Strengthening Working Families Initiative (SWFI)
Key Policy Clarifications
Updated: June 2018

This document provides answers to frequently asked questions regarding key policy guidance for Strengthening Working Families Initiative (SWFI) grantees. It should be viewed as a supplement to other technical assistance materials that have been and will be provided to SWFI grantees.

Populations Eligible to be Served
The intent of SWFI is to fund projects that provide education/job training services to low- and middle-skilled parents with child care responsibilities to help them pursue or advance in middle- to high-skilled, full-time employment within the grant period of performance.

Grantees may only serve parents with child care responsibilities, specifically custodial parents, legal guardians, foster parents, or other persons standing in loco parentis with job training needs and training barriers including child care and other participant supportive services. Eligible parent participants must be unemployed, underemployed, or an incumbent worker, as defined in the Funding Opportunity Announcement (FOA) and as it aligns with a grantee’s grant Statement of Work (SOW). For grantees serving frontline incumbent worker parents with child care responsibilities, no more than twenty five percent (25%) of the participants enrolled may be incumbent workers that meet the eligibility criteria.

All participants served must be 17 years of age or older, not enrolled in secondary school, eligible to work in the United States, and considered the custodial parent, legal guardian, foster parent, or other person standing in loco parentis of:
  • At least one dependent that is 13 years of age or younger; or
  • At least one dependent with a disability or developmental delay that may exceed 13 years of age.

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1 The term in loco parentis, "in the place of a parent" refers to the legal responsibility of a person or organization to take on some of the functions and responsibilities of a parent.
Eligible populations are:

- **Unemployed Worker:** Individuals who are without a job and who are seeking employment and are available to work.

- **Underemployed Worker:** Per the June 2018 Grant Officer Letter, the SWFI definition of underemployed worker has been amended to read:

  “Individuals seeking full-time employment who are not currently connected to a full-time job commensurate with the individual’s level of education, skills, training, or wage and/or salary earned previously, or who have obtained only episodic, short-term, or part-time employment.”

- **Incumbent Worker:** Individuals who are employed but need training to upgrade skills to secure full-time employment with their current employer or need to upgrade skills that will lead to career advancement with their current employer. Training provided to incumbent workers through the SWFI FOA is developed in partnership with the individual’s current employer or employer association.

For applicants proposing to serve incumbent workers, no more than 25 percent (25%) of the total participants served may be incumbent workers that meet the eligibility criteria.

**Definition of a Participant**
A participant is any individual who receives an H-1B grant-funded service beyond a determination of eligibility.

**Eligible Participants**
Per the Eligible Participants section of the FOA, grantees may only serve parents that have child care responsibilities, job training needs, and training barriers (including child care and other participant supportive services). In particular, training participants must be 17 years or older, out of secondary school, eligible to work in the U.S. and considered the custodial parent, legal guardian, foster parent, or other person standing in loco parentis of a dependent that is 13 years of age or younger, or a dependent with a disability or developmental delay.

As long as the participant is a parent who meets the above criteria, they are eligible to participate. The following categories of parents are of particular focus of SWFI, but are not required: Unemployed parents, underemployed parents, and parents enrolled in or pre-qualified for one or more of the programs listed in the Eligible Participants section of the FOA (including unemployed, underemployed, and incumbent workers, TANF, SNAP, Head Start, and WIOA).

Grantees also have to adhere to the participant populations described in their statements of work.

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2 Updates to the previous version of the FAQ are reflected in green font.
**Supportive Service Costs**
Grantees may use up to 25 percent of their grant funds to provide quality, affordable child care and other support services to individuals who are participating in education and training activities provided through the grant. Support services for training participants include child care related services such as child care, aftercare, transportation and housing that are necessary to enable an individual to participate in education and training activities funded through this grant. Participant support service costs may include, but are not limited to, provision of the actual supportive service (i.e. child care); providing participants with a voucher for the service (i.e. public transportation cards or tokens); or providing a stipend directly to the participant. Where stipends for participant support services are provided, the stipend amount must be for cost of a specific support service (i.e. childcare), rather than simply based on a general need.

For the purposes of this FOA, grantees may use grant funds, up to the percentage specified above to provide support services only to individuals who are participating in education and training activities provided through the grant when: 1) the grantee is unable to provide these services through referral to other programs or with other funds; and 2) such services are necessary to enable individuals to participate in grant-funded education and training activities.

Supportive services for training participants include the costs of child care related services, such as transportation to child care, that are necessary to enable an individual to participate in education and training activities funded through this grant. When using grant funds to pay the cost of transporting participants’ children to or from childcare, grantees must ensure that they adhere to their own organization’s policies, the policies of their service providers (such as car sharing services, bus transportation, etc.), and state law regarding transportation for individuals under 18. Many service providers require that an individual 18 years or older be present for individuals under the age of 18 to use the transportation service.

**Selective Service Registration Requirements**
SWFI grants are authorized under the American Competitive Workforce Improvement Act (ACWIA). ACWIA does not require that a determination of Selective Service registration be made prior to enrollment or in determining eligibility to participate in a SWFI grant program. While grantees may be checking Selective Service registration for other reasons, such as co-enrollment in Workforce Innovation and Opportunity Act (WIOA)-funded programs, SWFI does not require grantees to check if participants are registered for Selective Service.

**Requirement to Collect Social Security Numbers (SSNs)**
As part of performance reporting requirements, grantees are required to collect participant Social Security Numbers (SSNs) and provide these to the Department of Labor (DOL), Employment and Training Administration (ETA) as part of the quarterly reporting process. DOL/ETA will use SSNs to track exit-based indicators of performance on the behalf of grantees. Grantees should also ensure that when they are collecting this information from participants, that they inform the participants of the reason for requesting SSNs, in accordance with the ACWIA, which authorizes H-1B grant programs.
Please note, grantees are required to ask participants for their SSNs, but if a participant chooses not to disclose this information they cannot be denied services.

**Incentive Payments to Collect Employment Outcomes**
Grantees may use up to 1.5 percent of grant funds for the provision of gift cards or other payments to participants for providing information on their employment status after they leave the program, for the purposes of reporting these employment and retention outcomes to DOL/ETA. These incentive payments must be tied to the goals of the grant. Grantees must have policies and procedures in place governing the awarding of incentive payment and the incentives provided under the grant must comply with these organizational policies.

The use of grant funds for incentive payments other than to collect participant information on employment status after they leave the program is not allowed.

**Co-enrolling Participants Across Multiple H-1B Job Training Grants**
DOL/ETA encourages H-1B job training program grantees to maximize the use of their resources and minimize the duplication of efforts, particularly through the leveraging of other Federal and non-Federal funding sources. Leveraging resources may include co-enrolling H-1B job training participants in programs through the Workforce Innovation and Opportunity Act (WIOA), other Federally-funded programs, and non-Federal programs. The intent of co-enrollment is to meet the training and employment needs of program participants and provide as many participants as possible with comprehensive services that may not otherwise be available or allowable under an individual grant or funding source.

The intent of co-enrollment for an H-1B job training grant program is to leverage complementary resources to maximize the scope and scale of the funded activities through the grant. Therefore, it is not acceptable to leverage resources that would result in co-enrollment in other H-1B funded programs that are providing the same or similar services. Specifically, grantees should not co-enroll participants in more than one H-1B job training program grant (enrollment in both H-1B SWFI and an H-1B America’s Promise program, for example) as a strategy to facilitate the attainment of grantee service levels and performance outcomes across multiple H-1B job training programs. The purpose of H-1B job training grant programs is to provide education and job training services to participants and increase the number of individuals obtaining employment. Co-enrolling participants in two H-1B job training grant programs may lead to duplication of efforts while limiting the total number of participants served through H-1B job training grants. This guidance does not prevent grantees from leveraging tools, materials, or other resources that were developed under other H-1B job training grant programs, assuming these activities do not result in co-enrollment.

If your H-1B grant program is co-enrolling participants through WIOA, other Federally-funded programs, and non-Federal programs, please ensure:
• Participants are determined eligible for each grant program, as it aligns with each program’s eligibility criteria. Every program has very specific and distinct eligibility requirements;
• Participants are enrolled in allowable, non-duplicated grant activities, as it pertains to each grant program;
• The grantee adheres to cost allocation, if appropriate. For example, if a participant is enrolled in an IT training program, of which the classroom and instructor salary are paid for with Trade Adjustment Assistance Community College and Career Training (TAACCCT) grant funds and the cost of training/tuition is covered by H-1B TechHire funds, the grantee would need to ensure that the cost of training/tuition billed to the TechHire grant did not include any costs or fees paid for by TAACCCT grant funds;
• The grantee reports on leveraged resources (both Federal and non-Federal funded) on the ETA-9130 financial report form and quarterly narrative reports (QNR), as appropriate;
• The grantee reports on performance outcomes in accordance with the performance reporting requirements for each co-enrolled program, as appropriate.
• Grantees can report on all outcomes and other deliverables that result from activities and services funded with both leveraged resources and grant funds in the Quarterly Performance Report (QPR) and QNRs for each co-enrolled grant program. For example, for a SWFI grant, any outcomes achieved as a result of leveraged TAACCCT grant funds, the SWFI grant funds, or a combination of both, may be reported.

Individuals Served with Leveraged Resources

Individuals Served with BOTH Leveraged Resources and Grant Funds
Individuals who receive services through a SWFI project funded with both leveraged resources and grant funds are considered grant participants. Grantees must report on all outcomes and other deliverables that result from activities and services funded with both leveraged resources and grant funds in the Quarterly Performance Reporting (QPR) Form ETA No. 9173 as appropriate. Grantees would also report on leveraged resources that have been provided to support their grant in both the grant’s Quarterly Narrative Report (QNR) and in their quarterly financial report Form ETA 9130.

Individuals Served with ONLY Leveraged Resources
Individuals who receive services through a SWFI project funded solely with leveraged resources (i.e. no services are provided with grant funds) are not considered grant participants. Grantees must not report on outcomes for individuals funded solely with leveraged resources on their required Quarterly Performance Report (QPR).

Career Pathways and Job Placement in Middle- and High-skilled Occupations
Participants served through the project must pursue at least a middle-skilled occupation (those defined as requiring more education and training than a high school diploma but less than a four-year college degree) or high-skilled occupation, and develop the competencies to enable them to enter middle and high-skilled jobs along a career pathway in H-1B industries and occupations during the grant period of performance. Training along a career pathway may start with entry-level occupations, but must lead to employment in middle- and high-skilled positions in H-1B occupations and industries. While the
primary intent is employment during the grant period, some participants may not have completed training by the end of the grant, or some participants may be continuing on to further education along the career pathway. Grantees should ensure that their training activities are designed to meet the training completion and employment outcome targets identified in their grant Statements of Work (SOW).

Further, projects must provide individualized career plans for all participants that will help each participant navigate and assess their various career pathway options, identify skills and competencies needed for those occupations, and describe how the education and training provided will place individuals in or along a career pathway within the identified H-1B occupation or industry.

**Intellectual Property Rights**

SWFI grantees will need to make work created with the support of the grant available and public under a Creative Commons Attribution 4.0 (CC BY) license. Work that must be licensed under the CC BY includes both new content created with the grant funds and modifications made to pre-existing, grantee-owned content using grant funds.

Additional information on where products should be submitted and made available will be provided in future guidance.