

U.S. Department of Labor
Veterans' Employment and Training Service

Jobs for Veterans State Grants

COVID-19 Questions and Answers for State Workforce Staff

Dated May 12, 2020

1. Can Jobs for Veterans State Grants-funded staff be moved to another program area temporarily, for example, to help process unemployment insurance (UI) claims?

Per [VPL 04-18](#), states are able to increase or decrease the planned numbers of Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) without prior approval. However, appropriations law prohibits using Jobs for Veterans State Grants (JVSG) funding for any other purpose, so staff who are moved into other program areas must be supported through another funding source. Any such movement of JVSG-funded staff due to the pandemic should be communicated with Grant Officer Technical Representatives (GOTR) and documented in quarterly reports.

2. Can VETS offer an extension on the JVSG State Plan deadline given that the states are inundated with UI claims and other concerns?

Per [Grant Officer's Memorandum 01-20](#), states who anticipate submitting a state plan after April 1, 2020, whether via the portal or as a stand-alone plan through E-Grants, should keep the GOTR apprised of their progress and anticipated submission dates.

Current JVSG State Plans expire on June 30, 2020. Many states have already submitted their plans, so a blanket extension will not be provided. However, VETS will consider providing individual extensions if necessitated by the state's response to the pandemic. Extension requests for stand-alone JVSG state plans should be submitted to the GOTR and include the specific reason for the request as well as the expected date by which the PY 2020-PY 2023 JVSG State Plan will be submitted.

3. Can JVSG funds be used to sanitize workspaces?

JVSG funding must be used in accordance with the cost principles outlined in [2 CFR 200](#), Uniform Administrative Requirements. Assisting in the cleaning and sanitizing of dedicated and common space that is used to house and serve program staff and participants is an allowable grant function. These costs should be treated the same as other maintenance expenses. Such

expenses are typically cost-shared with other funding sources. The state's cost allocation plan or negotiated indirect cost rate agreement must be followed.

4. How can states offset under expenditures due to the cancellation of travel and conferences, delays in filling vacancies, temporary movement of JVSG-funded staff into other program areas, and reduced supplies expenses?

VETS understands that JVSG expenditures might drop as states focus on other needs. It is of vital importance that states make every effort to keep staffing levels high in order to continue serving eligible veterans during this crisis. States may consider using such flexibilities as temporary, contract, limited-term, and not-to-exceed employees, as these can sometimes be hired more quickly.

In addition, such savings may be offset by cost-shared expenses like sanitizing workspaces and by increased system enhancements to accommodate greater telework and virtual services. We also ask states to stay in contact with counterparts across the nation to identify additional opportunities. If the state anticipates needing to move greater than 10% of their total grant award between object class categories, however, Grant Officer approval is required. Please refer to [VPL 04-18](#).

If states need to make budget adjustments of greater than 10% between object class categories but are unable to obtain prior approval before the need arises, they must timely communicate their intentions and needs through the GOTRs to the greatest practicable extent. VETS may consider waiving the prior approval requirement in those cases.

5. How should states document changes in expenditures, staffing, and other areas caused by the impact of COVID-19?

States must carefully document all COVID-19 impacts to prepare for increased reporting requirements that are invariably generated by stimulus packages. This documentation may occur in various ways, including in quarterly reports, in transmittal memorandum submitted with interim modification requests, and via email with the GOTR.

6. Will VETS extend quarterly report deadlines to accommodate states' need to prioritize the COVID-19 response?

Quarterly financial reports were due April 30, 2020, and quarterly performance and narrative reports are due May 14, 2020. VETS encourages grantees to submit timely reports if possible. Reporting in accordance with established due dates allows grantees to report more accurately and helps to avoid the undue burden of submitting reports in very close succession. Timely reporting also allows VETS to make informed financial decisions and to identify potential technical assistance needs as early as possible.

However, grantees who will be unable to report timely as a result of the COVID-19 pandemic should request an extension through GOTRs. The request should be submitted to the GOTR via email by the report due date, identify the specific reason the extension is needed, and include the estimated date by which they will be able to submit the report.

7. Will VETS extend closeout report deadlines to accommodate states' need to prioritize the COVID-19 response?

The closeout report due date for our FY 2019 JVSG grants is March 31, 2020. Closeout reports on the five-year FY 2015 JVSG grants are due on June 30, 2020. VETS requests that states meet these deadlines if possible and to communicate through GOTRs if they anticipate any delays. Per [2 CFR 200.343\(a\)](#), the Grant Officer may approve an extension to the closeout requirements if requested by the grantee.

However, approval of a closeout extension request does not constitute an extension of a grantee's requirement to withdraw any obligated funds within 90 days of the period of performance end date. Such withdrawals must be coordinated in advance with the GOTR. The request must be submitted via email and include a full description of the purpose of the withdrawal.

8. As the majority of states have closed their American Job Centers, and are offering services virtually, do you have any suggestions/recommendations on how they should be conducting the triage typically done to determine DVOP eligibility?

VETS reminds states that the roles and responsibilities of DVOPs and LVERs do not allow them to conduct initial assessments. States are encouraged to develop ways to triage participants virtually and safely prior to referring eligible participants to DVOPs.

For example, the Colorado Department of Labor and Employment has developed a virtual triage form that is submitted online and assessed by workforce center staff. Eligible participants are then referred to DVOPs, who use a virtual case management system.

The NASWA Veterans Committee holds calls for state veteran coordinators every Friday throughout this crisis; states' participation on those calls offers a great way to share best practices.

9. For states whose offices are closed, how do we handle JVSG staff who do not have adequate technology to telework (e.g., no internet in the home, or no issued laptops)?

Consistent with the state's policies regarding administrative, sick, or emergency leave, states may place JVSG staff on leave that is charged to JVSG. [2 CFR 200.431\(b\)](#) provides that a leave policy is allowable if it is an established, written policy that applies equitably and consistently to all staff regardless of employee class, and if it is reasonable. The state may only charge an employee's paid time off to the federal grant if it is the state's overarching policy to pay all employees in this situation, regardless of the funding source used to cover such an expense.

If the state amends its existing leave policy or develops a new emergency leave policy applicable to all employees affected by the COVID-19 pandemic, costs incurred under that policy would be allowable provided they meet the requirements in 2 CFR 200.431(b). For any change in policy that results in the movement of greater than 10% of the total grant award between object class categories, a budget realignment request is required per [VPL 04-18](#).

10. Can a DVOP assist an eligible veteran with low computer skills to complete the online UI claim process (e.g., asking the veteran the UI application questions and entering the veteran's responses into the system for him/her)?

UI is an employment service, so assisting an eligible veteran in this way would be within the DVOP roles and responsibilities. In consultation with the U.S. Department of Labor's Office of Unemployment Insurance staff, VETS asks states to note the following:

- The veteran must first have been triaged by other workforce center staff prior to referral to the DVOP.
- The veteran and DVOP must actually be on the phone together while the claim is being filed because there is no provision in UI for any person to file on behalf of another person.
- The DVOP must ask the claim questions verbatim, and must not provide any interpretation or rephrasing of the questions.
- The DVOP must answer claim questions exactly as expressed by the veteran.

11. If a state's incentive award plan was to send award recipients to the NASWA conference (or similar event) which is then canceled due to travel restrictions, can the incentive award timeframe be extended? Alternatively, can incentive funds be used for something else instead, for example, to cover laptops and phones to support telework?

Per [VPL 04-19](#), incentive award funding must be spent following the approved incentive award plan and obligated by September 30 of each fiscal year. Any substantial change to the incentive award plan must be approved in advance by the Grant Officer. The incentive award plan itself must also adhere to the requirements established in [38 USC 4112](#) and further described in the VPL.

Incentive award funding cannot be used for any other purpose. If a state needs additional funding to cover the cost of laptops and phones, they may request the funding and/or consider a budget realignment. For example, states should see cost savings due to travel restrictions; funding originally planned for travel can be used to support additional telework capabilities. Funding moved between object class categories that is less than 10% of the total grant award does not require approval, although VETS strongly encourages states to document these changes with their GOTR.

12. Will states be penalized for not meeting performance goals during the pandemic?

VETS understands the challenges states may face meeting PY 2019 performance goals given the circumstances surrounding COVID-19. As a reminder, [Grant Officer's Memorandum 03-19](#) directed that PY 2019 would be used to continue establishing performance baselines. No determinations of sanctions will be made based on PY 2019 performance information.

Grantees are also advised that the National Labor Exchange (NLx) has resources available for placing participants quickly during this crisis. Many employers are in need of making a large number of immediate hires to respond to the pandemic. NLx posts these jobs at

needajobnow.usnlx.com. As of the time of this writing, there are over 300,000 jobs available across the nation on this site, which also provides links to similar resources in several states.

13. Will the National Veterans' Training Institute continue to offer in-person classes?

As a result of the COVID-19 pandemic, all in-person classes are canceled until further notice. However, the National Veterans' Training Institute (NVTI) is moving its in-person courses to live virtual online training to allow students to continue training. Visit NVTI.org for details on class offerings.

14. How will DVOPs meet the 18-month deadline for the completion of the required JVSG core courses?

Given the current environment, it is understandable that some personnel will fail to meet the 18-month deadline. NVTI is moving its in-person courses to live virtual online training to allow students to continue training. Visit NVTI.org for details on class offerings.

VETS will work with those states who have employees who were not able to meet the 18-month requirement for training due to COVID-19. NVTI canceled in-person courses beginning March 16, 2020.

15. Can VETS temporarily allow DVOPs to serve veterans without a significant barrier to employment (SBE) but who have been affected by the pandemic?

The populations that DVOPs may serve are authorized by [38 USC 4103A](#) and by annual appropriations. Veterans who are not eligible for DVOP services must be given priority of service by other AJC staff.

The number of veterans with significant barriers to employment and targeted populations in need of DVOP services is likely to increase in this crisis. Assigning non-SBE veterans to DVOPs in addition to their already burgeoning caseload could result in a lower quality of services for all participants.

16. Can LVERs provide individualized career services to eligible veterans affected by COVID-19?

[VPL 04-18](#), *Submission of JVSG Interim Modification Requests*, provides that states may convert staff between LVER and DVOP position titles without prior approval by DOL VETS. Therefore, states may use this flexibility to reassign LVER staff into DVOP roles, at which point they may serve eligible veterans.

[VPL 01-20](#), *Consolidated DVOP and LVER Staff Positions*, describes the process by which consolidated positions may be approved. Although new consolidated positions require formal approval from DOL VETS, states that already have approval for one or more of the positions may convert LVER staff to consolidated positions as needed.

Newly converted JVSG staff must satisfactorily complete all required NVTI training within 18 months of assignment. Staff who are newly assigned to the DVOP specialist role must attend abbreviated online versions of the DVOP-specific training, at a minimum, prior to providing

direct services to veterans. The schedule and availability of training courses can be found at NVTI.org. [VPL 01-19](#), *Training Requirements and Reference Tool for Newly Hired JVSG Staff*, and its attachment, [JVSG Primer](#), can assist staff with this conversion.

Conversions between staff roles must be documented in quarterly reports. The [VETS-402 Expenditure Detail Report](#) should accurately reflect program-specific expenditures and base positions paid, and the [VETS-403 Technical Performance Narrative](#) must document conversions between staff positions. Please refer to [VPL 07-19](#), *JVSG Recurring Report Requirements*, and the Grant Officer's Technical Representative (GOTR) for assistance in completing quarterly reports.

17. Can a state use funds originally earmarked for a state veteran conference to instead pay for virtual career fairs for veterans?

States may transfer up to 10% of their grant award between object class categories without prior approval. A transfer exceeding 10% would require a budget modification approved by the Grant Officer.

However, all grant expenditures must be allowable, allocable, and reasonable, as defined by [2 CFR 200.403](#) et seq. In this instance, JVSG can only be charged for the portion of the virtual career fair that is for veterans who are eligible for DVOP services. An event for all veterans would likely need to be cost-shared with another program, such as Wagner-Peyser.

States cannot transfer incentive award funds since they cannot be used for any other purpose. Incentive funds may only be expended in accordance with the state's approved incentive award plan. Please refer to Question #11 for more information about incentive award expenditures.