

USDOL Responses to Technical Questions

August 12, 2011

Responses to SGA 11-02 (GAP)

1. **Question:** *Do all three Major Program Components (**Protection of Child Domestic Workers, Research, Capacity Building and Strategic Policy Development**) have to be addressed in each country? Do they all have to be implemented by the same organization?*

Answer: The SGA specifies the specific countries in which activities for each Major Program Component must be implemented. However, Section III.A. of the SGA provides that for the research and capacity building components,” if the Applicant believes it is not possible to carry out this work in any of the named countries, a detailed rationale should be provided. In the case where USDOL has not specified countries, Applicants must provide justification for their country selections.”

The Applicant may choose the organizational structure that is most appropriate to ensure that the project activities are implemented. Accordingly, under some structures, the same organization would not implement activities under all Major Program Components.

2. **Question:** *Can an organization sub for a prime in one country and cover only one or two of the Major Program Components? For example, an organization covers just Research in Laos?*

Answer: Yes, as noted above, the Applicant has the discretion in proposing an organizational structure to ensure that all of the activities outlined in the SGA can be effectively implemented. It is noted, that requirements on key personnel and for providing justifications for limiting country activities need be satisfied. See Section III.A. and B.

3. **Question:** *Do all the activities (bullet points) under each Major Program Component have to be undertaken? Can an organization sub for a prime and only cover one or two activities (bullet points) under one Major Program Component in a target country, while another sub covers the remaining activities under that Major Program Component in that same country?*

Answer: Yes, all activities under each Major Program Component must be undertaken. The Applicant may determine the appropriate organizational structure to best ensure that all activities outlined in the SGA are implemented.

4. **Question:** *In SGA 11-02, Section V. C. 4, Other Reports (Deliverables) - Could you confirm whether the “documentation of government support to work in each target country prior to beginning in-country activities” is required to be submitted along with the bid or is it a post award requirement?*

Answer: Documentation of government support to work in each country is required post-award of the cooperative agreement and prior to commencing activities in each country. However, if available, USDOL welcomes the submission of this documentation as part of an Applicant’s proposal.

5. **Question:** *Due to the number of organizations and programs that could be identified throughout the proposals, would it be acceptable to provide an additional attachment identifying abbreviations solely for the purposes of comprehension?*

Answer: The Applicant may submit an acronyms list after the table of contents of its proposal. The acronym’s list will not be counted as part of the 50 page limit.

Responses to SGA 11-03 (GEM)

6. **Question:** *In SGA 11-03, given the nature and the timing of the activities to be carried out, there appear to be intervals as specified in the Work Plan when the level of effort required by the Project Director to implement project activities might not create the need for a full time position. Therefore, would the USDOL accept to reduce the level of effort of the Project Director with the understanding that the reduced level of effort funded by the USDOL would be committed 100% of the time to this project’s activities?*

Answer: Section III.B. of the SGA provides that “[t]he Project Director must allocate 100 percent of their time to the project for the duration of implementation.” The Applicant must propose a staffing structure that ensures that all activities outlined in the SGA can be achieved.

7. **Question:** *In SGA 11-03, the SGA allows for periods of time where the Research Specialist is to be employed at 80%. Given the nature and the timing of the activities to be carried out during those times, would it be possible to reduce the level of effort even lower than 80% with the understanding that the reduced level of effort funded by the USDOL would be committed 100% of the time to this project’s activities?*

Answer: Section III.B. of the SGA provides that “[t]he Research Specialist must allocate 100 percent of their time to the project during the design, implementation, data analysis and report drafting periods for each of the impact evaluation and tracer activities. Applicants may propose a time allocation for the Research Specialist of not less than 80 percent during other times not noted above but must

provide a detailed justification for such a proposal.” The Applicant must propose a staffing structure that ensures that all activities outlined in the SGA can be achieved.

Responses to SGA 11-04

8. **Question:** *If an organization does not have any federal grants to date and does not have a budget of \$500,000 or more do they need to submit the mandatory audit?*

Answer: Section V.B.2. of the SGA provides that, “U.S.-based non-profit Grantees whose total annual expenditure of Federal awards is more than \$500,000 must have an organization-wide audit conducted in accordance with 29 CFR Parts 96 and 99...” A U.S.-based non-profit with less than \$500,000 in Federal expenditures is exempt from this requirement. Applicants that are for-profit or foreign-based organizations must submit their most current independent financial audit. More information on audits is also available in Section III.G.2.6. Annex G.

9. **Question:** *While it is clear that the prime organization can sub grant to partners, can prime sub grantee partners sub grant or subcontract to other smaller organizations?*

Answer: As noted on the SGA, a Grantee may enter into sub-contract or sub-grants. There is no prohibition regarding a subgrantee or a subcontractor having a subcontractor or subgrantee of their own. As mentioned in Section III.I.5, “subgrants and subcontracts awarded after the cooperative agreement is signed, and not proposed in the application, must be awarded through a formal competitive bidding process in accordance with 29 CFR 95.40-48. Subgrants and subcontracts are subject to audit, in accordance with the requirements of 29 CFR 95.26(d)”.

10. **Question:** *With microfinance being encouraged, can loan amounts, that are leveraged from microfinance partners and are used for project beneficiaries be used as match?*

Answer: Section III.G.1.e. of the SGA provides that Applicants may propose cost sharing, but are not required to do so. If the Applicant includes a microfinance element in its proposal, funds that will be used by the project and provided by a partner organization could be deemed a cost share. However, the Applicant should be aware that they will be responsible for ensuring the provision of the funds. Failure to do so may result in USDOL’s disallowance of costs in the amount of the committed cost share.

11. **Question:** *The SGA has conflicting information regarding the order of technical proposal Annexes. Page 36, paragraph 6 through page 37 lists the annexes one*

way, which is different than what is outlined on page 57 of the SGA. Which is the correct order?

Answer: ILAB will publish an amendment to SGA 11-04 on Grants.gov the ILAB web page, which includes the correct list of the annexes to be submitted along with the technical proposal. This correct order for the annexes is:

- i. **Annex A:** Logic Model
- ii. **Annex B:** Work Plan
- iii. **Annex C:** Past Performance Table(s)
- iv. **Annex D:** Project Management Organization Chart
- v. **Annex E:** Personnel Descriptions, Résumés, and Letters of Commitment
- vi. **Annex F:** Documentation of Country Presence and Host Government Support
- vii. **Annex G:** Audit Report(s).”

12. **Question:** On page 36 of the SGA, under Annex A: Logic Model, there are two examples given of the logic model, however the formats are different: the first examples sequence is Inputs, Outputs (Activities and Participation) and Outcome (short, medium, and long) whereas the second examples sequence is Inputs, Activities, Outputs, Outcomes, and Impact. Does USDOL have a preferred example to use?

Answer: Applicants should submit a logic model that best describes their proposed project strategies. USDOL encourages Applicants to review the tools and guidelines included in both of the examples included in Section III.G.2.c. 6.A. of the SGA (<http://www.uwex.edu/ces/pdande/evaluation/evallogicmodel.html> and <http://www.wkkf.org/knowledge-center/resources/2006/02/WK-Kellogg-Foundation-Logic-Model-Development-Guide.aspx>).

13. **Question:** A Log frame is not mentioned in the SGA as being required. Should this say Logic Model instead of Log frame or is a Log frame required?

Answer: A Logic Model is required as part of the Applicant’s Technical Proposal. USDOL will publish an amendment to SGA clarifying this requirement. It will be published on Grants.gov and the USDOL website (<http://www.dol.gov/ILAB/grants/main.htm>).

14. **Question:** On page 43 of the SGA under the Application Evaluation Criteria, it mentions that 5 extra points are possible; however the SGA does not describe how these 5 extra points can be attained. Please clarify.

Answer: ILAB will publish an amendment to the SGA clarifying that no extra points will be awarded. The amendment will be available on Grants.gov and the USDOL website (<http://www.dol.gov/ILAB/grants/main.htm>).

15. **Question:** *Current and former USDOL grantees in the Philippines have implemented in sugarcane areas. Can the proposal include beneficiaries who have benefited from a past USDOL project? If no, how would a new grantee know who benefited from past USDOL projects?*

Answer: Applicants may provide services to former or current USDOL project beneficiaries. If an applicant is proposing to provide services to former USDOL project beneficiaries, they must provide USDOL with a justification for doing so and seek agreement from USDOL on how the project will report on such beneficiaries.

16. **Question:** *Page 23 of the SGA notes that the proposal will include the “Applicant’s strategy and methodology for monitoring the project’s direct beneficiaries and provide details on the components of the proposed direct beneficiary monitoring system (DBMS). Applicants must develop indicators to allow them to regularly monitor the work status of each beneficiary child.” Could USDOL please confirm if the indicators in the DBMS that track status of work of the children will be reported/ included in the GPRA reporting framework?*

Answer: The work status of children is not an indicator that is collected the purposes of the Government Performance and Results Act. However, USDOL expects Grantees to monitor the work status of children in their DBMS, as this information is important to track reductions in child labor.

17. **Question:** *Please advise whether USDOL guidelines permit provision of cash to children 15-17 for food, stipend, or other necessities for an apprenticeship if accounted for and monitored or must these necessities be provided through a voucher form or a service provider?*

Answer: The provision of direct cash transfers is not allowed. As stated in Section III.I.2, “Grantees may not provide direct cash transfers to communities, parents, or children. Purchase of incidental items is allowable if necessary for direct beneficiaries’ participation in project activities and as a means of promoting sustainable reduction of exploitative child labor amongst the target group. These beneficiary support costs could include direct costs such as uniforms, tool kits for livelihood interventions, school supplies, books, provision of tuition, or transportation costs. *If approved by USDOL, the Grantee or its subgrantees or subcontractor(s) must purchase or directly pay for these items in the form of vouchers or payment to the service provider, as opposed to handing cash directly to project beneficiaries or other individuals.* This ensures that the money is used for its intended purpose and is not diverted or lost.”