American Rescue Plan Act (ARPA)
State Fiscal Recovery Funds (SFRF) Grant
Local Workforce Development Board (WDB) Q & A

Matters of Emphasis

Any participant enrolled in Title I must meet all WIOA eligibility requirements. It is at the WDB's discretion if ARPA participants are co-enrolled in Title I.

All OJT participants must have W-2 employers.

WEX can include 1099 employers. In this case the WEX is required to be entered in Salesforce. It is at the WDB's discretion if the WEX is also entered in NCWorks. If entered in NCWorks, use the LWIA or the Title I contractor as the employer.

IWT – ARPA only – all data is entered in to Salesforce. No information is entered in NCWorks.

1. **Q: Can WDBs reimburse employers up to 75% of wages for OJT agreements?**
   A: Yes, wage reimbursement to the employer should not exceed 75%.

2. **Q: Is a micro-business that has been conducting business for at least 6 months eligible to participate in WBL agreements?**
   A: Regardless of duration, any micro or small business operating in NC may participate in a WBL component of the ARPA grant.

3. **Q: Can an Employer with less than 4 employees participate in OJT?**
   A: Yes, any micro or small business with fewer than 25 employees may participate in OJT or other WBL components of the ARPA grant.

   Note: REVISED 11.01.2023

4. **Q: Can a small business owner receive training (IWT) if they are a W-2 employee of the business for at least 3 months?**
   A: W-2 employees, or 1099 employees, regardless of the duration of employment, may participate in IWT training through this grant.

5. **Q: When will Salesforce licenses be assigned?**
   A: Salesforce licenses will be made available shortly after the ARPA Kick-off meeting.

6. **Q: For Incumbent worker grants, are we able to service employers that have less than 5 employees?**
   A: Yes, micro and small businesses with fewer than 25 employees may participate in the ARPA grant.

7. **Q: Will we need to adhere to ALL state policies around IWT? For example, business must be operational for at least 1 yr., minimum 5 employees, etc.? The current policies do not support small business growth.**
   A: DWS Operational Guidance for IWT is not applicable to state fiscal recovery funds authorized through the American Rescue Plan Act.

8. **Q: Will we be allowed to reimburse wages during training with these dollars?**
   A: Yes, participant wages is an allowable cost.

9. **Q: Will the information in NCWorks populate into Salesforce so we don't have to enter the information in twice?**
   A: Employer records and employer services are the <u>only</u> data elements that transfer from NCWorks to Salesforce.

10. **Q: Will there be additional employer information needed in Salesforce that is not already in NCWorks?**
    A: Yes, there will be information required for NCPRO reporting that will need to be tracked via Salesforce that cannot be keyed in NCWorks.

11. **Q: Is ARPA requiring the use of Salesforce?**
    A: There are required metrics for ARPA reporting that necessitate the use of Salesforce which is why it is required.

12. **Q: Are ARPA Business Services funds for small business or microbusinesses?**
    A: Yes, the ARPA grant funds are strictly for businesses that have 25 employees or less.

13. **Q: Can we do the BS grants (OJT, IWT, WEX) in house with this grant or do we have to use our contractors like we do with WIOA funds?**
    A: Yes, you can provide these services in house using ARPA funds.

    Note: REVISED 3.22.23

14. **Q: Some small businesses use contract employees and not full-time regular employees; can we provide services to them?**
    A: Individuals served through IWT and WEX agreements may have 1099 or W-2 employment. Individuals served through OJT agreements *must* have W-2 employment.

15. **Q: Can we provide services to businesses that are sole proprietors?**
    A: Yes, as long as the business meets the definition of micro or small business (25 employees or less).

16. **Q: Can new or startup businesses be served with this grant?**
    A: Because this is not WIOA funded, this type of business can be served. There is no requirement for the amount of time they have been in business.

17. **Q: Can online courses be allowed for small or micro businesses if the Community College doesn't offer the course or training?**
A: Yes, online courses will be acceptable.

18. **Q: Can a small business owner receive training (IWT) if they are a W-2 employee of the business for at least 3 months?**
A: Yes, the small business owner can receive training.

Note: REVISED 10.6.23

19. **Q: Do all participants have to be enrolled as Adults in WIOA?**
A: No, all participants do not have to be enrolled as adults. ARPA grant participants are to be enrolled in Wagner-Peyser. Enrollment in WIOA Title I Adult is optional and at the board's discretion.

20. **Q: How should participants and employers be coded in NCWorks to identify OJT/WEX/IWT activities?**
A: Special activity codes for each ARPA activity will be added to NCWorks. Examples would be ARPA OJT and ARPA Paid Work Experience.

21. **Q: Will a keying guide for NCWorks be provided? What activities are expected to be used?**
A: Yes, keying instructions are being created and they will be found under "Staff Online Resources" in NCWorks. All activity codes will be identified as "ARPA," for example: ARPA Case Management.

22. **Q: Can there be a running Q&A document to reference?**
A: Yes! The updated Q&A will be housed on the Commerce DWS webpage.

23. **Q: Will the monthly reporting just be programmatic information, or will it include financials?**
A: The monthly report will require some financial and programmatic information. The financial information will need to be accurate to the time the report is submitted.

24. **Q: When will monthly reports be due?**
A: Monthly reports will be due on the 10th of each month.

25. **Q: How will the calls and site visits work?**
A: The Program Managers will contact you to coordinate these meetings. There will be a quarterly check in call with your Program Manager and site visits twice a year. These are not monitoring visits but check-ins for technical assistance and grant updates.

Note: REVISED 10.6.23

26. **Q: Do we still need to collect data elements from participants? (Social Security Card, Driver's license, etc.)**
A: No, there are no verification requirements. A signed Wagner-Peyser application is sufficient.

Note: REVISED 10.6.23

27. Q: Due to having more flexibility in serving adults, and as discussed potentially removing any income requirements like we currently have in place with regular WIOA adults, would there be a requirement to document a customer's income under ARPA? If so, can a self- attestation of income by used for ARPA adults?
A: No, there is no requirement to document a participant's income.

Note: REVISED 10.6.23

28. Q: What is grant end date?
A: ARPA funds expire 12/31/2026. More information from NCPRO will be forthcoming.

29. Q: Can we use the short form in NCWorks that we use for IWT?
A: The short form that is used for IWT cannot be keyed for anything else but WIOA Incumbent Worker data. Incumbent worker data will need to be keyed into Salesforce.

30. Q: Does the Salesforce portal provide the unique employer identifier?
A: For accounts that migrate from NCWorks, the Salesforce portal will have the NCWorks Unique ID, the Worksite ID and FEIN. Accounts also have a unique identifier assigned by Salesforce (stored in the background).

31. Q: Is there a training portal for us to practice with before going live, or do we have to train with actual accounts?
A: Currently, there is not a training portal for the Salesforce portal. The PPT and recording from this training will be posted to the TRAIN site. A user manual will be made available soon, and technical assistance can be requested via **Salesforcehelp@commerce.nc.gov**

32. Q: What if we searched and found an employer account but it is inactive. Do we contact a DWS rep. to activate the account?
A: Please follow the process in place for changing a NCWorks employer account from inactive. Accounts with the employer status in the Salesforce portal are populated from the entry in NCWorks. As such, the account should be updated from the original source based on the established process. Once updated, the updates will migrate to Salesforce that evening.

33. Q: Can documents be loaded in Salesforce?
A: There is currently no area to upload documents in the DWS Employer Services Portal. Documentation confirming performance outcomes/expenditure must be maintained by WDBs for standard compliance and future monitoring visits.

34. Q: Do we complete a WIOA IWT application for ARPA IWT participants? Please clarify again.
A: No, the WIOA IWT application is not available for use for ARPA IWT participants. Incumbent worker data will need to be keyed into Salesforce.

35. **Q: Is it acceptable to video screen share Salesforce with a user?**
A: It is acceptable to screenshare with another authorized Salesforce user. It is suggested to not share FEIN information over screenshare with anyone.

36. **Q: Do we ever upload a document like our internal IWT Contract with Federal Assurances, or do we just create a separate contract in Salesforce? Our internal contract will have a different contract number than what is created in Salesforce. Our contract number is for our internal accounting purposes. Do you see that having two contract numbers will create a problem?**
A: The information required for entry in Salesforce for IWT is specified on the Grant Service Employer Agreement page, IWT Budget, IWT Funds Request, and IWT Closeout pages. Boards are responsible to adhere to any additional policies/requirements that are not specific to Salesforce. The description fields in Salesforce can be used to detail what hard copy contract corresponds with the electronic Grant Service Employer Agreement in Salesforce.

37. **Q: Are all previously created business accounts still in Salesforce?**
A: Yes, all accounts previously created in NCWorks and the Salesforce system are available in the Employer Services Salesforce portal. New accounts created in NCWorks moving forward will migrate on a nightly basis and be available in the portal.

38. **Q: Should we use Salesforce for regular WIOA funded WEX/OJT or only for ARPA funded grant services?**
A: The Employer Service Salesforce portal should only be used for ARPA funded projects, at this time.

39. **Q: What action is needed if duplicates are created?**
A: Please email Salesforcehelp@commerce.nc.gov if duplicates are identified. Creation of duplicate accounts can be avoided by searching for companies by address, FEIN and/or name.

40. **Q: If employer services are keyed in NCWorks, should staff be keying any services in Salesforce? Or would this be only for employers not in NCWorks?**
A: Employer services should be keyed in a single system. Key areas for consideration are: Any services keyed in NCWorks will migrate to Salesforce nightly Services keyed into Salesforce will not migrate to NCWorks Services keyed in NCWorks or Salesforce are included in federal reporting • Employers not registered yet in NCWorks can have services logged in Salesforce.

41. **Q: For WIOA IWT, we reimburse the employer for training costs. For ARPA, can we pay the training provider directly?**
A: Yes, the Board can pay the training provider directly.

42. **Q: Will we be able to update the maximum reimbursement amount when we have contract modifications for raises? (When the maximum contract amount changes.)**
A: Yes, the Board will be able to update the maximum reimbursement amount when there is a contract modification for raises. Should this occur, please contact salesforcehelp@commerce.nc.gov for assistance with the training plan data in Salesforce.

43. **Q: We only reimburse at the contracted reimbursement rate when someone gets a raise, and we do not change the maximum reimbursement amount. Other boards may do this differently. For ARPA would we be required to increase the maximum reimbursement amount upon a raise?**

A: If the board maintains the contracted reimbursement amount for the duration of the training plan, the method to log appropriate hours/payments is to record hours and payments specific to what is paid. At closeout of the training plan, the increase can be noted by reporting the wage in the "ending wage" field. The increase of the maximum reimbursement due to a raise is at the discretion of the Board.

44. **Q: Can Small Business Center Training (such as Icehouse) that is provided to small business owners and/or other existing employees through WBL ARPA funds be tracked within the IWT WBL in Salesforce?**
A: Yes, existing employees with small businesses can receive IWT trainings. When creating the IWT Grant Service Agreement in Salesforce, the amount of the IWT agreement should be placed in the budget section. The amount paid for trainings should be logged in the funding request and approved payment amounts. The description field within the funding request object can be used to specify types of trainings if that is beneficial.

Note: REVISED 10.6.23

45. **Q: Is an enabled employer account in NCWorks a requirement for ARPA OJT and WEX employers?**
A: Yes, for ARPA OJT only. No, for WEX. OG 04-2022, Change 2 requires ARPA OJT participants to be enrolled in Wagner-Peyser and employer accounts must be enabled in NCWorks consistent with standard requirements for WIOA.

46. **Q: Are ARPA funds subject to the Stevens Amendment, which requires grantees to disclose the percent of costs financed with federal funds, the federal dollar amount, and the percentage and dollar amount financed by non-government funds?**
A: ARPA funds do require a disclosure statement which slightly differs from the statement used under WIOA. Any publications produced with funds from the ARPA grant must display the following language: **""This project [is being/was] supported, in whole or in part, by federal award number SLFRP0129 awarded to NC Department of Commerce by the U.S. Department of the Treasury"**. The statement is the required statement for the ARPA grant by the Department of Treasury. For press releases and other documents, it is recommended that the WDB refer to **OG 08- 2022** when determining what type of documents/publications require the disclosure.

47. Q: Current WIOA OJT forms require workers comp information to be collected from the employer. Is it necessary to collect this information for the ARPA funded WBL grants? If so, what are the requirements?
A: North Carolina law requires that all businesses which regularly employ three or more employees obtain workers' compensation insurance or qualify as self-insured employers. Therefore, the requirements would remain the same as they were under WIOA. The WDBs should continue to document that the businesses are compliant with state law before entering into a contractual relationship with them. Currently WDBs are required to obtain the workers' compensation company name, the account number, and the effective dates.

48. Q: Should the ARPA case management activity be left open during enrollment OR open/closed the same day?
A: It is recommended that you leave the A00 Case Management activity open the entire time you are serving customer, there is no system/soft exit on ARPA funds, but it will be up to staff.

49. Q: Would the ARPA case management activity be keyed more than once such as every time to document a service or would this be the regular WIOA case management activities?
A: Since the case management activity is being left open, it should not be keyed more than once.

Note: REVISED 10.6.23

50. Q: For those participating in ARPA WBL funded activities, would there be any reason to also key regular WIOA WBL activities at the same time?
A: ARPA services will not be reported in the PIRL and Title I enrollment is not required. So, if you want Title I WBL services recorded for this individual you will need to enroll the participant in Title I and key the Title I WBL activity. This would be specifically important if it were services that impacted performance, such as a 300-Occupational Skills Training. The keying of this activity would allow the WDB to obtain credit for all performance measures tied to this activity. It is important to note that if a A50 – OJT is keyed under ARPA, a 301-OJT cannot be keyed under Title I since this activity is funded with ARPA dollars and the parameters of an OJT activity between each grant differs.

51. Q: Do those with only ARPA activities need measurable skills gains keyed, or do they count?
A: Participants with ARPA activities keyed will not be added to the measurable skills gain pool until a Title I activity is keyed that is included in the measure. Those who are only participating in ARPA WBL or training activities do not need a measurable skills gain keyed, unless they are in those activities under Title I, as well.

Note: REVISED 11.01.23

52. Q: The ARPA Q&A says employers must have enabled accounts in NCWorks—would those employers that only pay via 1099 have access to do this?
A: A 1099 employer may not be entered in to NCWorks. OJT can only be utilized with W-2 employers. A 1099 employer can be utilized for WEX but can NOT be keyed into NCWorks. In this specific situation, the LWIA/Contractor would have to be substituted for the employer in NCWorks.

53. **Q: Since we're targeting micro businesses who may not have unemployment insurance, how can we complete their ARPA IWT & OJT registration in NCWorks Online without the required UI number?**
A: In NC, a general business employer with a gross payroll of at least $1,500 in any calendar quarter or with at least one worker in 20 different weeks during a calendar year is required to pay UI taxes. If planning to serve the employer with OJT, it is advised to request the employer work with DES to get a UI tax number. If they don't plan to pay UI tax, it is advised to serve them with a different work-based learning component, such as WEX.

54. **Q: Please confirm that the A60 code for ARPA Existing Employee Training is inactive.**
A: A60 should not be used. This was setup originally based on early speculation of what was to be recorded and later determined not to be used.

55. **Q: Do ARPA IWT trainees need to be registered in NCWorks Online at all?**
A: While not required, we encourage that all individuals participating in ARPA IWT be registered in NCWorks.

Note: REVISED 10.6.23

56. **Q: Where should support documentation for trainings completed, certifications and credentials earned through ARPA funding be placed?**
A: ARPA OJT and WEX participants must be enrolled in Wagner-Peyser and are not required to be co-enrolled in WIOA Title I. Documents confirming completion of certifications and trainings completed through ARPA should be (1) uploaded in NCWorks consistent with Wagner-Peyser Programs and (2) name the document accordingly (e.g. ARPA Certificate of Completion) to distinguish it from other files. ARPA IWT participants are not required to be co-enrolled in WIOA Title I. Workforce Development Boards are responsible for having a method in place to maintain documentation confirming completion of trainings or certifications and make them available if needed for future monitoring.

57. **Q: Is it considered conflict of interest if a board member utilizes the ARPA Small Business grant?**
A: The board must review local policy, CPS 05-2022, and GS 14-234 to determine if there is a conflict and if the board member utilizing the ARPA Small Business grant meets all requirements.

58. **Q: Can we serve businesses with 25 or less employees in a tier 3 county?**
A: Yes, businesses with 25 or less employees in tier 3 counties can be served. While OG 04- 2022 Change 2 states "Emphasis should be placed on historically underutilized businesses, industries

significantly impacted by the pandemic, or businesses located in an economically distressed Tier 1 or Tier 2 county", Tier 3 counties can be served.

59. **Q: Are businesses required to be HUB certified to receive services?**
A: No, businesses are not required to be HUB certified to receive services. It is encouraged to share HUB registration with businesses that can be certified; more information is available at https://ncadmin.nc.gov/businesses/historically-underutilized-businesses-hub.

60. **Q: Can a revision to the approved application be submitted?**
A: Yes, at a minimum an explanation of the changes being made, a revised budget and revised performance targets will be required to document changes. Additional information may be requested as needed.

61. **Q: Do H2A and H2B workers count towards a business's employee numbers?**
A: H2A and H2B workers don't count toward employee numbers, because those workers are seasonal and not required to pay Federal, State, or UI taxes.

62. **Q: Does the 25 and under headcount include part- time employees?**
A: The headcount of part-time employees may be based on full- time equivalent positions to determine if a business qualifies as eligible for 25 employees and under, for the ARPA Small Business program.