Employment Development Department Equity and Special Populations Program Year 2021-22 Solicitation for Proposals Questions and Answers October 20, 2021

Format, Submission, and General Questions:

1. How can the exhibits be downloaded?

The links are on the page immediately following the Equity and Special Populations (ESP) Solicitations for Proposals (SFP) title page and must be accessed from the SFP on the Employment Development Department (EDD) Workforce Development Solicitations for Proposals website. Once saved to a personal computer, the links will not work. A browser issue may cause difficulty downloading the forms. The EDD suggests Google Chrome as the preferred browser.

2. Must applications be mailed or received in Sacramento by November 1, 2021?

Applications must be received by 3 p.m. on November 1, 2021. Applications must be submitted electronically. Only the two hard copy cover pages with wet signatures must be delivered to the EDD office in Sacramento by the deadline.

3. Will the EDD send out the slides, notes, or transcript from the webinar?

No, but the questions and answers will be published to the EDD Workforce Development Solicitations for Proposals website.

4. Will questions still be taken in writing after the webinar and if so what is the cut-off date?

The deadline to submit questions was Monday, September 27, 2021 at 12 noon. However, the grants team will answer additional questions on a case-by-case basis as time and resources allow.

5. Is there a template for the Notice of Intent to Apply (NOI)? Will the deadline for the NOI be revised since the webinar was rescheduled? Does submitting an NOI obligate an organization to apply?

The NOI deadline of October 8, 2021 will remain the same. There is no template. The NOI should include the name of the applicant organization and the population(s) the applicant

intends to serve. The NOI must be emailed to WSBGrants@edd.ca.gov with the subject line "Notice of Intent." Submitting an NOI does not obligate an organization to apply.

6. Should the narrative be single or double-spaced?

Single spacing is the acceptable format.

7. The SFP states that applications must be typed in Calibri 12-point font. Can Calibri 10-point font be used for charts?

All fonts in charts, attachments, and exhibits must be Calibri 12-point or larger to ensure compliance with accessibility recommendations.

8. Must the Executive Summary include the industries of focus and other items listed below the proposal instructions in SFP Appendix A: Proposal Package Instructions?

Yes, all fields are required. Applicants must follow all instructions in SFP Appendix A to correctly complete the application.

9. Do applicants need to provide a narrative along with the Partner Roles and Responsibilities (Exhibit J)?

Yes, a narrative response is required. Refer to SFP Appendix A.

10. Do applicants need to provide a narrative along with the Performance Goals Matrix (Exhibit K)?

Yes, a narrative response is required. Refer to SFP Appendix A.

11. The proposal narrative appears to have more questions than previous solicitations, yet the page limit remains at 15 pages. Can this be reevaluated?

No, the page limit will remain the same. This year's SFP has only 83 questions consolidated into six sections compared to 102 questions in seven sections in Program Year (PY) 2020-2021 (20-21). Applicants have tools at their disposal, such as exhibits and letters, that do not count towards the page limit but give ample opportunity to demonstrate the strengths and merits of the project.

- 12. The SFP Appendix A indicates that the Proposal Narrative (Exhibit A) "must include the following seven sections" but there are only six sections listed. Is this an error?
 - Questions have been consolidated into six sections for the ESP SFP PY 21-22. The EDD apologizes for the typographical error.
- 13. How many populations can each entity serve and what is the award ceiling? How many projects does the EDD plan to fund?
 - The EDD plans to fund 20-30 projects. Applicants may serve as many populations as they choose. There is no award ceiling except for the maximum per population amount of \$500,000. However, applicants should carefully consider how many populations they can successfully serve while still meeting performance goals. Failure to meet performance goals can result in the de-obligation of funds and impact an organization's ability to secure future funding.
- 14. The SFP states that applicants may apply up to \$500,000 per population and that "based on the availability of funds, the state may choose to exceed the maximum amount of awards." Can you clarify this?
 - The EDD, in collaboration with the Labor and Workforce Development Agency, has the flexibility to award additional dollars to meritorious projects that benefit the state. For example, if only ten organizations submit proposals that meet or exceed program requirements, the state may allocate funds above and beyond the \$500,000 per population to those ten organizations if they are capable of serving additional participants to merit the expanded funding.
- 15. Will there be a Disability Employment Accelerator (DEA), Dislocated Youth Worker Innovation Challenge (DYWIC), English Language Learner (ELL), or Veterans Employment Assistance Program (VEAP) SFP this year?
 - No, there will not be a DEA, DYWIC, ELL, or VEAP award in PY 21-22. These initiatives, and the populations they served, were combined to establish the ESP as the EDD's singular SFP for PY 21-22.
- 16. Will there be a separate SFP for technical assistance (TA)? If so, when will it be released?
 - Yes, there will be a separate SFP for TA and evaluation. The release date will be determined once program awardees have been selected for the ESP SFP PY 21-22.

17. Is this one time funding, or can an organization apply again to serve the same population in two years?

The ESP is funded by *Workforce Innovation Opportunity Act* (WIOA) 15% Governor's discretionary funds, which are not guaranteed annually. If the grant is available in two years then the organization may apply. Applicants should describe in their proposal narrative how they plan to sustain their project beyond the life of the grant.

18. Is this SFP funded according to WIOA Title I, WIOA Title III, or both?

This SFP is funded under WIOA Title I.

19. What is a CBO?

A CBO is a community based-organization. Refer to page 1 of the SFP.

20. What is a Title I Local Area? Is this the same as a Title I school?

A Local Area is a Local Workforce Development Area. Title I refers to the type of WIOA funding Local Areas receive. Refer to SFP Appendix E: Internet Resources, which provides a link to find the Local Area that serves your region.

21. Is a Title I Local Area in the service region the same as a Workforce Development Board?

Is a Title III Wagner-Peyser local office in the service area the same as an EDD local office?

Can the EDD provide a local office contact person?

A Local Workforce Development Board and a Local Area are not the same. However, either will fulfill the Title I partnership requirement. A Title III provider is not necessarily a local EDD office, as the EDD does not run all America's Job Centers of CaliforniasM (AJCCs). It is the applicant organization's responsibility to reach out to the appropriate offices in the service area to secure the required partnerships. Refer to SFP Appendix E for links to locate Local Areas and AJCCs.

Eligibility and Special Populations

- 22. What are other target populations in geographic areas disproportionately impacted by the novel coronavirus 2019 (COVID-19)? Can an applicant serve any population impacted by COVID-19?
 - Applicants must make a convincing case for why the population they intend to serve has been disproportionately impacted by COVID-19, utilizing reliable supporting data and citing these sources in the narrative. For example, if data indicates that women have suffered more job loss than men in a particular industry and/or region due to the pandemic and the applicant convincingly presents and supports such data, that population would qualify.
- 23. Does the young adult target population include current college students who are underserved and/or underrepresented in quality jobs or are interested in apprenticeship opportunities? Can our young adults served number include both in and out-of-school youth (ISY and OSY)?
 - Yes, the young adult population may consist of ISY that are current college students who are underserved and/or underrepresented. The young adult eligibility for the ESP PY 21-22 SFP include both ISY and OSY between the ages of 18-24 at the time of enrollment.
- 24. Could victims of human trafficking be considered people with disabilities (PWD)?
 - No, victims of human trafficking do not qualify as PWD unless they "identify as a person with a physical or mental impairment that substantially limits one or more major life activities; have a record of such impairment, or are regarded as having such an impairment" as defined in the Americans with Disabilities Act. Depending on individual circumstances, victims of human trafficking may be eligible to participate in the ESP program as immigrants, English language learners, homeless or housing insecure individuals, or under the "other populations disproportionately impacted by COVID-19" category if the applicant organization presents a viable argument of disproportionate impact with supporting data. Refer to Workforce Services Directive WSD18-09, Subject: Services and Referrals to Victims of Human Trafficking (January 31, 2019).
- 25. Can military personnel interested in taking courses that lead to credentials in preparation for post-service careers participate in the ESP program?
 - No. Active duty military personnel are not considered veterans and therefore do not qualify for the ESP program. In order to be eligible, participants must obtain a DD-214 form that indicates official separation from the military.

26. Can the young adult age limit be increased to over 24 years of age?

The WIOA defines youth as 16-24 years of age. However, the ESP is funded with WIOA Adult funds. Therefore, all participants must be at least 18 years of age. Applicants may serve participants over the age of 24, but they are not considered young adults.

27. Can a public state agency apply for this grant?

No, however, a public state agency may partner with the applicant. Refer to SFP section I.D. for eligibility requirements.

28. Are county departments of education or community colleges eligible to apply for this grant?

Yes, county departments of education and institutions of higher education are eligible to apply provided that the proposed plan and scope of services are allowable under the WIOA and align with the goals of the grant. Refer to SFP section I.D. for eligibility requirements.

29. What education and training providers are eligible applicants for this SFP?

Education and training providers must be Bureau of Private Post-Secondary approved and/or on the State's Eligible Training Provider List (ETPL) except for providers offering specific types of training including but not limited to customized, cohort, and on-the-job training (OJT). Refer to WSD15-07 Subject: WIOA Eligible Training Provider List (November 10, 2015).

30. Is an organization that currently has DEA, DYWIC, ELL, or VEAP grant funding through the EDD eligible to apply for this grant?

Yes, the entity is eligible to apply if the organization is not serving the same population they served under a PY 2020-21 award. If you need further assistance in determining eligibility based on a prior award, please contact the grants team at WSBGrants@edd.ca.gov.

31. If an organization has not received funding recently to serve the target population, but one of the organization's partners has, can the applicant still serve that target population?

The lead applicant is eligible to serve the target population if they have not received PY 20-21 funding from the EDD to serve that target population as a lead applicant. Partners may have received PY 20-21 funding from the EDD to serve the target population so long as they are not the lead applicant for the ESP PY 21-22 for the same population.

32. Do participants require authorization to work documents or can undocumented immigrants be served?

The need for authorization to work verification depends on the services provided and the project design. Refer to WSD18-03, Subject: *Pathway to Services, Referral, and Enrollment* (August 29, 2018).

33. A Local Area receives Title I youth funds as part of a regular allocation. Does this preclude them from serving young adults through this SFP?

No, but eligible young adults for the ESP program must be 18-24 years old.

34. If a Local Area served as a subrecipient for the Prison to Employment Initiative, are they eligible to serve the justice-involved population through the ESP? Will their subrecipients be eligible to receive funding?

Yes, the Local Area is eligible to serve justice involved individuals through the ESP but services cannot be duplicated. The organization's subrecipients may receive funds through the subawards the Local Area would administer should they be awarded the ESP. Eligibility restrictions for serving the same population two program years in a row apply only to grants administered by the EDD.

35. Can an organization submit separate applications if serving multiple target populations?

No, please submit only one application per organization. However, a separate Exhibit K must be completed for each population the applicant plans to serve.

36. Can only one Exhibit K be completed for a proposal that serves overlapping target populations, such as individuals that are both ELL and immigrants?

Yes.

37. Our organization aims to serve transgender job seekers that also fall into other categories, such as veterans and homeless. Must we complete a separate Exhibit K for each category?

If transgender individuals are the target population, the applicant organization must provide documentation to support an argument that this population has been disproportionately impacted by COVID-19, complete one Exhibit K, and may only apply for funding for a single target population for a maximum of \$500,000. If, however, the organization is applying for multiple funding categories, such as veterans and homeless or housing insecure, then a separate Exhibit K is required for each of the two populations and the organization may apply for a maximum of \$1 million.

38. Will projects proposing to serve multiple populations be reviewed as one project or as multiple projects? Can an applicant receive funding to serve less populations than proposed? If there is overlap identified within the projects, will the applicant have the opportunity to make budget adjustments based on project approval?

Proposals will be reviewed as one project with multiple populations to be served. It is possible that the project will be awarded less funds than the organization applied for, or that an applicant could be selected to serve some of the populations proposed but not all. Awardees will be provided the opportunity to work with the EDD project manager to make budget modifications post-award.

39. Are applicants required to identify a specific number of participants to be enrolled under each of the populations in the proposal, or just the total number to be enrolled?

Yes, applicants must identify the anticipated number of participants that will be served for each population. Applicants must complete and submit one Exhibit K per population and demonstrate in the proposal narrative that the applicant can successfully serve multiple populations.

Partnership, Match, and Letters:

40. Are applicants required to have all of the partners listed in the required partnership section or only one?

Applicants must have one partner from each category listed in the required partnerships except for the category the applicant represents. For example, if the lead applicant is a CBO, the applicant must have a partner in each of the other categories but does not require an additional CBO partner. The intention is to build a well-rounded coalition of support for projects and participants. Additional partnerships with non-mandatory partners are also encouraged.

41. Can our organization serve as more than one required partner, for example, as both the CBO and the employer?

The purpose of partnership requirements is to ensure that participants receive training and supportive services and that there are employer partners willing to hire participants who complete the program. The applicant may serve as an employer partner except for OJTs. The proposal must state that the applicant will be both training participants and employing them as an employer partner. Training programs must be on the ETPL with the exception of OJT, customized, and cohort training. The EDD recommends building a strong network of employer partners to increase the opportunity for successful project outcomes. Refer to WSD18-06, Subject: *Subrecipient and Contractor Distinctions* (September 5, 2018).

42. Can partners participate in multiple ESP projects? If an organization is a lead applicant can the organization still participate as a partner on other ESP projects?

Yes, organizations can serve as partners in multiple ESP projects, even if they are an ESP awardee. However, services cannot be duplicated and individuals cannot be served through multiple ESP grants. Applicants must ensure that partners are providing services to distinct individuals.

43. If an organization applies to serve multiple counties, must the required partners in each jurisdiction be detailed? Would the required post-award reporting and budget be combined or separated by jurisdiction?

All required partners must be listed in Exhibit J and must provide partnership agreement letters. Supplemental Budget (Exhibit G) should be completed to detail the partner budget subawards. All budget documents submitted with the application should reflect a combined budget. Post-award reporting to the EDD will be combined.

44. If an organization is serving multiple counties with the ESP grant does the organization need partner letters from all counties? Are separate letters required from the standard partners for each county?

A partnership letter is not required from each county served. However, applicants must submit partnership agreement letters from each of the required partners and match commitment letters from all partners contributing match funds or in-kind resources. See SFP Appendix A for more information on partnership agreement letters.

45. If the Title I and Title III provider are the same agency, are two separate letters required?

Partnership agreement letters must adhere to all guidelines indicated in SFP Appendix A. If a partner is fulfilling the role of more than one required partner, the letter must clearly indicate the requirements being fulfilled.

46. Must we provide a letter from employers for every target industry we list in the grant?

Only one employer partner in the target industry is required for the application. However, if an applicant plans to focus on multiple industries, providing additional employer letters demonstrates strong support for the project.

- 47. Must an applicant proposing to serve young adults submit a partner letter from the local EDD field service office?
 - No, unless that office serves as a mandatory partner in the project. However, the EDD encourages partnering with a Youth Employment Opportunity Program if one is available through your local AJCC.
- 48. Can an applicant submit a match commitment letter for its own proposal, for example, if a portion of the salaries or workspace used for the project are not being charged to the budget?
 - Yes, match commitment letters are required from all organizations contributing funds or in-kind match, including the applicant organization. Refer to SFP Appendix A for guidance on match and partnership letters.
- 49. Can funding from philanthropic sources, current WIOA funds, other state or federal funding, or other grants that serve the same population be leveraged to provide placement bonuses, paid internships, and OJT as part of the 40% match?
 - Yes, match resources can be leveraged from a variety of sources. The parameters of the match must be clearly defined with the exact cash amounts or the estimate of the in-kind dollar amount of the match. Applicants must ensure that obligations to their funding entities are met and that the funds may be utilized as matched dollars. Match funds must be dedicated exclusively to project activities and must be consistent with the allowable activities of the funding source. Refer to SFP section IV.B and Appendix A for more details on match requirements and to WSD19-05 Subject: *Monthly and Quarterly Financial Reporting Requirements* (December 4, 2019).
- 50. Can an applicant count the in-kind match of as of yet unidentified employers who will place participants into unsubsidized and/or partially subsidized work experience?
 - No, all in-kind matches to meet the match requirement must be secured ahead of the application deadline and documented in the form of a match commitment letter. Refer to SFP section IV.B. and Appendix A for more information on match and cost sharing.

Training, Work-Based Learning, and Program Requirements:

- 51. How does the EDD define a "quality" job? Is a distinction made between skilled and unskilled labor?
 - A "quality job" provides family sustaining wages; advancement opportunities; and health, retirement, and other benefits. Most quality jobs fall under the category of skilled labor. The goal is to help individuals develop skills and obtain credentials that provide them with

access to better jobs. Refer to section I.A. of the SFP and consult the Aspen Institute Job Quality Tools Library website for additional information.

52. Must an applicant have predefined career pathways determined, or can this be driven by participants?

Yes, applicants must predetermine the career pathways that will be offered in the project. A cohesive, successful program design should specify the types of trainings that will be provided with clear career pathways for each of the occupations and/or industries. Occupations must be based on the in-demand industries the applicant chooses to target, and participants should be trained and placed in those occupations.

53. Do the trainings have to be conducted by an ETPL approved provider or a Registered Apprenticeship Program?

Yes, trainings must be either a Registered Apprenticeship Program and/or on the state's ETPL with the exception of a few specific types of trainings including but not limited to customized, cohort, and OJT. Refer to WSD15-07, Subject: WIOA Eligible Training Provider List (November 10, 2015).

54. What is a certified training? Is that something applicants must offer internally or does this refer to external training? Where can certified trainings be found?

A certified training is a program that is recognized by employers and industry leaders as a reliable indicator of skills, knowledge, and abilities in a particular field. Certified trainings are provided by multiple education and training providers, including community colleges and private organizations. The ETPL and additional information about training programs is available at www.caljobs.ca.gov by choosing "Services for Individuals" or "Services for Employers," then "Education Services." Detailed instructions on how to access this list if the applicant organization does not have a CalJOBS™ account can be found by clicking the "Search for Training Providers" tab on the EDD Jobs and Training website. Refer to WSD15-07, Subject: *WIOA Eligible Training Provider List* (November 10, 2015). Refer also to Rehabilitation Services Administration Technical Assistance Circular RSA-TAC-17-01 (PDF), Subject: *Performance Accountability Guidance for WIOA Title II, Title III and IV Core Programs* (August 17, 2017).

55. What are the certified trainings that lead to industry-recognized certificates? Must these trainings already exist or can they be developed for the target population(s)?

The certified trainings an applicant offers depend on the occupation(s) they plan to place participants in. Certifications verify the participant's mastery of skills and indicate to employers that they are competitive in their field. Consideration may be given to the development of new certified training programs depending on the project design and feasibility.

56. Must all participants complete the certified training?

No, at least one certified training must be offered, but not all participants are required to complete the training.

57. Our organization consulted the recommended resource, WSD15-07, but it does not specify a definition for customized training. If an organization has a training partner in audio and video production with certifications and employer partners, would that training qualify as a customized training even if the provider is not on the ETPL?

WSD15-07 provides direction on how to access CalJOBS to obtain information on ETPL and other trainings. Additional instructions for accessing information about training providers can be found on the EDD website. A definition for customized training can be found in WSD19-06, Subject: *CalJOBS Activity Codes* (December 27, 2019), attachment #1.

58. Can vocational training expenses be considered part of the majority of the funding for work-based learning (WBL)?

Short-term pre-vocational training services are allowed, but are not considered WBL. The following are considered WBL programs under the WIOA: pre-apprenticeship programs, registered apprenticeships, work experience, internships, transitional jobs, OJT, customized training, and incumbent worker training. Refer to the *Work Based-Learning Desk Reference* for more information.

59. The SFP states that "participant co-enrollment is strongly encouraged to provide additional resources to participants." What does this mean?

This statement serves to reinforce the importance of partnership networks and coenrollment as strategies to maximize funding and ensure the best possible outcomes for participants. Refer to WSD19-09, Subject: *Strategic Co-enrollment – Unified Plan Partners* (February 12, 2020).

Allowable Activities and Costs:

- 60. If our organization has a similar program operating in another city in our Local Area and we wish to expand this program, is this allowable under this grant?
 - If the organization was a lead applicant funded by the EDD to provide services to the same populations in program year 2020-21, then that organization is precluded from serving those same populations for 2021-22 regardless of expansion into a new area. However, expansion of an existing program is allowable under the grant as long as the applicant is eligible and the project design conforms to program requirements.
- 61. Do participants served under this SFP have to be new participants not enrolled in WIOA funded programs? If an entity applied the funding to out-of-school young adults currently being served under WIOA, is this "double dipping"?
 - No, this is not considered "double dipping." Co-enrollment strategies are encouraged. Participants may be co-enrolled as long as services are not duplicated. For example, a participant may be enrolled in Adult formula funds for supportive services for interview clothes and be eligible to enroll into the ESP for a WBL opportunity. The services provided by each program must be delineated in the project narrative and on the supplemental budget. Refer to WSD19-09, Subject: *Strategic Co-enrollment Unified Plan Partners* (February 12, 2020).
- 62. Are indirect costs in addition to the 7.5% administrative costs? Do we need to attach a copy of our negotiated Indirect Cost Rate agreement (ICR)?
 - Applicants must adhere to the 7.5% percent administrative cost rate limit. The use of an ICR, Cost Allocation Plan (CAP), or de minimis rate must be approved by the entity's cognizant agency but this does not allow an entity to exceed the administrative cost limit or any other line item cap set for the grant. Entities must follow their approved CAP or ICR when allocating costs back and reporting costs to the state in the appropriate category. Applicants are not required to attach their ICR agreement to their proposal. The state will request a copy of the ICR when the subgrantee returns the signed subgrant. The subgrant forms require that the entity indicate the rate they plan to use (ICR, CAP, or de minimis) and submit supporting documentation regarding how they allocate indirect costs. Refer to WSD18-15, Subject: *Indirect Cost Rates* (June 17, 2019).
- 63. Does the cost of managing the program count as administrative costs? Are program staff costs limited to 7.5% as well? Is there a limit to how much funding can be directed towards staffing?
 - The 7.5% administrative cost limit does not apply to program costs. Refer to Administrative Cost Desk Reference for details on program and administrative costs,

- WSD16-16, Subject: *Allowable Costs and Prior Written Approval* (February 21, 2017), and WSD18-15, Subject: *Indirect Cost Rates* (June 17, 2019).
- 64. The SFP states that applicants are expected to spend the majority of grant funds on WBL opportunities. Is there a certain percentage that must be spent on WBL?
 - There is no specific percentage requirement, but projects that devote more funding to training and employment opportunities will be prioritized and considered more competitive. The ESP funds are intended to help participants gain access to quality jobs with sustainable living wages, therefore, a minimal amount should be spent on expenses that do not directly provide WBL for participants.
- 65. Will there be a cap on transitional jobs as there is in the Adult and Dislocated Worker programs?
 - Yes, the ESP funds are WIOA Title I Adult funds and are subject to the same restrictions. However, until June 30, 2022 up to 30% of funds can be used for the provision of transitional jobs under the COVID-19 WIOA waiver. Refer to WSD20-13, Subject: *COVID-19 WIOA Waiver Guidance* (June 9, 2021).
- 66. Are vocational training costs an allowable expense?
 - Yes, vocational training costs are allowable under the WIOA.
- 67. Are training expenses such as Individual Training Accounts (ITAs) prohibited? If ITA costs are prohibited can books, supplies, uniforms and test fees be charged to supportive services?
 - No, ITAs are not prohibited. Books, supplies, uniforms, and test fees related to training can be charged either to a participant's ITA or to supportive services.
- 68. Are the participant training expenditures of this grant counted towards the WIOA state mandate on minimum participant training expenditures? Or would participants have to be co-enrolled in a WIOA Title I program for the expenditures to count?
 - Yes, the ESP training expenditures will count towards the WIOA participant training expenditures.
- 69. Are participant wages and OJT wages allowable expenses? Can WBL providers receive part of the funding awarded to the applicant organization?
 - Yes, participant training wages are allowable expenses and WBL providers can receive funds as partners or subgrantees/subrecipients of the awardee. Refer to WSD15-09, Subject: *Impact of WIOA Implementation on Waivers Approved Under WIA* (November 20,

- 2015) and Training and Employment Guidance Letter TEGL No. 13-15 (PDF), Subject: *OJT Wage Caps and Reimbursement Rate Waivers* (February 23, 2016).
- 70. My organization plans to request \$500,000 to establish a culinary training site and will provide a \$200,000 match. We plan to spend \$135,000 on equipment costs for a commercial kitchen incubator. Is this allowable?

Applicants are encouraged to reserve the bulk of the budget for the participants instead of overhead costs. Any equipment costs in excess of \$5,000:

- necessitate the submission of Exhibit G with the application.
- require EDD approval, which must be requested after awarding through negotiations with the assigned EDD project manager.
- will be dependent upon the feasibility of the proposal and the anticipated return on investment of the project.

In general, given the short grant period of performance (POP) the EDD advises applicants to explore leasing options for costly equipment or to utilize match funds to purchase equipment. Refer to WSD17-08, Subject: *Procurement of Equipment and Related Services* (March 14, 2018).

- 71. How should proposals address the possibility of project income, such as any finders' fees that employers pay for the placement of participants in quality jobs? Is income to the project allowed and how should it be accounted for?
 - Program income is permitted, but restrictions and guidelines regarding documentation and deduction of income from total allowable costs apply. It is not allowable to charge a finders' fee for services that should be offered free of charge through the ESP program. Refer to WSD15-25, Subject: WIOA Program Income (May 24, 2016), and Title 2 Code of Federal Regulations (CFR) Part 200: "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" (Uniform Guidance), Section 200.307.
- 72. Can potential project income be considered a cash match and therefore be accompanied in advance by a letter of commitment from each prospective employer?
 - Yes, potential project income may be considered a cash match since it provides additional revenue to support allowable subaward activities. Refer to WSD15-25, Subject: *WIOA Program Income* (May 24, 2016) for program income guidelines.

73. If a service provider is written into the proposal as a partner, does the applicant still have to conduct a competitive process for those services?

Yes, if local policy dictates. Local procurement policies and procedures must be followed. Refer to WSD17-08, Subject: *Procurement of Equipment and Related Services* (March 14, 2018).

74. Does this SFP allow for program staff costs including basic career services, individualized career services, and follow up services?

Yes, these are all allowable activities under WIOA. Refer to SFP Appendix B: WIOA Allowable Activities.

75. Does SFP Appendix B represent an exhaustive list of allowable activities?

Yes, SFP Appendix B provides a comprehensive list of WIOA Title I allowable activities.

76. Are outreach and recruiting efforts and marketing allowable costs?

Outreach and recruitment are allowable activities under the WIOA. However, there are restrictions and limitations depending upon the strategies employed. Refer to SFP Appendices B and C.

77. Are costs associated with documentation gathering (driver license, birth certificate, etc.) in order to serve justice-involved individuals eligible supportive services expenditures?

Yes. Refer to SFP Appendix B.

Performance Goals and Participants Served:

78. How is a sustainable, living wage calculated?

The definition of a sustainable, living wage is dependent on regional economic and labor market factors. Applicants are encouraged to provide labor market and other economic data to demonstrate wages in the proposed project area. Refer to section I.A. of the SFP for more information on job quality as defined in the ESP program and the Massachusetts Institute of Technology living wage calculator for California.

79. How are median earnings calculated? Do the median earnings in the 2nd quarter after exit represent two quarters' worth of earnings?

The median is the numerical value that separates the higher half from the lower half of earnings. The median earnings in the 2nd quarter after exit do not represent two quarters' earnings but, rather, quarterly earnings after the participant has been out of the program for three months. For example, if a participant completes the program on December 31, 2021, the median quarterly earnings would represent wages during the three month period spanning April 1, 2022 through June 30, 2022. Refer to WSD19-03, Subject: *Performance Guidance* (August 28, 2019) and the WorkforceGPS guide to calculate median earnings in the 2nd quarter after exit.

80. What is the suggested appropriate amount for participant wages for WBL?

According to WIOA rules, participants must earn at least the minimum wage. However, program applicants should establish a more competitive rate of pay based on regional and industry standards and the quality jobs goals of the ESP program. Refer to section III.E. for earnings goals for the ESP program and WIOA (Public Law 113-128) Section 404 (5) (PDF) for minimum wage requirements.

81. In the performance goals, the median income 2nd quarter after exit is \$6,000. The SFP indicates that participants should earn \$9,000-\$10,500 per quarter. Can you please clarify? Does this earnings goal apply to all populations and regions?

The \$6,000 median earnings in the state's negotiated performance goals do not meet the standards for a quality job. However, the earnings goal in the SFP provides a point of reference for establishing project goals. The median quarterly earnings goal for the ESP is \$9,000-\$10,500. Applicants must consider local goals and needs, as well as factors specific to the service area(s), the population(s) to be served, and the proposed services. If an applicant's earnings goal deviates from the earnings goal stated in the SFP, the proposal narrative must include a justification with supporting data in accordance with the SFP instructions.

82. Are the performance goals for employment after exit (67% for the 2nd quarter, 66% for the 4th quarter) and credential attainment (60%) the same for this SFP?

Yes, with the exception of the earnings goal, the performance goals are the same. However, the performance goals in the SFP provide a point of reference for project goals. Applicants must consider local performance goals and project specific factors as well. The project narrative should provide a rationale if the goals deviate from the negotiated performance goals. Refer to section III.E. and WSD19-11, Subject: *State Level Performance Goals and Local Area Negotiations* (April 16, 2020) for more information on performance goals.

83. What percentage of participants must be placed in employment? What is the target for participants who find employment?

Performance goals in SFP section III.E. Figure 2 indicate that 67% of participants must be employed in the 2nd quarter after exit and 66% in the 4th quarter after exit. Refer to WSD19-11, Subject: *State Level Performance Goals and Local Area Negotiations* (April 16, 2020) for more information.

84. Our private non-profit organization has five student employees who are paid \$15 per hour. We want to scale up to 20 more students per semester. Is our organization eligible to apply?

Yes, your organization is eligible to apply. However, the participants served numbers are lower than negotiated performance goals and the proposed wages deviate from the wage goals for the ESP grant. Justification must be provided in the project narrative. Projects will be evaluated on a competitive basis.

85. Is there a minimum number of participants the applicant must serve?

No, applicants may apply for any amount within the allowable range while taking into account factors specific to the service area(s), the population(s) to be served, and the proposed services. Applicants must provide a detailed justification for the planned total participants in the narrative and explain how costs are necessary and reasonable. Refer to section IV.A. of the SFP and WSD19-11, Subject: *State Level Performance Goals and Local Area Negotiations* (April 16, 2020).

86. Does the table in Figure 3 refer to participants served annually or during the entire grant period? Do the funding amounts represent annual funding or funding over a 24-month period?

Figure 3 refers to the total award (column one), the total number of participants served (column two), and the required match (column three) for the entire 24 month POP. For example, if an organization requests \$400,000, the target number of participants served over the 24 month POP would be about 80-100 and the required match would be \$160,000.

87. What is the total number of the target population(s) to be served over the course of one program period?

The total number of populations served depends on the applicant's project design and whether the applicant chooses to serve one population or multiple populations. Refer to section IV.A and Figure 3 of the SFP.

88. What is the typical cost per participant?

The cost per participant depends on how the applicant structures their project. Applicants are encouraged to leverage funds from all available funding sources and to utilize coenrollment strategies to maximize services and the number of participants served while minimizing the costs charged to the grant. Refer to section IV.A. and Figure 3 of the SFP for more information.

Reporting, Budgeting, and Funding:

89. In terms of post exit employment rates in the 2nd and 4th quarters after exit, will the EDD provide this data, including percent employed and median earnings?

All awardees will have access to this information through CalJOBS[™] and will receive training on how to use the system upon request. However, for the application process, applicants must use the WIOA performance goals and the grant requirements as guidelines to complete Exhibit K. Refer to reliable sources such as O*net to estimate earnings for particular occupations.

90. Does this grant include measurable skills gains as a performance measure for participants enrolled in training?

Yes, measureable skills gains and other metrics of participant success must be documented in CalJOBS[™] and included in narrative quarterly reports post-award. Refer to WSD19-03, Subject: *Performance Guidance* (August 28, 2019).

91. What are the reporting requirements and what kind of participant data will awardees be required to collect?

Subrecipients must provide financial expenditure data and participant data including, but not limited to, the activities or types of services provided, training and WBL costs, supportive services costs, and closeout reports. Refer to WSD19-05, Subject: *Monthly and Quarterly Financial Reporting Requirements* (December 4, 2019).

92. Will awardees receive training from the EDD with regards to CalJOBS[™] requirements, reporting, and documentation of certified trainings, WBL, and performance goals?

Yes, the EDD project manager assigned to an awardee's project will provide training on the program requirements and coordinate CalJOBS[™] training. Refer to SFP sections III.F. and VII.C.

93. When completing fiscal reporting in CalJOBS[™], work experience is categorized as an individualized service. If awarded, will subrecipients need to report work experience as training?

No, work experience must be reported in the individualized career service cost category.

94. How long must awardees track participants?

Participants should be tracked for one year after exit for employment and median earnings indicators of performance by offering follow-up services.

95. Following the negotiated performance goals in Figure 2 and Department of Labor (DOL) requirements on the provision of follow-up services, do applicants have to enroll all participants in the first 12 months of the project in order to provide follow-up services for four quarters?

Applicants can be enrolled at any time during the grant POP, but any successful activities completed 90 days after the POP will not be reflected on the project performance outcomes. Participants should be tracked one year after exit to collect supplemental data that includes employment and median earnings. Follow-up services must be offered to exited participants and can be provided after the POP has ended. However, no grant funds can be expended after the grant POP has ended.

96. Can the 4th quarter placement occur after the end of the grant funded period if follow-up services are provided on an in-kind basis?

Yes, the placement can occur after the end of the grant funded period. However, the placement will not count towards ESP grant-related performance goals until after the grant closeout 60 days after the POP has concluded. No grant funds can be expended after the end of the POP. Refer to WSD16-05, Subject: WIOA Closeout Requirements (July 29, 2016).

97. Does this funding have the same requirements as traditional WIOA funding, including that all participants be enrolled and managed in CalJOBSsM?

Yes, the ESP is funded under WIOA Title I and all WIOA funding and reporting requirements apply.

98. Can funding be used for existing programming, or must projects be new in order to qualify?

Grant funds may be used to develop or expand innovative projects. However, funds must be used to increase the number of new participants or to add additional occupations

and/or industries to an existing program. The funds cannot be used to supplant other funding or to sustain a previously funded program.

99. Should applicants budget for their own final program evaluation, or will this be provided by external TA providers?

Applicants need not budget for final program evaluation. The program evaluation will be conducted by external TA providers authorized by the EDD.

100. Should applicants allocate funds for travel to required quarterly meetings in the budget?

At this time, no in-person meetings will be conducted. Virtual meetings may occur instead. However, applicants should budget for two in-person meetings, one meeting in Sacramento and one in the Los Angeles area, in case in-person meetings become possible during the grant POP. The EDD will work with awardees to make modifications as necessary based on public health mandates.

101. Our organization has an existing subaward with the EDD. If awarded, will ESP funds flow through our existing subaward or a separate agreement?

If an entity has an existing subgrant agreement through the EDD for PY 21-22 and is awarded the ESP PY 21-22 grant, the subgrant agreement will be modified to reflect the new award. If an entity has an existing subgrant from a previous year or has never been awarded funds by the EDD, the entity will receive a new subgrant agreement.

102. Are grant funds paid to grantees on a reimbursement basis only? If so, can start-up funds be negotiated?

No, grant funds are not dispersed to grantees as a reimbursement. Project start-up costs must be included in Exhibit A and the budget exhibits, as applicable. Start-up funds cannot be negotiated.

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