

CIRCUMSTANCES REQUIRING NARRATIVE JUSTIFICATION BY STATE (APPLICANT)

REGULAR PROJECT

Issue	If	Then
No Rapid Response	Layoff notification was provided but no rapid response has been initiated...	Narrative must provide specific information that explains why it was not feasible or appropriate to initiate Rapid Response prior to submitting the application. Plausible factors may include resistance by, or lack of cooperation from the employer, large number of layoff events statewide in the same time period, or notification did not provide sufficient lead time prior to layoff.
Layoff Date > 120 Days	Application includes a layoff date more than 120 days before the date of application submission...	Narrative must include specific information that demonstrates that the affected workers are still in need of, and interested in, re-employment services. Plausible factors include workers are already receiving formula-funded services or have registered for assistance through the local One-Stop system.
Participation Rate > 50 %	Planned number of participants is more than 50% of eligible target group...	Narrative must provide data (e.g., Rapid Response results, enrollment of target group in formula-funded services and assessment results) to justify the projected participation rate.
Number Participants < 50	Any employer data form shows the number of affected workers/workers served is less than 50...	Narrative must explain why the workers cannot be served with formula funds. The information should include accrued expenditures of formula funds to date and estimated expenditures to complete services to currently enrolled participants in formula-funded services.

CIRCUMSTANCES REQUIRING NARRATIVE JUSTIFICATION BY STATE (APPLICANT)

REGULAR PROJECT (CONT.)

If		Then
Wage Replacement < State Goal	The planned wage replacement rate for the project is less than the approved State goal...	Narrative must provide data on the reemployment barriers of the target group and local labor market conditions to explain why the target goal is not feasible.
High Cost Per-Participant	Proposed cost per-participant is more than 50% of the reported actual cost per-participant in the prior PY...	Narrative must identify specific factors (e.g., reemployment barriers that create a higher need for training, or longer-term training and/or support services) that justify why the proposed cost is greater than the formula program costs.
NRPs Provided	Application proposes to offer needs-related payments (NRPs) to <i>any</i> participants...	Narrative must explain the eligibility criteria for NRPs and how both the number of recipients needing NRPs and the cost per recipient (i.e., based on number of weeks and weekly amounts) were estimated.  <i>[Note: This information will be used to verify that NRPs are being provided consistent with Local Area policies during post-award reviews.]</i>
Indirect Costs	Indirect costs are proposed...	Narrative must identify the approved cost rate and base, the cognizant approval agency, and the date of approval for the indirect cost rate.  <i>[Note: This only applies to indirect costs proposed at the grantee level, not the sub-grantee level.]</i>

CIRCUMSTANCES REQUIRING NARRATIVE JUSTIFICATION BY STATE (APPLICANT)

REGULAR PROJECT (CONT.)

Issue	If	Then
NRP Administration Cost	Any costs are proposed for administration of NRPs...	Narrative must explain how the cost basis was determined (i.e., based on number of checks and the per check cost)
Grantee-Level Administrative Costs I	There are no planned Project Operator-level expenditures for Program Management and Oversight; AND, The proposed Grantee-level expenditures for Program Management and Oversight excl. NRP/Premium Payment Processing are greater than 10% of the Total Expenditures; Grantee Level excl. the planned expenditures for NRPs or Health Coverage Payments ...	Narrative must provide data on the reemployment barriers of the target group and local labor market conditions to explain why the target goal is not feasible.
Grantee-Level Administrative Costs II	There are planned Project Operator-level expenditures for Program Management and Oversight; AND, The proposed Grantee-level expenditures for Program Management and Oversight excl. NRP/Premium Payment Processing are greater than 1.5% of the Total Expenditures; Project Operator Level excl. all planned expenditures for NRPs or Health Coverage Payments ...	Narrative must identify specific factors (e.g., reemployment barriers that create a higher need for training, or longer-term training and/or support services) that justify why the proposed cost is greater than the formula program costs.

CIRCUMSTANCES REQUIRING NARRATIVE JUSTIFICATION BY STATE (APPLICANT)

**REGULAR PROJECT - EMERGENCY**

Issue	If	Then
Participation Rate > 50%	Planned number of participants is more than 50% of eligible target group ...	Narrative must provide data (e.g., Rapid Response results, enrollment of target group in formula-funded services and assessment results) to justify the projected participation rate.
Number Participants < 50	Any employer data form shows the number of affected workers/workers served is less than 50...	Narrative must explain why the workers cannot be served with formula funds. The information should include accrued expenditures of formula funds to date and estimated expenditures to complete services to currently enrolled participants in formula-funded services.
High Cost Per-Participant	Proposed cost per-participant is more than 50% of the reported actual cost per-participant in the prior PY ...	Narrative must identify specific factors (e.g., reemployment barriers that create a higher need for training, or longer-term training and/or support services) that justify why the proposed cost is greater than the formula program costs.

CIRCUMSTANCES REQUIRING NARRATIVE JUSTIFICATION BY STATE (APPLICANT)

**DISASTER PROJECT**

Issue	If	Then
Indirect Costs	Indirect costs are proposed...	Narrative must identify the approved cost rate and base, the cognizant approval agency, and the date of approval for the indirect cost rate.  <i>[Note: This only applies to indirect costs proposed at the <u>grantee level</u>, not the <u>sub-grantee level</u>.]</i>
Grantee-Level Administrative Costs I	There are no planned Project Operator-level expenditures for Program Management and Oversight;  AND,  The proposed Grantee-level expenditures for Program Management and Oversight excl. NRP/Premium Payment Processing are greater than 10% of the Total Expenditures: Grantee Level excl. the planned expenditures for NRPs or Health Coverage Payments ...	Narrative must justify the need for the higher project management & oversight costs.  Narrative must describe the specific administrative and project management activities to be performed, and must reference the applicable cost components, such as staff salaries and benefits, staff time allocated, equipment, travel, facilities, etc.

**CIRCUMSTANCES REQUIRING NARRATIVE JUSTIFICATION BY STATE (APPLICANT)**

**DUAL ENROLLMENT**

Issue	If	Then
No Rapid Response	Layoff notification was provided but no rapid response has been initiated...	Narrative must provide specific information that explains why it was not feasible or appropriate to initiate Rapid Response prior to submitting the application. Plausible factors may include resistance by or lack of cooperation from employer, large number of layoff events statewide in the same time period, or notification did not provide sufficient lead time prior to layoff.
Layoff Date > 120 Days	Application includes a layoff date more than 120 days before the date of application submission...	Narrative must include specific information that demonstrates that the affected workers are still in need of, and interested in, re-employment services. Plausible factors include workers are already receiving formula-funded services or have registered for assistance through the local One-Stop system.
Participation Rate > 50%	Planned number of participants is more than 50% of eligible target group...	Narrative must provide data (e.g., Rapid Response results, enrollment of target group in formula-funded services and assessment results) to justify the projected participation rate.
Number Participants < 50	Any employer data form shows the number of affected workers/workers served is less than 50...	Narrative must explain why the workers cannot be served with formula funds. The information should include accrued expenditures of formula funds to date and estimated expenditures to complete services to currently enrolled participants in formula-funded services.

**CIRCUMSTANCES REQUIRING NARRATIVE JUSTIFICATION BY STATE (APPLICANT)**

**DUAL ENROLLMENT (CONT.)**

<b>Issue</b>	<b>If</b>	<b>Then</b>
Entered Employment Rate < State Goal	The planned entered employment rate for the project is less than the approved State goal...	Narrative must provide data on the reemployment barriers of the target group and local labor market conditions to explain why the target goal is not feasible.
Wage Replacement < State Goal	The planned wage replacement rate for the project is less than the approved State goal...	Narrative must provide data on the reemployment barriers of the target group and local labor market conditions to explain why the target goal is not feasible.
Training Costs	Proposed expenditures for training and/or NEG funded training	Narrative must identify specific that create a need for training not covered under TAA.
High Cost Per-Participant	Proposed cost per-participant is more than 50% of the reported actual cost per-participant in the prior PY...	Narrative must identify specific factors (e.g., reemployment barriers that create a higher need for training, or longer-term training and/or support services) that justify why the proposed cost is greater than the formula program costs.
Indirect Costs	Indirect costs are proposed...	Narrative must identify the approved cost rate and base, the cognizant approval agency, and the date of approval for the indirect cost rate. <i>[Note: This only applies to indirect costs proposed at the grantee level, not the sub-grantee level.]</i>

CIRCUMSTANCES REQUIRING NARRATIVE JUSTIFICATION BY STATE (APPLICANT)

**DUAL ENROLLMENT (CONT.)**

Issue	If	Then
<p>Grantee-Level Administrative Costs I</p>	<p>There are no planned Project Operator-level expenditures for Program Management and Oversight;  AND,  The proposed Grantee-level expenditures for Program Management and Oversight excl. NRP/Premium Payment Processing are greater than 10% of the Total Expenditures; Grantee Level excl. the planned expenditures for NRPs or Health Coverage Payments  ...</p>	<p>Narrative must justify the need for the higher project management &amp; oversight costs.    Narrative must describe the specific administrative and project management activities to be performed, and must reference the applicable cost components, such as staff salaries and benefits, staff time allocated, equipment, travel, facilities, etc.</p>
<p>Grantee-Level Administrative Costs II</p>	<p>There are planned Project Operator-level expenditures for Program Management and Oversight;  AND,  The proposed Grantee-level expenditures for Program Management and Oversight excl. NRP/Premium Payment Processing are greater than 1.5% of the Total Expenditures; Project Operator Level excl. all planned expenditures for NRPs or Health Coverage Payments  ...</p>	<p>Narrative must justify the need for the higher project management &amp; oversight costs. Plausible factors may include large number of Project Operators, inexperienced or historically underperforming Project Operators requiring a greater level of oversight and technical assistance, or a particularly challenging target group.    Narrative must describe the specific administrative and project management activities to be performed.</p>

CIRCUMSTANCES REQUIRING NARRATIVE JUSTIFICATION BY STATE (APPLICANT)

**DUAL ENROLLMENT (CONT.)**

Issue	If	Then
<p>Project Operator-Level Administrative Costs</p>	<p>There are planned Project Operator-level expenditures for Program Management and Oversight;  AND,  The Project Operator-level expenditures for Program Management and Oversight excl. NRP payment processing are greater than 10% of the total Project Operator-level expenditures (excluding NRPs) ...</p>	<p>Narrative must justify the need for higher project management &amp; oversight costs. Plausible factors may include number of service locations, support to transition committees,   Narrative must describe the specific administrative and project management activities to be performed and must reference the applicable cost components, such as staff salaries and benefits, staff time allocated, equipment, travel, facilities, etc.</p>

**CIRCUMSTANCES REQUIRING NARRATIVE JUSTIFICATION BY STATE (APPLICANT)**

**TRADE ACT HEALTH INSURANCE COVERAGE ASSISTANCE (HCIC)**

Issue	If	Then
Indirect Costs	Indirect costs are proposed ...	Narrative must identify the approved cost rate and base, the cognizant approval agency, and the date of approval for the indirect cost rate.
Administrative Costs	The proposed Grantee expenditures for Program Management and Oversight excl. NRP/Premium Payment Processing are greater than 10% of the Total Expenditures: Grantee Level excl. the planned expenditures for Health Coverage Payments ...	<p>Narrative must justify the need for the higher project management &amp; oversight costs.</p> <p>Narrative must describe the specific administrative and project management activities to be performed.</p> <p>and must reference the applicable cost components, such as staff salaries and benefits, staff time allocated, equipment, travel, facilities, etc.</p>