOS Activity Record using Codes 416, 430, 431, and 432. Actual start and end dates must be reflected on attendance records.

1.4 Youth Paid and Unpaid Work Experiences, Including Internships--Paid and unpaid work experiences that have as a component academic and occupational education, which may include-

- i. Summer employment opportunities and other employment opportunities available throughout the school year;
- ii. Pre-apprenticeship programs;
- iii. Internships and job shadowing; and
- iv. On-the-job training opportunities

Funds under this Grant may be used to pay stipends for work experiences in the public; private; for-profit; or non-profit sectors where the objective assessment and the individual service strategy indicate that work experiences are appropriate. Work experiences are planned, structured learning experiences that take place in a workplace for a limited time. The purpose is to provide the youth participant with the opportunities for career exploration and skill development and is not intended to benefit the employer, although the employer may, in fact, benefit from the activities performed by the youth. The students may be paid for the training and work experience. Work Experiences will occur concurrently with the basic skills training or is recommended to take place while waiting on the GED scores in order to keep the youth active in the program. Work Experiences may include but are not limited to internships, job shadowing, supported work, work adjustment or transition activities and on-the-job-training (OJT). However, OJT is not an appropriate work experience activity for youth under age 18.

ACHIEVE staff will rely on guidance from the UWB and the experience of SC Works to best implement OJT, pre-apprenticeships, etc. Occupational skills training may prerequisite a work experience if a credential will enhance the work experience and on-the-job training. Occupational skills will come from various providers, such as the SCC SmartJobs initiative that provides training at no-cost to the participant. Other providers have been and will be innovatively designed to fit the industry sectors and provide training in a condensed fashion, integrated with education and skills, such as CellBotics.

1.4.1 Work Experiences may include, but are not limited to:

- A. a short-term or part-time entry employment training assignment with a public or private non-profit organization for a participant who needs assistance in becoming accustomed to basic work requirements or in becoming gainfully employed. It is recommended for youth with no prior work history to acclimate the youth to the world of work; or
- B. a short-term internship or part-time training assignment with a private for-profit organization for a participant who needs assistance in becoming accustomed to basic work requirements or in becoming gainfully employed. It is recommended for youth with little or some prior work history to acclimate the youth to the world of work and successfully transition to unsubsidized employment;
- C. a short-term job shadowing or vocational exploration assignment for twenty (20) hours at a work site in the public, private non-profit, or private for-profit organization in which the youth participant is not actively engaged in productive work which benefits the organization.

1.4.2 Participation in Work Experience will be for a reasonable length of time, based on the needs of the participant and as contained in the applicable O*NET. The duration will be in the participant's ISS, and shall not exceed four hundred eighty (480) hours. Work Experience will be accompanied

either concurrently or sequentially with other activities or services designed to increase the basic education and/or occupation skills of the participant, as recorded in the ISS.

- 1.4.3 Work Experience, to the extent feasible, will include contextual learning opportunities that integrate the development of general competencies with the development of academic skills.
- 1.4.4 The Grantee shall pay participants with the agreed upon stipends, which may be varied in stipend amount bases on the length of the work experience. This activity must be recorded with a SCWOS Activity Record using Code 419.
- 1.4.5 The Grantee may deduct FICA from participant wages and provide Worker's Compensation for participants. All WIOA participants are covered under a blanket insurance policy and this policy includes work experience.
- 1.4.6 The Grantee shall be responsible for the completion and file maintenance of the Employment Eligibility Verification Form [Form I-9] for all participants in the Work Experience Activity.
- 1.4.7 The Grantee will develop a Work Site Grant for all subsidized "Work Experiences" prior to placing participants at Work Sites. Work Site Grants are required for unpaid work assignments also.
- 1.4.8 The Grantee shall monitor work sites and training sites to insure compliance with Work Site Grants and Training Site Grants. The Grantee shall also maintain on-site documentation of all monitoring activities.
- 1.4.9 Work Site Monitoring: The Grantee shall monitor work sites using the Grantee's Work Site Monitoring Instrument. On-site monitoring shall be accomplished at least twice during a participant's training period.
- 1.4.10 This activity must be recorded with a SCWOS Activity Record using Code 425. Actual start and end dates must be reflected on attendance records.
- 1.4.11 Youth Summer Employment – The Grantee may provide summer employment opportunities through the use of the resources and tools available in the One Stop system or other resources available in the community. Grantee may secure summer employment for youth with unsubsidized job placement being the preferred method. ACHIEVE operates year round, so employment opportunities are ongoing throughout the year and summer.

For younger youth, the Grantee should design a community project that develops teamwork, community service, participant's particular interest, and aptitudes. This project should be the culmination of the year-long learning process and should be an incentive for participants to remaining in the program year round. Once again, ACHIEVE operates on a year round basis, so community service and projects where participants plan and execute the projects are ongoing.

Careful consideration should be given to the participant's ISS to insure that the work done during the summer project best meets the participant's employment goals and will allow for acquisition of occupational skills that are applicable.

Participants themselves should be heavily involved in the planning for this project from the beginning of the annual program. Overseen by the Case Manager, plans should include:

- A. Project ideas
- B. Cost Involved
- C. Material needed
- D. Outside expertise needed (job shadowing and internship tie-in, when possible)
- E. Application of individual strengths
- F. Use of a team to accomplish the task

This activity must be recorded on the South Carolina Works Online Services Activity Record using Code 400. Actual start and end dates must be reflected on attendance records. Special projects may be recorded with Code 441.

1.5 Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster

While participants are attending classes for GED preparation and basic skills upgrades, and usually after receiving pre-employment (work readiness training), they may engage in occupational skills training, such as those mentioned in 1.3 Paragraph 4. These types of training activities lead to an Attainment of Degree/Certificate and may result in a work experience and continue to employment. ACHIEVE has participants in integrated education and training for a specific occupation or cluster through various providers. Current training includes Forklift training at SCC (manufacturing, distribution, retail); SC Manufacturing Certificate (SCMC) through SCC offers free training (manufacturing); cell phone and electronics repair/restoration through on-site training from CellBotics (trades, entrepreneurial); CNA and Phlebotomy at SCC (health); and CERT training (health). ACHIEVE is innovative in that staff is pursuing other means of training that will result in a work credential in a shorter amount of time. From the conferences that ACHIEVE staff has attended, this is the direction that businesses desire that will give quicker turnaround. Current training companies, such as CellBotics will train and then set up work related experiences and pre-apprenticeships followed by job placement. The appropriate activity code as related in 1.3 will be applied.

1.6 Youth Leadership Development Services – Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate

The Grantee shall provide leadership development activities in the form of exposure to post-secondary educational opportunities; community and service learning projects; peer centered activities including tutoring; organizational and team work training; citizenship training; employability; positive social behaviors; and Pre-Employment/Work Maturity Skills Training. Students will research and visit post-secondary schools in the area. Many training opportunities will be researched and tours of the colleges will be organized.

Pre-Employment/Work Maturity Skills training is designed to provide participants with skills and attitudes needed to succeed in the working world. This is entered as Code 425.

The Grantee will provide Leadership Development activities to **all appropriate youth**. We understand that COVID-19 may limit the availability of these services. We request the program be creative in finding opportunities to meet the Leadership Development requirement. Under non-COVID-19 services might include the following:

- A. A program of life skills, career, education, and personal development.
- B. Exposure to post-secondary educational opportunities
 - (1) Tour of the Community College, which includes financial aid information and exploration of their resource center;
 - (2) Tour of local colleges and universities, which include financial aid information and exploration of their resource center;
 - (3) Presentation of military service opportunities by recruiters representing branches.
- C. Community and service learning projects and Organizational and team work training

Participants are given the opportunity to “give back” to the community through service learning projects, such as delivering Mobile Meals. Special projects are done throughout the year, such as Christmas ornaments and other holiday bags made for the Mobile Meal recipients that involve team work. Since participants are entering and exiting the Program at various times and attend throughout the summer, projects are not limited to summer. Participants participate in food drives and help set up projects for community agencies, such as the ReGenesis Health Fair.
- D. Peer centered activities including peer mentoring and tutoring.
 - (1) Tutoring provided through peer groups, such as college students, may be a part of the leadership development.
 - (2) College students may participate in the Community Spotlight, where an individual will share obstacles that he/she overcame to achieve success.
- E. Citizenship training
 - (1) Attend a City or County Council meeting within the participant’s home county.
- F. Employability
 - (1) At least one tour of the local SC Works Center and exploration of their resource center.
 - (2) Complete a Pre-Employment/Job Readiness Training within one year of enrollment in the program or one year from beginning of course.
 - (3) All participants will be provided 16-24 hours (or more) of Pre-Employment/Work Maturity Skills Training prior to placement on a Work Experience Site. This

training will consist of preparing résumés, completing applications, interviewing skills, social media and the workplace, WIN Learning assessment and remediation (if needed). WIN Learning assessments are recorded as Code 412 while remediation is recorded as Code 401. Code 424 may also be used with résumé workshops.

G. Positive social behaviors and training in decision-making, including determining priorities.

- (1)** Presentation of local Drug and Alcohol Abuse Programs
- (2)** Presentation of Pregnancy Prevention/Safe Sex Programs
- (3)** Motivational/Self-Esteem Programs
- (4)** Career Development Programs
- (5)** Teamwork Skills

All Leadership Development Opportunities should be developed in conjunction with each county's appropriate agencies through linkages, and should be designed to be fun, informative, and motivational, and meet pre-determined measurable outcome expectations.

Events should be recorded on the ISS and also on the South Carolina Works Online Service Activity Record by using Code 441 or 424, Actual start and end dates must be reflected on attendance records.

1.7 Supportive Services— Grantee will provide participants with supportive services consisting of transportation to and from the training site. The program will use vans to transport youth to and from the program if specified as needed in the ISS. Childcare payments to a care facility will be provided should the participant require supportive services that are not provided by the Grantee; referrals will be made to appropriate agencies that can provide those support services to participants. Other supportive services include fees paid for field trips and GED fees; incentives/bonuses, which may be gift cards or work attire, considered to be a stipend; graduation; and any other funded service that is needed to remove a barrier and promote educational and employment activities. The internal Supportive Services Policy should be followed. All referrals must be documented in the participant's file. This activity must be recorded on the SCWOS Activity Record using Code 419, 480, 481, 482, or 485 as applicable. Actual start and end dates must be reflected on attendance records.

1.8 Youth Adult Mentoring – The Grantee shall provide adult mentoring through job shadowing or work site supervisors, tutors, program staff and community organizations for those individuals determined in need of adult guidance through initial assessment. The Grantee will be responsible for identifying and developing these relationships. Adult mentoring may take place during the time services are being rendered and afterwards during the 12-month follow-up. Adult mentoring will be provided and monthly activities will be coordinated between the mentor and youth. Mentors will encourage the youth to get involved in community service projects. Mentors should meet with their mentees at least four (4) hours per month to discuss goal setting, school, and problem solving.

Key to the success of any Youth Program or activity is an adult or adults within the community who are committed to serving as mentor(s) or role model(s) for all participating youth. Adult

mentors should serve as role models and impart standards or expectations for these youths with respect to employment decisions, life skills, self-sufficiency, and/or education achievement.

This activity must be recorded on the South Carolina Works Online System Activity Record using Code 411. Actual start and end dates must be reflected on attendance records.

- 1.9 Follow-Up** – not less than 12 months after the completion of participation, as appropriate, The Grantee will provide follow-up by phone and in person for each participant. Each participant will be provided follow-up services for at least 12 months after they exit the program. Staff will work with all participants to track progress of individual and to provide any support, counseling/referrals as may be necessary. Case Managers will arrange additional support services, when necessary, and use these check-up calls as a way to conduct follow-up. Mentors should also stay in contact with Case Managers to ensure clients are moving along with their ISS goals and such contact will be noted in the participants' files. Program operators are responsible for considering the level of intensity of the services provided and the needs of the individual in determining the corresponding appropriate level of follow-up services. The level of follow-up services must be sufficient to accomplish the performance goals and objectives outlined in this grant. Generally, more frequent follow-up services with measures of progress are less likely to be challenged and will result in better participant performance. However, a minimum of one contact or service per month is required while a participant is receiving follow-up services.

This activity must be recorded in the SCWOS follow-up record and a copy of the follow-up documentation must be maintained in the client's file. A minimum of one monthly case note is also required during follow-up.

- 1.10 Youth Comprehensive Guidance and Counseling** – The Grantee will provide comprehensive guidance counseling that will take place in the form of Case Manager follow-up calls, coordination of services, ISS updates, issuance of supportive services, mentor updates, etc.

ACHIEVE has several avenues of guidance and counseling:

- (1)** The job coordinator offers guidance and counseling throughout the duration of the participant enrollment and follow-up. Guidance/counseling is offered concerning jobs and college situations and is documented in SC Works Online System (SCWOS).
- (2)** ACHIEVE has experienced an increase in participants with mental health issues and has outside funding through several grants to provide a part-time onsite counselor. This counselor offers individual counseling as well as small group. Referrals are made to appropriate assistive agencies if additional services are needed.
- (3)** Some of ACHIEVE's participants receive drug/alcohol counseling through The Forrester Behavior Center (formerly SADAC) as well as behavioral counseling through the Department of Juvenile Justice (DJJ). SCVRD (Voc Rehab) and ACHIEVE are partnering to identify participants that can qualify for services due to substance abuse.
- (4)** SAFE Homes has been a strong counseling referral for ACHIEVE participants experiencing domestic violence.

Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, must be provided to each youth participant in any youth activity. These guidance and counseling resources are to be provided under a comprehensive Case Management approach with each participant. Case Management is a client-centered approach in the development of services designed to assist youth in finding employment through the proactive provision of counseling, pre-employment, and work maturity skills, basic and remedial education, occupational training, work experience, etc.

Case management shall be provided by the Grantee. Case Management strategies should include, but not limited to:

- Regularly scheduled contact with the participants (Minimum of four times each month)
- Intensive and personal follow-up activities (Shall be documented in ISS)
- Use of the ISS benchmarks to measure progress.

The basic objective of case management is to monitor participant progress in fulfilling the ISS. In an effort to help guide the student's success, an academic plan will include the educational and employment goals and a personal statement from the youth on how he/she intends to reach that goal. Where progress is slow or in reverse, case managers must be proactive in identifying the problem and solving the problem before the participant quits without achieving a recorded positive outcome. All case management/counseling must be documented as part of the ISS.

Case Managers will know the name, face, family, and life situation of each participant. They must have detailed knowledge of other community services within the participant's resident county and cultivate a wide network of contacts. Special need resources may be found through the UWB or SC Works Center.

1.10.1 The Grantee shall provide counseling services to participants on a monthly basis and shall begin at orientation. Additional counseling sessions may be scheduled on an "as needed" basis.

1.10.2 The Case Manager shall document all counseling sessions in the Case Notes Section of SCWOS.

1.11 Financial Literacy Education—to educate and assist participants in budgeting and understanding loans, interest, credit and other financial life skills. Financial literacy is integrated in the classroom (GED) as well as in pre-employment training as career pathways are discussed and explored. Formally, the Carolina Foothills Federal Credit Union does financial workshops at ACHIEVE and the participants especially learn from and enjoy the simulation process. ACHIEVE staff have participated in the CommunityWorks sessions, Training-the-Trainer, which has better equipped the job coordinator to assist participants with questions and situations. CommunityWorks will also be a referral for ACHIEVE participants.

1.12 Entrepreneurial Skills Training—part of the pre-employment and career pathway training to acquaint participants with owning one's own business

Entrepreneurial topics are integrated within the pre-employment curriculum. More intensive training is done when CellBotics offers entrepreneurial training and information. Tours to small businesses, such as SC Tool, offer opportunities to see an entrepreneurship in full force. ACHIEVE has a former student who is interested in educating participants about starting a small business,

as he has his own business, Student Painters, while attending college. ACHIEVE will follow any other direction from the WB concerning training in entrepreneurship.

1.13 Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services

Labor market information (LMI) is conveyed within the hours of pre-employment training through various sources, including ONET, Personal Pathways to Success, etc. Participants are offered a variety of workshops through integrated services from ACHIEVE and SC Works that keep LMI and in-demand occupations at the forefront. Additionally, training providers deliver LMI during the class as part of the educational training.

1.14 Activities that help youth prepare for and transition to post-secondary education and training

Postsecondary preparation is ingrained into the pre-employment training, LST, as well as in the GED classroom. The GED instructor has been employee at SCC as well as in high school, so she naturally discusses postsecondary and the systems in place to help participants who begin college. Participants also visit colleges. They prepare to take college entrance tests through practice in COMPASS, SAT, ACT and ASVAB. In follow-up, the job coordinator helps participants and family to complete FAFSA and arrange college entrance procedures. In some cases, enrollment fees are paid to help the participant begin college sooner.

Innovative Programs and Services that are consistent with the requirements and expectation of WIOA Youth Activities may be provided and reflected in the participant's ISS.

2.0 TRAINING LOCATION

The Grantee will operate a training site at 220 E Kennedy St, Suite 1, Spartanburg, SC 29302, co-located with SC Works Upstate.

3.0 RECRUITMENT

The Grantee is responsible for the recruitment of eligible youth. Direct and indirect contact will be made with all high schools and alternative schools in each county as well as with the Department of Juvenile Justice, the Department of Social Services, Alcohol and Drug agencies, Vocational Rehabilitation, Adult Eds, Hope Center for Children, faith-based organizations and an array of other agencies that will target clients that have barrier to employment. Many referrals are made from high school guidance counselors and principals. While contact is necessary for ACHIEVE's available services to be known, developing a relationship with these agencies is part of the ongoing systematic approach of recruitment. A staff has served on the Department of Juvenile Justice Review and Planning Committee for the last seven years in order to identify educational alternatives for youth offenders. Staff serves on The Forrester Center (SADAC) Impact Coalition and assists in planning on the Drug Free Communities team. Many partnerships have been formed to provide outreach for ACHIEVE while working with these agencies and schools to find alternative education for the at-risk youth involved and for the greater good of the community-at-large.

Presentations, exhibits, flyers, brochures and similar literature is presented at area community events, displayed at one-stop centers and mailed to agencies.

ACHIEVE plans to advertise through publicity, such as news releases.

ACHIEVE has a FaceBook presence and will regularly post news and events:
https://www.facebook.com/YouthGEDProgram?ref=br_tf.

While ACHIEVE will continue to recruit in the aforementioned manner, many of the program's participants come to the program by referrals from previous participants who have found satisfaction in their achievement and know family and friends who can use ACHIEVE's services. ACHIEVE recently began an incentive program to award participants who make referrals. If the referral enrolls and attends well, a gift card incentive may be given.

Last, but not least, potential participants access ACHIEVE's online application to complete and submit for initial orientation to the Program.

The Grantee will recruit individuals, age 16-24 years, who appear to meet the youth eligibility criteria and who appear in need of one or more of the fourteen (14) required youth services. The Grantee will provide an introductory program orientation and pre-screening for program requirements for **potential applicants**.

3.1 The following steps shall occur from recruitment through selection. **The process may terminate at any point.**

- A. The Grantee will provide an introduction to WIOA, explain the full array of WIOA services, explain the applicant's responsibilities, and provide orientation to the intake process.
- B. The Grantee will provide the applicants with a list of required eligibility documentation.
- C. The Grantee will acquire and/or complete the appropriate intake Forms: SCWOS Program Application, Pre-Screening Form, Receipt of Information, Release of Information, and Participant Rights Handout.
- D. The Grantee shall provide the applicant with a Basic Skills test (TABE) to determine if the individual is Basic Skills Deficient. The Grantee may use a recently administered test (within the past 6 months) should the test give a grade level equivalency. A copy of the test must be maintained in the participant file. This information must be recorded in the Assessment section of SCWOS.

4.0 CERTIFICATION OF ELIGIBILITY

4.1 WIOA defines eligibility criteria for out-of-school and in-school youth and expands the age of eligibility for OSY to 24. Eligibility requirements are defined below.

An **out-of-school youth** is an individual who is not younger than age 16 or older than 24 at the time of enrollment, is not attending any school, and is one or more of the following:

1. A school dropout.
2. A youth who is within the age of compulsory school attendance (defined as under the age of 17 in South Carolina), but has not attended school for at least the most recent complete school year calendar quarter (based on how a local school district defines its school year quarters);
3. A low-income individual who is a recipient of a secondary school diploma or its recognized equivalent, and is either basic skills deficient or an English language learner;
4. An individual who is subject to the juvenile or adult justice system;
5. A homeless individual (as defined in the Violence Against Women Act of 1994 or the McKinney-Vento Homeless Assistance Act), a runaway, an individual who is in foster care or who has aged out of the foster care system, a child eligible for assistance under Section 477 of the Social Security Act, or an individual who is an out-of-home placement;
6. An individual who is pregnant or parenting;
7. An individual with a disability; or
8. A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

The term **school** refers to both secondary and post-secondary school. However, the US Department of Labor does not consider providers of Adult Education under title II of WIOA, YouthBuild programs or Job Corps programs to be schools. Therefore, youth attending these programs are considered to be out-of school for purposes of WIOA youth program eligibility.

The term **basic skills deficient** means the youth has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test.

See the local instruction for established definitions and eligibility for using “**requires additional assistance**” criteria for OSY, as well as ISY.

An individual who meets any one of the following criteria satisfies the **low-income requirement** for the WIOA youth program:

1. Receives, or in the past six months has received, or is a member of a family that is receiving or in the past six months has received, assistance through the Supplemental Nutrition Assistance Program (SNAP), the Temporary Assistance for Needy Families (TANF) program, or the Supplemental Security Income (SSI) program, or state or local income-based public assistance;
2. Receives an income, or is a member of a family that receives an income that, in relation to family size, is not in excess of the most recent Family Income guidelines issues via State Instruction;
3. Is a homeless individual as defined in the McKinney-Vento Homeless Assistance Act or the Violence Against Women Act of 1994;
4. Receives, or is eligible to receive, a free or reduced-price lunch under the Richard B. Russell National School Lunch Act;
5. Is a foster child on behalf of whom State or local government payments are made; or
6. Is an individual with a disability whose own income meets the income requirements above, but who is a member of a family whose income does not meet this requirement.

The eligibility of applicants will be determined by the Grantee in accordance with procedures and guidelines established by the Upstate Workforce Board. **All applicants must be certified eligible prior to WIOA participation.** It will be the Grantee's responsibility to ensure that the applicant is aware and will produce the required documentation for certification. The Grantee is responsible

to refer individuals that do not qualify for the WIOA program to a suitable program(s) as determined appropriate based on the individual's needs. The referral will be documented on the **Referral Log**.

WIOA Youth Eligibility Requirements for participants are as follows:

- a. To be eligible for WIOA Out of School Youth services, a youth must meet the above definition of an out of school youth and/or be facing additional barriers to employment defined by the Upstate WB as being working less than forty hours a week and/or not having a driver's license.
- b. To be eligible for WIOA In-School Youth services, a youth must meet the above definition of an in-school youth and/or be facing additional barriers to employment defined by the Upstate WB as being working less than forty hours a week and/or not having a driver's license.
- c. Because WIOA is NOT an entitlement program, a youth may be eligible (having met the criteria stated above and found in section 129) but the services provided may not be appropriate or suitable for the youth based on the individual's goals and needs. Suitability is determined through the guidance of Instruction Letter 15-12. Youth who are determined eligible to participate but do not become participants in a WIOA program, **MUST** be referred to other appropriate programs within the community.
- d. Is a resident of the Upstate Workforce Board Area (Spartanburg, Cherokee and Union counties).

4.2 5% CLIENTS – Up to five (5%) percent of youth participants may be individuals who do not meet the income criterion for eligible youth, provided that they are within one or more of the following categories:

- a) School Dropout,
- b) Deficient in basic literacy skills,
- c) Are one or more grade levels below the grade level appropriate to the individual's age,
- d) Pregnant or parenting,
- e) Possess one or more disabilities, including learning disabilities,
- f) Homeless or runaway,
- g) Offender,
- h) Face serious barriers to employment defined as:
- i. Youth who lacks work experience defined as not employed fulltime (40 hours per week) for three consecutive months with the same employer or lacks reliable transportation defined as not having a valid driver's license or automobile.

All participants certified under the 5% window must be approved in advance and in writing by the Upstate WB Executive Director prior to enrollment. Any youth certified under the 5% window that was not approved by the WB Director may be determined as ineligible and the costs incurred for that youth may be disallowed under WIOA. Any costs considered disallowed will be repaid by the Grantee using non-WIOA funds.

Five Percent Low-Income Exception

Five percent of local area participants, who ordinarily would need to be low-income, do not need to meet the low-income provision. This includes all ISY and those OSY with a high school diploma or those OSY who require additional assistance. (See OSY #3 and #8 above).

- 4.3 All males age 18 and over, born after 1959, must have complied with Selective Service Draft Registration requirements. If participant turns 18 while attending program, it is the Grantee's responsibility to ensure that participant register with the Selective Service. Verification of compliance with the draft registration requirements may be provided at www.sss.gov and the verification of registration must be printed and maintained in the participant file.
- 4.4 **Orientation** – The Grantee will provide each participant an orientation concerning the Program's outline, attendance requirements, performance goals, entry and exit tests, contact names, etc. Orientation session(s) should also include an overview of the Workforce Innovation and Opportunities Act's purpose and goals as it relates to youth. Every effort should be made to include family members or caretakers of each youth in these sessions. **Also, the Receipt of Information, Release of Information, and Participant Rights Handout must be completed by the participant during orientation, and a signed copy kept on file by the Grantee.**

The Grantee shall make each applicant aware of the grievance procedures and shall have him/her sign and receive a copy of the WIOA Participant Rights Handout. The Grantee shall also maintain a signed copy of the Handout in each participant's file.

5.0 ENROLLMENT

The Grantee is authorized to enroll no less than 85 participants in the program by no later than June 30, 2021. The program is to serve Older and Younger Youth from Spartanburg, Cherokee and Union counties.

- Cherokee- 8
- Spartanburg- 73
- Union-4

- 5.1 The Grantee shall enroll the applicant only after certification is completed and test scores are obtained. Eligibility verification will be reflected in SCWOS. At the time of participant's enrollment, the Grantee shall register the participant by entering the first funded activity (Objective Assessment) in the South Carolina Works Online Services. Once a participant is enrolled, the participant shall become part of the Grantee's performance and the Grantee shall be responsible for his/her positive performance outcomes.

- 6.0 **ASSESSMENT** - The Grantee will provide every eligible youth with an objective assessment of academic level, skills level, and service needs. The Grantee will document all results on the participant's ISS and the Grantee will review the ISS periodically and the Grantee will revise the ISS as needed. These assessments will include, as appropriate:

Review of basic skills: Basic skills training will be assessed by a pre-test and post-test in reading/writing and math. This assessment will show percentages gained in these skills during the program and provide verification of basic skills attainment. This should be done through the use of a current (administered within the past 6 months), standardized assessment instrument, or if

a current test score is not available, the use of a TABE and WIN Learning assessment is acceptable. Those determined basic skills deficient must be post-tested within one year of the youth participation date. Periodic assessments may be given to determine progress made throughout the year. Assessment scores must be entered into SCWOS.

Occupational skills: All past vocational or occupational skills training received by the participant will be gathered during enrollment and will be noted on the participant's ISS.

Employability: Strong linkages with the SC Works system should be formed to allow access to appropriate assessment tools. The WIN Learning assessment has been determined by the Upstate Youth Alliance to be the best means to determine an individual's employability skill. All youth participants are to be assessed using WIN Learning at some point during their participation. The WIN Learning scores will be noted in the ISS.

Interest: All participants should conduct an interest survey and the results should be noted in the ISS. Strong linkages with the SC Works Center may be formed to allow access to appropriate assessment tools such as Career Navigator.

Aptitude: Strong linkages with the SC Works Center should be formed to allow access to appropriate assessment tools.

Supportive Service needs: This information will be gathered during enrollment and will be noted on the participant's ISS. Supportive Service needs will be re-addressed periodically by the Grantee and will be so documented.

Developmental needs: This information will be gathered during enrollment and will be noted by the Grantee on the participant's ISS. Developmental needs will be re-addressed periodically and will be so documented.

The Grantee will develop an individual plan in the SC Works Online Service System for each participant that will identify:

- an employment goal, including (if appropriate) non-traditional employment, that is supported by local labor market information;
- appropriate achievement objectives; and
- appropriate services for the participant taking into account the assessment(s) performed above.

This individual employment plan must be printed from SCWOS and signed/dated by staff and participant.

The Grantee will design an overall program that provides:

- Preparation for post-secondary educational opportunities, if appropriate;
- Strong linkages between academic and occupational learning;
- Preparation for unsubsidized employment opportunities, and
- Effective connections to intermediaries with strong links to job market and local/regional employers, specifically the local SC Works system.

7.0 MIS REPORTING- All participant data must be entered in to the SC Works Online Service System at time of application and point of participation. Copies of all eligibility documentation will be maintained in the participant's file. Upon completion, the SCWOS Youth Application will be printed and signed by the participant, parent/guardian (if applicant below age 18) and the certifying WIOA staff.

7.1 PROGRAM ACTIVITY INITIATION/CONCLUSION

7.1.1 A participant is not a WIOA registered participant until an activity is entered into the system. The participant's educational and employment status must be confirmed at the time of registration. A participant may be initiated into more than one allowable training activity in accordance with the Individual Service Strategy (ISS). The Grantee shall initiate a participant into the appropriate training activity. At the time of participant initiation, the Grantee shall record the appropriate code on the SCWOS Activity record. SCWOS will allow for projected and actual start dates along with the projected end date upon entering an activity no later than fifteen (15) days after the event occurs. Activities must be entered in real-time and reflected in attendance records and case notes.

7.1.2 The Grantee shall conclude participants from an activity by completing the actual end date on the SCWOS Activity Record.

7.1.3 The conclusion date shall be the last day a participant works and receives compensation, or the last day of class attendance. The SCWOS Activity Record should be completed immediately upon completion of a training activity or at the time a participant withdraws or drops out of a training activity and no later than fifteen (15) days after the event occurs.

7.2 PROGRAM EXIT - Clients will exit the program when they are no longer receiving any WIOA-funded or WIOA-partnered services.

EXIT DEFINITION: A client is considered to have exited the program when the following occurs:

- A. Hard Exit:** A client who has a date of case closure, completion, or known exit from WIOA-funded or non-WIOA-funded partner services within the quarter due to being institutionalized, health/medical or family care, deceased, reserve forces called to duty, or relocated to a mandated program;
- B. Soft Exit:** A client who does not receive any WIOA-funded or non WIOA-funded partner service for ninety (90) days and is not scheduled for future services except follow-up services.

Clients who have a planned gap in service of greater than ninety (90) days should NOT be considered as exited if the gap in the services is due to a delay before the beginning of training or a health/medical condition that prevents an individual from participating in services. Service providers should document any gap in service that occurs with a reason for such a gap and enter into SCWOS activity code 001 Hold Code. Participants who exit from services because they are incarcerated, deceased, have a health/medical condition, reserve forces called to duty, or relocated to a mandated program that prevents the individual from participating in services

should be excluded from the measures. Also if the Grantee is provided an invalid social security number by the youth, they would be excluded from the performance measures. These incidents must be clearly documented in a case note explaining the circumstances and that the incident exceeds 90 days for the exclusion to be considered.

The exit date is the last date of WIOA-funded or partner service received (except follow-up services). For Soft Exits, the exit date cannot be determined until ninety (90) days have elapsed from the last day of service. At that point, the last date recorded is the last date of service. The quarter in which the last date of service takes place is the quarter that is counted in the performance measures.

8.0 PARTICIPANT TIME AND ATTENDANCE - Time and attendance are to be documented reflecting actual hours of attendance in all WIOA activities on the Participant Time Record. Time sheets will not be pre-signed or completed in advance. The timesheets must be completed in ink and whiteout should not be used for corrections. Individual attendance sheets must be kept in each participant file. All corrections should be clearly marked and initialed. Grantees should monitor attendance regularly and address any attendance problems with the youth.

9.0 PARTICIPANT FILES - The following documents will be maintained in the participant's file:

- SC WOS Youth Application
- Individual Service Strategy (ISS)
- SC WOS Employment Plan
- First Activity Record/Participation Record signed by Staff and Participant
- Receipt of Information
- SC Rights Handout
- Participant Time and Attendance
- Pre-test and Post-test Information for Basic Skills, Work Experience Skills And Occupational Skills Attainment
- Employment Verification Form (If Applicable)
- Work Experience Grant (If Applicable)

10.2 All forms, documents and information maintained by the Grantee pertaining to this Grant, or mentioned herein, shall be made available to the Upstate Workforce Board upon request and is subject to review at any time. It will be the responsibility of the Grantee to maintain these files until the end of the program year following the anniversary of the participant's exit date. These files will be stored for an additional 5 years and 45 days.

11.0 GRANTEE CENTRAL FILES

At a minimum the following documents will be maintained in the Grantee's Central Files and will be available for on-site monitoring purposes:

- Copy of the Grant and any modifications
- Copy of Act and Applicable Federal Regulations
- SCWOS Manual and SCWOS Instruction Letters
- Staff Job Descriptions

- Staff Time and Attendance to include annual leave hours, sick leave hours, and holiday hours
- Financial Procedures Manual
- Inventory Property List
- Upstate Workforce Board Area Instruction Letters (can be found on the Upstate Workforce Boards website. It is the responsibility of the grantee to watch the site for new instruction letters
- Financial Reports and Back-up Documentation
- Copy of approved travel requests per Instruction Letter 99-04
- Monitoring Reports and Replies
- Log of Complaints
- Referral Log

12.0 COMPLAINT LOG The Grantee will keep a log of complaints received and the disposition of such complaints. The Grantee will advise the UWB Staff immediately if a complaint is filed.

13.0 STAFFING

13.1 For purposes of this grant, the authorized permanent personnel funded by this grant are reflected in the budget. Job descriptions will be maintained for each position. Only staff listed in the budget may be paid utilizing funds from this grant.

13.2 All teachers/instructors employed for this program will have a current teaching Certificate.

13.3 The Grantee shall insure that all staff involved with this Grant receive a copy of this Grant and receive a briefing on their responsibilities as they relate to the Grant. **This briefing shall be documented.** Staff included in support of this grant shall have a designated point of contact to address any questions or concerns pertaining to this grant in order to avoid delays in service. Staff shall immediately notify their supervisor of any contractual problems.

14.0 PERFORMANCE STANDARDS

State PY20 Performance measures are as follows: (90% of the goal must be attained under WIOA):

Youth Employment Rate

2nd Quarter after Exit

GOAL: 77.1%

Youth Employment Rate

4th Quarter after Exit

GOAL: 69.5%

Youth Credential Attainment

Within 4 Quarters after Exit

GOAL: 68.6%

Measureable Skills Gain

Real time (not exit based)

GOAL: 48.0%

Youth Median Wages

Earning- 2nd Quarter after exit

GOAL: \$3,250.00

***Please note: Measureable skills gains and median earning are now goals. They are no longer baseline measures. Local area performance goals have not been negotiated for PY20. Once local numbers are known, a modification or memo will be issued. The state did inform our workforce area that local goals will not be less than state goals.**

15.0 FINANCIAL REPORTING

15.1 The Grantee shall establish and maintain a financial management system that provides accurate, current and complete disclosure of the financial transactions of this Grant. This system shall be in compliance with standards and procedures established in the Terms and Conditions of this Grant. Expenditures under this Grant shall be in compliance with the attached budget. NO ADJUSTMENTS SHALL BE MADE WITHOUT PRIOR AUTHORIZATION BY THE UPSTATE WORKFORCE BOARD.

15.2 Financial reports will be prepared and submitted according to instructions in the Financial Handbook. Original financial reports are due to the WB Office by the fifth (5th) working day of the following month.

The original financial report should be mailed to the following address:

**Mr. Brent Bishop, CFO
Upstate Workforce Board
P. O. Box 5666
Spartanburg, SC 29304**

Copies may be emailed to: bishop@upstateworkforceboard.org

15.3 Reimbursements should not exceed the Spending Plan that is part of this Grant. If funds in excess of the plan are requested, a detailed explanation must accompany the request.

15.4 Invoices for reimbursement or advances will not be processed if monthly financial reports are delinquent.

15.5 The grantee shall reimburse any and all costs determined to be disallowed costs in connection with the activities in this grant from non-WIOA fund sources.

15.6 A minimum of 22% of funds in this grant must be spent on Work Based Learning related activities. This percentage may be adjusted during the program year to ensure that the local area meets the overall 20% expenditure rate requirement of the law. Staff are REQUIRED to keep detailed records to justify staff cost associated with Work Based Learning.

16.0 GRANT MODIFICATION

Any change in this Grant or documents a part hereof, can be changed only by means of an official modification of this Grant. Please refer to the Grant Modification Procedures Instruction Letter.

The amount of this grant may be increased or decreased with the approval of both parties, if the Workforce Area has funds available, and it is determined by the Upstate Workforce Board to be in the best interest of the Workforce Area to increase or decrease the amount of the Grant.

17.0 GRANT CLOSEOUT

Grants will be closed-out within 30 days from the end of the grant period. This deadline supersedes the deadline as stated in the Terms and Conditions. All invoices for payment of expenditures must be submitted prior to or enclosed with the closeout package. Invoices submitted after the grant closeout may not be paid.

18.0 PROCUREMENT/UTILIZATION OF PROPERTY

18.1 USC is held accountable for any WIOA property/equipment shown on the property inventory for the program and will adhere to the Property Procurement rules as established by the Upstate Workforce Board and Spartanburg County, per the local Instruction Letter.

18.2 All purchases will be made in accordance with procedures outlined in the Property-Procurement Handbook.

18.3 Property/equipment will be inventoried at least annually. WB staff will include inventory monitoring on their monitoring visits at least annually.

19.0 MONITORING EXPECTATIONS

19.1 Program administration will be monitored by WB Staff on an on-going basis for compliance with the Act, Regulations, Grant Work Statement, financial reporting, Data System reporting and other administrative instructions.

19.2 If deviations in any area are deemed serious, the WB will be advised and may elect to begin sanction procedures.

19.3 The Monitor will conduct one on-site review throughout the life of this grant. Grantee personnel shall be cooperative in assisting the monitor. The US Department of Labor, the Office of the Inspector General, the Comptroller General of the United States; or any of their authorized representatives have the right to timely and reasonable access to all Grantee records as they pertain to this Grant. All forms, documents, and WIOA inventory maintained by the Grantee pertaining to this Grant shall be made available to the Upstate Workforce Board upon request and is subject to review at any time.

20.0 COMPLIANCE WITH SECTIONS 188 OF THE ACT AND 29 CFR PART 38

As a condition to this award of financial assistance with the Department of Labor under Title I of WIOA, the Grantee assures that it will comply fully with the nondiscrimination and equal opportunity provision of the following laws:

- Section 188 of the Workforce Innovation and Opportunities Act (WIOA);
- Title VI of the Civil Rights Act of 1964, as amended;
- Section 504 of the Rehabilitation Act of 1973, as amended;
- Title IX of the Education Amendments of 1972, as amended;
- 29 CFR Part 37 and all other regulations and instruction letters implementing the above.

The grant recipient understands that the United States has the right to seek judicial enforcement of this assurance.

21.0 GENERAL PROHIBITIONS

21.1 Non-Duplication: No funds under this Act may be used to provide funding under the School-to-Work Opportunities Act of 1994 nor to carry out, through funds under this act, activities funded under the S-T-W Act unless the programs funded under this Act only serve those participants eligible to participate in the program under this Act.

21.2 Against Federal Control of Education: No provision of this Act empowers and/or otherwise authorizes any department, agency, officer or employee employed under this Act to exercise any direction, supervision, or control over the curriculum, program of instruction, administration, or personnel of any educational institution, school, school system, or selection of library resources, textbooks, etc.

21.3 Non-Interference and Non-Replacement of Regular Academic Requirements: No funds under this Act shall be used to provide an activity for eligible youth who are not school dropouts if participation in the activity would interfere with or replace the regular academic requirements of the youth.

22.0 OPTION TO EXTEND

Based upon funding availability, the Upstate Workforce Board may extend a grant period of performance if it appears to be in the best interest of the Upstate Workforce Board and is agreeable with the Grantee. Similarly, the slot levels and or number of participants served and/or associated costs may be increased at any time during the Grant period, if agreeable with the Grantee.

23.0 TERMINATION

The performance of work under this Grant may be terminated by the Upstate Workforce Board, in whole or in part, for either of the following circumstances: Termination for Convenience or Termination for Cause, as defined in the Terms and Conditions attached hereto and incorporated herein.

24.0 SANCTIONS

24.1 If deviations in any area violate the Local/State Sanctions Policy, as outlined in the Local Instruction.

24.2 Sanctions may be imposed if there is a reoccurrence of customer complaints for this is considered failure to meet customer satisfaction levels.

25.0 BENCHMARKS

25.1 Tours should focus on the following industries when possible:

- Advanced Manufacturing
- Trades

25.2 Community Activities:

- Provide a minimum of seven (7) leadership development activities to participants that include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors.

26.0 COVID-19 Considerations

The COVID-19 Pandemic has created unprecedented circumstances for Upstate Workforce area. Given this unique situation, we expect that USC Upstate ACHIEVE Program will:

- Use virtual services as appropriate (including but not limited to enrollments, orientations, workshops, etc.) to maximize services for WIOA youth where in-person services are not in the best interest of customers or staff;
- Be responsive to changes that need to be made in service delivery due to COVID-19;
- Inform UWB staff if the program is no longer able to safely remain open and serve customers in-person;
- Follow local, state, and federal guidance related to COVID-19, including safety measures and guidelines given by the Center for Disease Control as they pertain to operating the program.

27.0 EFFECTIVE DATE OF GRANT

The effective dates of this grant are August 1, 2020 through June 30, 2021
~~July 23, 2020 through June 30, 2021.~~ E.S.

**PART III
TERMS AND CONDITIONS**

3.0 LEGAL AUTHORITY

- 3.0.1** The persons signing this Grant Agreement on behalf of the parties warrant and guarantee their full authorization to execute the Grant Agreement and to legally bind the parties to all terms, performance requirements, and provisions as set forth below.

3.1 AWARDING ENTITY

- 3.1.1** As the awarding entity, the Department of Employment and Workforce (DEW), has the following oversight responsibilities:
- Providing technical assistance, as requested by the Grantee or deemed necessary by DEW;
 - Conducting programmatic and financial monitoring of the Grant project;
 - Ensuring compliance with WIOA Public Law 113-128 and implementing Federal regulations, the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200), as well as any other Federal or State laws, regulations and policies applicable to the Grant Agreement;
 - Disbursing funds to the Grantee to pay for allowable expenses or services provided in accordance with applicable State and Federal laws upon receipt of proper supporting documentation of disbursement amounts previously drawn down; and
 - Evaluating the Grantee against specific deliverables, performance, and reporting requirements as outlined in the Grant Agreement's Statement of Work.

3.2 FINANCIAL SYSTEM AND REPORTING

- 3.2.1** The Grantee is responsible for developing and implementing procedures and standards for reporting financial, programmatic, and customer information in the required timeframes and using the systems and formats specified by DEW. Documentation of these procedures shall be maintained by the Grantee for the duration of the grant until grant closeout.
- 3.2.2** The Grantee shall maintain fiscal records and supporting documentation for all expenditures of funds under the Grant Agreement. The Grantee must provide adequate, qualified staff to prepare required reports. Proper internal controls are required to ensure separation of duties.
- 3.2.3** Costs incurred by the Grantee prior to the start date specified in the Grant Agreement are incurred at the Grantee's own expense. Prior authorization for pre-award spending must be obtained from DEW and the US Department of Labor before any costs are incurred.

- 3.2.4 Payment by DEW of Indirect Costs incurred requires the Grantee to submit its approved Indirect Cost Rate or Acceptance of Certification of Indirect Costs from its cognizant agency upon receipt. If DEW is the cognizant agency for the grant recipient, an Indirect Cost Rate proposal must be submitted to DEW no later than 180 days after the June 30 fiscal year end. Failure to do so may result in the disallowance of indirect costs. DEW may either disallow all indirect costs or establish a rate based upon audited historical data or such other data that have been furnished to DEW for indirect costs. (2 CFR Part 200.415(b)(2))
- 3.2.5 The Grantee is required to submit a Financial Status Report (FSR) on a monthly basis, regardless of whether any expenditures have accrued during the month. Reports must be submitted no later than the 20th of the following month. Expenditure data is reported cumulatively through the end of each reporting period on an accrual basis.
- 3.2.6 A Request for Payment (RFP) must be submitted each time the Grantee wishes to draw down funds, along with proper supporting documentation of disbursements previously drawn down. The Grantee may be required by DEW to provide additional supporting documentation as outlined in the Grant Agreement's Statement of Work. The Grantee may request funds in advance to cover upcoming cash expenditures and accruals to be paid within a short period of receipt of funds (usually within three (3) business days). The Grantee's cash needs must be projected to ensure that funds are received as close as possible to the time of actual disbursement in accordance with 2 CFR Part 200.305. Cash on hand should be limited to the amount needed for immediate disbursement.
- 3.2.7 The Grantee will submit a complete Grant Closeout Report to DEW no later than sixty (60) calendar days after the grant end date. DEW will supply the closeout forms and instructions prior to grant expiration.
- 3.3 **RECORDKEEPING**
- 3.3.1 DEW, and any of its authorized representatives, must have timely and reasonable access to all Grantee records and personnel related to the Grant Agreement for the purpose of inspection, investigation, monitoring, auditing, evaluation, interview, and discussion. Further, DEW and any of its authorized representatives, have the right to copy all records pertaining to the Grant Agreement.
- 3.3.2 The Grantee shall comply with requirements for custody and retention of records as set forth in 2 CFR Part 200, as applicable. Records must be retained for no less than three years after submittal of the Grant Agreement closeout to DEW or the last request for grant records during an audit, whichever is most recent. If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken (2 CFR Part 200.333).

- 3.3.3 The Grantee assures it will comply with Federal and State laws and guidelines for the handling and protection of Personally Identifiable Information, including but not limited to 2 CFR Part 200.79 and US Department of Labor Training and Employment Guidance Letter 39-11, *Guidance on the Handling and Protection of Personally Identifiable Information (PII)*, located at https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7872.
- 3.3.4 The Grantee agrees to maintain the confidentiality of any information that identifies or may be used to identify any grant and benefit participants. The Grantee shall not disclose or re-disclose any employer or personally identifying information of the subject of the information unless permitted by law.
- 3.3.5 All releases of information shall be in accordance with State and Federal law, regulations and guidelines, including but not limited to S.C. Code Ann. § 41-29-160; the Family Privacy and Protection Act (S.C. Code Ann. § 30-2-10 et al), 20 CFR 603, and IRS Publication 1075.

3.4 PROCUREMENT

- 3.4.1 The Grantee must have written procedures for procurement transactions that comply with State regulations. Procedures may reflect applicable local laws and regulations, provided they conform to applicable Federal law and the standards identified in 2 CFR Parts 200.318 through 200.326.
- 3.4.2 Procurement standards must ensure fiscal accountability and prevent waste, fraud, and abuse. The Grantee will conduct procurement in a manner that provides full and open competition consistent with the standards of 2 C.F.R Part 200.319.

3.5 ADDITIONAL CONDITIONS AND ENFORCEMENT

- 3.5.1 The Grantee acknowledges and accepts that special additional conditions may be unilaterally imposed by DEW in accordance with 2 CFR 200.207. Such conditions may be imposed if the Grantee demonstrates one or more of the following conditions:
- a history of unsatisfactory performance;
 - financial instability;
 - management system(s) that do not meet standards prescribed in 2 CFR 200.300 et seq.;
 - noncompliance with terms and conditions of previous Federal awards or subawards;
 - absence of responsibility disclosed as a result of ongoing evaluation of risk by DEW conducted in accordance with 2 CFR 200.331(b);
 - reports and findings from audits performed under 2 CFR Subpart F – Audit Requirements of this part or the reports and findings of any other available audits; and/or
 - inability to effectively implement statutory, regulatory, or other requirements.

3.5.2 If DEW determines that a grant award will be made or continued, special provisions shall address the condition identified and shall be included in the award. Such provisions may include but are not limited to:

- **requiring payments on a reimbursement basis;**
- **withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance;**
- **requiring additional, more detailed financial reports;**
- **requiring additional project monitoring;**
- **requiring the Grantee to obtain technical or management assistance and to implement corrective actions; and/or**
- **establishing additional prior approval.**

DEW will notify the Grantee regarding the nature and reason for implementing any of the above special provisions.

3.5.3 Failure to comply with any provision of the Grant Agreement, or any applicable law or regulation, may subject the Grantee to additional enforcement actions that are determined by DEW to be appropriate under the circumstances. Such enforcement actions include but may not be limited to:

- **requiring special award provisions as stated above;**
- **temporarily withholding cash payments pending correction of identified deficiencies, as identified in 2 CFR 200.338;**
- **disallowing cost (and, if appropriate, applicable matching credit) for any claim or action made that is not in compliance and require appropriate repayment or financial adjustment;**
- **suspending the grant award, in whole or in part, pending corrective action;**
- **terminating the grant award, in whole or in part;**
- **withholding further awards for the project or program;**
- **recommending to appropriate Federal officials that suspension or debarment proceedings be initiated as authorized under 2 CFR 180; and/or**
- **taking other remedies that may be legally available. (See 2 CFR 200.338.)**

3.5.4 The Grant Agreement may be immediately terminated by DEW in whole or in part for cause or noncompliance whenever such non-compliance is material and termination is in the best interest of the Grantee, DEW, or the US Department of Labor.

3.5.5 Appeals regarding monitoring findings and/or enforcement actions may be appealed as follows:

- 1. Within 14 days of receipt of the final monitoring determination or notice of enforcement action, a written appeal may be made to the Executive Director of DEW.**
- 2. The Executive Director will issue a written decision within 30 days.**
- 3. If dissatisfied with the decision, a written appeal may be made to the State Workforce Development Board (SWDB) within 14 days of receipt of decision.**

4. The Chair will designate the Executive Committee or an Ad Hoc Committee of at least five SWDB members to hear the appeal.
5. The SWDB will hear the appeal and render a decision within 60 days.
6. The Grantee will be notified in writing of the SWDB's decision within 20 days.

3.5.6 Appeal requests made to the SWDB must be submitted in writing as follows:

South Carolina Department of Employment and Workforce
Attn: Appeals, State Workforce Development Board
1550 Gadsden Street
Columbia, SC 29201

3.6 CHANGES AND AMENDMENTS

- 3.6.1 Any alterations, additions, or deletions to the terms of the Grant Agreement which are required by changes in Federal or State law or regulations are automatically incorporated into the Grant Agreement without written amendment, and shall become effective on the date designated by such law or regulation.
- 3.6.2 Alterations, additions, deletions, or extensions to the terms of the Grant Agreement must be modified in writing and executed by both Parties. Any other attempted changes, including oral modifications, shall be invalid.
- 3.6.3 To ensure effective performance under the Grant Agreement, the Parties agree that DEW may amend requirements in writing during the grant period to interpret or clarify a change in Federal or State law, rules or regulations.

3.7 ASSURANCES

- 3.7.1 **EQUAL OPPORTUNITY ASSURANCES:** As a condition to the award of financial assistance from the US Department of Labor under Title I of WIOA, the Grantee assures that it is aware of and has the ability to comply with the nondiscrimination and equal opportunity provisions of the following laws and will remain in compliance for the duration of the award of federal financial assistance. These laws include, but are not limited to:
 - A. *Section 188 of the Workforce Innovation and Opportunity Act (WIOA)*, which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or against beneficiaries on the basis of either citizenship status or participation in any WIOA Title I-financially assisted program or activity;

- B. *Title VI of the Civil Rights Act of 1964, as amended*, which prohibits discrimination on the bases of race, color, and national origin;
 - C. *Title IX of the Education Amendments Act of 1972*, which prohibits discrimination on the basis of sex in educational programs;
 - D. *Section 504 of the Rehabilitation Act*, which prohibits discrimination against qualified individuals with disabilities;
 - E. *The Age Discrimination Act of 1975, as amended*, which prohibits discrimination on the basis of age; and
 - F. *The South Carolina Pregnancy Accommodations Act*, which protects employees and applicants who have medical needs arising from pregnancy, childbirth, or related medical conditions.
 - G. The Grantee also assures that, as a recipient of WIOA Title I financial assistance, it will comply with 29 CFR part 38 and all other regulations implementing the laws listed above. This assurance applies to the Grantee's operation of the WIOA Title I-financially assisted program or activity, and to all agreements the grant applicant makes to carry out the WIOA Title I-financially assisted program or activity. The Grantee understands that the United States has the right to seek judicial enforcement of this assurance.
- 3.7.2 **ADDITIONAL ASSURANCES:** The Grantee additionally assures that it is aware of and will comply with the following:
- A. *Jobs for Veterans Act (38 U.S.C. §4215)*, which requires recipients to provide priority of service to veterans and spouses of certain veterans for the receipt of employment, training, and placement services in any job training program directly funded, in whole or in part, by the US Department of Labor. To obtain priority of service, a veteran or spouse must meet the program's eligibility requirements. US Department of Labor Training and Employment Guidance Letter 10-09 provides further guidance and can be found at https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2816;
 - B. *P.L. 113-114, Division E, Title VII, Section 743*, which prohibits an entity receiving Federal funds from requiring employees or contractors of such entity seeking to report fraud, waste, or abuse to sign internal confidentiality agreements or statements prohibiting or otherwise restricting such employees or contractors from lawfully reporting such waste, fraud, or abuse to a designated investigative or law enforcement representative of a Federal department or agency authorized to receive such information;

C. *P.L. 113-114, Division H, Title V, Section 505*, which establishes that when issuing statements, press releases, requests for proposals, bid solicitations and other documents describing projects or programs funded in whole or in part with Federal money, all recipients receiving Federal funds shall clearly state:

1. The percentage of the total costs of the program or project which will be financed with Federal money;
2. The dollar amount of Federal funds for the project or program, and
3. The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.

The requirements of this part are separate from those in 2 CFR Part 200 and, when appropriate, both must be complied with.

D. *Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency (LEP)"*, which requires that recipients of Federal financial assistance ensure that programs and activities provided in English are accessible to LEP persons and thus do not discriminate on the basis of national origin;

E. *Executive Order 13333*, which establishes this agreement may be terminated without penalty, if the Grantee or any subgrantee engages in: (i) severe forms of trafficking in persons; (ii) the procurement of a commercial sex act during the period of time that the grant is in effect; (iii) the use of forced labor in the performance of the grant; or (iv) acts that directly support or advance trafficking in persons. (22 U.S.C. §7104(g));

F. *Buy American Notice Requirement*, which provides that in the case of any equipment or product that may be authorized to be purchased with financial assistance provided using funds available under WIOA, entities receiving the assistance should, in expending the assistance, purchase only American-made equipment and products, as required by the Buy American Act (41 U.S.C. §10a et seq.);

G. *Executive Order 13043 Increasing Seat Belt Use in the United States (April 16, 1997)*, which provides that recipients of Federal funds are encouraged to adopt and enforce on-the-job seat belt policies and programs for their employees when operating vehicles, whether organizationally owned or rented or personally owned;

H. *Executive Order 13513, Federal Leadership on Reducing Text Messaging While Driving (October 1, 2009)*, which provides that recipients of Federal funds are encouraged to adopt and enforce policies that ban text messaging while driving company-owned or rented vehicles, Government-owned, Government-leased, or Government-rented vehicles, or while driving privately-owned vehicles when on official Government business or when performing any work for or on behalf of the Government, and to conduct initiatives of the type described in section 3(a) of the Executive Order;

- I. ***Special Requirements for Conferences and Conference Space.*** Conferences sponsored in whole or in part by the recipient of Federal awards are allowable if the conference is necessary and reasonable for successful performance of the Federal Award. Recipients are urged to use discretion and judgment to ensure that all conference costs charged to the grant are appropriate and allowable. For more information on the requirements and allowability of costs associated with conferences, refer to 2 CFR Part 200.432;

3.8 CERTIFICATIONS

3.8.1 Lobbying (2 CFR §200.450)

- A. No federally appropriated funds have been paid or will be paid, by or on behalf of the Grantee, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan or cooperative agreement.
- B. If any funds other than federally appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan or cooperative agreement, the Grantee shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

3.8.2 Debarment, Suspension, and Other Responsibility Matters

The Grantee agrees to comply with 2 CFR Part 200.213, which states that non-Federal entities and contractors are subject to the non-procurement and debarment and suspension regulations.

3.8.3 Drug-Free Workplace (Public Law 100-690)

The Grantee agrees to comply with provisions of 41 U.S.C. §702 in providing a drug-free workplace.