

# Best Practices for Kicking Off Your OCS Grant

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## **Deliver on your application.**

What did you say you were going to do and how were you planning on accomplishing it?

- Method for Creating New Jobs
- Project Partners
- Implementation Plan and Schedule
- Method for Filling New Jobs with Low-Income Individuals
- Proposed Staffing Plan
- Implementation Budget (OCS & leveraged non-OCS funds)
- Plan to Sustain Jobs Created

## **Are there any major changes?**

- Communicate with OCS/OGM Program Specialist.
- OCS must pre-approve all major changes in writing.
- TA is available, if necessary.

# **Make sure financial and management systems are in sync with regulations.**

- 45 CFR Part 74, OMB Circular A-122 (Cost Principles for Non-Profit Organizations), GAAP
- Meet with your organization's Financial Manager to discuss OCS budget, procurement procedures, invoicing and draw-down process, as well as tracking and reporting on leveraged funds and program income (if applicable).
- Ensure accounting system segregates OCS funds and creates an audit trail with sufficient supporting documentation.
- Share what you've learned at OCS Conference, including Flash Drive material, with each of the staff involved in your OCS project.

## **Develop or strengthen tracking systems for documenting JOLI/CED low-income eligibility.**

Review existing intake/assessment forms, and if necessary, modify to meet JOLI/CED eligibility. *At a minimum*, forms must capture:

- TANF Recipients,
- Family HH Size,
- Family HH Annual Income – **earned income/job wages only** (*prior to filling OCS created job*),
- Participant signature attesting to information.

FY 2011 JOLI/CED projects required grantees to ensure confidential/sensitive information is properly handled and safeguarded. Adding a consent statement for participants to agree to share data (necessary for the job creation project) with project partners will help address this requirement.

- ★ TANF Recipients are automatically low-income eligible.
- ★ All others must be compared to the most recent annual HHS Poverty Guidelines.

# 2012 HHS Poverty Guidelines for the 48 Contiguous States and the District of Columbia

Persons in Family HH	100% of Guidelines (JOLI)	125% of Guidelines (CED)
1	\$11,170	\$13,963
2	\$15,130	\$18,913
3	\$19,190	\$23,863
4	\$23,050	\$28,813
5	\$27,010	\$33,763
6	\$30,970	\$38,713
7	\$34,930	\$43,663
8	\$38,890	\$48,613
For more than 8 persons....	Add \$3,960 for each additional person.	Add \$4,950 for each additional person.

The HHS Poverty Guidelines are updated annually, typically in the end of January. They can be found at: <http://aspe.hhs.gov/poverty/index.shtml>

**Establish relationships with recruitment partners well in advance of job creation (*especially if majority of jobs are being created at one time*).**

- Meet with the partners in person (and throughout grant project).
- Discuss job requirements, OCS eligibility, and referral process, including safeguarding of sensitive information and participant consent to share data.
- Find out what services they can provide (job fair targeted to OCS jobs and low-income individuals, offering specific training/feeder programs that train low-income/TANF participants in skills for jobs being created, etc.).
  - Do they have assessment capacity to determine OCS eligibility?
  - Will they share eligibility documentation or just make referrals?
  - Give feedback - if partner referrals successfully fill the jobs created and/or if partner referrals are not eligible or appropriate.
- If necessary, identify other partners that work with low-income and TANF recipients (e.g., contractors for TANF or WIA, and DOL grantees).

## **Develop system to collect and report on project data.**

- Review implementation plan, deliverables and proposed project outcomes as described in your OCS application, and set up a system to capture and report on this data in your semi-annual progress reports.
- Be as specific as possible - who will track what and how.
- Additional outcome data may help attract future grants.
- Data collected needs to include each Performance Progress Report (PPR) measure on Form A , as applicable to your project.
- Financial Management staff need to be part of data collection and reporting for leveraged funds and program income, if applicable.
- Test out the CED/JOLI Data Collection Tool in advance of reporting deadlines. Note: this is a tool that aggregates data totals for populating PPR Form A, but is not the primary source of your data collection. Data needs to be collected in order to enter it into this tool.

## System to track job creation must distinguish between # of new job positions created and # of individuals hired.

In example below, 4 participants hired to fill 3 full-time jobs created. Of the 3 jobs created, 2 were filled by low-income/TANF. A total of 3 low-income participants were employed in full-time jobs created.

Name/ID	Low Income	TANF	Start Date	End Date	Job Title	New FT Job	New FT Job Filled by LI/TANF
Name 1	1		5/1/12	9/1/12	Technician A	1	1
Name 2	1		5/1/12		Technician B	1	1
Name 3	0	0	5/20/12		Technician C	1	0
Name 4	1	1	9/15/12		Technician A	0	0
<b>TOTAL</b>	<b>3</b>	<b>1</b>				<b>3</b>	<b>2</b>

## **Coordinate data-sharing with business partners.**

- Clarify data needed from business partner for OCS reporting, including how new positions created will be distinguished between new individuals hired to fill existing jobs. Use unique job titles (A, B, C).
- Develop a reporting template for your business partners to use to ensure job-related PPR required data is captured and reported to you.
- Confirm new FT jobs to be targeted for low-income individuals.
- Discuss and finalize method grantee and business partner will use to ensure jobs are filled by low-income individuals (and to safeguard sensitive information).

Example 1 - Grantee and referral partners refer JOLI/CED eligible individuals for employment, business confirms referrals hired.

Example 2 – Grantee, referral partners, and business partner(s) plan a joint job fair for OCS jobs. Grantee and/or referral partners perform eligibility assessments on-site at job fair.

Example 3 - Employer has job applicants fill out surveys (developed by grantee to self-report TANF, family HH size, and annual family HH earned income), surveys sent to grantee to determine low-income eligibility, grantee confirms which job applicants meet eligibility.

- A consent form for new employees to sign agreeing to share employment-related data with the grantee will help address the requirement to safeguard sensitive information.
- **Business partners need to submit data for each semi-annual reporting period** (as close to 4/1 & 9/30 as possible to allow time for grantee to reconcile questions before PPR is due 4/30 & 10/31).
  - For **microenterprise and new business creation projects**, reports should be collected and reviewed on a monthly basis to better monitor business revenues and their capacity to support the projected job creation.

- ★ Remember, business partners must agree to work with the grantee to fill 100% (JOLI) or 75% (CED) of the new job positions created with JOLI/CED eligible low-income individuals, and to maintain accurate, unduplicated counts of positions created throughout the 3 or 5 year grant period.
- ★ Business partners must also agree to regularly provide detailed records to the grantee that documents appropriate expenditures of grant funds (if applicable), cooperation with monitoring efforts, and agree to strategies, as developed with the grantee, on how prospective candidates for positions to be filled by low-income individuals will be recruited and verified as eligible under CED/JOLI, and on job retention strategies.
- ★ Full-time employment is defined as at least 30 hours/week in non-seasonal full-year job.

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