

## **Q & A's from the GVP Local Initiative updated 8/12/2021**

### **1. Can we do OJT 75% paid, 25% business?**

Yes, you can pay up to 90% of wages with the expectation that the business will keep the participant after the OJT period has expired, if they have performed successfully.

### **2. Can college students in the zip codes be served?**

Individuals who are enrolled in college full time can NOT be served under this initiative. However, if the youth is enrolled in p/t or not full-time college or courses they can be served under this initiative, but they must be within the priority zip code for that local area.

### **3. Are youth age 18 who are in high school eligible?**

No, high school participants should be served under other programs.

### **4. Does work experience count as employment?**

Work experience can be employment depending on the circumstances. If the participant is performing work and providing a service or product to the employer that would normally result in a wage, an employee, employer relationship exists, and a wage must be paid, and this would count as employment. While work experiences are temporary, the ultimate goal is placement in permanent employment.

### **5. Do youth have to be in a job for a certain amount of time?**

Permanent or year-round employment is the goal (in contrast to summer employment). The position the youth is placed in should remain available to the youth.

### **6. Can youth do work experience as they are getting their GED so they can take training?**

We need more information on this question, please email us.

### **7. Can funds be used for food, clothing, other needs under support services?**

Yes, however you must have a written policy (at least in draft form and approved by your board chair) to provide these supportive services to submit with your plan. You should also plan for this policy to be reviewed and approved at your next board meeting.

### **8. Can they purchase laptops for youth?**

Yes, provided you have a supportive services policy (can be in draft form for submission with the plan and approved before payment is made consistent with #7) in place which includes a reasonable tracking mechanism for storing and issuing the devices to participants in need and a procedure to attempt recovery of technology from dropouts.

### **9. Can we pay to bring in mental health professionals to have sessions with youth?**

Yes, this should be part of supportive services. You should include these supportive services in your plan. Note: the individual information is confidential for OSOS purposes.

**10. Would it be possible to word the OJT reimbursement request as "up to 90% OJT wage reimbursement"?**

Yes, please refer to the response to question 1.

**11. What are the data entry requirements under the Gun Violence Prevention Local Initiative. How will services be entered? Will the participants be co-enrolled in the WIOA Youth/Adult programs?**

With regard to the required data entry associated with this program, an OSOS guide with step-by-step instructions for completing data entry has been developed and can be found here: [GVP Local Initiative OSOS Guide](#). A GVP Local initiative program has been set up in the system that when selected, will not enroll the participant in WIOA. If the Local Area chooses to serve the participant with additional programs/funding such as the WIOA Youth/Adult programs, they may be co-enrolled. However, this is not a requirement nor is it automatically created by the system. A funding stream will also be added to the system that can be selected when entering services under this program. OSOS is not a financial tracking system. Therefore, a value of \$1 will be attached to the service similar to other funding streams that are entered in the system. Details for entering services and funding are clearly explained in the OSOS guide.

**12. Does placement in subsidized employment count towards the placement goal provided to the local area?**

Yes, it would count toward the placement goal, however, please keep in mind that the ultimate goal of this program is long term good paying jobs for participants.

**13. Can participants be co-enrolled in WIOA?**

Yes, local areas can co-enroll but it is not a requirement of this program. If co-enrolled, all WIOA eligibility and program requirements must be met.

**14. How do we report monthly expenditures?**

There will a program code in PeopleSoft made available for this initiative.

**15. Can we assign a unique name to the Gun Violence Prevention program?**

You can refer to the initiative as the Gun Violence Prevention Local Initiative. The initiative name may change in the coming weeks.

**16. Can any of our allotment be used for administrative costs?**

Yes. Administration is allowed but should held to 10%. This is limited to fiscal, legal and HR. Program staff are not included in admin costs.

**17. Are we able to hire program personnel using GVP funds?**

Yes

**18. Are we allowed to pay minimum wage stipends while the clients are in GED, soft skill, occupational skills training?**

Yes

**19. Are daycare/childcare expenses allowed while in training or employment?**

Yes

**20. Are we allowed to fund for advertising/outreach?**

Yes

**21. Are there any disallowed costs?**

Please share any programs/initiatives that you want to support in your plan, and these will be reviewed on a case-by-case basis by NYSDOL. We are trying to be flexible and ask that you use your best judgment in outlining costs.

**22. Are we to go by specific definitions when determining GVP eligibility?**

GVP eligibility should be determined based on the GVP eligibility guidelines provided on your GVP Local Initiative plans. See eligibility guidance below.

Eligibility for Program Participants

- The Program will serve unemployed, under-employed and out-of-school youth between age 18 and 24 in areas of cities impacted by gun violence.
- The Program will not serve youth enrolled in college; and
- At least 75% of program participants must reside within specified priority zip codes provided by NYSDOL

**23. When we use the term “unemployed” is it defined as collecting U.I. and seeking work or, in this case, just seeking work?**

Unemployed would-be seeking work.

**24. What do we consider the definition for “underemployed”? Is the definition for “out-of-school youth” the WIOA definition with all its conditions or something simpler?**

Please use this definition, Underemployed individuals, as defined by WIOA, may include (1) individuals employed less than full-time who are seeking full-time employment; (2) individuals who are employed in a position that is inadequate with respect to their skills and training; (3) individuals who are employed who meet the definition of a low-income individual in WIOA sec. 3(36); and (4) individuals who are employed, but whose current job’s earnings are not sufficient compared to their previous job’s earnings from their previous employment, per State or local policy.

**25. We would like to use OJT as a key incentive for employment but our WIOA OJT policy is very involved and burdensome (i.e., vetting of business with NYSDOL, posting of job order with us or NYSDOL, pre-award review business application, employer responsibility questionnaire and attestation, development of a detailed training plan and OJT contract with wage/hour requirements, monitoring responsibilities, etc.).**

- **May we adopt a simpler, more “streamlined” GVP OJT process than the one we use under WIOA?**  
There will be pieces of any OJT process that will need to remain intact, i.e. the due diligence process, attestations, monitoring, etc. but we will look at similar processes and look to streamline and simplify where possible.
- **Do we need a training plan and, if so, how detailed, or extensive?**  
Yes, a training plan is a critical and necessary piece of any OJT program. We will work to provide templates and/or examples to assist in the development of these plans.
- **Do we need monitoring provisions for the OJT, etc.?**  
Yes, as with any OJT program, monitoring is another important component. Monitoring should be done at the mid-point and end of the training period and may be done virtually when possible.
- **What can we do without to make this a viable tool for so many youths under GVP?**  
We will review the current OJT process and work to streamline, improve and automate where possible.

**26. One clarification on the phrase “Cost per Participant Cap”. We are assuming that that phrase refers to an average cost per participant, not a maximum, as some participants will need more resources, and some will need less. Am I understanding that correctly?**

The cap for GVP is really an average of \$5,000 per participant placed, based on final expenditures and actual number of participants placed.

**27. Does enrollment into college also count as a goal outcome for the youth? Or is it strictly permanent employment?**

No, placement into college does not count as a goal outcome. It must be employment.

**28. Will weekly reporting forms be coming soon for NYS GVP? I'm unsure as to how to report outreach and outcomes for this grant. Also, who will receive the weekly reports for the NYS GVP grant?**

NYSDOL is working on a process to report weekly outreach and recruitment. All other reporting will be captured through OSOS data entry. The GVP Local initiative OSOS Guide is located here, <https://dol.ny.gov/system/files/documents/2021/08/gun-violence-prevention-local-initiative-osos-guide.pdf>. In addition, two trainings have been scheduled to review this process. They will be held on Friday August 13<sup>th</sup> at 1:30pm and a repeat session will be held on Thursday August 19<sup>th</sup> at 11:00am.

**29. Can we sub-contract (all or some of GVP) and what are the procurement policies? (A local RFP process can take up to 8 weeks to finalize). Do we need a contract/budget with the outside agency? Will a simple MOU suffice?**

Yes, and you will need to follow your local policies for sub-contracting.

**30. Are we to track activities (i.e., Outreach/Recruitment, Register/Assess/ISS, Workforce Prep, Entered Training, Placements)? If so, will an OSOS management report be devised for this purpose? Will NYSDOL provide a spreadsheet to be used for this purpose? Are we to develop our own spreadsheet or tracking system?**

Please reference the response to number 28. Everything but outreach and recruitment numbers will be recorded in OSOS. NYSDOL will look into how existing management reports may be used to retrieve the information requested for GVP local initiative.

**31. Do we need to serve participants year-round like we do under WIOA?**

No, these participants do not need to be served year-round because the initiative is state funded.