Application

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**Minneapolis**
City of Lakes

City of Minneapolis
Community Planning and Economic Development
Employment & Training

# Career Pathways in the Green Energy Economy:
# Manufacturing, Construction, and Utilities

RELEASED: August 5, 2024

DUE: September 6, 2024

Dear Minneapolis Employment & Training Eligible Providers:

The City of Minneapolis Employment and Training's (MET) mission is to grow a competitive workforce. We provide programming to increase adults' access to career services. We offer skills training that leads to stable employment and career counseling for job seekers to gain rapid reentry to the workforce. MET uses a decentralized approach where services are delivered by community-based organizations at the neighborhood level. This neighborhood-based approach allows us to provide culturally competent counseling that is flexible and adaptable to changing economic, cultural, and social dynamics of our community. Community-based organizations are competitively selected to deliver services that correspond to programmatic goals and funding sources.

This Career Pathways in the Green Energy Economy funding is part of MET's increased emphasis on expanding workforce development in the "Green" industry sector. It is also linked to the City of Minneapolis' Climate Legacy Initiative (CLI). The CLI is a plan to fund the City of Minneapolis' aggressive climate goals over the next 10 years, as set forth in the Climate Equity Plan, in hopes of becoming one of the most sustainable cities in the nation.

It is with these values and this service model that we are requesting applications for the Minneapolis Career Pathways in the Green Energy Economy: Manufacturing, Construction, and Utilities to provide training and employment opportunities to Minneapolis job seekers in the "green" industry sector. It is the intent of this document to outline the specific services needing to be provided to job seekers in Minneapolis and the requirement of the funding source.

Please review the application for details. We look forward to your application.

Deb Bahr-Helgen, Director
City of Minneapolis Employment and Training

## OPENING STATEMENT

In this Request for Qualifications (RFQ), the City of Minneapolis intends to award up to a total of $250,000 to support two equally important initiatives at the City of Minneapolis. One is to complement our division's workforce development initiatives that work to reduce disparities in income and employment by preparing job seekers for high-demand positions and career advancement. The second is to support the City of Minneapolis Climate Equity Plan (CEP) and Climate Legacy Initiative (CLI) launched in January 2024. The mission is to collaborate with residents, organizations, and businesses to advance environmentally justice policies that achieve deep carbon emission reductions, repair past environmental injustices perpetrated upon indigenous, Black, and communities of color, and create solutions for a sustainable inclusive economy.

Examples of jobs in the Green Energy Economy are positions at businesses engaged in at least one of these criteria:

- Improving energy use and/or efficiency
- Reducing and/or limiting greenhouse gases
- Minimizing waste and pollution
- Protecting and/or restoring ecosystems
- Supporting adaptation to the effects of climate change

Projects will be evaluated based on the following measures:

- Linked and supporting the City's Climate Equity Plan and Climate Legacy Initiative
  - When alignment allows, connect to and provide program on-ramps from the City of Minneapolis Green Career Exposure Program (GCEP). https://www.minneapolismn.gov/government/programs-initiatives/environmental-programs/green-careers/
- Engages business in the identification, development, and support of green career pathways in manufacturing, construction, and utilities
- Achieves measurable outcomes by organizing education, career counseling, supportive services around the needs of target populations
- Clear and coordinated pathways that provide participants with visual roadmaps or templates depicting career laddering on-ramps, transitions, and off-ramps
- Contextualized and modular curriculum that provides multiple entry points to family-sustaining careers in regional green industry sectors
- Accelerated training that integrates basic skills and work-readiness training with occupational skills
- Industry endorsed training that leads to academic credits, credentials, or job placement.

## ELIGIBLE APPLICANTS

The funding is open to organizations that applied and were competitively selected by the City Council as [Eligible Providers](#) of Workforce Development Services for 2021-2025.

Before the proposed work can begin or funding will be awarded, all Eligible Providers competitively selected for this funding opportunity must have in place an executed Master Contract for Workforce Development Services with the city. If your organization has an executed master contract on file, then you will need to complete a project-specific Funding Availability Notice (FAN) agreement prior to moving forward with the proposed project.

Furthermore, all training providers included in an application must be on the State of Minnesota's [Eligible Training Provider List](#) (ETPL) at the time of project start.

There are two main criteria for a training provider to be considered eligible for Minnesota's ETPL:

- Have a public location in Minnesota, and
- Be licensed, registered, or exempt with the state agency that regulates the industry's training. Most often this is the Office of Higher Education. However, there are forty-seven unique state agencies that approve trainings for various industries.

There are a few reasons why these two eligibility criteria exist prior to review of specific courses and programs on the ETPL. They include basic consumer protections, federal guidance, and criteria set by the governor to help focus the ETPL on trainings that will lead to a sustainable career.

Additionally, all funded organizations must maintain the city's required insurance policies, as outlined in the Master Contract. These insurance levels may be subject to change by the city. The current required liability coverages include:

*All awarded Providers and their subcontractors (if any) shall secure and maintain the following insurance:*

a) ***Workers Compensation*** *insurance that meets the statutory obligations with Coverage B-Employers Liability limits of at least $100,000 each accident, $500,000 disease - policy limit and $100,000 disease each employee.*

b) ***Commercial General Liability*** *insurance with limits of at least $2,000,000 general aggregate, $2,000,000 products - completed operations $2,000,000 personal and advertising injury, $300,000 each occurrence fire damage and $5,000 medical expense any one person.  The policy shall be on an "occurrence" basis, shall include contractual liability coverage and the City shall be named an additional insured.  The amount of coverage will be automatically increased if the project amount is expected to exceed $2,000,000 or involves potentially high-risk activity.*

c) ***Commercial Automobile Liability*** *insurance covering all owned, non-owned and hired automobiles with limits of at least $1,000,000 per accident.*

d) ***Professional Liability*** *Insurance or Errors & Omissions Insurance providing coverage for 1) the claims that arise from the errors or omissions of the Consultant or its subcontractors and 2) the negligence or failure to render a professional service by the Consultant or its subcontractors.  The*

*insurance policy should provide coverage in the amount of $2,000,000 each claim and $2,000,000 annual aggregate. The insurance policy must provide the protection stated for two years after the expiration of the contract.*

e) ***Network Security and Privacy Liability*** *for the duration of this agreement providing coverage for, but not limited to, Technology and Internet Errors & Omissions, Security and Privacy Liability, and Media Liability.  Insurance will provide coverage against claims that arise from the disclosure of private information from files including but not limited to:  1) Intentional, fraudulent or criminal acts of the Consultant, its agents or employees.   2) Breach of the City's private data, whether electronic or otherwise.  The insurance policy should provide minimum coverage in the amount of $1,000,000 per occurrence and $2,000,000 annual aggregate.  If written on a Claims-Made basis, the policy must provide an extended reporting period and have a retroactive date that on or before the date of this Contract or the date Consultant commences work, whichever is earlier.*

## PARTNER INVOLVEMENT

While eligibility for this funding opportunity will be based on the lead applicant's status as an Eligible Provider, established partnership(s) with employer(s) and other stakeholders that bring additional expertise or resources to the project are encouraged. These partnerships must be comprised of at least two (2) employer partners and one workforce development organization.

A minimum two employer partners must provide a letter of support and state how the career pathway program provides credentials that will improve the likelihood of considering applicants for available unsubsidized full-time positions within the company. The two employers, and any additional employer partners, may also commit to participate in classroom training (i.e., mock interviews, facility tours, classroom speakers, etc.), inform and help deliver curriculum, and/or offer paid internships, paid work experience, On-The-Job training, and/or work-based learning opportunity(s) that will prioritize graduates for unsubsidized full-time open positions at the business.

All partners must be listed in the application Partnership Chart (see Section 2 of application form).

## FUNDING AND OUTCOMES

Funding award terms can last up to two years and are expected to range from $50,000 - $250,000. The primary outcome for this funding is placement into full-time employment as defined as a minimum of 32 hours per week.

## CO-ENROLLMENT

Eligible Minneapolis residents may be co-enrolled with other non-MET or MET funding streams as long as the participant is provided with distinct and specific services that are not duplicated. Additionally,

applicants should refer to their other programs requirements to clarify whether co-enrollment might be allowed.

## PARTICIPANT ELIGIBLITY

Participant eligibility requirements:

- <u>Minneapolis resident at time of enrollment – with special attention paid to the City of Minneapolis defined Green Zones:</u>
https://www.minneapolismn.gov/government/departments/health/sustainability-homes-environment/sustainability/green-zones/map/

    AND

- <u>Unemployed</u>

    OR

- <u>Employed/Underemployed</u>

    o Individuals who are employed/underemployed are employed full-time or part-time and meet the definition of a *low-income individual* (Household income at or below 200% of the federal Health and Human Services poverty guidelines adjusted to household/family size. - https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines) and are seeking training services as part of a career pathway.

## SCHEDULE

The following is a listing of key proposal and project milestones, along with their *estimated* timeline.

| Milestone | |
|---|---|
| RFQ Release | August 5, 2024 |
| Pre-Application Q&A session (Teams link will be provided) | August 26, 2024 (1:00PM – 2:00PM) |
| Questions for Q&A submission deadline | August 28, 2024 |
| Proposals Due | September 6, 2024 (By 12:00 PM, Noon, CDT) |
| Recommendation Notification | October 11, 2024 |
| Fund Availability Notice (FAN) and Project Begins as Early as | November 4, 2024 |

## APPLICATION PROCESS

Applications may be emailed to [MET@minneapolismn.gov](mailto:MET@minneapolismn.gov).

Please submit application **as a Word document (.doc) and a signed PDF.** Applications must be received no later than **12:00 P.M. (NOON, Minneapolis Time) on the application due date above.**

**NOTE: Applications received after the deadline will not be considered.**

## REQUESTS FOR CLARIFICATION

MET welcomes written questions about the proposal or application process. For more information, you may submit questions in writing only to [MET@minneapolismn.gov](mailto:MET@minneapolismn.gov) up until the Q&A submission deadline on August 28.

Answers to all written questions will be posted to the City of Minneapolis website, under the listing for Employment and Training funding opportunities:  [https://www2.minneapolismn.gov/business-services/doing-business-with-the-city/community-planning-development-rfps/](https://www2.minneapolismn.gov/business-services/doing-business-with-the-city/community-planning-development-rfps/)

## GENERAL CONDITIONS

The City of Minneapolis Employment and Training will be the administrator of any and all contracts let under this application.

Employment service providers selected through this Request for Qualifications will be monitored by Minneapolis Employment and Training staff for compliance with all Minneapolis Employment and Training policies, including source funding financial parameters. This RFQ does not commit Minneapolis Employment and Training to award a contract, to pay any costs incurred in the preparation of this request, or to procure or contract for services. The City of Minneapolis reserves the right to accept or reject any or all RFQs received as a result of this request, to negotiate with all qualified sources, or to cancel in part or in its entirety, this RFQ, if it is in the best interest of the City of Minneapolis to do so. The City of Minneapolis Employment and Training may require the selected providers to participate in negotiation and to submit any fiscal, technical, or other revisions of their proposal that may result from negotiations with Minneapolis Employment and Training.

Responding to this application does not guarantee that your organization will be selected to provide services.

Selected Eligible Providers that may be new to Minneapolis Employment & Training-funded projects and programs must complete a master contract agreement before services can begin and before Minneapolis Employment & Training will disburse any funds. All Providers must have current insurance coverage at the levels required by the City of Minneapolis. Please see the Eligibility section above for more information.

## Minneapolis Career Pathways in the Green Energy Economy:
### Manufacturing, Construction, and Utilities Application

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*Please complete this cover page and attach it to your application.*

**RFQ REQUIREMENTS: Must be able to reply "yes" to all red boxes.**

| Applicant Agency:<br>☐ **Yes, this agency is on the Eligible Provider list for 2021-2025 – REQUIRED.**<br>Please use the legal name and full address. This is the fiscal agent with whom the project agreement will be executed. | Contact Name and Address:<br>(If different from the APPLICANT AGENCY) |
|---|---|
| Agency Name:<br><br>Director Name:<br><br>Telephone:<br><br>Email: | Contact Name:<br><br>Title:<br><br>Telephone:<br><br>Email: |
| Address: | Address: |
| Federal Tax ID:<br>(required) | Minnesota Tax ID:<br>(required) |

Unique Entity ID (UEI**\***) Number: (required)_____

*\*For more information on how to obtain an UEI number, please watch the video, "How to get a Unique Entity ID" that can be found on this page* *https://sam.gov/content/home*

| Total funding requested | |
|---|---|
| Number of participants placed in jobs | |
| Cost per participant placed in job | |

*I certify that the information contained herein is true and accurate to the best of my knowledge and that I am authorized to submit this application on behalf of the applicant.*

| Authorized Signature | Title | Date |
|---|---|---|
| | | |

**Career Pathways in the Green Energy Economy:**
**Manufacturing, Construction, and Utilities**

## Section 1 – Project Narrative

1. Provide a 100 – 150 word narrative summary of your proposal that includes the training and outcomes. This will be your 'elevator pitch' that will help readers quickly understand what you plan to accomplish. **(10 points)**

2. Describe how your organization and training and employer partners' project aligns with the City of Minneapolis Climate Equity Plan (CEP) and Climate Legacy Initiative (CLI). The project benefitting more than one CEP and/or CLI goals is encouraged but not required. (15 points)

3. What are some processes you will provide to overcome the challenges of recruiting new participants in the current labor market with very low unemployment? **(10 points)**

   - **Connection Opportunity:** The city's new Green Careers Exploration Program (GCEP) helps students (K-12) and young people of color prepare for green energy and environmental careers with opportunities including training and education and paid training and internships. Targeting and recruiting young adults who participated in Green Careers Exploration programs is highly recommended but not required.

4. Include a visual roadmap depicting green career laddering on-ramps, transitions, and off-ramps for participants, which helps illustrate paths to participants' success. See Appendix A and B for examples of visual roadmaps or flow charts. **(10 points)**

   - **Connection Opportunity:** Incorporating the city's Green Careers Exploration Program into a career laddering roadmap is strongly encouraged but not required.

5. Describe how your organization addresses equity and fair and just inclusion into society so all Minneapolis residents can participate, prosper, and reach their full potential. **(5 points)**

6. Provide a summary of the partnerships and collaborations the proposed program will facilitate. All partners must be listed in the Partnership Chart, provide letters of support, and indicate the specific service and commitment to the program for each partner. Your summary should align with the Proposal's attached Work Plan. **(15 points)**

   Include a minimum of two (2) employer partners and their commitment to the project according to the required component.

   - A commitment that applicants who complete the program will improve the likelihood of them being considered for unsubsidized open full-time employment positions within the company.
   - May also commit to participate in classroom training (mock interviews, facility tours, classroom speakers, etc.), inform and help deliver curriculum, and/or offer paid internships, paid work experience, On-the-Job training, and/or work-based learning opportunity(s) that will prioritize graduates for unsubsidized full-time open positions at the company.

7. Describe the specific outreach to under-represented communities and populations and/or geographic areas? What knowledge, resources, and community connections does your organization have to provide services to the populations/areas you will serve? **(10 points)**

8. How does your agency evaluate its outreach efforts and adapt strategies when needed? If you have any staff involved in recruiting and/or outreach for this project, please list them on the Staff Chart in Section 2. **(5 points)**

9. Describe the support services your organization will provide to participants throughout the program. What is your agency's process to determine what support is needed (assessments, questionnaires, interviews, ongoing case management), and what resources will you provide or help them access? **(10 points)**

10. Describe how your organization and/or training partners will prioritize participant/trainee retention to maximize training participation and successful completion of the educational component/s? **(5 points)**

11. Describe how businesses will be engaged in the identification, development, and support of green career pathways. **(10 points)**

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12. List the anticipated employment positions training graduates will be eligible for, the occupational demand and/or supporting labor market information (LMI) for the position(s) you are preparing job seekers for and complete the grid below. **(10 points)**

| Position | Employer/Occupational Demand | Skills Required | Target Wage |
|---|---|---|---|
| | | | |
| | | | |
| | | | |

13. How does your *soft skills/work readiness* and/or pre-apprenticeship training(s), when applicable, training prepare individuals for the positions above? Include a summary of the curriculum or content, hours, and training provider(s). **(5 points)**

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14. How does your *technical* training prepare individuals for the positions above? Include a summary of the curriculum or content, hours, credential earned, and identify training provider(s). **(10 points)**

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15. Describe how your organization and/or partners will provide continuous support for individuals who have completed their training programs, and ongoing data tracking and reporting requirements. Note: Data tracking and job placement assistance for participants in training-related positions can continue for at least 90 days beyond the end date of the award. Placements attained within those 90 days will be credited to the original project's results. **(10 points)**

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## Section 2 – Budget & Staff Chart

Provide a list and description of planned expenses for this project.  Note that this budget will be the basis for allowable costs and expected documentation for the funding. Expenses not included in the budget will not be reimbursed.

| Project Budget (10 points) | | |
|---|---|---|
| Budget Item | Description | Total Cost |
| Direct Services | (Staff) | $0.00 |
| Training Stipends (If applicable) | (Total stipends provided to participants.) | $0.00 |
| Support Services | (List services provided directly to participants) | $0.00 |
| Training | (List individual training programs and cost) | $0.00 |
| Administrative and Operational | (Insurance, travel, professional fees, occupancy, communications, etc.) | $0.00 |
| **Total Costs** | | **$0.00** |
| Leveraged Funding- Workforce | (List all additional funding that is directly supporting the project) | $0.00 |

| Staff Chart (5 points) | | |
|---|---|---|
| Staff | Role | % FTE |
| | | |
| | | |
| Ratio of direct service FTE to cohort size* | | |

*Staff that directly engage participants on a regular basis, typically employment coaches/navigators. Typically, will not include supervisors or other support positions.

## Section 3 – Workplan (15 points)

List key activities/outcomes for the project and who is responsible for them.  This may include recruitment, enrollment, eligibility/aptitude assessments, training, support services, placement, data tracking, retention, and employer engagement.  Provide specific numbers for quantifiable objectives such as enrollment, placement, and retention.

Project Goal – Recruitment / Outreach

| Objective | Activities | Expected Outcomes | Person(s) Responsible | Timeframe |
|-----------|-----------|-------------------|----------------------|-----------|
|           |           |                   |                      |           |

Project Goal 2 – Training

| Objective | Activities | Expected Outcomes | Person(s) Responsible | Timeframe |
|-----------|-----------|-------------------|----------------------|-----------|
|           |           |                   |                      |           |

Project Goal 3 – Placement

| Objective | Activities | Expected Outcomes | Person(s) Responsible | Timeframe |
|-----------|-----------|-------------------|----------------------|-----------|
|           |           |                   |                      |           |

### Section 4 – Past Performance (10 points)

List Minneapolis Pathways projects and/or other past Career Pathways programs funded either by the Minneapolis Pathways program or State of Minnesota Pathways to Prosperity (P2P) and managed within the last two years. Include the Workforce One performance data to date.

Date of Workforce One data pull: _____

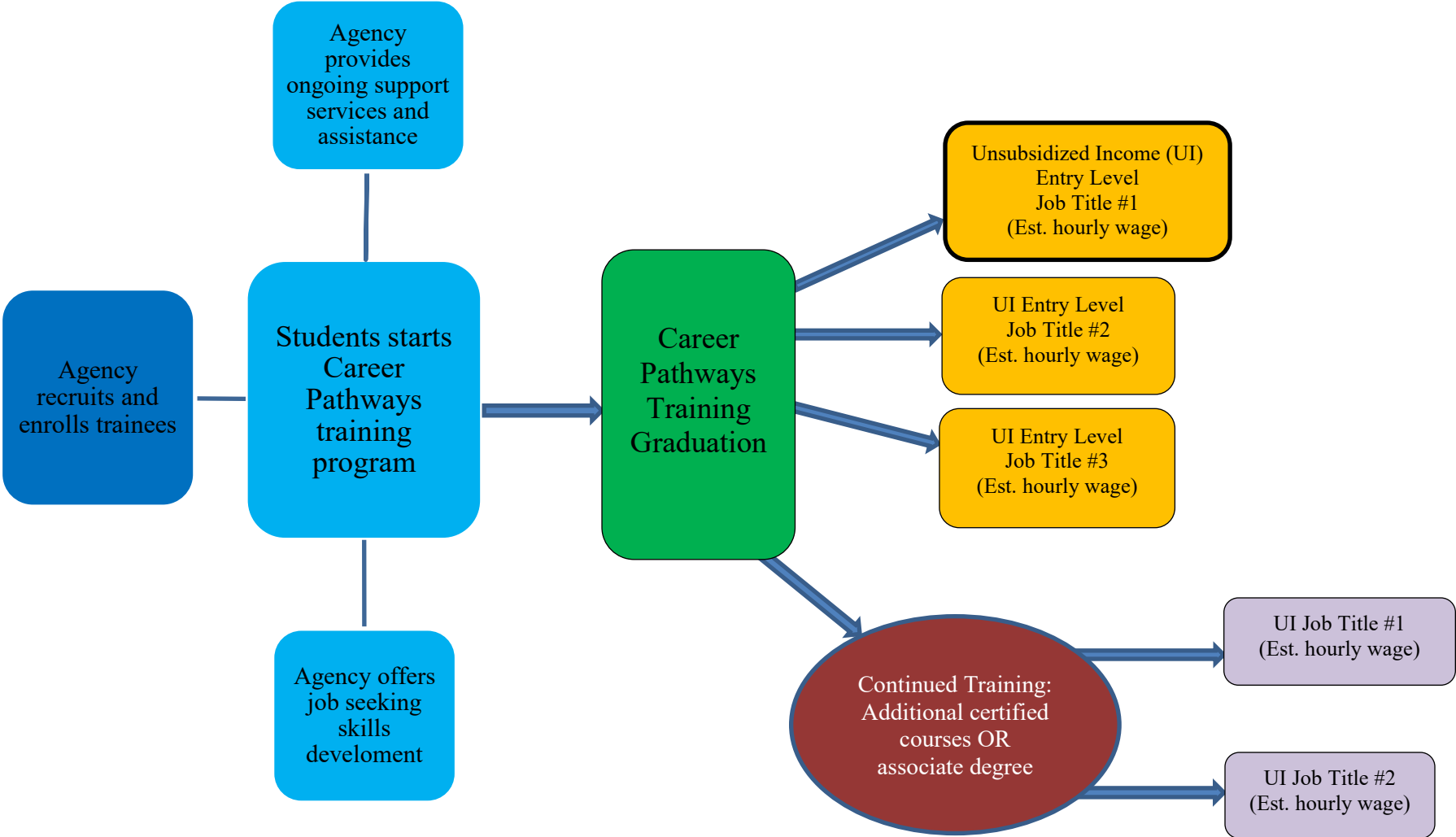| Program Name | Start Date | End Date | Enrollment Goal # | Actual Enrollment | Job Placement # | Actual Placement | Percent Exited to UE* |
|--------------|-----------|----------|-------------------|-------------------|-----------------|------------------|-----------------------|
|              |           |          |                   |                   |                 |                  |                       |
|              |           |          |                   |                   |                 |                  |                       |
|              |           |          |                   |                   |                 |                  |                       |

*Unsubsidized Employment (UE)

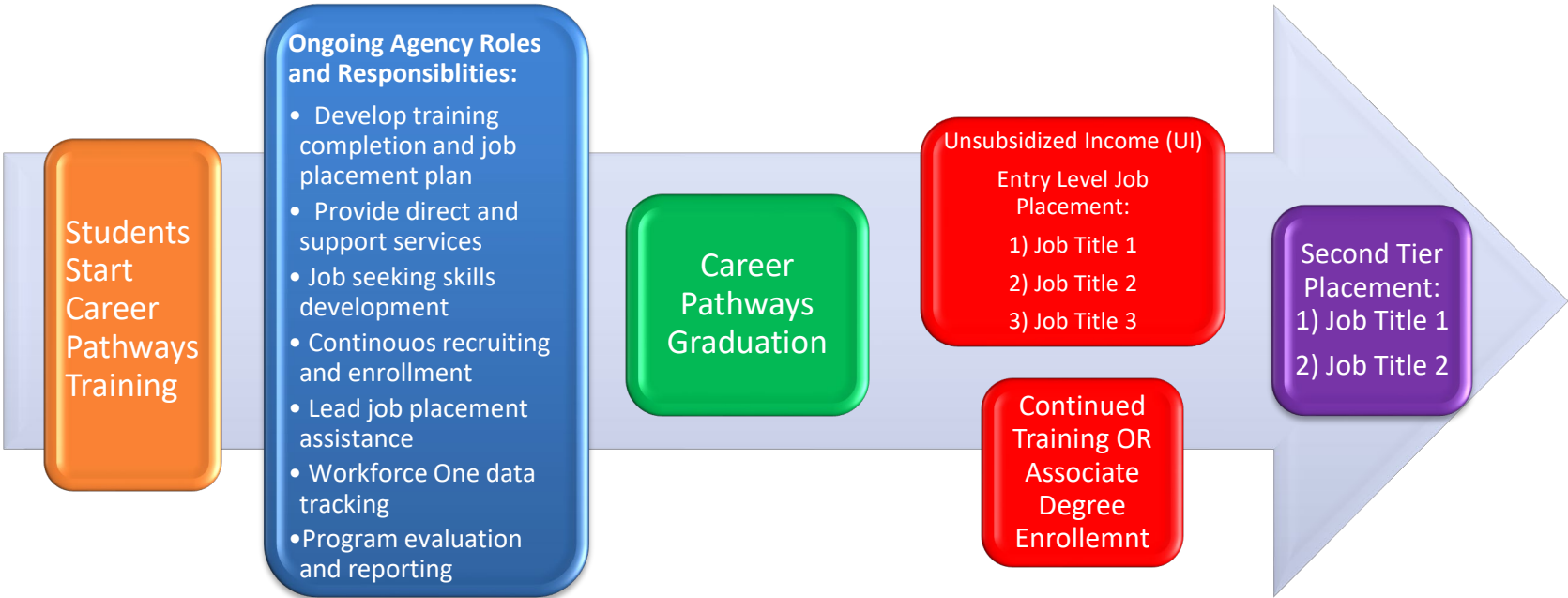### Section 5 – Partnership Chart (10 points)

List partners and employer(s) and their commitments to this project.  A minimum two employer partners must provide a letter of commitment and state how the career pathway program provides credentials that will improve the likelihood of considering applicants for available unsubsidized full-time positions within the company. Additional letters of commitment are encouraged but not required.

| Name | Key Contact | Specific commitment(s) | Employer (Y/N) | Letter of Commitment Enclosed (Y/N) |
|------|-------------|------------------------|----------------|-------------------------------------|
|      |             |                        |                |                                     |
|      |             |                        |                |                                     |
|      |             |                        |                |                                     |
|      |             |                        |                |                                     |
|      |             |                        |                |                                     |

# Appendix A
# Example Career Pathways Visual Roadmap 1

Agency provides ongoing support services and assistance

Agency recruits and enrolls trainees

Students starts Career Pathways training program

Agency offers job seeking skills develoment

Career Pathways Training Graduation

Unsubsidized Income (UI) Entry Level Job Title #1 (Est. hourly wage)

UI Entry Level Job Title #2 (Est. hourly wage)

UI Entry Level Job Title #3 (Est. hourly wage)

Continued Training: Additional certified courses OR associate degree

UI Job Title #1 (Est. hourly wage)

UI Job Title #2 (Est. hourly wage)

**Appendix B**
**Example Career Pathways Visual Roadmap 2**

Students Start Career Pathways Training

**Ongoing Agency Roles and Responsiblities:**

• Develop training completion and job placement plan

• Provide direct and support services

• Job seeking skills development

• Continouos recruiting and enrollment

• Lead job placement assistance

• Workforce One data tracking

•Program evaluation and reporting

Career Pathways Graduation

Unsubsidized Income (UI)

Entry Level Job Placement:

1) Job Title 1

2) Job Title 2

3) Job Title 3

Continued Training OR Associate Degree Enrollemnt

Second Tier Placement:
1) Job Title 1
2) Job Title 2

This summary document is intended to reinforce the information and guidance found in your agency's City of Minneapolis Master Contract. This document does not replace or revise the conditions of your current City of Minneapolis Master Contract.

1. The recipient of Minneapolis Employment & Training program funds (hereafter referred to as "agency") under this Funds Availability Notice (FAN) will ensure program funding is expended on services identified under this FAN. Your agency is considered to be a subrecipient or contractor. All revenues received under this FAN will be accounted for in the agency's finance system. All FAN expenditures will be allowable as per Cost Principles identified in the Uniform Guidance (UG)* and specific grant requirements. Expenditures will be tied to program delivery and directed toward achieving the outcomes identified under this FAN agreement. Agency is financially responsible for all costs determined to be unallowable under all federal, state and local financial guidelines specified under the terms of the Master Contract.

   As a subrecipient of or contractor for a federal or state grant passing through the City of Minneapolis, it is required that the agency has appropriate accounting system in place to track and report on each grant-funded activity separate from activities funded through other sources, maintaining financial records to support all expenditures billed to the grant. This would include personnel activity reports for all staff members whose compensation is charged in whole or in part directly to the grant and should reflect total after-the-fact actual hours worked daily, with grant hours clearly separated and reportable by grant funding source. All costs, both program and administrative, must reflect actual dollars spent. Any allocated costs must be properly supported. Budget estimates do not qualify as support for charges to awards. Calculating administrative costs based on the administrative cap percent does not qualify as support for charges to awards.

   Costs invoiced under this FAN agreement will be supported by documentation maintained by the agency. Documentation will include (but is not limited to): administrative policies and procedures, internal controls, payroll ledgers, time sheets, travel expense reports, competitive contracts and purchase orders, equipment inventory, audit reports and findings, lease agreements, and others as identified in policy documents provided by the grantor. Additionally, Minneapolis Employment & Training may request agencies produce back-up documentation for any and all invoiced costs invoiced under this FAN.

   By the end of this FAN period, the agency's total program delivery expenses will meet, or exceed, total revenue received under this FAN. The agency is required to submit a FAN Agreement Closeout Statement to Minneapolis Employment & Training, within 30 days of FAN expiration, certifying program expenditures align with revenue received. Minneapolis Employment & Training may request a financial summary of program expenses at any time during this FAN period; such requests may include a final, full accounting of program revenue and expenses. Should agency receive funds in excess of program-related costs, these funds must be returned to Minneapolis Employment & Training as per guidance issued by Minneapolis Employment & Training administrative staff. This does apply to performance-based contracts.

2. Agency will receive prior approval from Minneapolis Employment & Training under each of the following conditions, and/or in any of the following situations:
   a. Agency plans to sub-contract funds for program-related services, including program delivery, consulting, outcomes monitoring, enhanced services, or other.
   b. Agency plans to make a one-time purchase of more than $5,000.00.
   c. Any situation in which it is unclear to the agency, or to an outside auditor of the agency, whether costs are allocable, allowable, reasonable, and/or consistently treated across the agency.

3. Agency is prohibited from any of the following, unless permission has been granted in Minneapolis Employment & Training policy documents:
   a. Use of program funds to purchase food or beverages
   b. Use of program funds to provide incentives to participants in the program
   c. Use of program funds to provide incentive payments to agency staff members.

4. Any agency expending $750,000 or more of federal funds in a fiscal year shall complete financial and compliance audits in accordance with the Single Audit Act and/or OMB Uniform Guidance, as applicable. Agencies shall cooperate fully in the following:
   a. During the term of this Agreement and as necessary after the expiration of this Agreement, to ensure compliance with applicable law, the agency agrees to provide an annual audit report to the City consistent with the provisions of the Single Audit Act and/or OMB Uniform Guidance in accordance with government auditing standards, as applicable within nine (9) months after agency's fiscal year-end.
   b. The agency shall provide all information requested by the City and report as directed by the City.

5. If the agency is a non-profit organization, signature on the FAN assures and certifies it has met federal, state and local requirements regarding their agency's financial management system.

*Uniform administrative requirements, cost principles, and audit requirements for federal awards: https://tinyurl.com/2CFRPart200

**Attachment B** - Protection of Personally Identifiable Information (PII)
(*revised 12/18/19*)

As part of their grant activities, Employment and Training Administration (ETA) grantees may have in their possession large quantities of Personally Identifiable Information (PII) relating to their organization and staff; sub-grantee and partner organizations and staff; and individual program participants. This information is generally found in personnel files, participant data sets, performance reports, program evaluations, grant and contract files and other sources.

OMB defines PII as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. (***See list on back of this form***)

Federal law, OMB Guidance, and Departmental and ETA polices require that PII and other sensitive information be protected. ETA has examined the ways its grantees, as stewards of Federal funds, handle PII and sensitive information and has determined that to ensure ETA compliance with Federal law and regulations, grantees must secure transmission of PII and sensitive data developed, obtained, or otherwise associated with ETA funded grants.

Grantees further acknowledge that all PII data obtained through their ETA grant shall be:
1. stored in an area that is physically safe from access by unauthorized persons at all times,
2. the data will be processed using grantee issued equipment,
3. managed information technology (IT) services, and
4. designated locations approved by ETA.

*Accessing*, *processing*, and *storing* of ETA grant PII data **on *personally owned* equipment, at *off-site* locations** e.g., employee's home, and non-grantee managed IT services, e.g., Yahoo mail, is strictly prohibited unless approved by ETA.

Access to any PII created by the ETA grant must be restricted to only those employees of the grant recipient who need it in their official capacity to perform duties in connection with the scope of work in the grant agreement.

A grantee's failure to comply with the requirements identified in this TEGL, or any improper use or disclosure of PII for an unauthorized purpose, may result in the termination or suspension of the grant, or the imposition of special conditions or restrictions, or such other actions as the Grant Officer may deem necessary to protect the privacy of participants or the integrity of data.

The complete Guidance Letter on the Handling and Protection of Personally Identifiable Information can be found at:
https://tinyurl.com/TEGL-39-11

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- Sensitive Information – any unclassified information whose loss, misuse, or unauthorized access to or modification of could adversely affect the interest or the conduct of Federal programs, or the privacy to which individuals are entitled under the Privacy Act. Do not email unencrypted sensitive PII and do not store sensitive data on CD, DVD, thumb drives (unless encrypted using a FIPS 140-2 compliant and NIST validated cryptographic module).

- Protected PII and non-sensitive PII - the Department of Labor (the Department) has defined two types of PII, protected PII and non-sensitive PII. The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the "risk of harm" that could result from the release of the PII.

    1. Protected PII is information that if disclosed could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include, but are not limited to, **social security numbers (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital**

**status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial information and computer passwords**.

2. Non-sensitive PII, on the other hand, is information that if disclosed, by itself, could not reasonably be expected to result in personal harm. Essentially, it is stand-alone information that is not linked or closely associated with any protected or unprotected PII. Examples of non-sensitive PII include information such as **first and last names, e-mail addresses, business addresses, business telephone numbers, general education credentials, gender, or race**. However, depending on the circumstances, a combination of these items could potentially be categorized as protected or sensitive PII.

To illustrate the connection between non-sensitive PII and protected PII, the disclosure of a name, business e-mail address, or business address most likely will not result in a high degree of harm to an individual. However, a name linked to a social security number, a date of birth, and mother's maiden name could result in identity theft. This demonstrates why protecting the information of our program participants is so important.

*Protected PII is the most sensitive information that you may encounter in the course of your grant work*, and it is important that it stays protected. Grantees are required to protect PII when transmitting information, but are also required to protect PII and sensitive information when **collecting**, **storing** and/or **disposing** of information as well. Outlined below are some recommendations to help protect PII:

- Whenever possible, use unique identifiers for participant tracking instead of SSNs. While SSNs may initially be required for performance tracking purposes, a unique identifier could be linked to each individual record (Workforce One ID#).  Once the SSN is entered for performance tracking, the unique identifier would be used in place of the SSN for tracking purposes. If SSNs are to be used for tracking purposes, they must be stored or displayed in a way that is not attributable to a particular individual, such as using a truncated SSN.

- Use appropriate methods for destroying sensitive PII in paper files (i.e., shredding or using a burn bag) and securely deleting sensitive electronic PII.

- Do not leave records containing PII open and unattended.

- Store documents containing PII in locked cabinets when not in use.

- Data may be downloaded to, or maintained on, mobile or portable devices only if the data are encrypted using NIST validated software products based on FIPS 140-2 encryption. In addition, wage data may only be accessed from secure locations.