



**U.S. DEPARTMENT OF LABOR  
EMPLOYMENT AND TRAINING  
ADMINISTRATION (DOL/ETA)**

**NOTICE OF  
AWARD (NOA)**

Under the authority of the **Workforce Innovation and Opportunity Act, P.L. 113-28**, this grant or agreement is entered into between the above named **Grantor Agency** and the following named **Awardee**, for a project entitled - **PATHWAY HOME 2**.

**Name & Address of Awardee:**  
County of Santa Barbara  
234 Camino del Remedio  
Santa Barbara, CALIFORNIA 93110-1341

**Federal Award Id. No. (FAIN): PE-36546-21-60-A-6**  
**CFDA #: 17.270- Reintegration of Ex-Offenders**  
**Amount:\$2,499,999.00**  
**EIN: 956002833**  
**DUNS #: 787264878**

**Accounting Code:** 1630-2021-0501742021BD202101740008205XF002A0000AOWI00AOWI00-A90200-410023-ETA-DEFAULT TASK-

**Payment Management System DOC#:** PE36546WR1

The Period of Performance shall be from **July 01, 2021 thru December 31, 2024**.  
Total Government's Financial Obligation is **\$2,499,999.00** (unless other wise amended).

Payments will be made under the Payments Management System, and can be automatically drawn down by the awardee on an as needed basis covering a forty-eight (48) hour period.

In performing its responsibilities under this grant agreement, the awardee hereby certifies and assures that it will fully comply with all applicable Statute(s), and the following regulations and cost principles, including any subsequent amendments:

**Uniform Administrative Requirements, Cost Principles, and Audit Requirements:**

2 CFR Part 200; Uniform Administrative Requirements, Cost Principles, and Audit Requirements; Final Rule  
2 CFR Part 2900; DOL Exceptions to 2 CFR Part 200;

**Other Requirements (Included within this NOA):**

Condition(s) of Award (if applicable)  
Federal Award Terms, including attachments

**Contact Information**

The Federal Project Officer (FPO) assigned to this grant is Bradley Levine. Bradley Levine will serve as your first line point of contact and can be contacted via e-mail - [levine.bradley.m@dol.gov](mailto:levine.bradley.m@dol.gov). If your FPO is not available, please call your Regional Office at 415-625-7900 for assistance.

The awardee's signature below certifies full compliance with all terms and conditions as well as all applicable Statues(s), grant regulations, guidance, and certifications.

Signature of Approving Official - **AWARDEE**

Signature of Approving Official - **DOL / ETA**

See SF-424 for Signature

**No Additional Signature Required**  
**90-day temporary ICR**

**MELISSA ABDULLAH**, June 24, 2021  
GRANT Officer

Close

Print

**Pathway Home 2**  
**County of Santa Barbara**  
**Conditions of Award**  
**PE-36546-21-60-A-6**

As part of the Condition(s) of Award to receiving the Pathway Home 2 Grant, the U.S. Department of Labor (DOL), Employment and Training Administration (ETA) has identified the following area(s) that require further clarification and/or modification.

Please note that a submittal of the required document(s) does not constitute approval by DOL/ETA. A grant modification will need to be submitted and final approval must be given by the Grant Officer (GO). Your Federal Project Officer (FPO) will review the documentation and then submit it to the GO for formal approval as a modification to the grant agreement. Once approved, the revised document(s) will comprise the official modification to this grant agreement and the special conditions will be resolved. Any questions related to the below items must be submitted to your FPO.

A response to this request for clarification and modification must be submitted to your FPO within **90 days** of receipt of this grant award package.

**Condition 1 – Budget Narrative**

The Budget Narrative must include enough details for all expenditures to demonstrate their valuations and adherence to the Uniform Guidance Cost Principles. Specifically, the budget narrative must clarify the following:

- *Indirect Costs*-Please include an amount for indirect costs (through a Negotiated Indirect Cost Rate Agreement or De Minimis) on the SF-424A budget form, then include one of the following:  
If you have a Negotiated Indirect Cost Rate Agreement (NICRA), provide an explanation of how the indirect costs are calculated. This explanation should include which portion of each line item, along with the associated costs, are included in your cost allocation base. Also, provide a current version of the NICRA from a Federal entity.

The grantee must submit a budget modification request which includes the following:

- 1) An SF-424A whose totals align with any revised subtotals indicated on the revised budget narrative, including any claimed indirect costs.
- 2) A revised budget narrative which addresses and breaks down the entirety of each line reflected on the SF-424A as outlined above. The budget narrative must contain costs per entry in each category which add up to the indicated line item total with enough information to ascertain whether the represented totals are mathematically accurate.

To resolve, please submit a revised Budget Narrative with the accompanying SF-424A as a Budget Realignment or Budget Clarification modification request to your FPO.

**Condition 2 – Budget Clarification (Indirect Costs – 10% De Minimis)**

The grantee has incorporated indirect costs into the budget, but has not submitted a Negotiated Indirect Cost Rate Agreement (NICRA). It is not clear whether the grantee is claiming indirect costs under a NICRA or electing to use the 10% de minimis indirect cost rate if eligible.

To resolve, you must either remove the indirect costs from the budget and request a budget realignment modification, submit a NICRA to confirm that the indirect costs were calculated accurately, or, if eligible, request the use of the 10 percent de minimis rate.

If you intend to claim indirect costs using the 10 percent de minimis rate, please confirm that your organization meets the requirements as described in 2 CFR 200.414(f). Clearly state that your organization does not have a current negotiated (including provisional) rate, and your organization is not one described in 2 CFR Part 200, Appendix VII of paragraph (D)(1)(b).

Applicants choosing to claim indirect costs using the de minimis rate must use Modified Total Direct Costs (see 2 CFR 200.1 below for definition) as their cost allocation base. Provide an explanation of which portion of each line item, along with the associated costs, are included in your cost allocation base. Note that there are various items not included in the calculation of Modified Total Direct Costs. See the definitions below to assist you in your calculation.

- **2 CFR 200.1 Modified Total Direct Cost (MTDC)** means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000. Other items may be excluded only when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

The definition of MTDC in 2 CFR 200.1 no longer allows any sub-contracts to be included in the calculation. You will also note that participant support costs are not included in modified total direct cost. Participant support costs are defined below.

- **2 CFR 200.1 Participant Support Cost** means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects.

Please work with your Federal Project Officer (FPO) to determine the best approach for resolving this condition. Your FPO can direct you to additional resources and information on this topic as needed.

**Condition 3 – Budget (Needs-Related Payments)**

In accordance with the Funding Opportunity Announcement, up to 1.5% of grant funds may be used to provide needs-related payments, such as those authorized under WIOA paid directly to participants, such as those payments authorized under WIOA to assist participants remaining in training and often used by participants to pay for food, utility bills, or immediate needs. Needs-related payments are a form of supportive services paid directly to participants that enable the individual to participate in training. Needs-related payments must tie directly to the cost identified, and grantees must ensure the payments are documented to support both the participant’s need for the service as well as the actual transaction. Grantees must have a consistent policy in place on the provision of needs-related payments. These payments are a form of supportive services paid directly to the participants that enable the individual to participate in skills training. The Budget Narrative submitted includes costs that exceeds the limitation (*Supportive Services*).

**Response to Programmatic Compliance Review**

After receipt of this award DOL/ETA staff will be performing a general compliance review to help ensure the programmatic aspects of the grant projects are in compliance with the Funding Opportunity Announcement (FOA) and other Federal requirements. After the review, if there is any action needed, ETA will transmit the results of the review and instructions for response to the Grantee in a separate document after receipt of this grant award. The Grantee must respond to the actions cited in the review document.

**TERMS AND CONDITIONS LIBRARY**  
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## **1. Order of Precedence**

In the event of any inconsistency between the terms and conditions of this Notice of Award (NOA) and other requirements, the following order of precedence shall apply:

- I. The Workforce Innovation and Opportunity Act.
- II. Other applicable Federal statutes.
- III. Further Consolidated Appropriations Act, 2020 (Public Law 116-94) dated December 20, 2019.
- IV. Implementing Regulations.
- V. Executive Orders and Presidential Memoranda.
- VI. The Office of Management and Budget (OMB) Guidance, including the Uniform Guidance at 2 CFR 200 and 2900.
- VII. The U.S. Department of Labor (DOL)/Employment and Training Administration (ETA) Directives.
- VIII. Terms and conditions of this award.

## **2. Notice of Award**

The funds shall be obligated and allocated via a NOA grant modification. These obligations and expenditures may not exceed the amount awarded by the NOA modification unless otherwise modified by the ETA.

## **3. Funding Opportunity Announcement**

The Funding Opportunity Announcement (FOA) and any amendments found at <https://www.dol.gov/sites/dolgov/files/ETA/grants/pdfs/FOA-ETA-21-02.pdf> and amendment <https://www.dol.gov/sites/dolgov/files/ETA/FOA-ETA-21-02%20Amendment%201.pdf> are hereby incorporated into this NOA. Award recipients are bound by the authorizations, restrictions, and requirements contained in the FOA. Therefore, the expenditure of grant funds by the award recipient certifies that your organization has read and will comply with all the parts that are contained in the NOA.

## **4. Administrative Law Judge Removal of Award**

By drawing down funds, your organization as the award recipient agrees to the provisions of 20 CFR 683.820(b)(6), which states:

“Any organization selected and/or funded under WIOA Title I, Subtitle D, is subject to having its award removed if an Administrative Law Judge (ALJ) decision so orders. As part of this process, the Grant Officer will provide instructions on transition and closeout to both the newly selected grantee and to the grantee whose positions is affected or which is being removed.”

## **5. Federal Project Officer**

The DOL/ETA Federal Project Officer (FPO) for this award is:



Name: Bradley Levine  
Telephone: 415-625-2244  
E-mail: Levine.bradley.m@dol.gov

The FPO is not authorized to change any of the terms or conditions of the award, or approve prior approval requests. Any changes to the terms or conditions or prior approvals must be approved by the Grant Officer through the use of a formally executed award modification process.

## 6. Indirect Cost Rate and Cost Allocation Plan

Indirect (facilities & administrative (F&A)) costs means those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. Direct costs, by contrast, can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Identification with the Federal award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect (F&A) costs of Federal awards.

If the DOL serves as the Federal Cognizant Agency (FCA) for the grant award recipient, then the grantee must work with DOL's Cost & Price Determination Division (CPDD), which has delegated authority to negotiate and issue a Negotiated Indirect Cost Rate Agreement (NICRA) or Cost Allocation Plan (CAP) on behalf of the Federal Government. More information about the DOL's CPDD is available at <https://www.dol.gov/agencies/oasam/centers-offices/office-of-the-senior-procurement-executive/cost-price-determination-division>. This website has guidelines to develop indirect cost rates, links to the applicable cost principles, and contact information. The CPDD also has Frequently Asked Questions to provide general information about the indirect cost rate approval process and due dates for provisional and final indirect cost rate proposals at <https://www.dol.gov/agencies/oasam/centers-offices/office-of-the-senior-procurement-executive/cost-price-determination-division/faq>.

If a new NICRA is issued during the grant's period of performance, it must be provided to DOL within 30 days of issuance. Funds may be re-budgeted as necessary between direct cost categories as long as it is consistent with the Budget Flexibility term within this agreement, grant requirements, and DOL regulations on prior approval. However, the total amount of the grant award will not be increased.

- A. A current federally approved Negotiated Indirect Cost Rate Agreement (NICRA) or current federally approved Cost Allocation Plan (CAP) has been provided – copy attached. Regarding only the NICRA:

- (1) Indirect Rate approved: \_\_\_\_\_
- (2) Type of Indirect Cost Rate: \_\_\_\_\_
- (3) Allocation Base: \_\_\_\_\_
- (4) Current period applicable to rate: \_\_\_\_\_

Estimated Indirect Costs are shown on the SF-424A budget form.

- B.** (1)  Latest NICRA or CAP approved by the Federal Cognizant Agency.<sup>1</sup> (FCA) is not current,
- (2)  No NICRA or CAP has ever been approved by an FCA.

**URGENT NOTICE:** Estimated indirect costs have been specified on the SF-424A, Section B, Object Class Category “j”, however only *[/If B is not selected, enter N/A. If B is selected, enter these words: the de minimis rate of 10% of Modified Total Direct Costs (MTDC)]* will be released to support the indirect costs in the absence of a NICRA or CAP approved by the FCA. The remaining funds which have been awarded for Indirect Costs are restricted and may not be used for any purpose until the recipient provides a signed copy of the NICRA or CAP and receive documentation stating that the restriction is lifted by the Grant Officer. Upon receipt of the NICRA or CAP, the Grant Officer will issue a grant modification to the award to remove the restriction on those funds.

As the grant award recipient, the grantee must submit an indirect cost rate proposal or CAP. If the FCA for indirect costs is DOL, these documents should be submitted to the DOL’s Cost & Price Determination Division (CPDD) (see <https://www.dol.gov/agencies/oasam/centers-offices/office-of-the-senior-procurement-executive/cost-price-determination-division> ). Otherwise, they should be submitted to the grant award recipient’s FCA. Alternatively, the grantee may request the de minimis rate if eligible (see section D. below). In addition, the recipient must notify the FPO that the documents have been submitted to the appropriate FCA.

**If the grant recipient does not submit a NICRA proposal within 90 days of award, they will be limited to the de minimis rate of 10% of Modified Total Direct Costs (MTDC). See section D. below for more details and definitions.**

- C.** The grant award recipient elected to exclude indirect costs from the proposed budget. Please be aware that incurred indirect costs (such as top management salaries, financial oversight, human resources, payroll, personnel, auditing costs, accounting and legal, etc. used for the general oversight and administration of the organization) must not be classified as direct costs;

<sup>1</sup> The Federal agency providing the organization the preponderance of direct Federal funds.

these types of costs are indirect costs. Only direct costs, as defined by the applicable cost principles, will be charged. According to 2 CFR 200.412, if indirect costs are misclassified as direct costs, such costs may become disallowed through an audit.

- D.** The grant award recipient does not have a current negotiated (including provisional) rate and may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. A governmental department or agency unit that receives more than \$35 million in direct Federal funding must submit its indirect cost rate proposal to its cognizant agency for indirect costs and cannot request a de minimis rate. This methodology must be used consistently for all Federal grant awards until such time as the grant award recipient chooses to negotiate for an indirect cost rate, which the grantee may apply to do at any time. See 2 CFR 200.414(f) for more information on use of the de minimis rate. Please be aware that incurred indirect type costs (such as top management salaries, financial oversight, human resources, payroll, personnel, auditing costs, accounting and legal, etc. used for the general oversight and administration of the organization) must not be classified as direct costs; these types of costs are recovered as part of charging the de minimis rate.

All grant recipients with an approved NICRA or de minimis rate must report indirect costs on their **FINAL** ETA-9130 Form. If a grant recipient has a NICRA and a CAP, only the indirect costs tied to the NICRA are reported on the ETA-9130 Form. The grantee can refer to Training and Employment Guidance Letter (TEGL) 20-19 and [https://www.doleta.gov/grants/pdf/ETA-9130\\_Financial\\_Reporting\\_Resources.pdf](https://www.doleta.gov/grants/pdf/ETA-9130_Financial_Reporting_Resources.pdf) for additional guidance.

## 7. Approved Statement of Work

This project's narrative is the approved SOW. It has been included as Attachment D. If there is any inconsistency between the project narrative and the program statute, appropriation, regulations, Executive Orders, Uniform Guidance, OMB Circulars, and DOL/ETA directives, the order of precedence (as described in Section 1. above) will prevail.

## 8. Approved Budget

The grant award recipient's budget documents are attached in this NOA. The documents are: 1) the SF-424, included as Attachment A; 2) the SF-424 A, included as Attachment B; and 3) the Budget Narrative, included as Attachment C. As the grant award recipient, the grantee must confirm that all costs are allowable before creating any expenses. Pursuant to 2 CFR 2900.1, the approval of the budget as awarded does not constitute prior approval of those items specified in 2 CFR part 200 or as a part of the grant award as requiring prior approval. The Grant Officer is the only official with the authority to provide such approval.

Any changes to the budget that impact the Statement of Work (SOW) and agreed upon outcomes or deliverables will require a request for modification and prior approval from the Grant Officer.

If the period of performance will include multiple budget periods, subsequent budget periods are subject to the availability of funds, program authority, satisfactory performance, and compliance terms and conditions of the Federal award.

## **9. Return of Funds**

DOL/ETA does not accept paper checks for any type of returned funds. For active grants, all returns of funds are to be submitted electronically through the PMS operated by the U.S. Department of Health and Human Services (HHS) via the same method as a drawdown. For grants that have been cancelled or are expired (typically older than five years), incoming payments, including returns and recoveries to DOL, must be made via the Pay.gov website (<https://www.pay.gov/public/form/start/177233981>).

If there are questions regarding the return of funds or your organization no longer has access to PMS, contact the DOL, ETA, Office of Financial Administration via email at: [ETA-ARteam@dol.gov](mailto:ETA-ARteam@dol.gov) for further assistance.

## **10. Evaluation, Data, and Implementation**

As the grant award recipient, the grantee must cooperate during the implementation of a third-party evaluation. This means providing DOL or its authorized contractor with the appropriate data and access to program operating personnel and participants in a timely manner.

## **11. Cost Limitation Restrictions**

### **a. Single Audit Submission Deadline Extension Related to COVID-19**

In [OMB Memorandum M-20-17](#), OMB offered an extension of Single Audit submission deadlines for fiscal years ending June 30, 2020 to allow recipients and subrecipients a responsible transition to normal operations. This flexibility was extended through December 31, 2020 by [OMB Memorandum 20-26](#).

In [OMB Memorandum M-21-20](#), Appendix 3, Item IX, OMB has offered an additional extension of Single Audit submission deadlines for fiscal years ending June 30, 2021. Award recipients and subrecipients that have not yet filed their single audits with the Federal Audit Clearinghouse as of March 19, 2021 that have fiscal year-ends through June 30, 2021 may delay the completion and submission of the Single Audit reporting package, as required under 2 CFR § 200.501 (Audit Requirements), to six (6) months beyond the normal due date. This extension does not require individual recipients and subrecipients to seek approval for the extension by the cognizant or oversight agency for audit; however, recipients and subrecipients should maintain documentation of the reason for the delayed filing.

## **b. Budget Flexibility**

Federal recipients are not permitted to make transfers that would cause any funds to be used for purposes other than those consistent with this Federal program. Any budget changes that impact the SOW and agreed upon outcomes or deliverables require a request for modification and approval from the Grant Officer.

As directed in 2 CFR 200.308(e), for programs where the Federal share is over the Simplified Acquisition Threshold (SAT) (currently \$250,000), the transfer of funds among direct cost categories or programs, functions, and activities is restricted such that if the cumulative amount of such transfers exceeds or is expected to exceed 10% of the total budget as last approved by the Federal awarding agency, the recipient must receive prior approval from the Grant Officer. Any changes within a specific cost category on the SF424(a) do not require a grant modification unless the change results in a cumulative transfer among direct cost categories exceeding 10% of total budget. It is recommended that the assigned FPO review any within-line changes to the grant award recipient's budget prior to implementation to ensure they do not require a modification.

For programs where the Federal share of the project is below the SAT of \$250,000, recipients are not required to obtain the Grant Officer's approval when transferring funds among direct cost categories.

## **c. Consultants**

For the purposes of this grant award, the ETA's Grant Officer has determined that fees paid to a consultant who provides services under a program shall be limited to \$750.00 a day (representing an eight-hour workday). Such costs must be reasonable, allocable and allowable to the program. Any fees paid in excess of this amount cannot be paid without prior approval from the Grant Officer.

## **d. Non-Federal Share (Match or Cost Share)**

This grant award does not include a match requirement.

## **e. Travel**

This award waives the prior approval requirement for domestic travel as contained in 2 CFR 200.475. For domestic travel to be an allowable cost, it must be necessary, reasonable, allocable and conform to the non-Federal entities written policies and procedures. All travel must also comply with Fly America Act (49 USC 40118), which states in part that any air transportation, regardless of price, must be performed by, or under a code-sharing arrangement with, a U.S. Flag air carrier if service provided by such carrier is available.

## **f. Travel – Foreign**

Foreign travel is not allowable except with prior written approval from the Grant Officer through the process described in 2 CFR 200.407 and 2 CFR 2900.16. All travel, both

domestic and Grant Officer approved foreign travel, must comply with the Fly America Act (49 USC 40118), which states in part that any air transportation, regardless of price, must be performed by, or under a code-sharing arrangement with, a U.S. Flag air carrier if service provided by such carrier is available.

#### **g. Travel – Mileage Reimbursement Rates**

Pursuant to 2 CFR 200.475(a), all award recipients must have policies and procedures in place related to travel costs; however, for reimbursement on a mileage basis, this Federal grant award cannot be charged more than the maximum allowable mileage reimbursement rates for Federal employees. Mileage rates must be checked annually at [www.gsa.gov/mileage](http://www.gsa.gov/mileage) to ensure compliance.

#### **h. WIOA Infrastructure**

WIOA, Section 121(b)(1)(B) and 20 CFR 678.400 require the following programs to be One-Stop partners:

- A. WIOA, Title I programs: Adult, Dislocated Worker, and Youth formula programs, Job Corps, YouthBuild, Native American programs, and NFJP;
- B. Wagner-Peyser Act Employment Service (ES) program authorized under the Wagner-Peyser Act (29 U.S.C. 49 et seq.), as amended by WIOA, Title III;
- C. SCSEP authorized under Title V of the Older Americans Act of 1965;
- D. Trade Adjustment Assistance (TAA) activities authorized under Chapter 2 of Title II of the Trade Act of 1974;
- E. Unemployment Compensation (UC) programs; and
- F. Jobs for Veterans State Grants (JVSG) programs authorized under Chapter 41 of Title 38, U.S.C.

With the exception of Native American programs established under WIOA, Section 166 all One-Stop partner programs including all programs that are funded under Title I of WIOA are required to contribute to the infrastructure costs and certain additional costs of the One-Stop delivery system in proportion to their use and relative benefits received, per 20 CFR 678.700 and 678.760. While Native American programs are not required to contribute to infrastructure costs per WIOA Section 121(h)(2)(D)(iv), they are strongly encouraged to contribute as stated in TEG L No. 17-16. The sharing and allocation of infrastructure costs between One-Stop partners is governed by WIOA Section 121(h), WIOA's implementing regulations, and the Federal Cost Principles contained in the Uniform Guidance at 2 CFR part 200 and DOL's exceptions at 2 CFR part 2900. The Federal Cost Principles state that a partner's contribution is an allowable, reasonable, necessary, and allocable cost to the program and is consistent with other legal requirements.

## **12. Administrative Requirements**

### **a. Audits**

Organization-wide or program-specific audits must be performed in accordance with Subpart F, the Audit Requirements of the Uniform Guidance. DOL awards recipients that expend \$750,000 or more in a year from any Federal awards must have an audit

conducted for that year in accordance with the requirements contained in 2 CFR 200.501. OMB's approved exception at 2 CFR 2900.2 expands the definition of 'non-Federal entity' to include for-profit entities and foreign entities. As such, for-profit and foreign entities that are recipients or subrecipients of a DOL award must adhere to the Uniform Guidance at 2 CFR 200, including Subpart F. Those audits must be submitted directly to USDOL-OGM, Attention: Audit Resolution Team.

#### **b. Revisions to the Uniform Guidance**

The Office of Management and Budget issued revisions to 2 CFR parts 25, 170, 183, and 200 (the Uniform Guidance) on August 13, 2020. These revisions became effective November 12, 2020, except for the amendments to §§ 200.216 and 200.340, which were immediately effective on August 13, 2020. The grant award recipient must operate in compliance with these revised regulations. Please note that the section numbering in the Uniform Guidance has changed in some instances, and this Terms & Conditions document has been updated accordingly.

#### **c. Changes in Micro-purchase and Simplified Acquisition Thresholds**

OMB's memorandum M-18-18, issued on June 20, 2018, increased the threshold for micro-purchases under Federal financial assistance awards from \$3,500 to \$10,000 and the threshold for simplified acquisitions under Federal financial assistance awards from \$100,000 to \$250,000. These two threshold increases were effective for all of ETA's grant recipients as of October 1, 2018. All ETA grant recipients should carefully review the above-referenced memorandum and make any necessary updates to their financial and administrative policies, procedures, and systems as a result of these threshold increases.

#### **d. Closeout/Final Year Requirements**

At the end of the grant period, the award recipient will be required to close the grant with the ETA. The grant recipient will be notified approximately 15 days prior to the end of the period of performance that the closeout process will begin when the period of performance ends. See <https://www.dol.gov/agencies/eta/grants/management/closeout> for further information on the closeout process. The recipient's responsibilities at closeout may be found at 2 CFR 200.344. During the closeout process, the grant recipient must be able to provide documentation for all direct and indirect costs that are incurred. For instance, if an organization is claiming indirect costs, the required documentation is a NICRA or CAP issued by the grantee's FCA. For those approved to utilize a de minimis rate for indirect costs, the grant agreement is sufficient documentation. Not having documentation for direct or indirect costs will result in costs being disallowed and subject to debt collection.

The only liquidation that can occur during closeout is the liquidation of accrued expenditures (NOT obligations) for goods and/or services received during the grant period (2 CFR 2900.15).



#### e. Open Licensing

As required at 2 CFR 2900.13, any intellectual property developed under a discretionary Federal award process must be licensed under an open license, which allows subsequent users to copy, distribute, transmit and adapt the copyrighted work and attribute the work in the manner specified by the recipient.

#### f. Equipment

The grant award recipient(s) must receive **prior approval** from the Grant Officer to purchase any equipment as defined in the Uniform Guidance at 2 CFR 200.1. Prior approval is required only when the acquisition cost is \$5,000 or more regardless of the non-Federal entity's capitalization threshold. Equipment purchases must be made in accordance with 2 CFR 200.313 or 2 CFR 200.439.

Being awarded this grant **does not** automatically mean that the equipment specified in the approved budget or SOW is approved by the Grant Officer. If not specified above, the recipient must submit a detailed list describing the purchase to the FPO for review within 90 days of the NOA date. The recipients are strongly encouraged to submit requests for equipment purchase as early as possible in the grant's period of performance with as many planned pieces of equipment as possible.

Recipients may not purchase equipment during the last year of the period of performance or the last year of full program service delivery (not follow up activities), whichever comes first. If any approved acquisition has not occurred prior to the last funded year of performance, approval for that item is rescinded.

#### g. Federal Funding Accountability and Transparency Act (FFATA)

1. Reporting of first-tier subawards.
  - I. *Applicability.* Unless the grant award recipient is exempt as provided in paragraph [4.] of this award term, the grantee must report each action that equals or exceeds \$30,000 in Federal funds for a subaward to a non-Federal entity or Federal agency (see definitions in paragraph [5.] of this award term).
  - II. *Where and when to report.*
    - I. The Federal entity or Federal agency must report each obligating action described in paragraph [1.i.] of this award term to <https://www.fsrc.gov>.
    - II. For subaward information, the recipient must report no later than the end of the month following the month in which the obligation was made. (For example, if the obligation was made on November 7, 2010, the obligation must be reported by no later than December 31, 2010.)
  - III. *What to report.* The grant award recipient must report the information about each obligating action that the submission instructions posted at <https://www.fsrc.gov> specify.
2. Reporting total compensation of recipient executives for non-Federal entities.
  - I. *Applicability and what to report.* The grant award recipient must report total compensation for each of their five most highly compensated executives for the preceding completed fiscal year, if—



- I. the total Federal funding authorized to date under this Federal award is equals or exceeds \$30,000 as defined in 2 CFR 170.320;
  - II. in the preceding fiscal year, the grantee received—
    - (A) 80% or more of the annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and
    - (B) \$25,000,000 or more in annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and
  - III. The public does not have access to information on the compensation of the executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or Section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the U.S. Security and Exchange Commission (SEC) total compensation filings at <https://www.sec.gov/answers/execomp.htm>.)
- II. *Where and when to report.* The grant award recipient must report executive total compensation described in paragraph [2.a.] of this award term:
- a. As part of your registration profile at <http://www.sam.gov>.
  - b. By the end of the month following the month in which this award is made, and annually thereafter.
3. Reporting of Total Compensation of Subrecipient Executives.
- I. *Applicability and what to report.* Unless the grantee is exempt as provided in paragraph [4.] of this award term, for each first-tier non-Federal entity subrecipient under this award, the grant award recipient shall report the names and total compensation of each of the subrecipient's five most highly compensated executives for the subrecipient's preceding completed fiscal year, if—
    - I. in the subrecipient's preceding fiscal year, the subrecipient received—
      - (A) 80% or more of its annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and
      - (B) \$25,000,000 or more in annual gross revenues from Federal procurement contracts (and subcontracts), and Federal financial assistance subject to the Transparency Act (and subawards); and
    - II. The public does not have access to information on the compensation of the executives through periodic reports filed under Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or Section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the SEC total compensation filings at <https://www.sec.gov/answers/execomp.htm>.)

- II. *Where and when to report.* The grant award recipient must report subrecipient executive total compensation described in paragraph [3.a] of this award term:
    - I. To the recipient.
    - II. By the end of the month following the month during which the grantee make the subaward. For example, if a subaward is obligated on any date during the month of October of a given year (i.e., between October 1 and 31), the grantee must report any required compensation information of the subrecipient by November 30 of that year.
4. Exemptions.
- If, in the previous tax year, the grant award recipient had gross income, from all sources, under \$300,000, the grantee is exempt from the requirements to report:
- a. Subawards, and
  - b. The total compensation of the five most highly compensated executives of any subrecipient.
5. Definitions.
- For purposes of this award term:
- a. *Federal Agency* means a Federal agency as defined at 5 U.S.C. 551(1) and further clarified by 5 U.S.C. 552(f).
  - b. *Non-Federal Entity* means all of the following, as defined in 2 CFR part 25:
    - I. A Governmental organization, which is a State, local government, or Indian tribe;
    - II. A foreign public entity;
    - III. A domestic or foreign nonprofit organization; and
    - IV. A domestic or foreign for-profit organization.
  - c. *Executive* means officers, managing partners, or any other employees in management positions.
  - d. *Subaward*:
    - I. This term is used as a legal instrument to provide support for the performance of any portion of the substantive project or program for which the grantee received this award and that the grantee as the recipient award to an eligible subrecipient.
    - II. The term does not include the grant award recipient procurement of property and services needed to carry out the project or program (for further explanation, see [2 CFR 200.330]).
    - III. A subaward may be provided through any legal agreement, including an agreement that the grantee or a subrecipient considers a contract.
  - e. *Subrecipient* means a non-Federal entity or Federal agency that:
    - I. Receives a subaward from the grant award recipient under this award; and
    - II. Is accountable to the grantee for the use of the Federal funds provided by the subaward.
  - f. *Total compensation* means the cash and noncash dollar value earned by the executive during the recipient's or subrecipient's preceding fiscal year and includes the following (for more information see 17 CFR 229.402(c)(2)):
    - I. *Salary and bonus.*

- II. *Awards of stock, stock options, and stock appreciation rights.* Use the dollar amount recognized for financial statement reporting purposes with respect to the fiscal year in accordance with the Statement of Financial Accounting Standards No. 123 (Revised 2004) (FAS 123R), Shared Based Payments.
- III. *Earnings for services under non-equity incentive plans.* This does not include group life, health, hospitalization or medical reimbursement plans that do not discriminate in favor of executives, and are available generally to all salaried employees.
- IV. *Change in pension value.* This is the change in present value of defined benefit and actuarial pension plans.
- V. *Above-market earnings on deferred compensation which is not tax-qualified.*
- VI. Other compensation, if the aggregate value of all such other compensation (e.g. severance, termination payments, value of life insurance paid on behalf of the employee, perquisites or property) for the executive exceeds \$10,000.

#### **h. Personally Identifiable Information**

The grant award recipient(s) must recognize and safeguard Personally Identifiable Information (PII) except where disclosure is allowed by prior written approval of the Grant Officer or by court order. Award recipients must meet the requirements in TEGL No. 39-11, Guidance on the Handling and Protection of PII, can be found at [http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=7872](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7872).

#### **i. Pre-Award**

All costs incurred by the award recipient prior to the start date specified in the grant award issued by the Department are *incurred at the recipient's own expense*.

#### **j. Procurement**

The Uniform Guidance Procurement Standards at 2 CFR 200.318-327 require all grant award recipients and subrecipients to conduct procurement transactions in a manner that promote practical, open, and free competition. The award recipient's description in the SOW of a specific entity that will provide goods or services does not constitute approval or justification of sole-source procurement from this entity.

The Uniform Guidance (at 2 CFR 200.317) requires States (as defined at 2 CFR 200.1) to follow the same procurement policies and procedures it uses for non-Federal funds. The State must comply with 2 CFR 200.321, 200.322, and 200.323 and ensure that every purchase order or other contract includes any clauses required by § 200.327.

#### **k. Program Income**

The Addition method as described in 2 CFR 200.307 must be used in allocating any program income generated for this grant award. The grant award recipient must expend all program income prior to drawing down any additional funds as required at 2 CFR

200.305(b)(5) and 2 CFR 200.307(e). Any program income found remaining at the end of period of performance must be returned to ETA. In addition, the grant award recipient(s) must report program income on the quarterly financial report using ETA-9130 form.

For the YouthBuild program, please refer to 20 CFR 688.590 for guidance on program income.

### **I. Recipient Integrity and Performance Matters**

1. If the total value of the currently active grants, cooperative agreements, and procurement contracts from all Federal awarding agencies exceeds \$10,000,000 for any period of time during the period of performance of this Federal award, then the grant award recipient during that period of time must maintain the currency of information reported to the System for Award Management (SAM) that is made available in the designated integrity and performance system (currently the Federal Awardee Performance and Integrity Information System (FAPIIS)) about civil, criminal, or administrative proceedings described in Paragraph 2 of this award term and condition. This is a statutory requirement under Section 872 of Public Law 110-417, as amended (41 U.S.C. 2313). As required by Section 3010 of Public Law 111-212, all information posted in the designated integrity and performance system on or after April 15, 2011, except past performance reviews required for Federal procurement contracts, will be publicly available.
2. Proceedings about which the grant recipient must report. Submit the information required about each proceeding that:
  - a. Is in connection with the award or performance of a grant, cooperative agreement, or procurement contract from the Federal Government;
  - b. Reached its final disposition during the most recent 5-year period; and
  - c. Is one of the following:
    - I. A criminal proceeding that resulted in a conviction, as defined in Paragraph 5. of this award term;
    - II. A civil proceeding that resulted in a finding of fault and liability and paying a monetary fine, penalty, reimbursement, restitution, or damages of \$5,000 or more;
    - III. An administrative proceeding, as defined in Paragraph 5. of this award term, that resulted in a finding of fault and liability and grantee payment of either monetary fine or penalty of \$5,000 or more or a reimbursement, restitution, or damages in excess of \$100,000; or
    - IV. Any other criminal, civil, or administrative proceeding if:
      - (A) It could have led to an outcome described in Paragraph 2.c.I, II, or III of this award term;
      - (B) It had a different disposition arrived at by consent or compromise with an acknowledgment of fault on the grantee's part; and
      - (C) The requirement in this award term to disclose information about the proceeding does not conflict with applicable laws and regulations.

3. Reporting procedures. Enter in SAM, Entity Management area (formerly CCR), or any successor system, the FAPIIS information that SAM requires about each proceeding described in Paragraph 2. of this award term. The grant award recipient does not need to submit the information a second time under assistance awards that were received if the recipient already provided the information through SAM (formerly CCR) because the recipient was required to do so under Federal procurement contracts that the recipient was awarded.
4. Reporting frequency. During any period of time when the grant award recipient is a subject to the requirement in paragraph 1. of this award term, the grantee must report FAPIIS information through SAM no less frequently than semiannually following the initial report of any proceedings for the most recent 5-year period, either to report new information about any proceeding(s) that the grantee has not reported previously or affirm that there is no new information to report.
5. Definitions. For purposes of this award term:
  - a. Administrative proceeding means a non-judicial process that is adjudicatory in nature in order to make a determination of fault or liability (e.g., SEC Administrative proceedings, Civilian Board of Contract Appeals proceedings, and Armed Services Board of Contract Appeals proceedings). This includes proceedings at the Federal and State level. It does not include audits, site visits, corrective plans, or inspection of deliverables.
  - b. Conviction, for purposes of this award term, means a judgment or conviction of a criminal offense by any court of competent jurisdiction, whether entered upon a verdict or a plea, and includes a conviction entered upon a plea of nolo contendere.
  - c. Total value of currently active grants, cooperative agreements, and procurement contracts includes —
    - I. Only the Federal share of the funding under any award with a recipient cost share or match; and
    - II. The value of all options, even if not yet exercised.

#### **m. Reports**

All ETA grant award recipients are required to submit quarterly financial and narrative progress reports for each grant award.

- a. **Quarterly Financial Reports.** All ETA grant award recipients are required to report quarterly financial data on the ETA-9130 Form. ETA-9130 reports are due no later than 45 calendar days after the end of each specified reporting quarter. Reporting quarter end dates are March 31, June 30, September 30, and December 31. A final financial report must be submitted no later than 45 calendar days after the quarter ends and the closeout 9130 report must be submitted no later than 90 calendar days after the grant period of performance ends. A closeout report will be submitted during the closeout process. For additional guidance on ETA's financial reporting, reference TEGl 20-19 and [https://www.doleta.gov/grants/pdf/ETA-9130\\_Financial\\_Reporting\\_Resources.pdf](https://www.doleta.gov/grants/pdf/ETA-9130_Financial_Reporting_Resources.pdf)

The instructions for accessing both the online financial reporting system and the HHS PMS can be found in the transmittal memo accompanying this NOA.

- b. **Quarterly Narrative Progress Reports.** Grant recipients are required to submit a narrative quarterly and final report on grant activities funded under this award. All reports are due no later than 45 calendar days after the end of each specified reporting quarter. Reporting quarter end dates are March 31, June 30, September 30, and December 31.
1. The last quarterly progress report that award recipients submit will serve as the grant's Final Performance Report. This report should provide both *quarterly and cumulative* information on the grant's activities. It must summarize project activities, employment outcomes and other deliverables, and related results of the project.
  2. The grant award recipient shall use any standard forms and instructions to report on training and employment outcomes and other data relating to the progress reports as provided by ETA.
  3. The grant award recipient shall utilize standard reporting processes and electronic reporting systems to submit their quarterly progress reports as provided by ETA.

#### **n. Requirements for Conference and Conference Space**

Conferences sponsored in whole or in part by the grant award recipient are allowable if the conference is necessary and reasonable for the successful performance of the Federal Award. The grant award recipients are urged to use discretion and good judgment to ensure that all conference costs charged to the grant are appropriate and allowable. For more information on the requirements and the allowability of costs associated with conferences, refer to 2 CFR 200.432. Recipients will be held accountable to the requirements in 2 CFR 200.432. Therefore, costs that do not comply with 2 CFR 200.432 will be questioned and may be disallowed.

#### **o. Subawards**

A *subaward* means an award provided by a *Pass-Through Entity* (PTE) to a subrecipient for the subrecipient to carry out part of a Federal award received by the PTE. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the PTE considers a contract.

The provisions of the Terms and Conditions of this award will be applied to any subrecipient under this award. The recipient is responsible for monitoring the subrecipient, ensuring that the Terms and Conditions are in all subaward packages and that the subrecipient complies with all applicable regulations and the Terms and Conditions of this award (2 CFR 200.101(b)).

#### **p. Supportive Services & Participant Support Costs**

When supportive services are expressly authorized by a program statute, regulation, or FOA, this award waives the prior approval requirement for participant support costs as described in 2 CFR 200.456. Costs must still meet the basic considerations at 2 CFR 200.402 – 200.411. Questions regarding supportive services and participant support costs should be directed to the FPO who is assigned to the grant.

#### **q. System for Award Management (SAM)**

SAM is the official federal system that collects, validates, stores, and disseminates business information about the federal government's trading partners in support of contract awards, grants, and electronic payment processes. A SAM registration is required for an entity to be able to apply for federal grants, to request modifications to existing grants, and to enable them to closeout expiring grants. See Training and Employment Notice 18-17 for additional guidance.

Unless the grant award recipient is exempt from this requirement under 2 CFR 25.110, the grantee must maintain current its information in the SAM. This includes information on the recipient's immediate and highest level owner and subsidiaries, as well as on all of the recipient's predecessors that have been awarded a Federal contract or Federal financial assistance within the last three years, if applicable, until the grantee submits the final financial report required under this Federal award or receive the final payment, whichever is later. This requires that the grantee review and update the information at least annually after the initial registration, and more frequently if required by changes in its information or another Federal award term.

#### **1. Unique Entity Identifier Requirements**

If the grant award recipient is authorized to make subawards under this award, then the grantee:

- i. Must notify potential subrecipients that no entity (see definitions below) may receive a subaward from the grant award recipient until the entity has provided its unique entity identifier to the grantee.
- ii. May not make a subaward to an entity unless the entity has provided its Unique Entity Identifier to the grantee. Subrecipients are not required to obtain an active SAM registration, but must obtain a Unique Entity Identifier.

NOTE: At some point, the DUNS Number will be replaced by a new, non-proprietary identifier requested in and assigned by SAM.gov. This new identifier is being called the Unique Entity Identifier (UEI), or the Entity ID. Users should continue using the DUNS Number in UEI fields until further notice. To learn more about SAM's rollout of the UEI, please visit [gsa.gov/entityid](https://gsa.gov/entityid).

#### **2. Definitions**

For purposes of this term:

- i. SAM is the Federal repository where the grant award recipients must provide information required for the conduct of business as recipients. Additional



information about registration procedures may be found at the SAM website (<http://www.sam.gov>).

ii. *Unique entity identifier* means the identifier assigned by SAM to uniquely identify business entities.

iii. *Entity*, as it is used in this grant award term, includes all of the following, as defined at 2 CFR Part 25, Appendix A:

- a. A non-Federal entity as defined at 2 CFR 200.1 (A State, local government, Indian Tribe, Institute of Higher Education (IHE), or nonprofit organization that carries out a Federal award as a recipient or subrecipient);
- b. A foreign organization;
- c. A foreign public entity;
- d. A domestic for-profit organization; and
- e. A Federal agency.

iv. *Subaward* means:

An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

v. *Subrecipient* means:

An entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a Federal award; but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

### **3. Existing SAM Registrants**

ETA advises grant recipients registered in SAM to review their registration information, particularly their financial information and points of contact. Assistance is available by contacting the Federal Service Desk at [www.fsd.gov](http://www.fsd.gov). Grant recipients should contact ETA at [ETAAccountingGrants@dol.gov](mailto:ETAAccountingGrants@dol.gov) if they find that payments have been paid to a bank account other than their registered bank account.

ETA further encourages grant recipients to review the expiration date of their SAM registration and begin the renewal process well in advance, to ensure that their registration remains valid. If the grant recipient has not logged in and updated its entity registration record within at least the past 365 days, its record will expire and go into inactive status. Timely renewal will ensure that the grant recipient can continue to request and receive modifications to their existing grants, as well as apply for new funding opportunities. Further, the DUNS and EIN numbers must remain active until the grant award closeout process is fully completed.

### **4. Validation**



ETA routinely checks the validity of a grant recipient's SAM registration and verifies that the recipient isn't included on the excluded parties list before making a grant award, or approving a modification to an existing award. Failure to have an active SAM registration can delay grant recipients from receiving their initial award or requested modifications to their existing awards.

#### **r. Vendor/Contractor**

The term "contractor," sometimes referred to as a vendor, is a dealer, distributor, merchant or other seller providing goods or services that are required to implement a Federal program (see 2 CFR 200.1). These goods or services may be for an organization's own use or for the use of the beneficiaries of the Federal program. Additional guidance on distinguishing between a subrecipient and a contractor (vendor) is provided in 2 CFR 200.331. When procuring contractors for goods and services, DOL/ETA recipients and subrecipients, must follow the procurement requirements found at 2 CFR 200.319, except states, pursuant to 2 CFR 200.317, which calls for free and open competition.

#### **s. Whistleblower Protection**

This grant award and employees working on this grant award are subject to the whistleblower rights and remedies established at 41 U.S.C. 4712. The grant award recipient shall inform its employees in writing, in the predominant language of the workforce, of employee whistleblower rights and protections under 41 U.S.C. 4712, as described in section 3.908 of the Federal Acquisition Regulation (48 CFR 3.908; note that for the purpose of this term and condition, use of the term "contract," "contractor," "subcontract," or "subcontractor" in section 3.908 should be read as "grant," "grantee," "subgrant," or "subgrantee"). The recipient shall insert the substance of this clause in all subgrants and contracts over the Simplified Acquisition Threshold.

#### **t. Telecommunications**

Title 2 CFR §200.216 Prohibition on certain telecommunications and video surveillance services or equipment. (Effective August 13, 2020)

(a) Recipients and subrecipients are prohibited from obligating or expending loan or grant funds to: (1) Procure or obtain; (2) Extend or renew a contract to procure or obtain; or (3) Enter into a contract (or extend or renew a contract) to procure or obtain equipment, services, or systems that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system. As described in Public Law 115-232, section 889, covered telecommunications equipment is telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities).

(i) For the purpose of public safety, security of government facilities, physical security surveillance of critical infrastructure, and other national security purposes, video

surveillance and telecommunications equipment produced by Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities). (ii) Telecommunications or video surveillance services provided by such entities or using such equipment. (iii) Telecommunications or video surveillance equipment or services produced or provided by an entity that the Secretary of Defense, in consultation with the Director of the National Intelligence or the Director of the Federal Bureau of Investigation, reasonably believes to be an entity owned or controlled by, or otherwise connected to, the government of a covered foreign country. (b) In implementing the prohibition under Public Law 115-232, section 889, subsection (f), paragraph (1), heads of executive agencies administering loan, grant, or subsidy programs shall prioritize available funding and technical support to assist affected businesses, institutions and organizations as is reasonably necessary for those affected entities to transition from covered communications equipment and services, to procure replacement equipment and services, and to ensure that communications service to users and customers is sustained. (c) See Public Law 115-232, section 889 for additional information. (d) See also §200.471.

#### **u. Intellectual Property Rights**

The Federal Government reserves a paid-up, nonexclusive and irrevocable license to reproduce, publish or otherwise use, and to authorize others to use for federal purposes: i) the copyright in all products developed under the grant, including a subgrant or contract under the grant or subgrant; and ii) any rights of copyright to which the grant award recipient, subrecipient or a contractor purchases ownership under an award (including but not limited to curricula, training models, technical assistance products, and any related materials). Such uses include, but are not limited to, the right to modify and distribute such products worldwide by any means, electronically or otherwise.

Federal funds may not be used to pay any royalty or license fee for use of a copyrighted work, or the cost of acquiring by purchase a copyright in a work, where the DOL/ETA has a license or rights of free use in such work, although they may be used to pay costs for obtaining a copy which is limited to the developer/seller costs of copying and shipping.

If revenues are generated by selling products developed with grant funds, including intellectual property, these revenues are considered as program income. Program income must be used in accordance with the provisions of this grant award and 2 CFR 200.307.

The following language must be on all workforce products developed in whole or in part with grant funds:

“This workforce product was funded by a grant awarded by the U.S. Department of Labor (DOL)’s Employment and Training Administration (ETA). The product was created by the recipient and does not necessarily

reflect the official position of DOL/ETA. DOL/ETA makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information, including any information on linked sites and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability, or ownership. This product is copyrighted by the institution that created it.”

#### **v. Intellectual Property Rights and the Bayh-Dole Act**

All small business firms, and non-profit organizations (as defined at the link below, and including Institutions of Higher Education) must adhere to the Bayh-Dole Act, which requirements are provided at 37 CFR 401.3(a) and at <https://doleta.gov/grants/pdf/BayhDoleGrantTerm.pdf>. To summarize, these requirements describe the ownership of intellectual property rights and the government’s nonexclusive, nontransferable, irrevocable, paid-up license to use any invention conceived or first actually reduced to practice in the performance of work under this grant award. These requirements are in addition to those found in the Intellectual Property Rights term above.

### **13. Program Requirements**

The Funding Opportunity Announcement contains the program requirements for this award.

### **14. Federal Appropriations Requirements**

#### **a. Requirement to Provide Certain Information in Public Communications**

Pursuant to P.L. 116-94, Division A, Title V, Section 505, when issuing statements, press releases, requests for proposals, bid solicitations and other documents describing projects or programs funded in whole or in part with Federal money, all non-Federal entities receiving Federal funds shall clearly state:

1. The percentage of the total costs of the program or project which will be financed with Federal money;
2. The dollar amount of Federal funds for the project or program; and
3. The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.

The requirements of this term are separate from those in 2 CFR Part 200 and, when applicable, both must be complied with.

#### **b. Fair Labor Standards Act Amendment for Major Disasters**

Pursuant to P.L. 116-94, Division A, Title I, Section 108, the Fair Labor Standards Act of 1938 (FLSA) will apply as if the following language was added to Section 7 (the Maximum Hours Worked Section). This language specifically relates to occurrences of a major disaster (as declared or designated by the state or federal government) and are applied for a period of two years afterwards. The language is as follows:

“(s)(1) The provisions of this section [maximum hours worked] shall not apply for a period of 2 years after the occurrence of a major disaster to any employee—

- (A) employed to adjust or evaluate claims resulting from or relating to such major disaster, by an employer not engaged, directly or through an affiliate, in underwriting, selling, or marketing property, casualty, or liability insurance policies or contracts;
- (B) who receives from such employer on average weekly compensation of not less than \$591.00 per week or any minimum weekly amount established by the Secretary, whichever is greater, for the number of weeks such employee is engaged in any of the activities described in subparagraph (C); and (C) whose duties include any of the following:
  - (i) interviewing insured individuals, individuals who suffered injuries or other damages or losses arising from or relating to a disaster, witnesses, or physicians;
  - (ii) inspecting property damage or reviewing factual information to prepare damage estimates;
  - (iii) evaluating and making recommendations regarding coverage or compensability of claims or determining liability or value aspects of claims;
  - (iv) negotiating settlements; or
  - (v) making recommendations regarding litigation.

(2) The exemption in this subsection shall not affect the exemption provided by section 13(a)(1) [of the FLSA].

(3) For purposes of this subsection—

- (A) the term ‘major disaster’ means any disaster or catastrophe declared or designated by any State or Federal agency or department;
- (B) the term ‘employee employed to adjust or evaluate claims resulting from or relating to such major disaster’ means an individual who timely secured or secures a license required by applicable law to engage in and perform the activities described in clauses (i) through (v) of paragraph (1)(C) relating to a major disaster, and is employed by an employer that maintains worker compensation insurance coverage or protection for its employees, if required by applicable law, and withholds applicable Federal, State, and local income and payroll taxes from the wages, salaries and any benefits of such employees; and
- (C) the term ‘affiliate’ means a company that, by reason of ownership or control of 25 percent or more of the outstanding shares of any class of voting securities of one or more companies, directly or indirectly, controls, is controlled by, or is under common control with, another company.”

### **c. Health Benefits Coverage for Contraceptives**

Federal funds may not be used to enter into or renew a contract which includes a provision for prescription drug coverage unless the contract also includes a provision for contraceptive coverage. This requirement does not apply to contracts with 1) the religious plans Personal Care’s HMO and OSF HealthPlans, Inc. and 2) any existing or future plan if the carrier for the plan objects to such coverage on the basis of religious beliefs.

In implementing this section, any plan that enters into or renews a contract may not subject any individual to discrimination on the basis that the individual refuses to

prescribe or otherwise provide for contraceptives because such activities would be contrary to the individuals' religious beliefs or moral convictions. Nothing in this term shall be construed to require coverage of abortion or abortion related services.

#### **d. Privacy Act**

No funds can be used in contravention of 5 U.S.C. 552a (the Privacy Act) or regulations implementing the Privacy Act.

#### **e. Prohibition on Contracting with Corporations with Felony Criminal Convictions**

The recipient may not knowingly enter into a contract, memorandum of understanding, or cooperative agreement with, make a grant to, or provide a loan or loan guarantee to, any corporation that was convicted of a felony criminal violation under any Federal law within the preceding 24 months.

#### **f. Prohibition on Contracting with Corporations with Unpaid Tax Liabilities**

The grant award recipient may not knowingly enter into a contract, memorandum of understanding, or cooperative agreement with, make a grant to, or provide a loan or loan guarantee to, any corporation that has any unpaid Federal tax liability that has been assessed, for which all judicial and administrative remedies have been exhausted or have lapsed, and that is not being paid in a timely manner pursuant to an agreement with the authority responsible for collecting the tax liability.

#### **g. Prohibition on Procuring Goods Obtained Through Child Labor**

Pursuant to P.L. 116-94, Division A, Title I, Section 103, no funds may be obligated or expended for the procurement of goods mined, produced, manufactured, or harvested or services rendered, in whole or in part, by forced or indentured child labor in industries and host countries identified by the DOL prior to December 20, 2019. DOL has identified these goods and services here: <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-products>.

#### **h. Prohibition on Providing Federal Funds to Association of Community Organizations for Reform Now (ACORN)**

Pursuant to P.L. 116-94, Division A, Title V, Section 521, these funds may not be provided to the ACORN, or any of its affiliates, subsidiaries, allied organizations or successors.

#### **i. Reporting of Waste, Fraud and Abuse**

No entity receiving federal funds may require employees or contractors of such entity seeking to report fraud, waste, or abuse to sign internal confidentiality agreements or statements prohibiting or otherwise restricting such employees or contractors from

lawfully reporting such waste, fraud, or abuse to a designated investigative or law enforcement representative of a Federal department or agency authorized to receive such information.

**j. Requirement for Blocking Pornography**

Pursuant to P.L. 116-94, Division A, Title V, Section 520, no Federal funds may be used to maintain or establish a computer network unless such network blocks the viewing, downloading, and exchanging of pornography.

**k. Restriction on Health Benefits Coverage for Abortions**

Pursuant to P.L. 116-94, Division A, Title V, Section 506 and 507, Federal funds may not be expended for health benefits coverage that includes coverage of abortions, except when the pregnancy is the result of rape or incest, or in the case where a woman suffers from a physical disorder, physical injury, or physical illness, including a life-endangering physical condition caused by or arising from the pregnancy itself that would, as certified by a physician, place the women in danger of death unless an abortion is performed. This restriction does not prohibit any non-Federal entity from providing health benefits coverage for abortions when all funds for that specific benefit do not come from a Federal source. Additionally, no funds made available through this grant award may be provided to a State or local government if such government subjects any institutional or individual health care entity to discrimination on the basis that the health care entity does not provide, pay for, provide coverage of, or refer for abortions.

**l. Restriction on Lobbying/Advocacy**

Pursuant to P.L. 116-94, Division A, Title V, Section 503, no federal funds may be used by a grant recipient, other than for normal and recognized executive-legislative relationships, to engage in lobbying or advocacy activities (including, for publicity or propaganda purposes, the preparation, distribution, or use of any kit, pamphlet, booklet, publication, electronic communication, radio, television, or video presentation) designed to support or defeat the enactment of federal, state, or local legislation, regulation, appropriations, order, or other administrative action, except in presentation to Congress or a State or local legislature itself or for participation by an agency or officer of a State, local or tribal government in policymaking and administrative processes within the executive branch of that government.

**m. Publicity**

No funds provided under this grant shall be used for publicity or propaganda purposes, for the preparation, distribution or use of any kit, pamphlet, booklet, publication, radio, television or film presentation designed to support or defeat legislation pending before the Congress or any state or local legislature or legislative body, except in presentation to the Congress or any state or local legislature itself, or designed to support or defeat any proposed or pending regulation, administrative action, or order issued by the executive branch of any state or local government, except in presentation to the executive branch of any state or local government itself. Nor shall grant funds be used to pay the salary or

expenses of any recipient or agent acting for such recipient, related to any activity designed to influence the enactment of legislation, appropriations, regulation, administrative action, or Executive Order proposed or pending before the Congress, or any state government, state legislature, or local legislative body other than for normal and recognized executive-legislative relationships or participation by an agency or officer of a state, local, or tribal government in policymaking and administrative processes within the executive branch of that government.

#### **n. Restriction on the Promotion of Drug Legalization**

Pursuant to P.L. 116-94, Division A, Title V, Section 509, no Federal funds shall be used for any activity that promotes the legalization of any drug or other substance included in Schedule I of the schedules of controlled substances established under Section 202 of the Controlled Substances Act except for normal and recognized executive-congressional communications or where there is significant medical evidence of a therapeutic advantage to the use of such drug or other substance or that federally sponsored clinical trials are being conducted to determine therapeutic advantage.

#### **o. Restriction on Purchase of Sterile Needles or Syringes**

Pursuant to P.L. 116-94, Division A, Title V, Section 527, no Federal funds shall be used to purchase sterile needles or syringes for the hypodermic injection of any illegal drug.

#### **p. Salary and Bonus Limitations**

Pursuant to P.L. 116-94, Division A, Title I, Section 105, recipients and subrecipients shall not use funds to pay the salary and bonuses of an individual, either as direct costs or as indirect costs, at a rate in excess of Executive Level II. The Executive Level II salary may change yearly and is located on the OPM.gov website (<http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2020/executive-senior-level>). The salary and bonus limitation does not apply to contractors (vendors) providing goods and services as defined in 2 CFR 200.331. Where States are recipients of such funds, States may establish a lower limit for salaries and bonuses of those receiving salaries and bonuses from subrecipients, taking into account factors including the relative cost-of-living in the State, the compensation levels for comparable State or local government employees, and the size of the organizations that administer Federal programs involved including ETA programs. See TEGL 5-06 for further clarification, available at [http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=2262](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2262).

## **15. Public Policy**

### **a. Architectural Barriers**

The Architectural Barriers Act of 1968, 42 U.S.C. 4151 et seq., as amended, the Federal Property Management Regulations (see 41 CFR 102-76), and the Uniform Federal Accessibility Standards issued by the U.S. General Services Administration (GSA) (see 36 CFR 1191, Appendixes C and D) set forth requirements to make facilities accessible to, and usable by, the physically handicapped and include minimum design standards. All new facilities designed or constructed with grant support must comply with these



requirements.

### **b. Drug-Free Workplace**

The Drug-Free Workplace Act of 1988, 41 U.S.C. 702 et seq., and 2 CFR 182 require that all award recipients receiving grants from any Federal agency maintain a drug-free workplace. The award recipient must notify the awarding office if an employee of the recipient is convicted of violating a criminal drug statute. Failure to comply with these requirements may be cause for suspension or debarment.

### **c. Executive Orders**

**12928:** Pursuant to Executive Order (EO) 12928, the grant award recipient is strongly encouraged to provide subcontracting/subgranting opportunities to Historically Black Colleges and Universities and other Minority Institutions such as Hispanic-Serving Institutions and Tribal Colleges and Universities; and to Small Businesses Owned and Controlled by Socially and Economically Disadvantaged Individuals.

**13043:** Pursuant to EO 13043, Increasing Seat Belt Use in the United States, dated April 16, 1997, the grant award recipients are encouraged to adopt and enforce on-the-job seat belt policies and programs for their employees when operating company-owned, rented, or personally owned vehicles.

**13166:** As clarified by EO 13166, Improving Access to Services for Persons with Limited English Proficiency, dated August 11, 2000, and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI, recipients must take reasonable steps to ensure that LEP persons have meaningful access to programs in accordance with DOL's Policy Guidance on the Prohibition of National Origin Discrimination as it Affects Persons with Limited English Proficiency [05/29/2003] Volume 68, Number 103, pages 32289-32305. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. The grant award recipients are encouraged to consider the need for language services for LEP persons served or encountered both in developing budgets and in conducting programs and activities. For assistance and information regarding your LEP obligations, go to <http://www.lep.gov>.

**13513:** Pursuant to EO 13513, Federal Leadership On Reducing Text Messaging While Driving, dated October 1, 2009, the grant award recipients and subrecipients are encouraged to adopt and enforce policies that ban text messaging while driving company-owned or -rented vehicles or government-owned vehicles (GOV), or while driving privately-owned vehicles (POV) when on official Government business or when performing any work for or on behalf of the Government. Recipients and subrecipients are also encouraged to conduct initiatives of the type described in section 3(a) of this order.



**14005:** Pursuant to EO 14005, Ensuring the Future Is Made in All of America by All of America's Workers, the grant award recipient agrees to comply with all applicable Made in America Laws (as defined in the EO), including the Buy American Act at 41 USC sections 8301-8305. For the purposes of this award, the grant recipient is required to maximize the use of goods, products, and materials produced in, and services offered in, the United States, in accordance with the Made in America Laws. No funds may be made available to any person or entity (including as a contractor or subrecipient of the grant recipient) that has been found to be in violation of any Made in America Laws. "Made in America Laws" means all statutes, regulations, rules, and Executive Orders relating to Federal financial assistance awards or Federal procurement, including those that refer to "Buy America" or "Buy American," that require, or provide a preference for, the purchase or acquisition of goods, products, or materials produced in the United States, including iron, steel, and manufactured goods offered in the United States. Made in America Laws include laws requiring domestic preference for maritime transport, including the Merchant Marine Act of 1920 (Public Law 66-261), also known as the Jones Act.

#### **d. Flood Insurance**

The Flood Disaster Protection Act of 1973, as amended, 42 U.S.C. 4001 *et seq.*, provides that no Federal financial assistance to acquire, modernize, or construct property may be provided in communities in the United States identified as flood-prone, unless the community participates in the National Flood Insurance Program and flood insurance is purchased within 1 year of the identification. The flood insurance purchase requirement applies to both public and private applicants for the DOL support. Lists of flood-prone areas that are eligible for flood insurance are published in the Federal Register by FEMA.

#### **e. Hotel-Motel Fire Safety**

Pursuant to 15 U.S.C. 2225a, the recipient must ensure that all space for conferences, and, conventions or training seminars funded in whole or in part with federal funds complies with the protection and control guidelines of the Hotel and Motel Fire Safety Act (P.L. 101-391, as amended). Recipients may search the Hotel-Motel National Master List at <https://apps.usfa.fema.gov/hotel/> to see if a property is in compliance, or to find other information about the Act.

#### **f. Prohibition on Trafficking in Persons**

##### **1. Trafficking in persons.**

###### **a. Provisions applicable to a recipient that is a private entity.**

I. The grantee as the recipient, the grantee's employees, subrecipients under this award, and subrecipients' employees may not—

(A). Engage in severe forms of trafficking in persons during the period of time that the grant award is in effect;

(B). Procure a commercial sex act during the period of time that the award is in effect; or

(C). Use forced labor in the performance of the award or subawards under the award.

II. DOL/ETA as the Federal awarding agency may unilaterally terminate this grant award, without penalty, if the grantee or a subrecipient that is a private entity —

(A). Is determined to have violated a prohibition in paragraph a.1 of this award term; or

(B). Has an employee who is determined by the agency official authorized to terminate the award to have violated a prohibition in paragraph a.1 of this award term through conduct that is either—

i. Associated with performance under this award; or

ii. Imputed to you or the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR Part 180, “OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement),” as implemented by our agency at 2 CFR Part 2998.

b. *Provision applicable to a recipient other than a private entity.* DOL/ETA as the Federal awarding agency may unilaterally terminate this grant award, without penalty, if a subrecipient that is a private entity—

I. Is determined to have violated an applicable prohibition in paragraph a.1 of this grant award term; or

II. Has an employee who is determined by the agency official authorized to terminate the award to have violated an applicable prohibition in paragraph a.1 of this grant award term through conduct that is either—

(A). Associated with performance under this award; or

(B). Imputed to the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR part 180, “OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement),” as implemented by our agency at 29 CFR Part 98.

c. *Provisions applicable to any recipient.*

I. The grant award recipient must inform DOL/ETA immediately of any information the grantee receive from any source alleging a violation of a prohibition in paragraph a.1 of this grant award term.

II. DOL/ETA right to terminate unilaterally that is described in paragraph a.2 or b of this section:

(A). Implements section 106(g) of the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7104(g)), and

(B). Is in addition to all other remedies for noncompliance that are available to DOL/ETA under this grant award.

III. The grant award recipient must include the requirements of paragraph a.1 of this grant award term in any subaward the grantee make to a private entity.

d. *Definitions.* For purposes of this award term:

I. “Employee” means either:

(A). An individual employed by the grant award recipient or a subrecipient who is engaged in the performance of the project or program under this award; or

(B). Another person engaged in the performance of the project or program under this grant award and not compensated by the grantee including, but not limited to, a volunteer or individual whose services are contributed by a third party as an in-kind contribution toward cost sharing or matching requirements.

II. “Forced labor” means labor obtained by any of the following methods: the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

III. “Private entity”:

(A). Means any entity other than a State, local government, Indian tribe, or foreign public entity, as those terms are defined in 2 CFR 175.25.

(B). Includes:

i. A nonprofit organization, including any nonprofit institution of higher education, hospital, or tribal organization other than one included in the definition of Indian tribe at 2 CFR 175.25(b).

ii. A for-profit organization.

IV. “Severe forms of trafficking in persons,” “commercial sex act,” and “coercion” have the meanings given at section 103 of the TVPA, as amended (22 U.S.C. 7102).

### **g. Veterans’ Priority Provisions**

The Jobs for Veterans Act (Public Law 107-288) requires grant award recipients to provide priority service to veterans and spouses of certain veterans for the receipt of employment, training, and placement services in any job training program directly funded, in whole or in part, by the DOL. The regulations implementing this priority of service can be found at 20 CFR Part 1010. In circumstances where a grant award recipient must choose between two qualified candidates for a service, one of whom is a veteran or eligible spouse, the veterans priority of service provisions require that the grant award recipient give the veteran or eligible spouse priority of service by first providing him or her that service. To obtain priority of service, a veteran or spouse must meet the program’s eligibility requirements. Recipients must comply with the DOL guidance on veterans’ priority. ETA’s TEGL No. 10-09 (issued November 10, 2009) provides guidance on implementing priority of service for veterans and eligible spouses in all qualified job training programs funded in whole or in part by DOL. TEGL No. 10-09 is available at [http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=2816](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2816).

## 16. Technical Assistance, Resources, and Information

Additional resources, training, and information to assist the grant award recipient are located on the ETA website at <https://www.dol.gov/agencies/eta/grants/resources> and on the Grants Application and Management collection page on WorkforceGPS.org at <https://grantsapplicationandmanagement.workforcegps.org/>. **SMART** training is a technical assistance initiative sponsored by DOL-ETA to assist its grant recipients and subrecipients in improving its program/project operations through effective grants management. Please take some time to review the training modules which are focused on:

Strategies for sound grant management that include:

**M**onitoring,

**A**ccountability,

**R**isk mitigation and

**T**ransparency.

These four themes are woven throughout the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, also known as the Uniform Guidance (2 CFR Part 200 and 2 CFR Part 2900). The 508-compliant PowerPoints of the modules may be found on WorkforceGPS.org at the [Resource](#) page.

## 17. Attachments

**Attachment A: SF-424**

**Attachment B: SF-424A**

**Attachment C: Budget Narrative**

**Attachment D: Statement of Work**

**Attachment E: Negotiated Indirect Cost Rate Agreement**

## **Attachment A: SF-424**

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text" value="03/15/2021"/>	4. Applicant Identifier: <input type="text" value="County of Santa Barbara"/>	
5a. Federal Entity Identifier: <input type="text" value="95-60002833"/>	5b. Federal Award Identifier: <input type="text"/>	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="County of Santa Barbara"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="95-60002833"/>	* c. Organizational DUNS: <input type="text" value="7872648780000"/>	
<b>d. Address:</b>		
* Street1: <input type="text" value="234 Camino del Remedio"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Santa Barbara"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="CA: California"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="93110-1341"/>	
<b>e. Organizational Unit:</b>		
Department Name: <input type="text" value="Workforce Development Board"/>	Division Name: <input type="text" value="Department of Social Services"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Raymond"/>	
Middle Name: <input type="text" value="L"/>	* Last Name: <input type="text" value="McDonald"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="Executive Director"/>	
Organizational Affiliation: <input type="text" value="Workforce Development Board"/>		
* Telephone Number: <input type="text" value="805-681-4652"/>	Fax Number: <input type="text" value="805-681-4403"/>	
* Email: <input type="text" value="R.mcdonald@sbcsocialserv.org"/>		

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

Employment and Training Administration

**11. Catalog of Federal Domestic Assistance Number:**

17.270

CFDA Title:

Reentry Employment Opportunities

**\* 12. Funding Opportunity Number:**

FOA-ETA-21-02

\* Title:

Pathway Home 2

**13. Competition Identification Number:**

FOA-ETA-21-02

Title:

Pathway Home 2

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

Santa Barbara County Pathway Home 2

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="2,499,999.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="2,499,999.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:



## **Attachment B: SF-424A**

**BUDGET INFORMATION - Non-Construction Programs**

OMB Number: 4040-0006  
Expiration Date: 02/28/2022

**SECTION A - BUDGET SUMMARY**

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Pathway Home 2	17.270	\$ <input type="text"/>	\$ <input type="text"/>	\$ 2,499,999.00	\$ <input type="text"/>	\$ 2,499,999.00
2.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
4.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<b>5. Totals</b>		\$ <input type="text"/>	\$ <input type="text"/>	\$ 2,499,999.00	\$ <input type="text"/>	\$ 2,499,999.00

**SECTION B - BUDGET CATEGORIES**

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1)	(2)	(3)	(4)	
	Pathway Home 2				
<b>a. Personnel</b>	\$ 139,707.00	\$	\$	\$	\$ 139,707.00
<b>b. Fringe Benefits</b>	88,753.00				88,753.00
<b>c. Travel</b>	0.00				0.00
<b>d. Equipment</b>	0.00				0.00
<b>e. Supplies</b>	0.00				0.00
<b>f. Contractual</b>	924,515.00				924,515.00
<b>g. Construction</b>	0.00				0.00
<b>h. Other</b>	1,255,000.00				1,255,000.00
<b>i. Total Direct Charges (sum of 6a-6h)</b>	2,407,975.00				\$ 2,407,975.00
<b>j. Indirect Charges</b>	92,024.00				\$ 92,024.00
<b>k. TOTALS (sum of 6i and 6j)</b>	\$ 2,499,999.00	\$	\$	\$	\$ 2,499,999.00
<b>7. Program Income</b>	\$	\$	\$	\$	\$

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**SECTION C - NON-FEDERAL RESOURCES**

(a) Grant Program		(b) Applicant	(c) State	(d) Other Sources	(e)TOTALS
8.	Pathway Home 2	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
9.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
10.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
11.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
12. TOTAL (sum of lines 8-11)		\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>

**SECTION D - FORECASTED CASH NEEDS**

	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$ <input type="text" value="1,500,000.00"/>	\$ <input type="text" value="150,000.00"/>	\$ <input type="text" value="400,000.00"/>	\$ <input type="text" value="450,000.00"/>	\$ <input type="text" value="500,000.00"/>
14. Non-Federal	\$ <input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
15. TOTAL (sum of lines 13 and 14)	\$ <input type="text" value="1,500,000.00"/>	\$ <input type="text" value="150,000.00"/>	\$ <input type="text" value="400,000.00"/>	\$ <input type="text" value="450,000.00"/>	\$ <input type="text" value="500,000.00"/>

**SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT**

(a) Grant Program		FUTURE FUNDING PERIODS (YEARS)			
		(b)First	(c) Second	(d) Third	(e) Fourth
16.	Pathway Home 2	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
17.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
18.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
19.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
20. TOTAL (sum of lines 16 - 19)		\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>

**SECTION F - OTHER BUDGET INFORMATION**

21. Direct Charges: <input type="text"/>	22. Indirect Charges: <input type="text"/>
23. Remarks: <input type="text"/>	

## **Attachment C: Budget Narrative**

<b>Applicant:</b> County of Santa Barbara
<b>Project Name:</b> Pathway Home 2

**Section IV.B.2.a) Budget Narrative**

**A. Personnel (42 months): \$139,707**

<b>Position</b>	<b>Annual Salary</b>	<b>% of Time Devoted to Grant</b>	<b>Yearly Salary Funded by Grant</b>	<b>Yearly In-kind Contribution</b>
<b>Program Manager</b>	\$93,138	43%	\$40,049	\$53,088.80

**Role and Responsibilities:**

Program Manager will act at the lead agency (the County of Santa Barbara Workforce Development Board) point of contact. The responsibilities will include the implementation and coordination of the Pathway Home 2 Project. This includes contract negotiations and management, and coordinating all service providers -- project sub recipients and contractors. These sub recipients and contractors are responsible for delivering services to project participants. Additionally, this staff is responsible for analyzing labor market information, targeted industries, occupations, training opportunities, sector strategies, hiring needs in order to provide relevant sources of data to project sub recipients and contractors. Additionally, responsible for collecting, tracking, and reporting participant data, and ensuring project goals and objectives are met.

**In-kind Contribution:** 57% of the Program Manager time/salary will be provided in-kind using Title I Adult and Dislocated Worker allocation.

**B. Fringe Benefits (42 months): \$88,753**

Amounts and percentages that comprise fringe benefit costs such as health insurance, FICA, retirement, etc.

<b>Position</b>	<b>Annual Benefits</b>	<b>% of Time Devoted to Grant</b>	<b>Yearly Benefits Funded by Grant</b>	<b>Yearly In-kind Contribution</b>
<b>Program Manager</b>	\$59,169	43%	\$25,443	\$33,726

<b>Benefit Funded by Grant</b>	<b>%</b>	<b>Annual</b>	<b>42 months</b>
		<b>\$25,443</b>	<b>\$88,753</b>
Retirement	39%	\$15,551	\$54,248
EE Pickup Retirement Contribution	-3%	-\$1,001	-\$3,493
Retiree Medical OPEB	7%	\$2,771	\$9,668
FICA Contribution	6%	\$2,478	\$8,646
FICA/Medicare	1%	\$580	\$2,022
Health Insurance Contribution	12%	\$4,924	\$17,176
Life & Disability Insur	.347%	\$139	\$486
<b>Total Benefits</b>	<b>64%</b>	<b>\$25,443</b>	<b>\$88,753</b>

In-kind Contribution: 57% of the Program Manager benefits will be provided in-kind using Title I Adult and Dislocated Worker allocation.

**C. E. Staff Travel \$0**

**D. F. Equipment \$0**

**E. Supplies \$0**

**F. Contractual \$924,515**

<b>Name of Partner</b>	<b>Contractor/Sub recipient</b>	<b>Purpose/Activity to be Provided</b>	<b>Estimated Cost</b>
<b>Santa Barbara County Sheriff's Office (SBSO)</b>	<b>Contractor</b>	Will work collaboratively with the County of Santa Barbara Workforce Development Board in the implementation of the project. SBSO will grant access to the two local jails to project service providers. Will work together to identify criminogenic risks and needs of incarcerated individuals and will work collaboratively on designing and refining programs, curriculum, and supportive services to meet those needs. Will coordinate with the SBCWDB in	<b>\$175,266</b>

		<p>regards to the number of inmates participating, location of inmate education within the Main Jail and North Branch Jail, management of inmates during classes, and training of partner agency staff for in-custody case management and class environments. Facilitating access to facilities, internet, and provide administrative support and security staff.</p>	
<p><b>Community Solutions Inc. (CSI)</b></p>	<p><b>Contractor</b></p>	<p>CSI will provide Case Management and Discharge Planning. Will provide pre and post-release Case Management services including assessing criminogenic risks and needs, socio-economic barriers, education, and support systems. Will provide a bridging mechanism between incarceration and successful re-entry by allowing the participants to access community-based services while in a structured, supervised program. CSI will be responsible for tracking and reporting recidivism rates.</p>	<p><b>\$85,000</b></p>
<p><b>Freedom 4 Youth (F4Y)</b></p>	<p><b>Contractor</b></p>	<p>.Freedom 4 Youth (F4Y) will implement a pilot mentoring program. F4Y will provide credible messenger mentorship support for individuals who are reentering back into the community after a period of incarceration. Credible messengers are experienced advocates, neighborhood leaders, and individuals with relevant life experiences whose role is to empower people to transform their attitudes and behaviors around harmful actions. They serve people whose needs transcend the traditional mentoring approach of companionship and confidence-building.</p>	<p><b>\$40,000</b></p>



<p><b>Allan Hancock College (AHC)</b></p>	<p><b>Contractor</b></p>	<p><b>Career Services</b></p> <p>pre-release programming includes providing in-person academic support, assessment and testing of basic skills, job and employability skills training, job seeking support, and life skills training that includes internal and external support to provide seamless post-release support with the goal of decreasing recidivism. Career Services will include: Developing and using appropriate job seeking and keeping strategies; applying classroom learned skills to the world of work; using career planning resources; practicing effective decision making techniques; improving academic and life skills; increasing employment options and reduce recidivism</p> <p><b>Academic and Occupational Skills Courses (pre and post release)</b></p> <p>AHC’s program will consist of a blend of academic and workforce development instruction that offer participants the resources and tools necessary to access the workforce upon release. Please see narrative for the list of occupational courses being provided by AHC.</p>	<p><b>\$150,000</b></p>
<p><b>Santa Barbara City College (SBCC)</b></p>	<p><b>Contractor</b></p>	<p><b>Career Services</b></p> <p>pre-release programming includes providing in-person academic support, assessment and testing of basic skills, job and employability skills training, job seeking support, and life skills training that includes internal and external support to provide seamless post-release support with the goal of decreasing recidivism. Career Services will include: Developing and using appropriate job seeking and keeping strategies; applying classroom</p>	<p><b>\$150,000</b></p>

		<p>learned skills to the world of work; using career planning resources; practicing effective decision making techniques; improving academic and life skills; increasing employment options and reduce recidivism</p> <p><b>Academic and Occupational Skills Courses (pre and post release)</b>  Santa Barbara City College’s program will consist of a blend of academic and workforce development instruction that offer participants the resources and tools necessary to access the workforce upon release. Please see narrative for the list of occupational courses being provided by SBCC.</p>	
<b>AJCC/Equus Workforce Solutions</b>	<b>Sub recipient</b>	<p>Project operator and coordinator of all direct services.</p> <ul style="list-style-type: none"> <li>• <b>Workforce Case management</b>  Provide comprehensive case management, Including assessing project eligibility, coordinating referrals to other program elements/partners</li> <li>• <b>Developing Individual Development Plans (IDPs)</b> using state and local labor market information (LMI) that identify barriers to employment. Provide all participants with quality individualized plans by utilizing tools such as interest inventories, that promote opportunities for self-exploration, career exploration, career planning, and postsecondary education and training in order to advance short-and long-term career goals. This includes utilizing assessments (including needs assessments) provided in coordination with other project partners.</li> </ul>	<b>\$100,000</b>

		<ul style="list-style-type: none"> <li>• <b>Supportive Services</b> Offer supportive services throughout the project.</li> <li>• <b>Additional Case management and Career Services</b> Job readiness preparation; assistance with obtaining state identification, legal assistance (e.g., modification of child support orders, expungement proceedings, securing participant licenses, child custody assistance, and protective and restraining order assistance); counseling, and referrals to the legal and social services required to help participants transition back to their communities. – in partnership with CSI; job finding assistance; information about apprenticeship &amp; pre-apprenticeship programs, and education and training opportunities; Labor Market Information and Career pathways on-ramp connections.</li> </ul>	
<b>Good Samaritan</b>	<b>Contractor</b>	Will coordinate Shelter and provide additional Supportive services for homeless participants	<b>\$20,000</b>
<b>Employer of Record (possibly: Equus Workforce or Foundation for California Community Colleges)</b>	<b>Contractor</b>	Employer of record, payroll service provider for work experience component. Cost includes overhead costs.	<b>\$204,249</b>

G. Construction \$0

H. Other \$1,255,000

<b>Direct Job Seeker Costs</b>	
<b>Paid Work Experience</b>	
<b>Number of Participants to complete WEX</b>	200
<b>Hourly Rate</b>	\$15.00
<b>Total Hours</b>	300
<b>Wages</b>	\$900,000.00
<b>Taxes/Fringe Benefits (@ 12%)</b>	\$108,000.00
<b>Workers' Compensation (@ estimated 23%)</b>	\$207,000.00
<b>Total Wages &amp; Taxes</b>	<b>\$1,215,000.00</b>
<b>Supportive Services @ \$200/participant</b>	\$40,000
<b>Total</b>	<b>\$1,255,000.00</b>

Work experiences are a planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience will be paid. A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists.

### **Wages**

**The estimated wages for work experience is \$15/hour.** Pursuant to WIOA section 181 (a)(1)(A) Individuals participating in a work experience opportunity must be compensated at the same rates, including periodic increases, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills.

### **WEX Fringe Benefit Cost**

Estimated at 12% based on previous costs for a similar program. This includes:

- FICA Tax
- SDI Tax
- Paid Time Off, Sick, Vacation

### **Workers' Compensation**

Estimated at 23% based on previous costs for a similar program. The cost varies depending on occupation.

### **Supportive Services**

Supportive services are budgeted at \$200/participant. Examples of supportive services include, but are not limited to:

- Child care and dependent care for dependents of participant;
- Clothing adequate to allow participant to wear appropriate work attire while participating in WIOA activities and during job interviews;
- Housing such as temporary shelter, housing assistance, and referral services;
- Linkages to community services such as alcohol/drug/gang intervention counseling, drop-out prevention, pregnancy prevention, money management, tutoring or other purposes;
- Referrals to appropriate medical service providers;
- Transportation for commuting to and from WIOA activities such as public transportation fare, carpool arrangement or gas for personal auto;
- Department of Motor Vehicle's fees for Driver License or California ID required for employment or education related activities.
- Other, including, but not limited to: uniforms or work-related tools, eye glasses and protective eye gear which may be needed for participating in WIOA activities and/or employment, materials for individuals with disabilities, meals, and needs related payments.

### **I. Indirect Cost \$ 92,024**

Indirect cost rate is calculated at 40.28% of direct staff salaries and benefits. The indirect cost rate is a ratio composed of two main factors. First, the numerator of the ratio is a sum all of the overhead cost from fiscal agent – County of Santa Barbara Department of Social Services (DSS) which we called generic cost. The generic cost (overhead) includes communication, IT, rent, utilities, janitorial services, office expense, furniture & fixture, equipment, motor pool charges and any other cost that is not direct claim to a specific program. Second, the denominator of the ratio is the sum of all of the direct salaries claim to a specific program. We divide the generic cost by the direct salaries to come up with our ICR annual. The ICR is calculated each Fiscal Year using the data from two prior Fiscal Year. The ICR is reviewed and approved by the County of Santa Barbara Auditor-Controller Office.

## **Attachment D: Statement of Work**

### **3. Project Narrative**

#### **a) Statement of Need**

With recidivism rates among formerly incarcerated individuals alarmingly high, the Santa Barbara County is not exempt from the need of providing comprehensive prerelease and post release services to incarcerated individuals. Although the United States comprises nearly five percent of the world's population, it houses almost 21 percent of the world's incarcerated population, according to the NAACP, Criminal Justice Fact sheet. Per capita, it incarcerates more individuals than any other nation, and as a result, spending is equally as high. The annual cost of mass incarceration in the United States is estimated to be nearly \$182 billion. On the other hand, a RAND Corporation (2013) report suggests that participation in prison education reduces recidivism by approximately 40 percent, saving taxpayers \$4 to \$5 for every dollar spent on education. One community in Santa Barbara County in particular, Lompoc, has a crime rate that is 44% higher than the national average and in 2016 and Santa Barbara County had the third highest murder rate per capita in the state of California. According to the California Budget & Policy center, Santa Barbara County spends almost 20% of the county budget on incarceration and responding to crime.

According to the Bureau of Justice Statistics, about two-thirds, 67.8 percent, of all released prisoners will be rearrested within three years. About three-quarters, 76.6 percent, will be rearrested within five years of release. More than half, 56.7 percent, are rearrested by the end of the first year.

California and more specifically, Santa Barbara County, is not immune from the nation's high incarceration and recidivism rates, nor is it resistant to the high costs

associated with these. To address the large number of incarcerated individuals in Santa Barbara County, a north Branch Jail near Santa Maria is currently under construction. This \$80 million facility that is anticipated to be completed in April 2021, will house 376 inmates. The North Branch Jail was designed with rehabilitation in mind and includes several purpose designed educational spaces, including those wired for computer and multimedia. Additionally, several career and technical education spaces were designed to provide inmates with skills they can use to get a job.

As noted in the EdSource article, there is a perception that Santa Barbara County is a wealthy area but with such a large wealth gap and high cost of living, per the Public Policy Institute many communities, such as our agriculture areas, domestic and service workforce, live in poverty, with 28.8% of children living in poverty and ranks first in the state of CA. Most of these impoverished communities suffer from lack of resources. The poverty rate in Santa Barbara County is 12 percent but what many are unaware of is there is a clear gap in resources for our current incarcerated population in the Santa Barbara jail, as the Santa Barbara County Sherriff's Office (SBSO) reports they are limited to providing discharge planning services for an average daily population of approximately 630 incarcerated individuals and currently have only 1 Discharge Planner and 1 Case Manager. SBSO does not currently have any pre-release services that include employment preparation, vocational training, or services that follow our returning citizens into the community unless they are being supervised by Probation or Parole. The current agreement with Santa Barbara City College only includes classes on Professional Development and limited Serv-Safe certification, but does not include the ability to provide incarcerated individuals with GED or High School Diploma testing due to



technical limitations, access to pre-release academic planning, vocational training, or other training that will put a returning citizen on the path to livable-wage earning employment. There are no existing apprenticeship programs or paid vocational training for returning citizens.

This project will serve 250 participants throughout the duration of the grant. The SBSO reports that in calendar year 2019 there were 11,621 returning citizens released to Santa Barbara County. In 2020, due to reduced bookings as a result of the County's COVID19 response, there were 6,562 releases. SBSO anticipates this number to increase, as the new jail begins its occupancy in June 2021, which will serve over 367 incarcerated individuals. The SBSO anticipates that based on the number of individuals being released into the community, this project can meet the goal of serving 250 participants with this grant.

This project will provide pre-release services at the Santa Barbara County Jail and the Santa Maria County Jail when it opens in April 2021. Post-release services will be provided county wide, based on where individuals reside once released. Cities include, Santa Barbara, Santa Maria, Lompoc, Goleta, and Carpinteria. It is also important to note that this project will place an emphasis on serving individuals living in the unincorporated areas of Santa Barbara post-release, to ensure they have access to continued resources and support. With lack of accessible resources, individuals often become disinterested or are forced to travel to areas that might deter their progress of staying out of jail. Remaining present to all of Santa Barbara County participants will allow this project to accommodate needs of individuals and ensure accessibility by participants.

As previously mentioned, there is high demand for pre-release and post release services in the County of Santa Barbara. Currently, there are only 2 staff members in the Santa Barbara Jail that provide minimal services as individuals transition from jail back into the community. The services currently provided by Santa Barbara City College (SBCC) pre-lease, include few professional development workshops and serve-safe certification. Aside from the lack of actual services provided pre-release, there is a need for incarcerated individuals to be connected to outside agencies that will help them reach their employment and training goals. Without a strong presence of pre-release services and agencies in the jail, individuals will not be linked or referred to programs that will support their efforts as they are released. Based on the complex needs of these incarcerated individuals, the services are inadequate to ensure their successful transition back into the community.

Lastly, we have seen a local community organizations who at one point operated programs that serviced justice involved participants, decrease. Based on these needs, it is assured that there will not be an oversaturation of services in Santa Barbara County.

#### b) Performance Data Collection Strategies

This project will utilize the CA Employment Development Department (EDD) management information system CalJOBS, to track all program activities including program application, individual employment plan, objective assessment, activities, supportive services, milestones, case notes and tracking of all performance measure indicators. It will also track all Follow-up services, which will allow us to measure performance indicators. Each performance indicator will be measured by entering data in CalJOBS, in its respective link, as follows:

1. Employment Rate in the Second Quarter- employment information data will be entered in the second quarter follow-up link
2. Employment Rate in the Fourth Quarter- employment information data will be entered in the fourth quarter follow-up link
3. Median earnings in the Second Quarter- wages and earnings will be entered in the second quarter follow-up link
4. Credential Attainment by the Fourth Quarter- credential attainment information can be entered in multiple locations within the participants CalJOBS profile that will generate this performance data and include- an active activity code, tied to the successful completion of occupational skills training; the credential link; and in follow-up links quarter's one through four.
5. Reentry Employment Opportunities (REO) Performance Indicator- this project will utilize the SBSO ACTS, Applied Correctional Transition Strategy system that tracks participant's recidivism. This data will be shared with Case Manager and it will be entered into CalJOBS in order to generate recidivism reports. SBSO will also provide reports to report performance for this indicator.

Applications CalJOBS currently has the capacity to support WIOA adult programming and all indicators previously listed. If, in the event that there are additional items and indicators that need to be tracked that are not supported by the existing WIOA application, Santa Barbara County Workforce Development Board (SBCWDB) staff has experience developing program specific modules that will allow for specialized tracking. The SBCWDB has an establish partnership with EDD to

ensure the set-up of CalJOBS for this project, as well as privileges to make modifications for local project requirements.

The SBCWDB staffs 2 CalJOBS Management Information System (MIS) administrators who have over 15 years of experience supporting WIOA programs and special workforce development projects and are experts in CalJOBS. SBCWDB has an established training curriculum in place that will provide in depth training to all staff who will support this project. Training plan includes: providing Case Managers with protected usernames; training on the entire CalJOBS system and its functions; intensive training on eligibility and program services; system rules on when data must be entered (CalJOBS has a 30 day lock down rule which program services must be entered within 30 days); intensive training on determining which program activities trigger a participant to be entered in a performance indicator denominator; intensive training in follow-up services.

SBCWDB staff will provide on-going training and support for all staff members throughout the duration of this project to ensure accurate data entry. Currently, MIS administrators, provide training to current program operators, minimum once a month on special topics. Case Managers of this project will have the responsibility of accurately entering all data into CalJOBS and will have access to all resources that are stored in a shared system called “The Box,” which is a library of the curriculum. In addition, reporting will be generated through detailed CalJOBS reports. The MIS administrators have created a list of CalJOBS reports utilized for tracking and reports of performance measures and program services indicators. In addition, local case manager tracking tools have been developed by the local area and utilized for tracking real time data and to validate CalJOBS data. Lastly, SBCWDB Program Manager has developed a dashboard

that tracks monthly performance data for all SBCWDB programs and MIS administrator runs quarterly performance reports. All program performance data is reported to the SBCWDB Performance Committee who provides performance oversight.

In addition to the established primary performance indicators of this project, the SBCWDB will establish and measure the following goals:

	Additional Performance Measures	Goal
1	Total Enrollments	250
2	Co-enrollments into WIOA, Special Project Programs	50
3	Completion of Job Readiness Workshops, Pre-release	175
4	Diploma/GED, Occupational Skills Certificate, pre/post	90
5	Paid Work Experience completers, post release	200

The SBSO uses an electronic data collection system called ACTS (Applied Correctional Transition Strategy). ACTS provides actuarial assessment, case management, and tracks recidivism of participants. Utilizing ACTS, the SBSO is able to assess each participant using the Virginia Pre-Trial Risk Assessment (VPRAI), tailor programming and case management to meet their criminogenic risks/needs, identify and plan for barriers they will experience post-release, provide a written transition plan with community resources that they will be connected to through this grant, and track and report out on recidivism data at milestones determined by the grant.

SBSO staff will share and provide the recidivism data to Case Managers of this project. Case Managers will also maintain this data in CalJOBS, the data management information system that will be used, by adding activities codes to document their break in program services and add case notes on specifics such as how long they will be incarcerated. This data will be utilized to keep track of a participants statuses in the

program, will allow Case Managers to reassess their existing employment and training plans and make adjustments as needed. Case Managers will be able to generate reports from CalJOBS in regards to recidivism as well as reports that can generate what activities a participant has engaged in before they returned to jail. This data will be analyzed and can help with future development of employment plans and conclude what intervention is required to reduce recidivism. Lastly, the reports generated by both the ACTs and CalJOBS systems, will be utilized to complete quarterly reports as requested by DOLETA.

### **c) Project Design**

As part of the SBCWDB 2020/2021 strategic plan, the SBCWDB has included developing America's Jobs Center of California (AJCC) Access Points throughout the County of Santa Barbara. Through the COVID19 pandemic, it was evident that the underserved parts of the county did not have access to services and programs and the SBCWDB found ourselves having to get creative to ensure that our underserved communities' members were getting imperative information and services. The LEAP pilot project in this FOA aligns with the work that is already in place at the SBCWDB. By including access points in the jails, individuals will have the advantage of working on job and training skills before they return to their communities which in turn will help reduce recidivism.

The SBCWDB currently operates 8 successful workforce development projects, which serve a variety of participants including, adult & dislocated workers, justice involved adults, students with disabilities, youth with barriers, veterans and those affected by the COVID19 pandemic. These programs are measured by the same performance measures indicators and outcomes as this project. The eight workforce programs have successfully transitioned their program design and models to accommodate the current state of the County and accommodate

the unique needs of each special population. Accommodations include: transitioning all program services to virtual platforms; providing participants with the appropriate technology and supportive services to connect to program services; providing hard copy of orientations and program activities which have been mailed or participants can pick up; in person appointments following all COVID19 safety guidelines as necessary under special circumstances. Services remain fluid and partners and staff have the ability to adapt to new needs as they arise.

This project will meet DOL outcomes utilizing the following strategies:

1. Employment- Participants will have the same case manager throughout their participation who will provide employment services including: job readiness training; paid work experience opportunity to gain recent employment history; on the job training opportunities; job search assistance; job matching; job coaching and additional job placement services. In addition, to ensure retention in employment, participants will be provided with one year of follow-up services that include case manager contacts to address any needs of the participant that relate to maintaining their job.
2. Median Earnings- This project is utilizing the high, in-demand industry sectors to guide placement in occupational skills training programs as well as employment. Individualized Employment Plans will be utilized to place participants in middle to high earning wage positions.
3. Credential Attainment- In partnership with AHC and SBCCC, participants will be afforded the opportunities to enroll in occupational skills training and will be provided with academic support and supportive services, to ensure that any barriers are eliminated and are able to successfully complete their training

program. Academic support includes, peer tutors and mentors, school counselors and flexibility with completing their training programs.

4. **Measureable Skills Gains-** As participants engage in occupational skills training, on the job training, GED or high school diploma classes, in program measurable skills gains will be measured through positive progress reports, attaining their GED or high school diploma, passing an exam or increasing educational function levels. As previously mentioned, participants will have access to a wide variety of support services including peer tutors, peer mentors, case manager and job and career coach.

Applicant Proposed Goals will be met using the following services and strategies:

5. **Total Enrollment-** This project will meet the 250 enrollment goal by engaging in active recruitment strategies in partnership with SBSO and CSI. SBCWDB will developed an enrollment plan that will allow case managers to set their monthly goals to meet the goal of 250 enrollments
6. **Co-enrollments-** Once individuals are participating in post release services, case managers will identify those participants that require additional support and leverage resources by co-enrolling 50 participants into WIOA and special workforce projects.
7. **Completion of Job Readiness Workshops, pre-release-** Participants will be enrolled in job readiness workshops pre-release. This project set the goal of having 175 participants complete job readiness workshops that will provide them with the skills and knowledge on how to job search, prepare for interviews and successfully maintain employment.



8. Diploma/GED, Occupational Skills Certificate, pre and post release-Although there is a performance indicators that measures certificate outcome, this project has set a specific goal of 90 participants to receive certificates. These are achievable through preparation classes through the community colleges as well as placement in skills training.
9. Paid Work Experience completers- This project has set the goal of 200 participants to enroll and complete paid work experience. To ensure meeting this goal, a strategic recruitment of employers who support justice involved individuals. In addition, employer and participant matching will happen to ensure the participant has an interest in working for the perspective employer and the industry.

After a year of providing workforce services during the COVID19 pandemic to a variety of special populations with their own unique needs, the SBCWDB has successfully transitioned program services to virtual services and developed a high quality program design and numerous program delivery paths that ensure all participants are able to receive services and participate in program activities. Although these participants are not incarcerated, many face barriers, such as homeless or risk of becoming homeless, no internet access, no access to community centers, libraries, job centers (closure of offices due to COVID19) little to no work history, and criminal justice records. Yet with these barriers in place, program operators have successfully managed to provide training and employment services.

Two challenging barriers during the COVID19 pandemic have been the closures and partial closures of businesses and participant's accessibility and proficiency of virtual services. Closures and partial closures of businesses have not only affected employment placement rates,

but decreased the work experience placements. Additional challenges arose with ensuring participants had access to technology and the knowledge of how to operate and connect to virtual platforms such as Zoom and YouTube.

With that being said, the state of COVID19 in the County of Santa Barbara has dramatically improved in the recent months and there has been an influx of businesses reopening which has increased permanent employment placements and placement in paid work experience. The SBCWDB continues to work closely and strategize with businesses to address their new needs as we navigate the reopening of the economy. The SBCWDB has also made large strides through a special COVID19 supportive service grant in ensuring participants have access to technology; providing workshops on how to navigate virtual activities; conduct weekly webinars on various workforce topics, that are available live and in a document library on the SBCWDB YouTube page so individuals can access at any time; conducted over the phone training sessions and made special accommodations by meeting in person for those that required it, following all safety guidelines.

SBSO has committed to ensuring internet access will be available throughout the centers and classrooms that individuals will be receiving pre-release services. In the instance that internet is not available, the existing program design and program service delivery paths, SBCWDB is prepared to provide services in the event internet is unavailable inside the local jail. Hard file packets of curriculum have been created which allows participants to complete guided program activities, such as resume prep and interviewing skills. In addition, the SBCWDB has current grant funding to provide portable WiFi hot spots and chrome books with integrated internet. Lastly, SBSO currently utilizes an SBSO approved computer tablet, ALTO, which will

allow partners to upload curriculum, assessments, etc. into the tablet and individuals will have access to pre-release services.

As previously mentioned, Community Solutions Inc. (CSI), a partner for this project, currently provides some services in the County Jail. Participation in these services and services in this project, are on a voluntary basis and will be selected from the pool of applicants by using an evidence based criminogenic needs assessment, the Virginia Pre-trial Risk Assessment, as well as a review of current correctional discipline and behavioral histories. With that being said, partners are confident that the comprehensive program described in this proposal, which offers enhanced pre-release services, implementation of post release services and support of a Case Manager, individuals will be more attracted to engage and enroll in this program. Lastly, the SBSO has committed to providing all partner staff the access to participants in jail by providing unescorted access to appropriate facilities, once back ground checks are complete and with appropriate identification. They have also committed to services being provided Monday- Friday from 9am-5pm but are willing to be flexible if needs arise outside these hours.

The comprehensive recruitment plan will be as follows:

1. A comprehensive “marketing” type orientation/information session will be conducted and a clear, simple and attractive program flyer will be developed to present to individuals for those that are visual learners. Highlights in the orientation will include those unique services to this program including all pre-release activities that will give individuals an advantage and head start once they are released; this information session will also share about the Paid Work Experience opportunities; Supportive Services once released; On the

Job Training opportunities; incentives; occupational skills opportunity and job placement services.

2. Individuals currently attending CSI workshops will be presented with the opportunity for more intensive services.
3. A calendar of orientations will be established to ensure that, as individuals become eligible, are able to attend information sessions. This will also allow the Case Managers to have a set schedule to have access to the jail and meet with prospective enrollments.
4. An additional calendar will be developed that will list Office Hours for Case Managers, which will remain the same throughout the program unless there is a need for adjustment.
5. If the program reaches capacity, a waiting list will be established. In partnership with SBSO, Case Managers will be provided with individuals contact information to contact individuals post release and refer to other workforce programs that can provide similar services. SBCWDB recently implemented a Prison 2 Employment program that provides similar services as this project that has an end date of June 2022. Individuals on this waiting list can be referred to this program for services. In the event that there is still a need beyond SBCWDB programs, project partners will collaborate on leveraging resources to ensure that any individual requiring assistance, support and have a need to services, will not be turned away.

There is a wide variety of pre-release and post release services that participants will receive through this project. The following will identify the services that participants will receive based from enrollment through follow-up:

- a. The following services will be provided pre-release, through the CalJOBS system. The only equipment needed to access CalJOBS is a laptop and internet access. In the event that case managers cannot access the internet in the local jail, all the services listed have hard paper copies to reference or just required a word document to make notes, which can later be transferred to the CalJOBS system. Case Managers will conduct can provide the following services in a one on one basis or group, if deemed appropriate.

Comprehensive and intensive Case Management will be provided by Equus Workforce Services, who currently manage the WIOA Adult & Dislocated program. The case management services will include: developing an Individual Employment Plan, which is similar to an IDP, in conjunction with an Objective Assessment. The Objective Assessment is a comprehensive, needs assessment tool that is utilized to report employment history and expectations, education history and occupation skills training goals, barriers to employment, supportive service needs, and agency referrals.

2. In addition, it is important to note that the SBCWDB operates under the Santa Barbara County Department of Social Services therefore, case managers for this program will have direct contacts to provide any type of social services “warm hand off” referrals for services that include CalWorks, CalFresh, General Relief and MediCal. As application for these services are online, Case Managers can assist with preliminary application and

ensure that once individuals are released, completing of these applications will be completed.

3. This project will also utilize a SBCWDB resource directory that lists agencies and organizations that help with various items including legal assistance, food services, child services etc..
4. Individuals will also be provided with job preparation, which includes career assessments, career planning, job exploration, interviewing techniques, financial literacy, customer service training and how to manage in the workplace.
5. Pre-release occupation training and life skills training will be provided by AHC and SBCCC. Some occupations skills training and life skills training are as follow:
  - a. Introduction to Life/Career Planning
  - b. Keyboarding
  - c. Microsoft Office
  - d. Sales and Marketing
  - e. Customer Service Training
  - f. Computer Business Office technology
  - g. Accounting
  - h. Healthcare and Addictive studies
  - i. Welding

In summary, the following services will be provided by the following partners:

- j. Job preparation- Equus, CSI
- k. Comprehensive case management- Equus

1. Developing IEPs (similar to IDP) using state and local labor market information (LMI) Equus
  - a. Identify barriers to employment
  - b. Needs assessment
  - c. Career Exploration and planning
  - d. Supportive Service needs such as assistance with obtaining state identification
  - e. Legal Assistance and referrals
  - f. Counseling services
  - g. Referrals to the legal services and those services needed post release
  - h. Social Services required to help them transition back to their communities
  - m. Pre-release occupation training is highly encouraged-SBCC and AHC
  - n. Mentoring- Freedom 4 Youth

All program partners will have access to participants in the jail. In partnership with the Sheriff's Department, staff will be provided unescorted access to participants, once background checks have been approved and have designated, secure space to provide pre-release services.

AHC, SBCC will continue skill building services that have been identified in the participants IEP, post-release. The providers will ensure there is no gap in services as participant's transition. When participants transition back into the community, they will have a clear plan on how to contact their case manager and continue services. It will already have been established, pre-release, the steps that will be taken post release. Participants will receive their

services, at the community colleges, Santa Barbara County America Job Centers of California locations as well as have the ability to access training remotely through a laptop/computer/tablet.

- a. The SBCWDB has identified the following in-demand industry sectors in Santa Barbara County: Building & Design; Healthcare; Business Services; Finance; Aerospace; Manufacturing & Food Service Industry. This project will provide a wide variety of occupational training that will lead to industry-recognized credentials that include, Introduction to Life/Career Planning; Keyboarding; Microsoft Office; Sales and Marketing; Customer Service Training; Computer Business Office technology; Accounting; Healthcare and Addictive studies; Welding.

The IEP and Objective Assessment, which will be used in place of the IDP, are written to include all goals and services related to employment, training, career pathways, supportive service needs, follow-up services and will be a living document, to ensure a continuum of services. These plans will be developed in the CalJOBS system. CalJOBS provides a comprehensive plan that allows case managers to enter short term and long term goals, list barriers and includes the timelines to ensure a participant's success and secure positive performance. In conjunction with the IEP, individuals will also complete an objective assessment in CalJobs that services as a needs assessment and allows case manager to create goals for individual.

Community Solutions Inc. (CSI) conducts a Level of Service Inventory for all participants in custody that assesses each individual's risk of reoffending and their level of job readiness which provides the information to incorporate in the IDP. SBSO also conducts Virginia Pre-trial Risk Assessment that identifies the participant's individual risk of reoffending. These



two assessments will be provided to case managers to incorporate them in their IEP. Case Managers will assess the risks and use this information to develop attainable and realistic goals and plans to ensure participants success.

This project will utilize a triage type of support for participants to provide wraparound services, but, it has been established amongst partners and will be made clear to participants, that although they might be engaging in a variety of activities provided by different agencies, there main point of contact and support person will be their Case Manager. This case manager will act as the convening person between all partners and services.

The case manager that provides services for individual's pre-release, will maintain those individuals on their case load post release. This is the standard and best practice for all SBCWDB workforce programs. Case managers provide all services to an individual from enrollment through the 1 year follow-up period due to the fact that they have developed a rapport with the individual.

If feasible, the case manager and individual will schedule an appointment while the participant is in custody, to meet within the first 72 hours of the participant's transition from correctional custody to the community. This calendared appointment post release, will attempt to provide the continued structure and accountability that individuals had while in custody. This first meeting post-release will be treated as a continuation of services rather than the start of a new program, which is the intent of this project.

Follow-up services will be provided for 1 year after the participant meets their goals and exit the active participation part of the program. These services will include the continued monitoring the participants placement and overall progress. At minimum, case manager will attempt to speak with participant three times a month. The follow-up contacts will assess any

additional needs of the participants to maintain their placement in employment or training; opportunity to attend a variety of workshops on topics that include how to maintain employment and customer service related training; job searching workshops in the event a participant is looking for alternate employment etc. Although not the main purpose, these follow-up contacts will also be used to collect any documentation that demonstrates they are employed and earning wages or collection of earned certificates. Participants will be informed that although their intensive services and follow-up services have ended, they will always have access to the local America Jobs Centers of California if additional needs arise.

**d) Mandatory Partnerships- Attached Letters**

**Recommended Partnerships- Attached Letters**

**e) Organizational, Administrative, and Fiscal Capacity**

**SBCWDB- Project Director**- SBCWDB staff will provide overall oversight and management of all aspects of this project as well as supervision of all staff supporting project. The SBCWDB staff that will manage this project, has over 15 years of experience in workforce program services with and experience successfully managing a diverse number of workforce projects and management of program staff for the County of Santa Barbara. This staff will be responsible of ensuring that all program components are being met, compiling quarterly reports and all reports mandated by this project.

**Santa Barbara County Department of Social Services (DSS)- Fiscal support**- DSS fiscal staff has two staff with extensive experience managing all financials of WIOA programs, federal and state special workforce grants. They are experienced in eligibility, compliance, reporting, and processing of invoices. Fiscal staff also provide invoice training to program operators to ensure accuracy and compliance. Fiscal staff will be in charge of receiving and reviewing all partner's invoices, ensuring they comply with their scope of work, follow their

respective budgets and are not providing un-allowed services which lead to disallowed costs. They will also support this project with any fiscal monitoring by DOLETA.

**Santa Barbara City College (SBCC)**- Two SBCC staff will provide pre-release and post-release work readiness, occupational training, career counseling, job development and job coaching services to South County participants. SBCC has an existing partnership with the SBSO and currently provides basic skills classes in the jail. SBCC has worked with the SBSO for over 8 years and have the expertise to ensure positive outcomes in certificate, skills training and job placement.

**Alan Hancock College-(AHC)**- Staff will provide pre-release and post-release work readiness, occupational training, career counseling, leadership development activities to North County participants. AHC has extensive experience serving justice involved individuals and currently operate a project that helps students with a criminal background. With their knowledge serving this populations, positive outcomes in job placement and certificates.

**Community Solutions Inc. (CSI)**- Pre-release services- This agency currently provides pre-release services in the Santa Barbara Jail. They have direct experience working with incarcerated individuals providing needs assessments, substance abuse education and post release program referrals. They have successful project outcomes in their current role at the SBSO that will transfer over to this project.

**Freedom for Youth (F4Y)- Mentorship**- F4Y provides mentorship for individuals with barriers in partnership with employment and training programs to reduce recidivism. F4Y refers to mentors as “Credible Messengers” and they have extensive experience providing mentorships services since 2008. Their role in this project will be to provide support to participants 1 month before their release and their services will support the goal of this project in reducing recidivism.

**Equus Workforce Services - Case Management**- This agency currently successfully operates the WIOA Adult & Dislocated Worker program, National Dislocated Worker Grant Additional Assistance Grant and COVID19 Supportive Service grant and has extensive experience in providing Case Management, Job Placement and Job Matching, Occupational and Career services. Equus will take the lead Case Management role in this project and be in charge of coordinating services amongst the partners, conduct enrollment and eligibility, pre-release services such as needs assessment and provide supportive services and post release services including job development, paid work experience and job placement. This partner will be responsible to ensure program performance indicators are being met and entering the date in CalJOBS.

**Good Samaritan Shelter (GSS)**- Housing Services- GSS will provide temporary housing services to those individuals transitioning out of jail to ensure successful outcomes of individuals as they engage in job and training services. In addition, GSS experience and employer partnerships will support employment outcomes.

As previously mentioned, the SBCDSS Fiscal team has extensive experience in managing all financials of WIOA programs, federal and state special workforce grants. They are experienced in eligibility, compliance, quarterly financial reporting, and processing of invoices. Fiscal staff also provide invoice training to program operators of these special programs to ensure accuracy and compliance. In addition to fiscal review and processing, the SBCWDB have also implemented a program team's review, where the WDB Programs Manager reviews all invoices for program compliance before approval.

In program year 2020/2021, the SBCWDB has tripled their total operating costs through grant solicitations which have allowed us to serve an additional 600 participants from a wide

variety of backgrounds including veterans, students with disabilities and justice involved individuals. Three SBCWDB staff have been assigned to research grant opportunities, once a week, from different funding streams to enable continuous employment and training services to individuals in the County of Santa Barbara.

In addition, through this project planning and design, partners of this proposal have been inspired to continue the work of further developing these partnerships and commit to leveraging existing resources to provide pre and post release services to incarcerated individuals. In addition to these efforts, there has been an emphasis of reentry programs in the state of California and with combination of existing resources, the sustainability of these programs is favorable.

**f) Past Performance–Programmatic Capability**

**County of Santa Barbara Workforce Development Board**  
**Santa Barbara County Pathway Home 2 Abstract**

**SUMMARY:** On January 19<sup>th</sup>, 2021 the Employment and Training Administration, U.S. Department of Labor announced the availability of approximately \$57,500,000 in grant funds authorized by the Further Consolidated Appropriations Act for ex-offender activities under the Workforce Innovation and Opportunity Act. This Funding Opportunity Announcement provides the opportunity to deliver reentry programming to eligible, incarcerated individuals prior to release from state correctional facilities or county or local jails and to continue comprehensive services after release. These projects are designed to eliminate the time gap between release from prison and enrollment into a reentry program leading to employment.

**PROJECT DURATION:** The grant period for this project is 42 month performance period.

**TARGET POPULATION & AREA:** The proposed project will serve 250 incarcerated individuals who are convicted under federal, state or local law. These individuals must reside, at the time of enrollment in the project, in Santa Barbara County Jail or Santa Maria County Jail. This project will serve participants Santa Barbara County wide, urban area.

**PROJECT BUDGET:** With the availability of \$57,500,000 million, approximately 15 grants are expected to be granted to applicants. The SBCWDB has requested \$2,499,999. The cost per participant for this project is \$9,999.

**EXPECTED OUTCOMES & OUTPUTS:** Program participants outcome's will be measured by the percentage of participants who, during a program year, are in education or training program that leads to a recognized post-secondary credential and employment and who are achieving measurable skills gains toward such a credential or employment. Performance will also be measured by the total number of participants served, total numbers of participants placed in unsubsidized employment.

**PROJECT ELEMENTS:** The program design of this project will take an America Job Center approach, where individuals who are incarcerated in the Santa Barbara County Jail and Santa Maria Jail, can receive employment and career services pre-release. As they make the transition back into to the community, participation will continue with no interruption of services. The following elements will be made available and accessible to participant's county wide, pre-release and post release, in an effort to limit barriers to accessing our services:

1. Education and Certified Training Opportunities that lead to industry-recognized certificate
2. Career Pathway and Skill Attainment
3. Offering Supportive Services and Case Management
4. Job Search and Job Placement within our regional and local industry sectors
5. Career Exploration- Labor Market Information
6. Job Search Training/Career Counseling
7. Provide participants with Individualized Employment Plans
8. One Year of Follow-up Services

**PARTNERS:** The project will collaborate with the Santa Barbara County Sherriff’s Office, local community colleges, Alan Hancock and Santa Barbara City College, local public and non-profit organizations. Partners will be utilized to support program operations and ensure that all required services are available to all program participants. Partners will work together to ensure each of the performance outcomes are met. Strong communication amongst partners is expected. Partners are expected to work with local employers and industry to ensure that services to participants are in line with employer needs and will lead to year round employment. The partners will be expected to provide letters of commitments that clearly identify their roles and responsibilities and resources to be committed.

**MANDATORY PARTNER:**

1. Santa Barbara County Sheriff’s Office  
Santa Barbara County Mail Jail, Local  
4436 Calle Real  
Santa Barbara, CA 93110

**OTHER PARTNERS:**

2. Santa Barbara City College
3. Alan Hancock College
4. Equus Workforce Services
5. Community Solutions Inc.
6. Freedom 4 Youth

**OPPORTUNITY ZONE CENSUS:** This project will serve individuals throughout the County of Santa Barbara, therefore, all Opportunity Zone census tracks will be targeted. Census tracks include 06 083: 002705, 002706, 002702, 002502, 002403, 002101, 002402.

**WORKSITES:** With a focus on industry sectors strategies, participants will be matched and placed with employers in positions that are in high demand. Participants will be placed at worksites that fall under State and Local Industry Sectors that include:

Industry Sectors	
<i>State</i>	<i>Local</i>
Health Care and Social Assistance	Building & Design
Advanced Manufacturing	Healthcare
Clean Energy	Business Services
	Finance
	Aerospace
	Manufacturing
	Food Service Industry
	Aerospace



# Office of the Sheriff

SANTA BARBARA COUNTY

**BILL BROWN**  
Sheriff-Coroner

**SOL LINVER**  
Undersheriff

## STATIONS

**Buellton**  
140 W. Highway 246  
Buellton, CA 93427  
Phone (805) 686-8150

**Carpinteria**  
5775 Carpinteria Avenue  
Carpinteria, CA 93013  
Phone (805) 684-4561

**Isla Vista**  
6504 Trigo Road  
Isla Vista, CA 93117  
Phone (805) 681-4179

**Lompoc**  
3500 Harris Grade Road  
Lompoc, CA 93436  
Phone (805) 737-7737

**New Cuyama**  
70 Newsome Street  
New Cuyama, CA 93254  
Phone (661) 766-2310

**Santa Maria**  
812-A W. Foster Road  
Santa Maria, CA 93455  
Phone (805) 934-6150

**Solvang**  
1745 Mission Drive  
Solvang, CA 93463  
Phone (805) 686-5000

**Sheriff - Coroner Office**  
66 S. San Antonio Road  
Santa Barbara, CA 93110  
Phone (805) 681-4146

**Main Jail**  
4436 Calle Real  
Santa Barbara, CA 93110  
Phone (805) 681-4260

## COURT SERVICES CIVIL OFFICES

**Santa Barbara Division**  
1105 Santa Barbara Street  
P O Box 690  
Santa Barbara, CA 93102  
Phone (805) 568-2900

**Santa Maria Division**  
312 E. Cook Street, "O"  
Santa Maria, CA 93456  
Phone (805) 346-7430

P. O. Box 6427 · 4434 Calle Real · Santa Barbara, California 93160  
Phone (805) 681-4100 · Fax (805) 681-4322

[www.sbsheriff.org](http://www.sbsheriff.org)

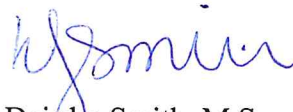
March 11, 2021

Raymond L. McDonald  
Director  
Santa Barbara County Workforce Development Board  
234 Camino Del Remedio  
Santa Barbara, CA 93110

RE: Pathways Home 2 Grant


Dear Mr. McDonald,

This letter is to confirm that the facilities where participants will reside at the time of enrollment are defined as state correctional facilities or local or county jails for adults by state or local law.



Deirdre Smith, M.S.  
Inmate Services Manager  
das5276@sbsheriff.org





# Office of the Sheriff

## SANTA BARBARA COUNTY

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Santa Barbara, CA 93110  
Phone (805) 681-4260

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P.O. Box 690  
Santa Barbara, CA 93102  
Phone (805) 568-2900

**Santa Maria**  
312 E. Cook Street, "O"  
P.O. Box 5049  
Santa Maria, CA 93456  
Phone (805) 346-7430

HEADQUARTERS  
P.O. Box 6427 • 4434 Calle Real • Santa Barbara, California 93160  
Phone (805) 681-4100 • Fax (805) 681-4322  
www.sbsheriff.org

**BILL BROWN**  
Sheriff - Coroner  
**SOL LINVER**  
Undersheriff

March 11, 2021

Raymond L. McDonald  
Director  
Santa Barbara County Workforce Development Board  
234 Camino Del Remedio  
Santa Barbara, CA 93110

RE: Letter of Commitment for Santa Barbara County Pathway Home 2

Dear Mr. McDonald:

On behalf of the Santa Barbara County Sheriff's Office (SBSO), I am pleased to write this Letter of Commitment in support of a working partnership between our office and the Santa Barbara County Workforce Development Board (WDB) for the Santa Barbara County Pathway Home 2 project.

The SBSO provides law enforcement for the unincorporated areas of Santa Barbara County, California, and several cities within the county, including Solvang, Buellton, Goleta, and Carpinteria.

Our physical plants, the Santa Barbara County Main Jail (located at 4436 Calle Real in Goleta, California) and the North Branch Jail (located at 2301 Black Road in Santa Maria, California) are secure correctional facilities holding pre-trial detainees and both male and female sentenced inmates. The Mail Jail and the North Branch Jail (slated to open in mid-2021) will receive new bookings of individuals mainly from Carpinteria, Goleta, Guadalupe, Isla Vista, Lompoc, New Cuyama, Santa Barbara, Santa Maria, and Isla Vista, as well as individuals from out-of-county.

The SBSO's intent is to work collaboratively on behalf of Santa Barbara County's incarcerated population to enhance and expand educational and re-entry opportunities currently available. In-custody assessment, case management, employment preparation, and educational tools will aid in returning citizen's re-introduction to the community upon release and provide them with a path to employment and enrollment at Santa Barbara City College (SBCC) and Allan Hancock College (AHC). The SBSO's hope is to provide pre and post-release opportunities for employment and earning a higher education and ultimately, to significantly reduce recidivism.



The SBSO is prepared to work collaboratively with the WDB to identify criminogenic risks and needs of incarcerated individuals and designing and refining programs, curriculum, and supportive services to meet those needs. The SBSO can coordinate with the WDB in regards to the number of inmates participating, location of inmate education within the Main Jail and North Branch Jail, management of inmates during classes, and training of partner agency staff for in-custody case management and class environments.

Partner staff will be screened through background investigation as per agency policy. They will be allowed unescorted access with appropriate clearance from the Jail Administrator. Partner staff will receive a SBSO contractor badge upon successful completion of their background check. They will go through an employee entrance at the North Branch Jail and any entrance at the Main Jail. They will need to wear their ID's at all times. There are off-limits areas that they will be familiarized with during training.

Pre-release services will begin with incarcerated individuals with 20-180 days to serve on their sentence. These individuals will be assessed by partner staff to identify criminogenic risks and needs, socio-economic barriers, education, and support systems and will base services based on those assessments.

The Main Jail and North Branch Jail have classrooms and areas available for additional vocational training. There is currently a metal/welding shop at the Main Jail and there is additional space available to accommodate any other type of structured activity, indoors and outdoors. Case-management services can be accommodated in classrooms, visitation booths, and medical offices.

Internet is currently available in most areas of the facility through an internal network. Tablets and wireless devices would require additional WAPs and the selected equipment would need to be hardwired for limited connectivity and internet access.

Inmates will be selected from a pool of applicants, currently serving a local sentence after conviction by using an evidence based criminogenic needs assessment (Virginia Pre-Trial Risk Assessment), as well as a review of current correctional discipline and behavioral histories. Amount and type of access to participants will mirror that of SBSO Sheriff's Treatment Program staff, M-F, typical hours are 8:00 a.m. to 5:00 p.m. but can be adjusted if necessary.

Additional resources would be in the form of administrative support and security staff, special accommodations are readily available.

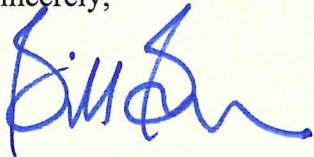
SBSO will provide complete oversight of all safety-related issues that may arise, and will adhere to the strict and established policies that insure the safety and security of inmates, partner agency staff, and SBSO staff. Partner staff will be trained how and when to communicate issues to security staff, and the budgeted security escort will also assist. It is the SBSO's understanding that funding for this pilot program is being made possible through an opportunity presented by the Department of Labor. Should the SBSO be given the opportunity, the SBSO would strongly recommend that funding to be awarded to benefit the WDB Santa Barbara County Pathway Home 2 project. The limited education, discharge planning and case management resources we currently offer returning citizens have had a positive impact; a strengthened program can significantly extend its reach and broaden its positive impact.

Additionally, the SBSO views Santa Barbara County as a particularly ripe candidate for this funding, based on the collaborative nature of local agencies serving incarcerated individuals and formerly incarcerated individuals, and on our community's openness and willingness to effect systematic change.

The SBSO believes that through a SBSO-WDB partnership, county incarcerated individuals can be presented with exceptional pre- and post-release re-entry, supportive services, and educational opportunities. The SBSO fully expects these opportunities will promote the success of participating incarcerated individuals during their incarceration and to continue following their release.

The SBSO looks forward to working with the WDB to develop coordinated re-entry, supportive services, and inmate educational programming and post-release success services.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bill Brown", with a stylized flourish at the end.

BILL BROWN  
Sheriff





**Kevin G. Walthers, Ph.D.**  
Superintendent/President

**Board of Trustees**

Larry Lahr, President

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Suzanne Levy, Ed.D.

Gregory A. Pensa

Hilda Zacarias

March 8, 2021

Ray L. McDonald  
Director  
Santa Barbara County Workforce Development Board  
234 Camino Del Remedio  
Santa Barbara, CA 93110

**RE: Letter of Commitment for Santa Barbara County, Pathway Home 2**

Dear Mr. McDonald:

As a comprehensive community college serving the diverse population of Northern Santa Barbara County and a federally recognized Hispanic Serving Institution, Allan Hancock College (AHC) is pleased to support your Pathway Home 2 project. Allan Hancock College has a long history of working with justice-impacted students, including those currently and formerly incarcerated, and we are highly committed to doing so.

Allan Hancock College also has a long history of partnering with the Santa Barbara County Workforce Development Board to bring about numerous workforce training and development projects that have greatly benefited our community, region, and the State of California. We are excited to once again support and partner in the delivery of this project and commit to the following:

1. AHC will provide mentoring, workforce training, and educational/training support.
2. The partnership will provide resources such as the Career Center, individualized career exploration, peer mentorship, technology lending, leadership development opportunities, learning assistance needs, education, and training.
3. AHC will partner with the Workforce Development team on a monthly basis to assess needs and plan to further support justice-involved participants.
4. Participants will receive educational opportunities to help smooth the transition from incarceration into society. Allan Hancock College will work closely with Community Solutions, Inc. to receive each participants' assessments, career goals, support services needs, and other learning support.

Santa Maria Campus  
800 South College Drive  
Santa Maria, CA 93454-6399  
1-805-346-1001  
[www.hancockcollege.edu](http://www.hancockcollege.edu)

AHC also has extensive experience in working with the Workforce Development Board on various workforce projects that include providing high quality training and employment services to our underserved communities. We plan on using these funds to extend and grow the opportunities for justice-involved students and the support their individualized needs for education to career success.

To further support this effort, we have the following experience:

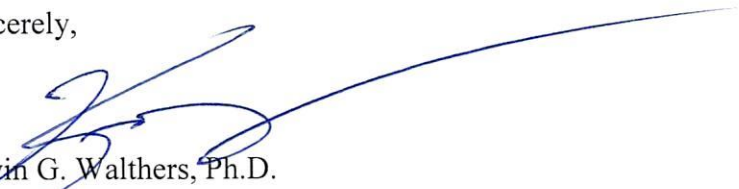
- a. Understanding and analyzing the need for education and training, including targeted industries, occupations, sector strategies, hiring needs and populations to be served.
- b. Assessing potential participants, career readiness, and their career goals.
- c. Identifying and referring candidates for education and training through educational counseling services.
- d. Providing food insecurities, childcare services, and other basic needs support.
- e. English language development and high school diploma equivalency.
- f. Connecting and placing participants with employers that have job openings.
- g. Leveraging other grants and funding sources.

Many of the AHC educational pathways to careers utilize advisory committees attended by industry leaders and local businesses to provide input on curriculum development and occupational education including activities such as job shadowing, and work experience or mentoring, and will consider participants for employment pre- and post-release.

We plan to secure lasting partnerships with employers in order to continue to train participants and increase employment opportunities for post-release participants.

If you have any technical questions about the project, please contact Rick Rantz, project director at 805-922-6966 ext. 5203 or [rrantz@hancockcollege.edu](mailto:rrantz@hancockcollege.edu). For any grant related questions, please contact Dr. LeeAnne McNulty at 805-922-6966 ext. 3450 or [leeanne.mcnulty@hancockcollege.edu](mailto:leeanne.mcnulty@hancockcollege.edu).

Sincerely,



Keyin G. Walthers, Ph.D.  
Superintendent/President



3/10/2021

Raymond L. McDonald, Director  
Santa Barbara County Workforce Development Board  
234 Camino Del Remedio  
Santa Barbara, CA 93110

RE: Letter of Commitment for Santa Barbara County Pathway Home 2

Dear Mr. McDonald:

I am pleased to extend my support and that of Santa Barbara City College, for the Santa Barbara County Pathway Home 2 project. Santa Barbara City College commits to partnering with the Santa Barbara County Workforce Development Board to assist in the implementation of this project.

Historically for more than eight years, Santa Barbara City College and California Adult Education Consortium have partnered with the Santa Barbara County Sheriff's office to provide limited education to offenders in the county jail. The college has offered some basic skills courses and some introductory job skills classes. Additionally, the college has offered a Transitions pre-release and post-release program supported by the college's Equal Opportunity Program. Students in the pre-release college credit courses offered in the jail includes PD 131 (Stress Management and Wellness) and PD 191A (Career Planning).

Post Release programming includes a Santa Barbara City College Transitions Program- 6 week summer bridge educational experience, students enroll in PD100 (college success), peer mentors available, tutoring, academic counseling, fee waivers, book grants, meal vouchers, bi-weekly \$200 stipends, and educational experiences. Additionally, throughout the academic year, formerly incarcerated students are able to qualify for book grants, and fee waivers also. Students also have access to academic counseling, workshops, events centered on the formerly incarcerated student experience. Prior to COVID, students were able to take and complete their Math, (Math 107) English requirements (ENG 110). This also included COMM 131.

California provides inmate students with an Excused Withdrawal (EW) when necessary: When students are released or transferred mid-semester, they risk receiving a Withdrawal (W) on their transcripts. The California Community Colleges Chancellor's Office approved the use of a new Excused Withdrawal (EW) for incarcerated students who cannot complete a course due to early release or involuntary transfer. The EW ensures the student avoids the adverse consequences attached to a W. Additionally, students have been provided with an opportunity to transition

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their classes from the jail to the college upon release. Covid has forced Santa Barbara City College to resort to correspondence course. Santa Barbara City College anticipates returning to the jail in fall 2021 to resume face-to-face classes.

One purpose of this pilot program is to expand the current program and services to provide eligible, incarcerated individuals in state correctional facilities or local/county jails with holistic and integrated guided pathway programming with pre-release and post-release services. Specifically, pre-release programming includes providing in-person academic support, job and employability skills training, job seeking support, and life skills training that includes internal and external support to provide seamless post-release support with the goal of decreasing recidivism. This project aligns with the California Community College's Vision for Success to making sure students from all backgrounds succeed in reaching their goals and improving their families and communities, eliminating achievement gaps once and for all. To this end, Santa Barbara City College commits to partnering with the Santa Barbara County Workforce Development Board, Santa Barbara County Jail, Community Solutions, Inc., Santa Barbara County Probation, California Adult Education Program, and Santa Barbara Adult Education Consortium to assist in the implementation and evaluation of the Pathway Home 2 Project.

The transition to life after incarceration is a big challenge. The Pathway Home 2 Program will support participants to:

- Develop and use appropriate job seeking and keeping strategies
- Apply classroom learned skills to the world of work
- Use career planning resources
- Practice effective decision making techniques
- Improved academic and life skills
- Increase employment options and reduce recidivism

Student Expected Outcomes include:

- Demonstrate knowledge of careers and the planning process
- Participation in mock interviews
- Demonstrate application of academic and occupational skills necessary for employment
- Improved academic skills
- Successful transition into Santa Barbara's workforce and communities

Santa Barbara City College's program will consist of a blend of academic and workforce development instruction that offer participants the resources and tools necessary to access the workforce upon. The goal for these transitioning inmates is to successfully re-integrate into society, become productive, stable and ultimately self-sufficient as data shows that upon incarceration, inmates have the lowest academic attainment rate of any segment of the population. Studies further show that offenders who participate in correctional education programs are less likely to reoffend following their release.

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### Services to be provided:

Following assessment, testing and orientation all eligible Pathway Home 2 program students will be enrolled in an appropriate academic program and will also participate in one of six rotating certificated CTE programs (Green Gardener, Construction Technology, Welding, Office Assistant, and Culinary). Each program is a pathway to a college associate degree and will provide program participants a pathway to enroll in Santa Barbara City College post-release to continue their educational journey. Green Gardener, Office Assistant, Culinary programs will provide opportunities for the program participants to engage in experiential learning in the jail setting.

- **Referral**
    - Participants eligible to receive training will be referred by jail personnel for admissions, assessment and appropriate placement and will have a scheduled release date between 20 to 180 days before release
  - **Assessment and Testing**
    - All program participants will complete the CASAS testing of basic and academic skills for adults and curriculum tools to design personalized instruction. CASAS tests promote the transition to higher education and the workforce. [CASAS assessments](#) will be used to identify adults in need of additional skills for workforce success, place participants into appropriate education and employment training programs, integrate [basic skills instruction](#), job knowledge, and skill development, and monitor progress and certify attainment of employment-related competencies.
    - A Career Specialist will meet with the participant to review CASAS scores, participant's skills and work history, and develop an Individual Development Plans (IDPs) that includes career and academic pre-release and post-release goals. The Career Specialist also refers and enrolls participants to appropriate pre-release academic or vocational programs within the facility.
    - Program participants will complete a post CASAS assessment prior to release.
    - All program participants will complete an up to three hour new student orientation.
  - **Documentation.** To support post-release employment a Career Specialist will work with each program participant to gather birth certificates, Social Security cards, General Education Diplomas (GEDs), and school transcripts, either by asking family members to get them or by writing or telephoning for the documents themselves.
  - **Program Courses**
    - Academic classes are organized around skills needs in Reading / Language Arts, Social Studies, Mathematics, and Science from basic literacy through adult secondary and post-secondary levels.
    - All classes are open-entry/open exit and include instructor led face-to-face, computer and independent learning instruction. A student's daily schedule will
-



be determined by CASAS assessment as well as time to release and can range from 6 to 8 hours of programming.

- CTE Courses: Green Gardener, Construction Technology, Welding, Office Assistant, and Culinary
- Depending upon referral in conjunction to release dates, students will complete between 3 to 5 hours daily Monday through Friday of CTE instruction
- All students CTE schedules will be supplemented with need based academic programming.
- Transitions Life Skills Program – SBCC will expand the current Transitions course offering to include up to 60 additional hours to this life skills program. Taught by SBCC instructors, the course consists of six modules that address the following: job readiness training, (including job, preparation and search and interviewing skills), self- concept (including anger management), family relationships (including parenting responsibilities and techniques), civic and legal responsibilities (including paying taxes), victim awareness (including domestic violence), personal health and hygiene. The course is taught through lectures, discussions, books, role play, and newspapers. Many inmates have serious social needs, ranging from medical care to shelter, that could interfere with their ability to find or retain a job if left unresolved. The program Career Specialist provides all enrollees with an up-to-date directory of local social and community services, from medical services for indigent persons to food, clothing, and housing resources.

- **Job Development**

- SBCC will contract with a third party vendor to provide reentry services job development resources to work with community partners to find businesses and organizations that are open to hiring ex-offender. Place former offenders in jobs and provide up to six weeks of job coaching. Data suggests that if ex-offenders can find a living wage job as soon as possible after release, they are less likely to return to a life of crime and to prison.
- The Career Specialist will provide on-the-job site coaching for up to six weeks post release

- **Program Evaluation (Performance Data Collection)**

- # of participants completing a CTE program
  - Pre and post CASAS assessment scores
  - # of participants who are employed in the employed in their CTE field of study within six weeks of release
  - # of participants who are employed in the employed in their CTE field of study after six weeks of release
  - # of participants who enroll in college post-release
-

Thank you for your consideration,

A handwritten signature in cursive script that reads "Joyce B. Coleman". The ink is dark and the signature is fluid and legible.

Joyce B. Coleman, MSW

Vice President, School of Extended Learning  
Santa Barbara City College  
300 N. Turnpike Road  
Santa Barbara, CA 93111  
(805) 683-8284 • [jcoleman3@pipeline.sbcc.edu](mailto:jcoleman3@pipeline.sbcc.edu)



## Letter of Commitment

3/9/2021

Raymond L. McDonald  
Director  
Santa Barbara County Workforce Development Board  
234 Camino Del Remedio  
Santa Barbara, CA 93110

RE: Letter of Commitment for Santa Barbara County Pathway Home 2

Dear Mr. McDonald:

I am pleased to extend my support and that of Community Solutions, Incorporated (CSI), for the Santa Barbara County Pathway Home 2 project. CSI commits to partnering with the Santa Barbara County Workforce Development Board to assist in the implementation of this project.

CSI has provided services to those involved, or at risk of involvement, in the criminal justice, juvenile justice, or child welfare systems since 1962. Our mission is to positively impact the lives of our clients and their communities by providing services that facilitate skill development, enhance responsible citizenship, and increase overall well-being. We envision a world where all people have opportunities to realize their fullest potential and contribute to society in productive ways.

If the Santa Barbara County Workforce Development Board is awarded the Pathways Home 2 Grant, CSI is willing to provide Case Management and Discharge Planning to clients in the program. CSI has a long standing relationship with the Santa Barbara County Sheriff's Office and already has a presence in the Santa Barbara County Jail. CSI has also developed a strong relationship with Santa Barbara County Probation Department and has been operating Day Reporting Centers in Santa Barbara and Santa Maria since 2010. CSI understands this blended approach toward service provision, providing pre and post-release Case Management services, allows us to leverage locally provided services to foster public safety in a cost effective manner. Most importantly, it provides a bridging mechanism between incarceration and successful re-entry by allowing the client to access community-based services while in a structured, supervised program. By introducing and accessing these services prior to discharge, the client and the Case Manager can identify and remove barriers to community-based treatment. Case management while in the Day Reporting Center and Probation Report and Resource Center programs increase the likelihood the client will remain in the community-based program following his/her successful discharge.

CSI Case Managers at the Santa Barbara County Jail perform job duties consistent with the following tasks:

1. Conducting risk and needs assessment interview in order to develop an individual service plan that will appropriately meet the short and longer-term needs of the inmate.
2. Coordinating and supporting the efficiency of access to mental health support and services via internal jail resources and community-based services.

3. Acting as a conduit of risk and need information, treatment recommendations, and housing, and to all units needing information about criminogenic risk and needs to assist in the reduction of inmate jail time as guided by best practices in the Criminal Justice systems.
4. Coordinating inmates' participation in evidence-based, curriculum driven groups to educate and assist inmates in recognizing and understanding the nature of the problem, to assess the need for treatment and services, and to evaluate progress.
5. Developing and implementing individualized treatment and service plans based on results from validated risk and need assessment tools.
6. Working closely with Discharge Planning team to make referrals for County health services as needed, confers with probation, parole, and other law enforcement agencies to determine inmate's legal status and/or develop appropriate discharge plans.
7. Consulting with representatives from community treatment programs and recovery facilities to determine the appropriate placement of inmates and to ensure continuity of care after release from custody.
8. Maintaining robust documentation in Case Management system, writing reports and summaries, making recommendations, and documenting inmate progress; completing forms and maintains client records and charts according to established procedures, guidelines, and legal requirements.
9. Participating in case conferences with other professionals to discuss client care and progress; attending departmental staff meetings to report on inmate safety, morale, and custody operations.
10. Attending conferences and/or meetings to keep abreast of current correctional practices, criminal and alcohol and drug issues, treatment modalities, and services available.

Post-release Case Management is designed to assist clients as they gain the necessary skills, confidence and direction to reintegrate into the community and overcome any barriers. Through the use of evidence-based practices, Case Managers and clients address their individual problem areas based on a criminogenic risk and needs assessment.

Discharge planning begins at intake for all post-release Case Management clients. A typical individual treatment plan will incorporate both Day Reporting Center or the Probation Report and Resource Center services and community-based programming. The Case Manager will foster cooperative relationships among the program staff and families, service provider agencies, schools, and informal community resources from which the client will receive services while in the program and following discharge.

CSI has a wealth of experience in fostering strong working relationships with our community partners. If awarded the Pathways Home 2 grant, CSI is looking forward to the opportunity to partner with the Santa Barbara County Workforce Development Board in replicating our current Case Management services through this program.

Thank you for your consideration,



Fernando Muñoz  
Chief Executive Officer  
Community Solutions, Inc.  
fmuñiz@csimail.org  
860-683-7100



Freedom 4 Youth Center: 187 S. Patterson Ave., Suite A, Santa Barbara, CA 93111  
Mailing Address: P.O. Box 2096, Santa Barbara, CA 93120  
Email: [info@freedom4youth.org](mailto:info@freedom4youth.org)  
[www.freedom4youth.org](http://www.freedom4youth.org)  
Tel: (805) 708-1292

*Our mission is to uplift & empower youth to build safe & compassionate communities*

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*Deputy Director*  
Manny Garcia  
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Eddie Perez  
*Chaplain*  
Dylan Griffith  
*Development Director*

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Jonathan Ibarra  
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Ilse Roques  
Dianna Cardenas  
Sharon Perez  
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Shelby Cathey  
Pricella Garcia  
Zoe Alfonso  
Lena Mallett  
Myra Morazan Marin  
Valerie Dimas  
Cole Williams

*Freedom 4 Youth is a 501(c)(3)  
Taxpayer ID No. 27-4437945*

Raymond L. McDonald, Director  
Santa Barbara County Workforce Development Board  
234 Camino Del Remedio  
Santa Barbara, CA 93110

RE: Letter of Commitment for Santa Barbara County Pathway Home 2

Dear Mr. McDonald:

I am pleased to extend my support and that of Freedom 4 Youth for the Santa Barbara County Pathway Home 2 project. Freedom 4 Youth commits to partnering with the Santa Barbara County Workforce Development Board to assist in the implementation of this project.

Freedom 4 Youth (F4Y) will provide credible messenger mentorship support for individuals who are reentering back into the community after a period of incarceration. Credible messengers are experienced advocates, neighborhood leaders, and individuals with relevant life experiences whose role is to empower people to transform their attitudes and behaviors around harmful actions. They serve people whose needs transcend the traditional mentoring approach of companionship and confidence-building. Research shows up to 50% reductions in felony arrest rates for individuals engaged in established credible messenger mentorship programs. Our credible messenger mentors utilize trauma-informed responses to help individuals identify their goals and values, and create action plans with accountability systems, while pinpointing and working through the root causes of their behaviors. The mentors are able to connect with people who may be seen as the most “challenging” because they come from the same or similar communities, are formerly incarcerated or were involved in the justice system, have demonstrated their ability to transform and live-in integrity, and are skilled and trained in mentoring people. These relationships are mutually beneficial and non-hierarchical, as credible messengers never ask their mentees to do something that they would not be willing to do themselves.

F4Y has extensive experience in working with the Workforce Development Board on various workforce projects that include providing high quality training and employment services to our communities that are underserved. Our coordinated efforts will ensure the project services and goals are met. We will set up streamlined systems of communication through a referral process, one in which we are well-versed in thanks to our contract with Santa Barbara County Probation and other community partners, to ensure that all individuals are provided with the opportunity to connect with a credible messenger and receive the support they deserve and need. Referrals will be sent by Community Solutions--the pre- and post-release case managers for Santa Barbara County Jail--to F4Y approximately one month before an individual’s release date.



Freedom 4 Youth Center: 187 S. Patterson Ave., Suite A, Santa Barbara, CA 93111  
 Mailing Address: P.O. Box 2096, Santa Barbara, CA 93120  
 Email: info@freedom4youth.org  
 www.freedom4youth.org  
 Tel: (805) 708-1292

*Our mission is to uplift & empower youth to build safe & compassionate communities*

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*Deputy Director*  
 Manny Garcia  
*Co-Founder, Chief of Staff*  
 Eddie Perez  
*Chaplain*  
 Dylan Griffith  
*Development Director*

**F4Y ADVOCATES**

Ana Zepeda ◊ Katie Stamm-Kirk  
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 Ilse Roques  
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 Sharon Perez  
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 Dillon Ruddell  
 Shelby Cathey  
 Pricella Garcia  
 Zoe Alfonso  
 Lena Mallett  
 Myra Morazan Marin  
 Valerie Dimas  
 Cole Williams

*Freedom 4 Youth is a 501(c)(3)  
 Taxpayer ID No. 27-4437945*

This will provide adequate time for us to connect with other partnering agencies, such as Santa Barbara City College who are offering holistic and integrated guided pathway programming, establish a relationship with the individual pre-release, and begin post-release mentorship support services from the moment they are permitted to leave Santa Barbara County Jail. Requested funds will be used to compensate a mentor supervisor and trainer as well as the credible messengers themselves.

While the WDB has vastly extensive experience in supporting individuals with job training and placement opportunities at sites throughout the county, we will complement those opportunities by utilizing our depth and breadth of community relationships with local independent businesses and the thousands of formerly incarcerated people we have supported through mentorship since 2008. Credible messenger mentoring is an important component in a process of growth and healing, providing people with the motivation to take ownership of their lives and to thrive. It is not a substitute for education, employment, housing, or substance abuse treatment. Credible messenger mentorship provides a necessary complement to the breadth of services provided by partnering agencies in this proposal.

Thank you for your consideration,

Dr. Billi Jo Starr  
 Co-Founder & Executive Director





**Administration Office**  
**Recovery Point Outpatient Services**  
P.O. Box 5908  
245 E. Inger Drive Ste 103-B  
Santa Maria, CA 93458  
Office: 805-346-8185  
Fax: 805-346-8656

**Emergency Shelter**  
**Family Transitional Shelter, H.E.L.P. Program**  
**Recovery Point Acute Care Detoxification Center**  
401 West Morrison Avenue  
Santa Maria, Ca 93458  
Office: 805-347-3338  
Fax: 805-347-3392

**Another Road Detox**  
113 'M' Street  
Lompoc, CA 93436  
Office: 805-736-0357  
Fax: 805-737-0389  
**Turning Point Outpatient Service**  
**Recovery Way Home**  
604 W. Ocean Avenue  
Lompoc, CA 93436  
Office: 805-736-0357  
Fax: 805-737-0389

**Project P.R.E.M.I.E**  
**First Steps**  
**Transitional House**  
412 East Tunnel Street  
Santa Maria, CA 93454  
Transitional House Office: 805-922-1200  
Office: 805-925-0315  
Fax: 805-346-1787

March 12, 2021

Raymond L. McDonald, Director  
Santa Barbara County Workforce Development Board  
234 Camino Del Remedio  
Santa Barbara, CA 93110

RE: Letter of Commitment for Santa Barbara County Pathway Home 2

Dear Mr. McDonald:

I am pleased to extend my support and that of Good Samaritan Shelter (GSS), for the Santa Barbara County Pathway Home 2 project. Good Samaritan Shelter commits to partnering with the Santa Barbara County Workforce Development Board to assist in the implementation of this project.

Good Samaritan Shelter will provide shelter, housing support, case management and job training opportunities within our shelter system in Santa Barbara County. Good Samaritan Shelter will partner with Santa Barbara County Workforce Development Board to implement a culinary and horticulture training program at our shelter locations for the population. GSS will also provide temporary housing within our shelter system, post-release case management and job training opportunities through the partnership. GSS will work with the team to place post-release participants into our shelter system and connect them with job training opportunities. The Pathway 2 Home grant will provide the ability to link participants pre-release to Good Samaritan Shelter upon release for post-release support services.

Good Samaritan Shelter has experience in working with the Workforce Development Board on various workforce projects that include providing high quality training and employment services to our underserved communities.. Our coordinator efforts will ensure the project services and goals are met. Good Samaritan Shelter has secured funding to start a Culinary Training Program within our shelter systems, and we hope to expand that job training program through this grant and partnership to include a Food Truck program that will provide training, income and real experience. GSS also occupies 3 acres of farmland in Northern Santa Barbara County with three unused green houses that can be utilized for a horticulture program that is co-located at our shelter system. By establishing a horticulture job training program, the benefits will be for both the participants and to provide farm to table produce for the homeless population that GSS serves.

*Mission Statement: "To Provide Emergency, Transitional and Support Services To the Homeless and Those in Recovery throughout the Central Coast."*



**Administration Office**  
**Recovery Point Outpatient Services**  
P.O. Box 5908  
245 E. Inger Drive Ste 103-B  
Santa Maria, CA 93458  
Office: 805-346-8185  
Fax: 805-346-8656

**Emergency Shelter**  
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401 West Morrison Avenue  
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Office: 805-347-3338  
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**Project P.R.E.M.I.E**  
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412 East Tunnel Street  
Santa Maria, CA 93454  
Transitional House Office: 805-922-1200  
Office: 805-925-0315  
Fax: 805-346-1787

Good Samaritan Shelter has partnerships with a number of local employers for employment opportunities, including the agricultural community and Hayward Lumber. This partnership will provide new opportunities and a formalized job training program. Good Samaritan Shelter is looking forward to working in partnership with WIB, and can provide shelter and support services for participants that are homeless upon release.

Thank you for your consideration,

Sylvia Barnard  
Executive Director  
Good Samaritan Shelter  
cell (805)331-0877

*Mission Statement: "To Provide Emergency, Transitional and Support Services To the Homeless and Those in Recovery throughout the Central Coast."*



Santa Barbara County Pathway Home 2 project

<b>Objectives/Activities</b>	<b>Estimated Dates</b>
<b>Quarter 1</b>	<b>7/1/2021-9/30/21</b>
<b>Start-up Activities</b>	
<ul style="list-style-type: none"> <li>• Execution of contract agreement to accept award funds</li> <li>• Negotiate, develop partner contracts.</li> <li>• Facilitation of meeting with project partners.</li> <li>• Begin staff recruitment, hiring, background checks</li> <li>• CalJOBS grant module set up</li> <li>• Development outreach within locations</li> </ul>	
<b>Quarter 2</b>	<b>10/1/2021-12/31/2021</b>
<ul style="list-style-type: none"> <li>• Development of Program materials, arrange curriculum</li> <li>• Facilitation of meeting with partners</li> <li>• Program eligibility &amp; program operation training for staff</li> <li>• CalJOBS training for staff</li> <li>• Develop program services calendar for individuals</li> <li>• Development of program operation documents</li> <li>• Set up of classrooms for program services</li> </ul>	
<b>Quarter 3</b>	<b>1/1/2022-3/30/2022</b>
<b>Implementation of Program Services</b>	
Assessment/Enrollment	
<ul style="list-style-type: none"> <li>• Assessment and enrollments of participants into program ie. Plans, application, CalJOBS enrollment</li> <li>• Individual Employment Plan &amp; Career Pathways development</li> </ul>	
<b>Quarter 4</b>	<b>04/01/2022-6/30/2022</b>
Assessment/Enrollment	
<ul style="list-style-type: none"> <li>• Assessment and enrollments of participants into program ie. Plans, applications, CalJOBS enrollment</li> <li>• Individual Employment Plan &amp; Careet Pathways development</li> </ul>	
<b>Quarter 5</b>	<b>7/01/2022-9/30/2022</b>
Job Placement, Retention & Follow-up	
<ul style="list-style-type: none"> <li>• Connect employer partners with participants who are ready for employment.</li> <li>• Case managers provide placement and retention services.</li> <li>• Occupational Skills Training</li> </ul>	
<b>Quarter 6</b>	<b>10/01/2022-12/31/2022</b>
Job Placement, Retention & Follow-up	
<ul style="list-style-type: none"> <li>• Connect employer partners with participants who are ready for employment.</li> </ul>	

<ul style="list-style-type: none"> <li>Case managers provide placement and retention services.</li> </ul>	
<ul style="list-style-type: none"> <li>Occupational Skills Training</li> </ul>	
<b>Quarter 7</b>	<b>1/01/2023-3/31/2023</b>
<b>Job Placement, Retention &amp; Follow-up</b>	
<ul style="list-style-type: none"> <li>Connect employer partners with participants who are ready for employment</li> </ul>	
<ul style="list-style-type: none"> <li>Case managers provide placement and retention services</li> </ul>	
<ul style="list-style-type: none"> <li>Occupational Skills Training</li> </ul>	
<b>Quarter 8</b>	<b>4/1/2023-6/30/2023</b>
Job Placement, Retention & Follow-up	
<ul style="list-style-type: none"> <li>Connect employer partners with participants who are ready for employment</li> </ul>	
<ul style="list-style-type: none"> <li>Case managers provide placement and retention services</li> </ul>	
<ul style="list-style-type: none"> <li>Occupational Skills Training</li> </ul>	
<b>Quarter 9</b>	<b>7/01/2023-9/30/2023</b>
Job Placement, Retention & Follow-up	
<ul style="list-style-type: none"> <li>Connect employer partners with participants who are ready for employment</li> </ul>	
<ul style="list-style-type: none"> <li>Case managers provide placement and retention services</li> </ul>	
<ul style="list-style-type: none"> <li>Occupational Skills Training</li> </ul>	
<b>Quarter 10</b>	<b>10/01/2023-12/31/2023</b>
<ul style="list-style-type: none"> <li>Operators meet 250 participant enrollment goal</li> </ul>	
<ul style="list-style-type: none"> <li>Continue program services</li> </ul>	
<b>Quarter 11</b>	<b>1/01/2024-3/31/2024</b>
<ul style="list-style-type: none"> <li>Continue Follow-up Services</li> </ul>	
<b>Quarter 12</b>	<b>4/1/2024-6/30/2024</b>
<ul style="list-style-type: none"> <li>Continue Follow-up Services</li> </ul>	
<b>Quarter 13</b>	<b>7/1/2024-9/30/2024</b>
<ul style="list-style-type: none"> <li>Continue Follow-up Services</li> </ul>	
<b>Quarter 14</b>	<b>10/01/2024-12/31/2024</b>
<ul style="list-style-type: none"> <li>Prepare for closeout of grant per DOL closeout process</li> </ul>	
<ul style="list-style-type: none"> <li>Prepare all case files for storage and retention</li> </ul>	

# Santa Barbara County Pathway Home APRIL 2021

Sun	Monday	Tuesday	Wednesday	Thursday	Friday	Sat
				1	2	3
4	5 CSI – Case Management and Discharge Planning 9 a.m. – 12 p.m.	6 Comprehensive and Intensive Case Management 9 a.m. – 12 p.m.	7 Career Services 9 a.m. – 12 p.m.	8 Academic and Occupational Skills Training 9 a.m. – 12 p.m.	9 F4Y - Mentoring 9 a.m. – 12 p.m.	10
11	12 CSI – Case Management and Discharge Planning 9 a.m. – 12 p.m.	13 Comprehensive and Intensive Case Management 9 a.m. – 12 p.m.	14 Career Services 9 a.m. – 12 p.m.	15 Academic and Occupational Skills Training 9 a.m. – 12 p.m.	16 F4Y - Mentoring 9 a.m. – 12 p.m.	17
18	19 CSI – Case Management and Discharge Planning 9 a.m. – 12 p.m.	20 Comprehensive and Intensive Case Management 9 a.m. – 12 p.m.	21 Career Services 9 a.m. – 12 p.m.	22 Academic and Occupational Skills Training 9 a.m. – 12 p.m.	23 F4Y - Mentoring 9 a.m. – 12 p.m.	24
25	26 CSI – Case Management and Discharge Planning 9 a.m. – 12 p.m.	27 Comprehensive and Intensive Case Management 9 a.m. 12 p.m.	28 Career Services 9 a.m. – 12 p.m.	29 Academic and Occupational Skills Training 9 a.m. – 12 p.m.	30 F4Y - Mentoring 9 a.m. – 12 p.m.	

**Career Services**

Job preparation  
Career Assessments  
Career Planning  
Career and job exploration  
Interviewing techniques  
Financial literacy  
Customer service training

**Academic and Occupational Skills Training**

Introduction to Life/Career Planning  
Keyboarding  
Microsoft Office  
Sales and Marketing  
Customer Service  
Computer Business Office  
Technology  
Accounting  
Healthcare and Additive Studies  
Welding

**Mentoring**

Meeting with  
Freedom 4 Youth  
(F4Y) credible  
messenger mentor.

**Comprehensive and Intensive Case Management Appointments**

Use this time to develop an employment plan with Equus Case Manager & share what needs you will have such as getting an ID or interview clothing. Includes: job preparation, providing supportive services, legal assistance and referrals, counseling services, referrals to the legal services and those services needed for post release, social services required.

**CSI Case Management and Discharge Planning**

Will provide pre and post-release Case Management services including assessing criminogenic risks and needs, socio-economic barriers, education, and support systems. Will provide a bridging mechanism between incarceration and successful re-entry by allowing the participants to access community-based services while in a structured, supervised program.

<b>Applicant:</b> Santa Barbara County Workforce Development Board
<b>Project Name:</b> Pathway Home 2

**Section IV.B.3.f) Past Performance – Programmatic Capability**

<b>Name of Previous Grantor Organization:</b> <i>Department of Labor, Employment and Training Administration</i>
<b>Grantor Contact:</b> <i>Marjorie Fong, Federal Project Office, Department of Labor Employment &amp; Training Administration, <a href="mailto:Fong.Marjorie@dol.gov">Fong.Marjorie@dol.gov</a>. 90 7<sup>th</sup> Street, Suite 17-300, San Francisco, California 94103. (415) 625-7963</i>
<b>Project Title and Grant Number:</b> <i>Santa Maria Summer Jobs and Beyond: Career Pathways for Youth. EIN: 956002833</i>
<b>Project Period of Performance:</b> <i>May 20, 2016 thru December 30, 2018</i>
<b>Number of Participants Enrolled:</b> <i>281</i>
<b>Population Served:</b> <i>This project served at-risk youth living in high poverty and high crime areas between the ages of 16-24. In School Youth (ISY) at risk of dropping out of high school with little to no work experience and Out of School Youth (OSY) -- high school drop outs with little to no work experience..</i>

<b>Performance Measurement</b>				
<b>Performance Indicator</b>	<b>Goal</b>	<b>Outcome</b>	<b>Outcome / Goal (Fraction)</b>	<b>Rate of Goal Achievement (Percentage)</b>
<i>Placement in Education or Employment</i>	<i>260</i>	<i>281</i>	<i>281 / 260</i>	<i>108%</i>
<i>Number of Participants who Attained a Measurable Skill Gain</i>	<i>Baseline</i>	<i>259</i>	<i>259 / Baseline</i>	<i>NA</i>
<i>Number of Participants Placed in Unsubsidized Employment</i>	<i>89</i>	<i>92</i>	<i>92/89</i>	<i>103%</i>

**Name of Previous Grantor Organization:** U.S. Department of Labor, *State of California Employment Development Department*

**Grantor Contact:** *Vivian Estrada, Regional Advisor, State of California Employment Development Department, [b.vivian.estrada@edd.ca.gov](mailto:b.vivian.estrada@edd.ca.gov). P.O. Box 826880, Sacramento, CA 94280. (916) 516-3306. Fed Catlg 17.258 and 12.278.*

[https://cwdb.ca.gov/wp-content/uploads/sites/43/2020/12/PY-2019-WIOA-AnnualReport\\_ACCESSIBLE.pdf](https://cwdb.ca.gov/wp-content/uploads/sites/43/2020/12/PY-2019-WIOA-AnnualReport_ACCESSIBLE.pdf)

**Project Title and Grant Number:** *Workforce Innovation and Opportunity Act, Title I Adult and Dislocated Worker*

**Project Period of Performance:** *Program Year: 07/1/2019 – 06/30/2020*

**Number of Participants Enrolled:** *Adults: 147; Dislocated Workers: 135*

**Population Served:** *Adult and dislocated worker job seekers, including ex-offenders.*

**Performance Measurement**

Performance Indicator		Goal	Outcome	Outcome / Goal (Fraction)	Rate of Goal Achievement
<i>Placement in Employment at 2<sup>nd</sup> Quarter after Exit</i>	<i>Adult</i>	<i>59</i>	<i>73</i>	<i>73 / 59</i>	<i>124%</i>
	<i>Dislocated Worker</i>	<i>43</i>	<i>51</i>	<i>51/42</i>	<i>121%</i>
<i>Number of Participants who Attained a Credential</i>	<i>Adult</i>	<i>19</i>	<i>28</i>	<i>28 / 19</i>	<i>147%</i>
	<i>Dislocated Worker</i>	<i>18</i>	<i>20</i>	<i>20 / 18</i>	<i>111%</i>

**Attachment E:**  
**Negotiated Indirect Cost Rate Agreement**  
**[If applicable]**

# COUNTY OF SANTA BARBARA

**BETSY M. SCHAFFER, CPA**  
Auditor-Controller

**C. EDWIN PRICE, JR., CPA**  
Assistant Auditor-Controller



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Fax: (805) 568-2016

## OFFICE OF THE AUDITOR-CONTROLLER

### CERTIFICATE OF INDIRECT COSTS

#### Department of Social Services

This is to certify that I have reviewed the indirect cost rate proposal submitted herewith and to the best of my knowledge and belief:

(1) All costs included in this proposal as of September 22, 2020 to establish billing or final indirect cost rates for use in fiscal year 2020-2021 are allowable in accordance with the requirements of the Federal award(s) to which they apply and 2 CFR Part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards." Unallowable costs have been adjusted for in allocating costs as indicated in the cost allocation plan.

Indirect Cost Rate Proposal 40.28%  
Apply to Direct Salaries & Benefits

(2) All costs included in the proposal are properly allocable to Federal awards on the basis of a beneficial or causal relationship between the expenses incurred and the agreements to which they are allocated in accordance with applicable requirements. Further, the same costs that have been treated as indirect costs have not been claimed as direct costs. Similar types of costs have been accounted for consistently and the Federal Government will be notified of any accounting changes that would affect the predetermined rate.

I declare that the foregoing is true and correct.

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C. Edwin Price Jr., CPA  
Assistant Auditor-Controller  
for  
Betsy M. Schaffer, CPA  
Auditor-Controller

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Date