

## Items to be Approved by the Office of Family Assistance (OFA)

- **Memorandums of Understanding (MOUs)**
  - See MOU Review Sheet
- **Contracts**
  - See Contract and Request for Proposal Review Sheet
- **Requests for Proposals**
  - See Contract and Request for Proposal Review Sheet
- **Key Staff Hiring**
  - Definition: The PI/PD and other individuals who contribute to the programmatic development or execution of a project or program in a substantive, measureable way, whether or not they receive salaries or compensation under the grant. Therefore staff that is supervisory in nature or making key programmatic decisions will be defined as key staff for HPOG and need approval.
  - Background: If key staff is not specified in the application materials, the grantee must submit that position for hiring approval. If key staff is named in the application this is not necessary.
  - Approval Process: Before the offer of employment is extended, the grantee will upload the following to GrantSolutions as a Grant Note using the naming convention *Key Staff NAME MM YYYY Proposed* (e.g. Key Staff Smith 11 2015 Proposed)
    - A copy of the organization's personnel/ hiring procedures (only for the first hiring approval ever submitted)
    - A written explanation detailing the steps taken by the organization in following that hiring procedures
    - The job description for the key staff position
    - The resume for the proposed person to be hired
  - OFA will note approval for the key staff hiring in GrantSolutions and once OFA has done this, the offer for employment can be extended to that key staff.
  - If this is changing the PI/PD or Authorized Official, then the grantee will need to complete an Amendment in GrantSolutions to have this officially changed on the Notice of Award.
- **Dissemination Materials**
  - Definition: There are two broad categories of dissemination materials - written documents and electronic media. Written documents include recruitment flyers, newsletters, information sheets, etc. This would also include media releases, newspaper articles, radio/ TV ads, etc. where advanced approval is possible. Electronic media includes things like websites. This would also include other items developed for use in conjunction with these dissemination materials such as a table runner.
  - Background:
    - Grantees should review the HPOG Grantee Style Guide to follow formatting, etc. Please contact your Program Specialist to obtain the Style Guide, if needed.
    - Written materials must include the following **funding and disclaimer statement**, along with the HPOG grantee lockup:

- “This document was supported by Grant [number of grant] from the Administration for Children and Families, U.S. Department of Health & Human Services (HHS). Its contents are solely the responsibility of the authors and do not necessarily represent the official views of HHS.”
- Recruitment materials developed by grantees that are part of random assignment, Impact Study, must also include the following **evaluation random assignment disclaimer statement**:
  - “HPOG is part of a study funded by the federal government which is being conducted to determine how these training opportunities help people improve their skills and find better jobs. During the study, all new eligible applicants will be selected by lottery to participate in these training opportunities. Not all eligible applicants will be selected to participate in these opportunities.”
  - Those grantees must also send marketing/ recruitment materials to the designated local evaluation team lead for approval.
- For instances where space or time is an issue, such as a radio or small newspaper ad, a **condensed version** of the above may be used:
  - Funding statement, disclaimer, and evaluation statement: *“Grant funding supported by the Administration for Children and Families. This document’s contents are solely the responsibility of the authors. All new eligible applicants will be selected by lottery to participate in these training opportunities. Not all eligible applicants will be selected.”*
- **Electronic media/ websites** must also contain the above full funding statement, disclaimer, evaluation statement, and HPOG grantee badge (linked to the HPOG website), as well as links to the official HPOG social media accounts. Please reference the HPOG Grantee Style Guide.
- **Social Media Accounts** – If you’re creating a Facebook, Twitter, or LinkedIn account for your HPOG program, you need to submit these for approval as well. Here are the steps you need to follow:
  - Design your page on Facebook, Twitter or LinkedIn.
    - Please make sure to include the funding statement and disclaimer(s) (referring to document content and/ or evaluation random assignment, if applicable) in the profile section of these accounts. If the full version does not fit in the profile section (due to character limits), please try the condensed version above. If it is still a problem, provide a link to your HPOG program’s home page where this information can be found.
      - This means that your office needs to have an HPOG page on their website (see information on electronic media above for more information). If you don’t, please speak with your program specialist about how to meet the disclaimer requirements.
  - Once it is final, submit a Grant Note in GrantSolutions requesting approval of the page, as you would the other types of dissemination information.
  - Your program specialist will go in and approve.

- Then, you should include a link to your Facebook, Twitter and/or LinkedIn pages in the Dissemination Section of your PPR. Your Program Specialist will be checking these pages every 6 months as part of your PPR review.
  - Approval Process: Before the item is disseminated to the public, the grantee will upload the document or link to GrantSolutions as a Grant Note using the naming convention *Marketing NAME MM YYYY Proposed* (e.g. Marketing Recruit Flyer 11 2015 Proposed)
    - If the grantee is part of random assignment, the document should also be sent to the designated local evaluation team lead for approval.
  - OFA will note approval for the dissemination material in GrantSolutions and once OFA has done this, the item can be used/ disseminated to the public.
- **Incentives/ Gift Cards**
- Background: As noted in the FOA, since grant funds may not be used for the provision of cash payments, OFA will be determining whether a grantee's use of funds for "incentives" and "gift cards" is allowable or not on a case by case basis. Gift cards may be used for the purpose of providing incentives and/or supportive services (such as gas cards limited to the purchase of gasoline as a transportation supportive service).
    - **The incentive policy** should clearly describe how obtaining an incentive is closely related to meeting a program milestone (such as completing training and/or obtaining employment) and how it meets with all of the funding restrictions outlined in this section of the FOA. All incentives and gift cards must be allowable and reasonable amounts as determined by the Cost Principles found at 45 CFR 75.
    - **Gift cards must be restricted** from being used to purchase alcohol, firearms, tobacco, or entertainment. The grantee must pursue a way to restrict the gift cards or provide gift cards to stores that do not sell these items. If a grantee can show evidence that they have attempted to restrict the gift cards, but cannot or that they cannot find a convenient vendor that does not sell these items, then the grantee should confer with their assigned Program Specialist. It would then be acceptable, as part of the incentive/ gift card policy, to include a signed statement by the participant whereby he/she affirms they will not use gift cards for the purchase of alcohol, firearms, tobacco, or entertainment in conjunction with unrestricted or partially restricted gift cards.
  - Approval Process: Before the organization implements an incentive/ gift card policy, the grantee will upload the policy containing the following items to GrantSolutions as a Grant Note using the naming convention *Incentive Policy MM YYYY Proposed* (e.g. Incentive Policy 11 2015 Proposed)
    - Incentive attainment milestones tied closely to meeting program milestones, such as completing training, obtaining employment, and retaining employment.
    - Incentive items to be awarded tied closely to program outcomes and support of participants such as scrubs, watches, items needed for a job or class, utility or gas cards.
    - Gift card details, if used
      - If gift cards are able to be restricted or you are utilizing vendors that do not sell restricted items, include a statement explaining this.
      - If there is no means of restricting the gift card or vendors cannot be found that align with the above parameters, then the following needs to be provided:

- Show evidence that the grantee has attempted to restrict the gift cards, but cannot or that they cannot find a convenient vendor that does not sell these items.
  - Include a statement that each participant would sign a document affirming he/she will not use gift cards for the purchase of alcohol, firearms, tobacco, or entertainment. A copy of the document the participant will sign should also be included.
  - Outline measures for occasional monitoring of card purchases for quality assurance.
- Type/store and amount of the gift card will need to be noted.
- To ensure that gift card amounts are allowable and reasonable, gift card policies must indicate a maximum allowable amount that a participant can receive per year.
- The process or forms for awarding the incentive items and how incentive items will be purchased or stored to assure proper use. For unrestricted or partially restricted gift cards, include the participant affirmation signature page citing the restrictions.
- OFA will note approval for the policy in GrantSolutions and once OFA has done this, the policy can be implemented.

#### ▪ **Gas Cards**

- Background: Same as information found with Incentive/ Gift Cards
- Approval Process: Before the organization implements the use of gas cards as an incentive or supportive service, the grantee will upload the policy containing the following items to GrantSolutions as a Grant Note using the naming convention *Gas Card Policy MM YYYY Proposed* (e.g. Gas Card Policy 11 2015 Proposed).
  - How students get gas cards – whether it is based on class attendance, part of an incentive plan, part of a supportive service, etc. There should be a written policy that both the staff and participant understand.
  - How the amounts of the cards are determined – could be preset by supportive service policy or by miles driven or number of classes to attend
  - How often students are given the cards, that students will sign for receipt of the cards, if receiving the cards is based on class attendance, or other proper use of the cards, etc.
  - Gas card restriction details
    - If gift cards are able to be restricted or you are utilizing vendors that do not sell restricted items, include a statement explaining this.
    - If there is no means of restricting the gift card or vendors cannot be found that align with the above parameters, then the following needs to be provided:
      - Show evidence that the grantee has attempted to restrict the gift cards, but cannot or that they cannot find a convenient vendor that does not sell these items.
      - Include a statement that each participant would sign a document affirming he/she will not use gift cards for the purchase of alcohol, firearms, tobacco, or entertainment. A copy of the document the participant will sign should also be included.

- Outline measures for occasional monitoring of card purchases for quality assurance.
  - OFA will note approval for the policy in GrantSolutions and once OFA has done this, the policy can be implemented.
- **Medical Care Supportive Services**
  - Background: The FOA states “As noted above in section 2005(a)(4), in proposing supportive services related to the provision of medical care, or for room and board, applicants must show how it is an integral but subordinate part of the HPOG-funded program.” In some cases, physicals, immunization, and testing are barriers to entry into health care employment due to the cost. Without having a physical, up to date immunization records, and TB testing, participants cannot be employed in a health care field.
  - Approval Process: Before the organization implements the use of such supportive service, the grantee will upload the policy containing the following items to GrantSolutions as a Grant Note using the naming convention *Service Policy MM YYYY Proposed* (e.g. Service Policy 11 2015 Proposed)
    - Explanation of the support proposed, provider organization, and average cost
    - How it is an integral but subordinate part of the HPOG-funded program
    - Confirmation statement that funds for the supportive service will be paid directly to a third-party vendor
  - OFA will note approval for the policy in GrantSolutions and once OFA has done this, the policy can be implemented.
- **Health Insurance**
  - Background: The FOA states “As noted above in section 2005(a)(4), in proposing supportive services related to the provision of medical care, or for room and board, applicants must show how it is an integral but subordinate part of the HPOG-funded program.” In some cases, medical insurance may be a requirement for participants to complete training and/or the absence of medical insurance may be a barrier to training completion. In these instances, the grantee may provide medical insurance as a supportive service.
  - Approval Process: Before the organization implements the use of such supportive service the grantee will upload the policy containing the following items to GrantSolutions as a Grant Note using the naming convention *Service Policy MM YYYY Proposed* (e.g. Med Ins Service Policy 11 2015 Proposed)
    - Explanation of how the provision of medical insurance is an integral but subordinate aspect of the student’s training. How would the lack of health insurance be a barrier to training or employment?
    - The policy must denote that the grantee will exhaust all other methods of securing health insurance for the participant (i.e. securing low cost insurance through the college and/or enrollment Medicaid or CHIP if eligible).
    - Explanation of the support proposed, provider organization, and average cost
    - Confirmation statement that funds for the supportive service will be paid directly to a third-party vendor

- OFA will note the approval for the policy in GrantSolutions and once OFA has done this, the policy can be implemented.
- **Room and Board Supportive Services**
  - Background: The FOA states, “As noted above in section 2005(a)(4), in proposing supportive services related to the provision of medical care, or for room and board, applicants must show how it is an integral but subordinate part of the HPOG-funded program.” For example, student housing may be needed during a boot camp, orientation type training where all-day training attendance is mandatory and participants cannot commute on a daily basis without much hardship. This housing is also temporary in nature and crucial to program success.
  - Approval Process: Before the organization implements the use of such supportive service, the grantee will upload the policy containing the following items to GrantSolutions as a Grant Note using the naming convention *Service Policy MM YYYY Proposed* (e.g. Service Policy 11 2015 Proposed)
    - Explanation of the support proposed, provider organization, and average cost
    - How it is an integral but subordinate part of the HPOG-funded program
    - Confirmation statement that funds for the supportive service will be paid directly to a third-party vendor
  - OFA will note approval for the policy in GrantSolutions and once OFA has done this, the policy can be implemented.
- **On the Job Training (OJT) Plan**
  - Background: The FOA states, “As noted above in section 2005(a)(3), grant funds may not be used to provide wages to participants. However, grant funds can be utilized to pay employer partners for training services provided by the employer at their sites for program participants, also known as on-the-job training (OJT).”
  - Approval Process: Before the organization implements the use of OJT, the grantee will upload the contract containing the following items to GrantSolutions as a Grant Note using the naming convention *Contract OJT MM YYYY Draft* (e.g. Contract OJT 11 2015 Draft)
    - Please reference the Contract Review Sheet for needed elements.
    - Additionally, contracts with employer partners must identify the title of the occupation, skills and competencies to be learned, how training will be provided, reimbursement rate, the length of training, and anticipated start date.
  - OFA will note approval for the contract in GrantSolutions or send needed edits. Once OFA has approved the draft contract, the grantee can execute the contract. This signed contract should then be uploaded to GrantSolutions as a Grant Note using the naming convention *Contract OJT MM YYYY Signed* (e.g. Contract OJT 11 2015 Signed).
- **Addition of New Healthcare Occupational Trainings**
  - Background: The healthcare occupations that were proposed in the grant application documents, and agreed upon by OFA, are the occupations that are considered approved for training participants. Programs are only allowed to train those healthcare occupations. Programs are allowed to add other healthcare occupational trainings as new labor market needs are identified,

as long as those occupations are part of an articulated career pathway. Programs can add those healthcare occupational trainings, and offer training, after receiving approval from OFA.

- Approval Process: Before the organization can train for a new healthcare occupation, the grantee will upload a justification containing the following items to GrantSolutions as a Grant Note using the naming convention *Add Occ NAME MM YYYY Proposed* (e.g. Add Occ Surgical Tech 11 2015 Proposed)
  - The most pertinent Standard Occupational Classification (SOC) code for the healthcare occupational training and a description of the new occupational training.
  - How the proposed healthcare occupation training is preparing students for one or more specific employer or industry recognized credential or degree (which can include a license, third-party certification, postsecondary educational certificate or degree, or a Registered Apprenticeship certificate).
  - A description, narrative or diagram, of the career pathway for the healthcare occupation.
  - Labor market information, including employment rates, projected employment rates, and number of job openings.
  - Real-time labor market trends, including job posting volume, and educational or experience requirements.
  - Occupational wage data, including the median wage and wage ranges.
  - Estimated average starting wages within the proposed service area.
  - Verification from local employers regarding their needs and expectations.
  - Local training capacity including the provider and length of training.
  - Estimated number of participants that will begin the occupational training and an indication of if this addition would require other workplan projection changes.
- OFA will note approval for the new healthcare occupation in GrantSolutions. Once OFA has done this, the new occupation with vendor information can be input into PAGES and training can be offered to participants for that occupation.

- **Enrollment of Existing/Currently Enrolled Students**

- Background: The intention of the HPOG program is to provide education and training to individuals who would not otherwise have access to it. The currently enrolled student body has access to education and training so the HPOG program should not recruit from it. There are some ways that existing students find their way to the HPOG program without having been recruited. For example, an existing student may go to a TANF agency, American Job Center or other program partner who refers them back to the HPOG program. There may also be some existing students who are only able to continue their education if they receive the additional support that HPOG could provide. Retention office staff may refer those students to the HPOG program. Given that there is the possibility for exceptions to exist, grantees should give highest priority to working with partners to recruit individuals who would not otherwise have access to postsecondary education. Any such enrollments should be considered exceptions and assessed on case by case bases. (For additional context please reference the enrollment of existing students [FAQ](#)).
- Approval Process: Any HPOG program with a recruitment and eligibility determination process that accepts existing students must create a policy which identifies clear and objective definitions for exceptions based on the above guidance and is subject to OFA approval prior to implementation. The

grantee will upload an existing students policy containing the following items to GrantSolutions as a Grant Note using the naming convention *Existing Students Policy MM YYYY Proposed*.

- Provide clear definitions for exceptions that can be uniformly and objectively applied to facilitate the eligibility determination process. For example, “at risk of dropping out” should have objective characteristics that can be consistently observed.
  - Reasonably ensures that currently enrolled student exceptions do not comprise the vast majority of HPOG participants served. To this effect, the policy should indicate the maximum number of currently enrolled students that will be enrolled under the exception per academic term (i.e. no more than 15% of overall enrollments).
  - Provides internal guidelines for tracking enrollment of existing students.
- OFA will note approval for the policy in GrantSolutions and once OFA has done this, the policy can be implemented.