

U.S. Department of Labor

Employment and Training Administration
200 Constitution Avenue, N.W.
Washington, D.C. 20210



May 9, 2014

Dear TAACCCT Round 3 Consortium Grantees,

This letter provides guidance to Trade Adjustment Assistance Community College and Career Training (TAACCCT) consortium grantees on specific processes for submitting grant modification requests and communicating with the Employment and Training Administration (ETA).

As you know, consortium grantees include three or more Member Institutions (including one Lead Institution), each of which has an individual grant agreement with ETA. While each Member Institution has its own grant agreement and its own unique SF-424 and SF-424A budget form, in most cases the members share one integrated common Budget Narrative and Project Narrative. Given the structure of the awards, modifications to components common to all members' agreements will generally require modification of each individual grant, while modifications to a component unique to one member will generally require modification of that specific member's grant. This letter provides examples of several common types of modifications and clarifies the documentation submission requirements for each.

In addition, this letter reiterates the special role played by the consortium's Lead Institution in coordinating and submitting grant modification requests, and in communicating generally with ETA. As outlined in the Solicitation for Grant Applications (SGA) Section III.A.2.b, "Role of Lead Institution in Consortium," the Lead Institution specified in the application will coordinate fiscal and administrative activity for the consortium award. These activities include, but are not limited to: communication, prior approval requests, and modifications.

General Communication

The Lead Institution is the entity that communicates with ETA on behalf of the consortium award. Questions from Member Institutions should be transmitted to ETA via the Lead Institution. To carry out programmatic functions of the grant, the Lead Institution should communicate regularly with members of the consortium, and share information and technical assistance provided by the Department or your Federal Project Officer (FPO). Remember, it is important that all consortium member institutions receive information related to technical assistance or a change in policy. Consortia must develop a communication process that promotes effective and efficient communication between the Lead Institution and the Member Institutions.

All official communication from the Department will be sent to both the Lead and Member Institutions.

Modifications

In general, the process for modification is initiated by one or more Member Institution(s) requesting the modification. The Member Institution(s) will prepare modification request

letter(s), signed by each respective authorized representative, and attach supporting modification documentation. Member Institutions are encouraged to work with the FPO, *through the Lead Institution*, in drafting their modification request. This will enable the Lead to acquire more experience in developing mod requests and provide effective TA to other institutions as they draft their requests.

The Member Institution(s) submits the request letter(s) and documentation to the Lead Institution. The Lead Institution then packages the documentation together and transmits the bundled request package to the Regional Office's designated staff person or mailbox, as directed by the FPO. To facilitate ETA's review, the request package should clearly identify the Lead Institution and specify which Member Institution grant number(s) is affected by the modification. The Regional Office's designated staff person will submit the modification request to the Grant Officer for review. Modifications specific to one Member Institution's grant, such as administrative changes or prior approval requests, will be processed only on that Member's grant and that Member will receive an executed modification, along with a copy to the Lead Institution. Modifications to common components of a grant award, such as Statement of Work changes, will be processed to each Member's grant award and each Member will receive an executed modification.

See below for specific types of modifications.

Statement of Work (SOW) change: For consortium awards, there is one SOW. In accordance with the SGA, the Lead Institution will submit all requests for modification to the consortium award statement of work. If a modification is needed to any part, the appropriate Member Institution will work with the Lead Institution to prepare a modification request. The request letter should clearly state all Member Institutions' names and grant numbers, and must be signed by the authorized representative of the Lead Institution. The Lead Institution will submit the request to the Regional Office's designated staff person or mailbox for processing and review by the Grant Officer. The modification will apply to all members of the consortium, and each Member will receive an executed modification specific to their grant number.

Budget Realignment: Any Member Institution that needs to realign budget line items will submit a revised SF-424A, a corresponding budget narrative, and a modification request letter (signed by the authorized representative of the affected consortium member) to the Lead Institution. Most consortium grant awards included a single integrated budget narrative that reflects the budgets of all Members. However, for budget modifications, each affected Member should submit a revised budget narrative that corresponds with its revised SF-424A; it is not necessary to resubmit the integrated budget narrative. The request package must clearly identify the Lead Institution and must include signatures of the authorized representative of each affected Member. If multiple Members are requesting budget realignments the requests may be grouped together. . The Lead Institution will submit the modification request to the Regional Office's designated staff person or mailbox for processing and review by the Grant Officer. The Member Institution(s) requesting the modification and Lead Institution will receive the executed modification with their revised SF-424A and budget narrative.

Prior Approval Requests (Equipment purchase, Renovation): The Member Institution(s) will provide a prior approval request letter, signed by their authorized

representative, and supporting documentation to the Lead Institution for all requests to purchase equipment, make capital expenditures, and/or renovate facilities. The Lead Institution will submit the modification request to the Regional Office's designated staff person or mailbox for processing and review by the Grant Officer. To the extent practicable, requests from multiple members should be submitted by the Lead Institution in one modification request package. The request must include the signature of the authorized representative of each Member requesting approval and clearly specify the items requested by each Member. The request should clearly state the names and grant numbers of the Members requesting prior approval. The executed modification will be sent to the Member Institution with a copy to the Lead Institution. If the prior approval request necessitates an SOW change modification, an SOW modification should be requested as well, as shown above.

Administrative Modifications: These include signatory change, address change, Grantee name change, incorporating an approved Indirect Cost Rate agreement, etc. The Member Institution requesting the modification should prepare the request letter and supporting documentation to give to the Lead Institution for submittal. The Lead Institution will submit the modification request to the Regional Office's designated staff person or mailbox for processing and review by the Grant Officer. The executed modification will be sent to the Member Institution with a copy to the Lead Institution.

Any questions regarding the modification process should be directed to your assigned FPO.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steven A. Rietzke', with a stylized flourish at the end.

Steven A. Rietzke
Grant Officer, Employment & Training Administration