

# Oklahoma Employment Security Commission



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## OKLAHOMA EMPLOYMENT AND TRAINING ISSUANCE # 8-2004

**TO:** National Emergency Grant (NEG) Recipients

**FROM:** Mike Ferguson, Director  
Employment and Training Division

**DATE:** June 24, 2004

**SUBJECT:** National Emergency Grant Policy

**PURPOSE:** To Disseminate Guidelines on National Emergency Grants

**MESSAGE:** Authorized by section 173 of the Workforce Investment Act (WIA), as amended, National Emergency Grants (NEG) are discretionary grants awarded by the Secretary of Labor intended to complement the resources and services capacity at the state and local area levels by providing supplemental funding for workforce development and employment services and other adjustment assistance for dislocated workers and other eligible individuals as defined in sections 101, 134 and 173, of WIA; sections 113, 114 and 203 of the Trade Act of 2002; and 20 CFR 671.140.

The provisions of WIA and the Regulations defines NEG project types:

- ***Single Company Layoff***, this is a project where 50 or more workers are displaced from a single company.
- ***Disaster***, which includes all eligible FEMA – declared natural and manmade disaster events.
- ***Trade – WIA Dual Enrollment***, which provides funding to ensure that a full range of services are available to trade- impacted individuals eligible under the Trade Adjustment Assistance program provisions of the Trade Act of 2002.

- **Multiple Company Layoff**, this project provider assists, where the dislocations from each company impact 50 or more workers.
- **Industry Wide Layoff**, this project assists workers from companies of the same industry and 50 or more are displaced.
- **Community Impacted Project**, this project will assist workers in a local workforce investment area (Primarily Rural) where the employers and multiple small dislocations over a 6 month period have a significant impact on the unemployment rate in the local workforce area.

## 1. Assessing the need for NEG Projects

- A. The OESC will review the WIA Dislocated Worker expenditure and performance status of all Boards for a statewide NEG when large layoffs occur across the state in a particular industry. The same type of review will be conducted when there is evidence of continuous layoffs in a particular industry sector in one or more Boards.
- B. Industry and company data will be extracted from the Rapid Response System.
- C. Workforce Centers may submit an application requesting that OESC apply for an NEG grant on their behalf or statewide participation.

## 2. Reviewing NEG Requests

- A. Requests for NEG funds will be accepted and reviewed at any time during the program year. The request for NEG funds must include:
  - 1) A description of the need for requesting an NEG and which type of NEG is being requested, Regular, Disaster, Trade-WIA Dual Enrollment, or Trade Health Coverage Assistance as described in the Federal Regulations.
  - 2) Description and documentation as to why existing funding is insufficient to serve identified target population, including:
    - a) Number of clients to be served
    - b) Justification of performance outcomes
    - c) Estimated cost per participant
    - d) Projected expenditures and obligations throughout the life of the NEG project.
  - 3) A description of services provided to the target population currently or prior to NEG request, including:
    - a) Rapid Response services previously or currently being provided

- b) If no Rapid Response services were provided, explain the circumstances that prevented service delivery
- 4) A description or explanation of the assessment process for participants to be enrolled in the requested NEG:
  - a) Was assessment completed during rapid response? If so, which assessment instrument was used?
  - b) Is further assessment needed?
- 5. Will the target population be co-enrolled with other programs, Trade?
- 6. Is target population identified as needing training more than job search assistance?

**7. Outreach and Recruitment Strategies**

- a) A description of outreach strategies for clients not already enrolled in WIA programs, rapid response, public service announcements, newspaper, etc.

**8. Local Partnerships**

- a) Applications must also contain description of local partnership initiatives that may contribute to the success of project through funding or other support, economic development corporations, local employers, non-profit organizations, etc.

**9. Recommendations**

- A. The Employment and Training Division will review and approve NEG requests.
- B. Recommendation to approve or disapprove will be forwarded to local Workforce Centers.

**10. Planning Committees**

- a). **State Staff/Rapid Response Team**
- b). **Local Staff/Others**

**11. Contracting**

- A. The Employment and Training Division will initiate the contracting process with the Local Workforce Centers.

- B. The Employment and Training Division will inform Workforce Center of grant review progress ( Conducted by DOL).

**12. Providing Technical Assistance**

- A. The Employment and Training Division will provide technical assistance to the Workforce Center(s) requesting NEG funding. Technical assistance will be given in the following areas:
  - 1) Development of the Workforce Center(s) NEG proposal;
  - 2) Supporting Documentation
  - 3) Completion of NEG proposal forms required by the Department of Labor.

The State will utilize these guidelines to administer National Emergency Grants.

**ACTION:** This issuance is to become a part of your permanent records. Please distribute to appropriate personnel.

If you have questions please call John Cole at 405-557-5344

MF/jc

Attachments

## National Emergency Grants Policies

### **Allocation of Funds**

When two or more Workforce Centers/One- Stop Areas are partners in a National Emergency Grant, the total funds received by the State will be allocated to each Workforce Areas/One-Stop Areas based on the budgets prepared by each center. The centers total budgets will be expressed as a percent of the total funds received by the State for each project.

### **Project Funds Authority**

When a project will operate in more than one local area, the State will have the authority to modify project operator agreements and move funds among designated project operators consistent with where eligible workers are seeking services. Where this action changes the scope of responsibility for individual project operators, the State will submit a revised Project Operator Data Form to USDOL/ETA. This action is for information purposes and will not constitute a formal grant modification request. This authority is further limited to cases where a grant modification would not be required.

### **Grantee/Project Operator**

The award is made to the State, which will also be Project Operator. Therefore, disaster grants are not to be pass-through grants. The States may sub-grant funds to Local Boards and/or may be expended through public and private agencies and organizations engaged in such projects. The State may deobligate and reobligate funds to affected areas and service providers quickly in order to ensure that the funds are where they need to be in order to fulfill the purposes of the grants and to ensure that workers needing assistance are receiving it. The State will coordinate with Local Board(s).

NEG applications covering the following dislocation events are accepted by ETA for consideration of NEG funding:

- (1) **A single company layoff of 50 or more workers.** Priority in funding will be given to applications that document the participation of a large enough group of

workers to sustain a separately funded project. Generally, projects that serve less than 50 workers should be funded with formula Dislocated Worker program dollars, but ETA will examine the sustainability of projects serving smaller groups on a case-by case basis.

- (2) **Multiple Company layoffs, where the dislocations from each company impact 50 or more workers.** Priority will be given to applications that demonstrate a sustainable project size. Generally, this standard will be deemed met with the documented planned participation of at least 50 workers from each qualified company.
- (3) **Industry-wide layoffs from companies in the same industry as determined by the three-digit code level in the North American Industrial Classification System.** Each layoff in an industry-wide application must have 50 or more workers unless the exception below is met. In order to ensure a consistent statewide approach, we expect to focus our funding of these projects on applications from state applicants. Priority will be given to applications that document the planned participation of 50 or more workers from each company of the identified companies when the affected workers are not in the same or geographically contiguous local workforce investment area(s). **Exception:** Where the dislocation events are in the same local workforce investment area or geographically contiguous area; one company must have a layoff of more than 50 workers, and other identified companies may have layoffs of less than 50 workers as part of the same application.
- (4) **Community impact projects to assist workers in a local workforce investment area (primarily rural) where the employer base is primarily small employers and multiple small dislocations over a six month period have a significant impact on the unemployment rate of the local workforce area, as determined by the state.** In order to ensure a consistent statewide approach, DOL is expect to focus funding on applications from state applicants. For single area states, a local commuting area or labor market area should be used. Priority will be given to applications where an increase of 1% in the unemployment rate has occurred in the affected local workforce area (or local commuter area or labor market area in single area states) over the previous six months. Each company and location must be identified as with other multiple company applications.
- (5) **Trade dual-enrollment projects with identified single or multi-company layoffs of more than 50 workers each, and where DOL has determined that workers were trade-impacted.** The following policies and expectations apply to dual-enrollment applications:
  - (a) The application and review process for dual-enrollment projects will include consideration of annual planning estimates for expenditures in the year of allotment as issued by the Department for the trade program. This will strengthen the State's ability to project needs and manage Dislocated

Worker funds, and improve ETA's ability to evaluate the need for additional training funds for trade-certified dislocated workers.

- (b) The primary purpose of dual-enrollment projects is to provide trade-eligible dislocated workers with "wrap-around" services that are not available through the trade program, and state formula Dislocated Workers program funds are not sufficient to provide such services, including conducting a comprehensive assessment, developing individual re-employment plans, providing on-going case management, and providing supportive services (WIA core, intensive and supportive services.) DOL will take into account the State's success in meeting a 70 percent formula Dislocated Worker program expenditure rate when deciding whether to approve an NEG application.
- (c) NEG funds may also be requested to provide training when the state demonstrates that it has spent or will spend by the end of the trade program's fiscal year its annual allotment, reserved trade funds are not available, and the requesting state is meeting the 70 percent expenditure requirement for Dislocated Worker program formula funds. Consideration of planning estimates and expenditure rates, and state effectiveness at operating the trade program will enable DOL to address resource requests in a timely and rational manner.
- (d) Generally, NEG funds awarded for training will be used to fill a temporary gap in trade training funds to ensure that workers who have been appropriately assessed and need training to return to work will have access to such training as soon as possible after dislocation. Systems must be in place to seamlessly accommodate a change in the funding of training, as appropriate.
- (e) Before a state applies for NEG funds for training trade-eligible workers, it must have evaluated its trade and WIA Dislocated Worker funds availability in the context of the above expenditure requirements. Any training proposed to be provided with NEG funds to trade-eligible workers must qualify under both the Trade and the WIA programs.
- (f) All dislocated workers, including those for whom trade petitions have been filed, are required to have access to rapid response, core and intensive services (paid with WIA or other resources available). This assistance should be available prior to a determination of trade certification to limit the period of unemployment.

Once a worker has been determined eligible for trade assistance, those services authorized under the Trade Program (approved training, job search authorized under the Trade Program transportation) should be funded with Trade Program funds to the extent those funds are available. Participants must

sign-off on their individual reemployment plans (including training as appropriate). Trade Readjustment Allowances (income support) are also paid under the Trade Program. It is the responsibility of state and local program managers to manage WIA and Trade Program funds in an integrated manner to best meet the needs of the workers and in accordance with all applicable trade and WIA statutes, regulations and federal policies. Discretionary funds, including both the Trade Program reserved funds and NEG resources, may be requested as needed, using application procedures.

- (g) In instances where a Trade Act petition has been filed, but no determination has been made, such companies may be included in an NEG application indicating that a petition is pending. In addition, if dislocations impacting trade-certified workers also qualify for industry-wide or community impact projects, those application criteria will also apply, e.g., for a dual-enrollment application that also qualifies as industry-wide (where all layoffs are trade-impacted), an application would be required to have at least one company with 50 or more workers, but other companies could have less than 50 (under the exception criteria)

**(6) Secondary Workers.** When a regular NEG application is submitted for a primary company layoff of 50 or more workers (or multi-companies with 50 or more layoffs each) and the state makes a determination that there is a secondary worker layoff (including those with 50 or fewer workers being laid-off) where the primary layoff contributed importantly to the secondary layoff, the application may include the secondarily-impacted firm(s). The definition of secondary workers is contained in the NEG application guidelines.

**a. NAFTA Secondary Workers.** Although the Trade Act amended the trade program for secondarily-impacted workers so they can access the same services as primary workers, the Department's policy of covering NAFTA secondary workers through NEGs, including needs-related payments, remains in effect for whom a petition has not been filed under the new law.

**b. Rapid Response and Other Early Intervention Assistance.** The value of early intervention assistance, including rapid response, in achieving positive employment and earnings outcomes for dislocated workers has been consistently demonstrated. The State is committed to the principles of rapid response and other early intervention strategies for assisting dislocated workers as soon as they learn they are going to be laid off. For all regular (single-company, multi-company, industry-wide and community impact) and dual-enrollment projects, NEG applications should reflect the results of the early intervention processes activated through the state rapid response system.

If a trade-petition is being filed, the full array of early intervention services should not be delayed until a petition determination has been made. When provided early intervention assistance, workers will be ready to participate in eligible trade program services if an affirmative finding is rendered by DOL or continue needed assistance under WIA (formula or NEG) if there is a negative petition finding.

**c. Linkage to Economic Development.** The "Power of e-3 " is the ETA reference to the linkage of education, employment and economic development. Linkage with economic development initiatives is a key component for communities developing strategies to help workers especially those workers affected by mass layoffs and plant closures. The development of any plan and request for NEG funding should be done in conjunction with economic development planning to support current and future economic growth in a community. Much of this planning can and should be done with rapid response and other resources, including any resources provided to states through the Economic Development Administration (EDA) at the U.S. Department of Commerce.

**d. Quality Customer Service.** The State expects that NEG project designs will provide time-efficient strategies that return workers to appropriate employment as quickly as possible to reduce the adverse impact of the dislocation event on the workers and the local economy. Applications will be evaluated for reasonableness of costs and planned outcomes and timeliness of planned assistance. When NEG funds are requested, it is expected that systems are in place or will be in place quickly to accommodate the needs of the workers, including having temporary personnel available to provide assistance when needed by the workers. Delaying the enrollments of eligible workers over a protracted duration of time due to staffing or other limitations is not an acceptable program design.

NEG projects should take advantage of the pre-layoff eligibility of dislocated workers under WIA (i.e., as soon as an individual layoff notice is received or 180 days prior to a planned closure) and be designed to support employment and wage replacement goals focused on returning individuals to the workforce as soon as possible after layoff. Often, these workers possess high skills and are long-tenured and highly effective workers. Enhanced service strategies should be built into the project design for participants requiring more and longer assistance (such as for limited English-speaking populations or in severely impacted communities). At a minimum, project designs should be demand-driven so that workers are being trained for jobs with career and growth potential.

**e. Integrated Service-Delivery.** NEG projects should be designed to make maximum use of assistance and resources available through One-Stop partners (including "required" and "additional partners"), employers and other state and local organizations. (Under the Trade Act, the trade program is a "required" partner.) "Silo-based" service policies and procedures are not acceptable. Integrated policies, procedures and approaches will be reviewed and considered as part of the NEG application process.

**f. Reprogramming of NEG Funds.** Federal appropriations law generally prohibits the redirection or reprogramming of funds to serve target populations not originally identified as part of an original grant award (change in scope) or the re-award of returned funds to another grantee, if such actions are executed after the year of appropriation, or after the Department's authority to obligate funds has expired. For instance, Program Year 2003 appropriated funds (which include FY 2004 funds) may be reprogrammed until June 30, 2004, but not thereafter. To ensure that the State has sufficient time to evaluate and act on such requests, grantees must manage the expenditure of NEG funds and take appropriate action to ensure effective use of the funds. Requests to reprogram excess NEG funds must be received by the State no later than May 1 of the program year in which the NEG award was made. Therefore, generally, NEGs awarded in the last two months of a program year will not qualify for any reprogramming actions.

**g. Incremental Funding.** To minimize any end of project under-expenditure, applicants should expect that most NEG awards will be funded incrementally. In most cases, the initial increment will be for six months to enable a project to achieve full enrollment. The release of subsequent funding increments will be based on a demonstrated need for funds as evidenced by enrolled / registered participants and accrued expenditures. "Accrued expenditures" equal actual cash payments, plus the cost of services or goods that have been received or are being provided (e.g., the cost of a semester of tuition that has not been paid but participants are in training).

**h. Cost Per Participant.** Part of the evaluation of "reasonableness of costs" will be a comparison of the average cost per participant in a state's formula Dislocated Worker program with the proposed cost in a NEG application, excluding disaster projects and the NEG "bridge" program. In making such an evaluation, the State recognizes that a two-year project with a limited number of participants may incur a greater cost per participant than the average annual cost for formula participants whose costs may be captured in more than one program year.

**i. Formula Dislocated Worker Program Expenditures.** The expected June 30 annual review for Dislocated Worker formula program funds when applying for NEG resources is 70 percent of 70 percent of "total available" (prior year carryover plus annual allotment). A review of each state's success in meeting this rate will be conducted at the end of each program year and will be part of the review of a state's need for NEG funds as applications are received. Quarterly financial reports of formula Dislocated Worker program fund expenditures, as well as recent NEG project experience, will also be factors in determining fundability.

**j. Assistance To Military Personnel.** Assisting military personnel with the transition to the private workforce is a priority of both the Departments of Defense and Labor. However, except for BRAC-directed closures or realignments of military installations, which involve significant dislocations, military personnel who are exiting military service are generally expected to seek and receive transition

assistance through such programs using formula funds. This includes those who are completing their commitments as well as those who are being involuntarily, but honorably discharged. Generally, it is expected that the number of personnel is such that local formula funds are available to provide the transition assistance in coordination with veterans' programs available in military services and the Department of Labor's Veterans Employment and Training Service. Individuals being dislocated as a result of an announced military installation closure or realignment may be served with NEG funds pursuant to WIA Section 173(c)(2)(A).

**k. Assistance to Military Spouses.** NEG funds may be requested to serve military spouses who qualify as dislocated workers, including those who were required to leave jobs to accompany military spouse members for the convenience of the Government. The number of individuals affected within a six-month period must be provided by the appropriate military branch, and any request for NEG funds must include documentation that demonstrates that formula funds are not adequate to provide the needed level of assistance. Other spouses who do not qualify as dislocated workers under WIA should be served with WIA adult program funds.

**l. Health Insurance Premiums.** The Trade Act of 2002 amended WIA by adding Section 173(g), and appropriated funds to permit the use of NEGs to provide appropriate qualified health coverage assistance for eligible TAA (TRA) recipients, certain TAA individuals who have not exhausted UI benefits, ATAA wage subsidy participants, and certain PBGC recipients. Guidance was issued by the Department in TEGL 20-2 on March 3, 2003. However, based upon recent experience, further guidance is being developed and will be issued.

Department of Labor / State policy is that the limited resources available for regular NEG will not be awarded to pay for health insurance premiums for dislocated workers who do not qualify under the trade program. NEG supportive service funds may be used to pay for emergency medical treatment and needs-related payments where authorized by local workforce investment boards for the Dislocated Worker formula program. This income support can be used by participants to pay for insurance premiums and other personal expenses.

**(7) Disaster applications.** These applications require verification that the Federal Emergency Management Agency (FEMA) has declared a disaster area eligible for public assistance. The primary purpose of a disaster project is to create temporary employment to assist with clean-up activities. The initial award will restrict the clean-up period to six months from the date of grant award until there is a subsequent modification (e.g., fully documented plan or other request) that justifies a longer clean-up period. A state may include in its fully documented plan, or modification request, a component for employment-related services. This component of a disaster project is for workers involved in the clean-up work who will not return to their prior employment. The application must demonstrate that the participants need employment-related assistance to return to work and that non-NEG resources are not available to provide such services. The employment-related component must provide information on the number of

participants that require assistance, the type of assistance and the duration and planned performance goals. The application must also include the outcomes of those who will not require employment-related assistance through the NEG project.

### **Coordination**

The State will coordinate activities funded under this grant with those funded by and/or performed under the auspices of Federal Emergency Management Agency(FEMA) in order to ensure non-duplication and maintenance of effort. If additional areas are declared eligible for assistance by FEMA, the State may immediately begin to provide services under this grant in those counties. The State will notify the Department of Labor by telefax of the inclusion of any additional areas within three days of the incurrence of costs of services in those areas.

### **Other Federal Assistance Programs**

The Small Business Administration, Department of Agriculture, the Department of Health and Human Services and other Federal Agencies provide a variety of needed services in the Disaster Area. The project staff should be aware of available services that may be needed by participants and be able to make the appropriate referral.

### **Other Emergency Services**

With the destruction of many cars, temporary transportation systems are sometimes established to transport workers to disaster work sites and other community services. Project staff should be able to provide information about such systems to participants, as appropriate.

### **Eligible Participant**

The primary purpose of a Disaster Grant is to create temporary jobs to assist in the cleanup and restoration efforts as a result of a disaster. Priority to participate in the grant shall first be given to those workers who have experienced temporary or permanent job loss or the inability to work as a result of the disruption to business activities caused by the disaster event. Participants in these projects should be co-enrolled in other programs in case additional services are needed. Other eligible dislocated workers and long-term unemployed (15 of the last 26 weeks) may also be served with these funds provided they meet the eligibility requirements as set forth at sections 101(9) and 173 (d)(2) and (3) of the Workforce Investment Act (WIA), and as further defined by the State's policies regarding participant eligibility for WIA Title I assistance and the long-term unemployed.

**Self-Certification** – Because of the circumstances surrounding a disaster, documentation of eligibility may be difficult to obtain. The State is prepared to accept an individual's signed certification that they meet the eligibility criteria **(to be used as a last resort to verify eligibility)**. However, as soon as practical, the State will need regular eligibility verification, and shall take prompt action where an ineligible participant is identified.

## **Monitoring**

A ninety (90) day review will be conducted by the State to ensure that the work sites and related activities are consistent with the Federal and State regulations and provisions. A Quarterly Progress Review will be conducted based on a desk review or on site review if necessary.

## **Performance Outcomes**

The grantee is expected to determine what other re-employment assistance is required and incorporate such services in a modification request for the grant. Disaster projects will be required to achieve performance outcomes regarding entered employment rates and wage replacement rates consistent with the Government Performance Review Act process and negotiated State performance goals.

## **Eligible Worksites**

The State expects the grantees to prioritize the work sites for temporary jobs so that the highest priority is for public facilities, which have been most severely damaged. The second priority is for private non-profit facilities that have the highest impact on providing needed temporary services and/or restoring public services, etc. In general, worksites will be limited to public and private non-profit facilities and property.

However, as determined by the extenuating circumstances of the disaster for which Title I funds are being provided, DOL and the State are prepared to authorize, on a case-by-case basis, repair and restoration activities on private property under certain limited conditions. For a private property worksite to be considered; all of the following conditions must be met:

- work may be performed on private land or homes if non-WIA employees of the employing unit or if State or Local government workers are authorized to do the same work and are in-fact engaged in performing the work using non-WIA funds;
- work on private land or buildings can be performed to remove health and safety hazards to the larger community;
- the only work that can be done is work to return a home to a safe and habitable level – not to do home improvements;
- work may only be performed on the homes of economically disadvantaged individuals who are eligible for the federally funded weatherization program;
- priority should be given for service to the elderly and individuals with disabilities;

- WIA funds will not be used for the cost of materials to do repairs; and
- work must be disaster-related and not related to general home improvements.
- The grantee must have in place procedures to ensure compliance with non-duplication and maintenance of effort as required by the WIA statute. The State must have in place a plan to recover WIA funds which have been expended for activities or services for which other funds are available. This includes, but is not limited to: HUD, FEMA, public or private insurance, donated time and construction workers employed by private for profit firms where resources are available to provide for such employment.

Compliance with the labor Standards provisions are required in the WIA regulations at CFR 667.272 (federal Register, August 11, 2000).

### **Local Documented Review**

The grantee will conduct a quarterly review of planned quarterly and budget expenditures for performance progress.

### **Participant Files**

The individual employment plan is an ongoing strategy jointly developed by the participant and the case manager that identifies the participant's employment goals, the appropriate achievement objectives, and the appropriate combination of services for the participant to achieve the employment goals. The same documentation as required for other dislocated workers, must be included in each National Emergency Grant participant file (20CFR 663.245 of the WIA regulations and State policy OETI #20-2001 Change 1).

### **Reporting Requirements**

#### National Emergency Grant Participants and Oklahoma Service Link

If your area has an NEG grant to serve dislocated workers, all data regarding service to these participants must be entered into Oklahoma Service Link. Federal reporting information has been built into OSL. The State will use this system to determine compliance with federal guidelines. It is imperative that all clients receiving services under an NEG grant be enrolled in Oklahoma Service Link System. All services rendered to these participants should be in the service, training, and outcome activities. These enrollments will also go into the supervisor's pending file for review, approved or denied.

The grant number must be listed in the following format NEG 01, NEG 02, NEG 03 etc...

Please make sure that you enter the correct grant numbers (Given by the State).

The NEG reporting system is operational, and there is no way for NEG information to be tracked unless it is in the system. The Department of Labor also requires that NEG information be reported on the WIASRD records. Remember, if it is not in the system, it never happened!

The grantee must provide a Monthly Report to the State one-month after receiving the contract, and continuing each month thereafter. The NEG Monthly Progress Report shall include the following:

### **Disaster Projects**

- Total participants enrolled to date
- Total participants in temporary jobs/entered employment
- Significant changes in impact, as determined by the State, not previously reported
- Types of services being provided by participants in temporary jobs
- Types of activities being performed
- Any significant event that occurred during the reporting period
- Total expenditures to date and the number of monitoring visits

### **Other National Emergency Projects**

- Total number of participants enrolled
- Core Services
- Intensive Services
- Training
- Total number of participants who have exited
- Total Entered Employment
- Total Administrative Expenditures
- Total Program Expenditures
- Wage Replacement Rate





