

Questions Asked Before the Office Hours

1. If an employee whose FTE is on DOL budget, will we need to go through a budget revision process, if the amount does not change?

No, a grant amendment for a budget realignment is not necessary if you budgeted the employee's full-time salary on your previously submitted budgetary form (SF-424A). A budget realignment is only necessary when you distribute the overall funding among different budget cost categories.

This means that for discretionary grant recipients, the total amount of the transfers between line items on the budget exceeds (or is expected to exceed) 10% of the total budget. A request for a budget modification must be submitted in writing at least 30 days before the effective date of any change and requires Grant Officer approval.

Generally, all grant modifications must include:

- A cover letter on grant recipient letterhead addressed to the Grant Officer, dated, and signed by the Authorized Representative. The letter must include:
 - A written description and justification for each proposed required modification types including:
 - Why the modification is being requested
 - The modification specifics
 - How the modification will contribute to the success of the award
 - Any other documentation to support the request

Specifically, if a budget realignment was needed, the amendment documentation should include:

- A revised SF-424A Budget Form
- A revised Budget Narrative that itemizes each cost and presents the basis for all calculations associated with each line item on the SF-424A,
- A revised narrative (If applicable)

2. If the indirect rate changes each year NICRA can the rate be applied or do, we need to keep using the rate that was submitted?

Your negotiated indirect cost rate agreement (NICRA) will identify key pieces of information necessary for your organization to charge indirect cost to a grant/ funding source. For example, your NICRA will discern the type of rate, the rate percentage, the timeframe for which the rate is in effect, and the base for the NICRA funds.

The rate must be used during the timeframe identified on the rate agreement when the cost has incurred. The indirect cost rate is meant to allow for recovery of costs in the timeframe the expenditure is incurred, not when grant funds have become available.

To reiterate, you must use the **approved NICRA** from your cognizant agency for indirect costs. The NICRA will indicate the timeframe in which the given rate can be used. You **cannot** use a submitted NICRA that has not been approved by the cognizant agency.

You are to report indirect costs only on the FINAL ETA-9130 report (line item 14). This field is not available for you to report on any quarterly ETA-9130 report. Note that you are to report ALL the rates used throughout the life of the grant as this is a cumulative report.

3. We have been given at times different guidance on reporting under the line "Other Federal Funds Expended".

Going forward, if you have any questions about interpreting regulations, please refer to the Federal Project Officer (FPO). Please also refer to the ETA-9130 reporting instructions. If you're using other Federal grant funds, regardless of if the funds are from DOL or another Federal agency, on allowable YouthBuild grant activities, then you are to report it on your ETA-9130 report on line item 11a – Other Federal Funds Expended. These expenditures must be allowable in accordance with the factors of allowability outlined at 2 CFR 200.403.

For example, if a participant is co-enrolled in your YB grant and WIOA Youth program and WIOA Youth funds were used to purchase work boots that the participant uses at the YB worksite and would have been paid for out of your YB grant, then the costs of those work boots should be reported on line item 11a.

Specifically, the instructions on your ETA-9130 report for line item 11a - Other Federal Funds Expended reads as:

“Enter any other Federal funds expended, by the recipient organization and any subrecipient organizations for the same purposes or activities of the subject grant. **Expenditures included must be allowable costs which could otherwise have been paid for out of subject grant funds.** Other Federal funds expended by any non-subrecipient partner organizations for the benefit of this grant program should be included in the quarterly progress report. This entry should include expenditures of all Federally funded leveraged resources, whether or not such expenditures are the result of a leveraging requirement.”

If you need further information, please reach out to your FPO.

4. What in-house back up documentation is best to have for this form?

We encourage documentation for all types of purposes (administrative, fiscal, or programmatic) to be collected on a frequent basis. For financial reporting, this is to ensure the accuracy of all balances reported on the ETA-9130. The documentation

should run in tandem with your financial reporting system, meaning that your documentation should identify the following: the amount, the source, and the expenditure of Federal funds for Federal awards. With this information, your financial system should be able to collect Federal awards, authorizations, financial obligations, unobligated balances, as well as assets, expenditures, income, and interest (2 CFR 200.302(b)(3)).

As a good grants management practice, you'll want to maintain documentation to support the budget categories on your SF-424A. You must maintain supporting documentation for items reported on your ETA-9130. For example, for personnel costs, you'll want to have timesheets for the staff not only charging time on the YouthBuild grant but for staff time that is being charged as cost-sharing expenditures. For supplies and equipment, you'll want to keep purchase orders and receipts. If you have any contracts, you'll want to keep documentation throughout all the phases of the procurement process, as well as the completion of the contract. If you have a subrecipient, you'll want to collect their financial documentation as well.

A lack of documentation could lead DOL-ETA staff to question costs. You can never go wrong with too much documentation. The more documentation you have, the easier it is for DOL-ETA grant staff to understand how Federal funds were used to benefit the grant.

If you need further information, please reach out to your FPO.

5. What is the best way to organize supporting documentation for future audits?

If you've never been through Federal monitoring or an audit with your auditors, or are not familiar with the process, then it might be helpful to look at the 2025 Core Monitoring Guide or Compliance Supplement created by the Office of Management and Budget in advance.

The Core Monitoring Guide (CMG) is the official tool for Grant Management (GM) staff to conduct monitoring. ETA utilizes monitoring as a means of tracking performance, holding recipients accountable, reviewing grant operations, and assessing compliance to ensure effective stewardship of Federal funds. The CMG contains citations, instructions, tips, and questions to help guide the user on compliance requirements. The CMG discusses a multitude of topics throughout its indicators, and you should maintain all proper documentation on applicable indicators. For example, if you're looking at what is required for a grant recipient and single or program-specific audit requirements, you would look at Indicator 3.h.1: Audit Process, as well as Resource G: Single Audit Report Framework or Tool Q: Audit Resolution Tracking Checklist.

As for the Compliance Supplement, it's updated yearly and gives guidance to auditors on how to conduct Federal audits for Federal awards. You can use this supplement to

understand, gather, and organize what types of documentation you'll need on hand prior to the audit. You can find the 2024 supplement here:

<https://www.fac.gov/assets/compliance/2024-Compliance-Supplement.pdf>

In addition to the supporting documentation that you must provide during an audit with your auditors, you must also prepare the documents that are outlined in [2 CFR 200.510](#). As an auditee, it is your responsibility to prepare financial statements and a schedule of expenditures for Federal awards (SEFA). The documentation for financial statements should include your organization's "financial position, results of operations or changes in net assets, and, where appropriate, cash flows for the fiscal year audited" (2 CFR 200.510). For the SEFA, you must include the total awards expended, which is listed out in [2 CFR 200.502](#). This includes activities requiring compliance with Federal statutes, regulations, and the terms and conditions of the award, such as expenditure transactions associated with the grant, disbursement of funds to subrecipients, receipt of property, and receipt of program income, amongst other things. Organizing your documentation into these two reports might be more beneficial for you when preparing for a single or program-specific audit.

6. Who helps with the submission of the financial reports?

The ETA-9130 financial report submission process is completed by two people within your organization. This is done as part of an internal control to ensure there is reasonable assurance over the accuracy of the final financial report and there are proper segregation of duties over the reporting and reviewing of the report.

The secondary financial reporting contact is responsible for entering the required ETA-9130 financial data into the Payment Management System (PMS) using the account password to enter the financial data. Most often, the secondary contact is a designated financial/reporting staff person with a limited role in program/grant implementation. It is best to collaborate with staff responsible for program/grant implementation (and/or reporting) to facilitate complete and accurate financial reporting.

The primary contact for financial reporting is responsible for certifying the accuracy of the data the secondary contact enters into PMS and uses the PMS account pin to electronically sign off on the report. The primary contact must serve a different role than the secondary contact. This is done so that certification authority is guaranteed to be by a separate staff person and the password and pin are held by separate people within the organization. This individual is typically in a role that they are able to sign off on the validity of the report and are able to sufficiently and competently review the report.

7. If line 10e changes by \$10 in the old quarter is the difference, then recorded in the new quarter?

You can correct any ETA-9130 report before it has been officially reviewed and closed by ETA staff. However, once the ETA-9130 report has been closed for that quarter, then you

would make all changes in the next quarter since ETA-9130 financial reports are cumulative. You should make any minor adjustments to the next submitted report in Line 10e.

You cannot revise a previously submitted ETA-9130 financial report once the subsequent quarter's report is generated in PMS. Adjustments on prior locked reports may occur only in limited circumstances and with approval from ETA. Requests for adjustments on prior locked reports should be submitted to the appropriate ETA regional office.

8. Is it necessary to report the indirect in the Quarterly 9130 reports or only in the final 9130?

Indirect cost expenditures are only required to be reported on the **FINAL** ETA-9130 Report. You must enter all indirect cost information on lines 13a – 13h at the end of the grant period. Please see Line Item 13 on your ETA-9130 report [https://www.dol.gov/sites/dolgov/files/ETA/pdfs/ETA-9130%20-%20Basic%20\(2023\).pdf](https://www.dol.gov/sites/dolgov/files/ETA/pdfs/ETA-9130%20-%20Basic%20(2023).pdf)

9. More information on Program income and the different options. How to complete Section 13 when no IDC was charged.

More information on program income can be found in our [NASWA Grants Management SMART Training](#), specifically the lesson *Financial Reporting – ETA-9130 Reporting*.

Like grant funds, program income and the expenditure of program income must be reported on an accrual basis. For ETA grants, YouthBuild grant recipients must report program income using the addition method, meaning that program income earned gets added to your Federal grant funds and can only be used to further program objectives. Program income earned during the period of performance also may only be used for costs incurred during the period of performance or allowable closeout costs, and program income must be expended prior to requesting additional Federal funds ([2 CFR 200.307\(a\)](#)). Should there be any remaining unexpended program income at the end of the grant, it must be returned to ETA.

Indirect cost expenditures are only required on the **FINAL** report. If there are no indirect cost expenditures, then each of Lines 13a-13h of the ETA-9130 should be filled in with “N/A” on the final report.

10. Other Federal Funds Expended: Use to report excessive match (regardless of source) or only federal funds leveraged?

Line-Item 11a “Other Federal Funds Expended” of the ETA-9130 is used to report expenditures of all other **Federal funds used on allowable grant activities**. It is also used to report any other Federal funds expended by any subrecipient organizations for the same purposes or activities of your YouthBuild grant.

Match (cost-sharing) and any excessive match that are from non-Federal sources are reported on Line-Item 10k “Recipient share of expenditures”. This line includes all of the

non-Federal funds expended you've expended for the purposes or activities of your YouthBuild grant. Expenditures identified on 10k must be allowable costs which could otherwise have been paid for out of your YouthBuild grant funds. These expenditures should include both match (cost-sharing) and other **non-Federal** leveraged resources. This line-item may, and often will, exceed the required match entered on 10j (Total Recipient Share Required). Allowable match and leveraged resources that are expended on grant activities are reported on the **SAME** line item 10k - Recipient share of expenditures. Any unallowable leveraged resources expended would be reported on your QNR, not your ETA-9130. These types of costs could be costs that are specifically unallowable per the FOA but are allowable under other grants.

Please see the ETA-9130 at the following link for more details:

[https://www.dol.gov/sites/dolgov/files/ETA/pdfs/ETA-9130%20-%20Basic%20\(2023\).pdf](https://www.dol.gov/sites/dolgov/files/ETA/pdfs/ETA-9130%20-%20Basic%20(2023).pdf)

Questions asked during Office Hours.

1. Can we still request funds monthly for our indirect costs with de minimis?

Unless you are operating on a reimbursement basis, you can request to draw down funds as often as needed and for immediate use. See here for the types of payment requests and when they'll be processed:

https://pms.psc.gov/forms/Payment_Request_Schedule.pdf

Starting March 17, 2025, grant recipients are required to have a written justification for each drawdown in PMS. The justification must demonstrate immediate cash needs only and why the funds are being drawn down. Due to the time needed to review each justification request, this process may take over 48 hours, so expect grant funds to be available within 2-3 days after submitting your drawdown request. If your organization is using the de minimis to calculate your indirect costs, please include that explanation in your PMS justification.

2. When we submit a drawdown, does it auto populate on the federal financial report on the ETA-9130 in PMS?

Yes, your quarterly drawdown total will be auto-populated in the ETA-9130. Based on the ETA-9130 Financial Report Instructions, line item 10a: Cash Receipts will have a pre-entered amount that agrees with DOL's cumulative quarter-end drawdown records associated with the grant. The amount is equal to the cumulative drawdowns posted in PMS through the end of the reporting date. Note, due to a timing issue, there may be instances where your Cash Receipts auto-populated on your quarterly ETA-9130 form will not reflect any recent drawdowns. If that is the case, please explain in the Remarks section of the form.

Please note that for grant recipients operating on a reimbursement basis, this amount will NOT reflect cash utilized from other fund sources of the recipient organization to

pay for subject grant activities, until such funds are drawn down under the specific grant subaccount.

3. Line 10k and 11a. Could there be the same leveraged fund amounts reported in each section?

Based on the ETA-9130 Financial Report Instructions, line item 10k: Recipient Share of Expenditures and line item 11a: Other Federal Funds Expended should NOT have the same leveraged funds reported on both lines. This would mean that you are double counting those leveraged resources. Line item 10k reports allowable, **non-Federal** funds expended, including both match and leveraged resources. Line item 11a reports allowable, **Federally-funded** leverages resources only. The only difference between the two line items regarding leveraged resources is that one is for non-federal funds, and the other is for Federal-funds.