



H RTP: WIOA 3.0 – Applying for WIOA Funds

Disclaimer: Requirements of Being a Recipient of (Workforce Innovation Opportunity Act (WIOA) Title 1 Funds

The purpose of this document is to prepare potential High Road Training Partnerships (H RTP): WIOA 3.0 applicants of the expectations if awarded funds under this grant program, as defined by WIOA law. It is the responsibility of the CWDB to make sure interested applicants are aware of the funding source and its requirements to ensure project and program success. The CWDB highly recommends that all potential applicants review the Uniform Guidance link below before submitting a Letter of Intent.

It is the responsibility of the Subrecipient (the entity awarded) to become well-versed with WIOA Title 1 and the Code of Federal Regulations, Title 2 (Uniform Guidance) so they can operate the grant program to meet WIOA requirements. This will be the sole responsibility of the Subrecipient. It is highly recommended that organizational staff capacity exists before accepting funds in order to support this work and have adequate administrative assistance.

Contents

WIOA & Uniform Guidance..... 2
Awardee/Subrecipient Requirements & Responsibilities..... 3
Serving Participants 4
Target Populations..... 4
CalJOBS Participant Reporting 7
Data Capture Deadlines..... 7
Services Provided..... 7
Individual Employment Plan..... 7
Participant Eligibility 8
Eligibility Requirements for Adults 8
Eligibility Requirements for Dislocated Workers..... 8
Eligibility Requirements for Youth..... 9
Incumbent Workers..... 10
Additional Resources: Establishing Eligibility 10
Right to Work Documents..... 10
List A: Documents that Establish Both Identity and Employment Eligibility..... 10

List B: Documents that Establish Identity.....	11
List C: Documents that Establish Employment Eligibility	11
Administrative and Additional Requirements	12
Code of Federal Regulations	12
Directives & Information Notices.....	12
Monitoring and Audits	13
Record Retention	13
Local Agency Policies.....	14
Administrative Policies	14
Steven’s Amendment	15
Participant Policies	15
Case Management	15
Supportive Services.....	16
Reporting.....	16
Compliance.....	17
Evaluation	17
Fiscal.....	17
Appendix A – Administrative Costs.....	19
Appendix B - Allowable Costs and Cost Items Matrix.....	21

WIOA & Uniform Guidance

High Roads Training Partnerships are supported by the California Workforce Development Board (CWDB) in coordination with the California Employment Development Department (EDD) with Department of Labor funding totaling \$10,530,000. All awards are subject to the availability of appropriated funds and to any modifications or additional requirements that may be imposed by law.

The use of these funds is governed by WIOA and its associated federal regulations, state and federal directives, and the federal Office of Management and Budget (OMB) Guidance for Grants and Agreements ([Uniform Guidance for Federal Awards 2 CFR Part 200](#)). Appendices A and B describe the general requirements pertaining to these funds.

Annual monitoring will be conducted by the Employment Development Department (EDD) Compliance Review Office and follow a similar protocol as WIOA Title I monitoring. Funds awarded under this funding cannot be used to purchase real property or construct buildings. A

maximum of 10% of the total project budget will be allowed for administrative costs. The definition of administrative costs is provided in Appendix A.

If invited to apply, applicants must confirm one of the following:

- The applicant has direct experiencing managing WIOA funded projects, are well versed with WIOA Title 1 and the Code of Federal Regulations, Title 2 (Uniform Guidance), and can responsibly operate and manage the grant program in order to meet WIOA requirements;
- The applicant is aware and willing to become familiar and comply with WIOA Title 1, the Code of Federal Regulations, Title 2 (Uniform Guidance), and EDD Workforce Services Branch Directives and Information Notices to responsibly operate and manage the grant program in order to meet WIOA requirements.

Awardee/Subrecipient Requirements & Responsibilities

The term Awardee/Subrecipient refers to the awarded agency entering into an agreement with the State of California.

As the first point of contact for the CWDB, the Awardee/Subrecipient is expected to:

- Be or become familiar with WIOA Title 1, the Code of Federal Regulations, Title 2 (Uniform Guidance), and EDD Workforce Services Branch Directives and Information Notices in order to responsibly manage the grant program.
 - All Applicants must confirm this when submitting an H RTP WIOA 3.0 application.
- Have knowledge of the project’s program and fiscal status at all times. This includes but is not limited to: program and partnership activities, the status of individual project teams, participant activities and data, project obstacles, expenditure status, etc.
- Have knowledge, experience, and practice in managing federal contracts and following fiscal rules and requirements.
- Be responsible for tracking and entering participant data in CalJOBS in a timely and accurate manner.
- Maintain active communication with stakeholders and the CWDB, and communicate any obstacles impeding the progression/success of the project to the CWDB.
- Organize and coordinate regional activities (if applicable to the project).
- Collect and report all data, deliverables, and outcomes of the partnership to the CWDB.
- Prepare for compliance monitoring or audits by EDD and/or Department of Labor (DOL).
- Be responsible for Single Audit Requirement if Subrecipient is a non-federal entity that expends more than \$750,000 in federal award funds during the program year.
 - The Single Audit is a requirement that is separate from compliance monitoring. It is the Subrecipient’s responsibility to perform a single audit on their entire organization. The Single Audit's objective is to assure the U.S. federal

government about the management and use of such funds by recipients such as states, cities, universities, non-profit organizations, and Indian Tribes. The audit is typically performed by an independent certified public accountant (CPA) and encompasses both financial and compliance components. The Single Audits must be submitted to the Federal Audit Clearinghouse along with a data collection form, Form SF-SAC.

Reporting is an essential component for communicating with the CWDB throughout the grant term. Reporting for the H RTP: WIOA 3.0 grant program includes:

- CalJOBS Participant Reporting (only if the project is serving participants).
- CalJOBS Fiscal Reporting.
- Quarterly Narrative Reporting.
- Periodic Review & Information Requests.
 - The CWDB may conduct periodic reviews and request information from selected projects as needed throughout the grant term.
 - If a funding recipient is not performing in accordance with program requirements, the recipient will be subject to remedies for non-performance. This may include de-obligation of funding.

Serving Participants

The information in the following sections (Target Populations, CalJOBS Participant Reporting, Participant Eligibility, and Right to Work Documents) is only applicable to projects serving participants.

Target Populations

Target populations under the H RTP: WIOA 3.0 grant program must serve at least one of the following:

1. English Language Learners¹

An English Language Learner (ELL) is defined as a person who has limited ability in speaking, reading, writing, or understanding the English language, and (a) his or her native language is a language other than English, or (b) he or she lives in a family or community environment where a language other than English is the dominant language.

2. Homeless and Housing Insecure²

A homeless and/or housing insecure individual lacks a fixed, regular, and adequate nighttime residence; has a primary nighttime residence that is a public or private place

¹ WIOA Public Law 113-128, Section 203(7)(a) and (b)

² 42 U.S.C. Section 11302 103(a) and (b)

not designed for or ordinarily used as a regular sleeping accommodation for human beings (such as car, park, abandoned building, bus or train station, airport, or camping ground); is living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements; is an unaccompanied or migratory youth; and/or is fleeing domestic violence or life-threatening conditions in the individual's current housing situation.

3. Immigrants³

An immigrant is defined as a citizen and national of the United States (U.S.); a lawfully admitted permanent resident alien; a refugee; an asylee; a parolee; an eligible migrant or seasonal farmworker; or another immigrant authorized by the attorney general to work in the U.S.

Immigrants with degrees from abroad are eligible for English language classes, provided they meet eligibility.

4. Justice-Involved Individuals⁴

A justice-involved individual is defined as an adult or juvenile (a) who is or has been subject to any stage of the criminal justice process, and for whom services under the WIOA may be beneficial, or (b) who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

5. People with Disabilities⁵

A Person with a Disability (PWD) is an individual who identifies as a person with a physical or mental impairment that substantially limits one or more major life activities of such individual; has a record of such impairment, or is regarded as having such an impairment. WIOA serves to help PWDs obtain education or training that leads to Competitive Integrated Employment (CIE).

6. Veterans⁶

A veteran is a person who served in the active military, naval, or air service and who was discharged or released under conditions other than dishonorable. The eligible participants in this program are veterans in at least one of the following priority groups. Each group is different and has particular characteristics. However, individual veteran

³ WIOA Public Law 113-128, Sections 167(1) and 188(a)5

⁴ WIOA Public Law 113-128, Section 3(38)(a) and (b)

⁵ 42 U.S.C. Section 12102 1(a)(b)(c)

⁶ 38 U.S.C. Section 101

participants can belong to more than one group: campaign,⁷ disabled,⁸ recently separated,⁹ veterans with significant barriers,¹⁰ and other covered veterans.¹¹

Or the eligible spouse of a veteran, defined as persons who were spouses of veterans who succumbed due to a service-connected disability or who succumbed while a total service-connected disability was in existence where or not that disability was the cause of death.

7. Youth¹²

For this grant program, a youth is an individual who meets the criteria for WIOA eligible out-of-school youth who is not younger than 16 or older than age 24.

8. Other target population(s) in geographic location(s) disproportionately impacted by COVID-19

Applicants choosing to serve other special populations under this category must provide justification and supporting evidence to clearly and convincingly demonstrate disproportionate impact by COVID-19 and be able to produce this documentation if requested.

Projects must serve at least one of the target populations listed above, and individuals may fall in more than one target population (Example: someone can be both homeless/housing insecure and a veteran and would be tracked as both). It is the responsibility of the

⁷ Campaign Veterans are those veterans who served on active duty in the U.S. Armed Forces during a war, or in a campaign or expedition for which a campaign badge or medal has been authorized. A list of these wars, campaigns, and expeditions can be found at the [Office of Personnel Management website](#).

⁸ These are veterans who are entitled to compensation under laws administered by the Department of Veterans Affairs, or individuals who were discharged or released from active duty because of a service connected disability. For additional clarification refer to the annotation below regarding Special Disabled and Disabled Veterans.

⁹ Recently separated veterans are those who separated from the military within the 48 months prior to application and received a DD214 for conditions other than dishonorable. Applicants must follow the participant eligibility guidelines outlined under WIOA Title I.

¹⁰ Veterans with significant barriers to employment include: a special disabled or disabled veteran, as those terms are defined in 38 U.S.C Section 4211(1) and (3); a homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 1302(a) and (b)) as amended; a recently separated service member, as defined in 38 U.S.C Section 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months; an offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration; a veteran lacking a high school diploma or equivalent certificate; or veteran who is a low-income individual (as defined by WIOA Section 3 (36)), a woman, or other minority.

¹¹ 38 U.S.C Section 4215 (a)(1)(B)

¹² WIOA Public Law 113-128, Section 129(a)(1)(B)

Awardee/Subrecipient to thoroughly screen and determine that an individual is both WIOA eligible and meets the selected target population definition. The Awardee/Subrecipient must be able to provide documentation showing how the individual was vetted and meets the criteria.

CalJOBS Participant Reporting

CalJOBS is the federal system of record for tracking and reporting data associated with the Workforce Innovation and Opportunity Act (WIOA), Title I. This data tracking system provides a unified and streamlined intake process and case management procedures that enable co-enrollment across all programs.

CalJOBS participant reporting is only applicable to H RTP: WIOA 3.0 projects serving participants. Applicants should have dedicated staff for CalJOBS data entry and case management within their organization if the project will serve participants.

Data Capture Deadlines

Program staff are required to enter participant information into the CalJOBS system. Designated staff and Management Information System (MIS) Administrators have the ability to change active participant data. Participant activities must be entered into CalJOBS within 30 days of the first service provided to avoid the loss of data.

After 30 calendar days, the CalJOBS system does not allow specific areas of the participant record to be changed or updated. When this occurs, it is necessary to complete a Data Change Request (DCR) form to enable the participant data to be changed or updated. Its purpose is to correct data key entry errors and other circumstances beyond staff control.

Reference the following directives for further guidance on participant reporting requirements and data entry time frames:

- [WSD 20-10 CalJOBS Participant Reporting](#)
- [WSD 18-02 Data Change Request Procedures](#)

Services Provided

Participant services provided directly with grant funds must be tracked in CalJOBS through activity codes. These activity codes directly relate to federal reporting and WIOA performance indicators and should be evaluated closely to ensure the service provided aligns with the definition of the activity code selected.

The [WSD 19-06 CalJOBS Activity Codes](#) Directive's Attachment 1: Activity Codes Dictionary provides a list of all available activity codes and definitions and Attachment 2: CalJOBS Activity Codes Detailed Listing provides the duration permitted for each code. Grantees should use the CalJOBS activity codes that most accurately correspond to the services rendered.

Individual Employment Plan

The Individual Employment Plan (IEP) is a function within CalJOBS that enables staff to record participants' goals, objectives, and services concerning their employment program(s). The IEP

allows staff and individuals to establish a defined goal towards employment, training, or skill needs. The creation of an IEP is required for H RTP: WIOA 3.0 participants.

Participant Eligibility

Participant eligibility is only applicable to H RTP: WIOA 3.0 projects serving participants. All individuals served through this grant program must be WIOA eligible.

Determining WIOA eligibility is the first step in enrolling a participant into the H RTP: WIOA 3.0 program. In addition to falling under at least one of the target populations identified in this document, all participants must meet WIOA eligibility requirements as an Adult, Dislocated Worker, or Youth and be registered, enrolled, and have participation created as such in the CalJOBS system.

Eligibility Requirements for Adults

- 18 years or older
- Selective Service registration for males*

*Gender and selective service registration is based on the gender listed on the birth certificate (not assigned at birth). If male, evidence of Selective Service enrollment can be found here: [Selective Service Registration Directive](#)

Eligibility Requirements for Dislocated Workers

1. An individual who meets one of the five definitions required for certification as a Dislocated Worker:
 - a. Has been terminated or laid off, or has received a notice of termination or layoff from employment; AND
 - b. Is eligible for or has exhausted unemployment insurance; OR has been employed for a duration sufficient to demonstrate attachment to the workforce, but is not eligible for unemployment insurance due to insufficient earnings or having performed services for an employer that was not covered under state unemployment compensation law; AND
 - c. Is unlikely to return to a previous industry or occupation.
2. Has been terminated or laid off, or received notification of termination or layoff, from employment as a result of a permanent closure of, or substantial layoff at, a plant, facility, or enterprise; OR Is employed at a facility, where the employer has made the general announcement that the facility will close within 180 days.
3. Was self-employed (including employment as a farmer, a rancher, or a fisherman) but unemployed due to general economic conditions in the community or because of a natural disaster.
4. Is a displaced homemaker. The term “displaced homemaker” means an individual who has been providing unpaid services to a family member in the home and who has been

dependent on the income of another family member but is no longer supported by that income OR is the dependent spouse of a member of the Armed Forces on active duty and whose family income is significantly reduced because of a deployment, call or order to active duty, a permanent change of station, or the service-connected death or disability of the member AND is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

5. Is the spouse of a member of the Armed Forces on active duty, and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member OR is the spouse of a member of the Armed Forces on active duty and who is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

Eligibility Requirements for Youth

Projects are required to serve only out-of-school youth. Out-of-school youth participants are 16 to 24 years old and are reportable individuals who have satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, and development of an individual service strategy, and received 1 of the 14 WIOA youth program elements in sec. 129(c)(2) of WIOA. Some 18 to 24-year-olds may be ready for adult services due to life experiences such as gaining occupational skills through education or training, prior work experiences, adult schedules, family responsibilities, and the participant's needs. Others need specific youth services covered in the 14 WIOA youth program elements based on characteristics such as maturity, drug and alcohol abuse, homelessness, foster care status, family abuse/neglect, literacy challenges, pregnancy, and lack of employability skills. Assessments of their skills, career readiness, literacy and supportive service needs should be considered when determining the appropriate program(s) for young adults.

Out of School Youth

One or more of the following barriers:

- A school dropout.
- A youth who is within the age of compulsory school attendance but has not attended school for at least the most recent complete school year quarter. Note – If the school does not use school year quarters, Local Areas must use calendar quarters.
- A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual "start underline" and "end underline" is either basic skills deficient or an English language learner.
- An offender.
- A homeless individual or a runaway.
- An individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under Section 477 of the *Social Security Act*, or in an out-of-home placement.

H RTP: WIOA 3.0 – Applying for WIOA Funds

- An individual who is pregnant or parenting (custodial and non-custodial parent including non-custodial fathers).
- An individual with a disability.
- A low-income individual who requires additional assistance to enter or complete an educational program or secure or hold employment.

More information on Out of School Youth can be found on the [Title 20 CFR Section 681.210 - Out of School Youth](#).

Incumbent Workers

To qualify as an Incumbent Worker, the employee must meet the following:

- Be a current employee of an eligible employer.
- Have been employed by the eligible employer for at least six months. If the employee has not been employed by the employer for at least six months, they would be considered a new employee.
- Meet the Fair Labor Standards Act requirements for an employer-employee relationship.

Incumbent Workers include a separate set of eligibility requirements for employers and participants. More information can be found on the [EDD Directive - Incumbent Worker Training](#).

Additional Resources: Establishing Eligibility

The following directives provide guidance on establishing eligibility:

- [WSD 15-14 WIOA Adult Program Priority of Service](#)
- [WSD 16-18 Selective Service Registration](#)
- [WSD 19-01 70 Percent LLSIL and Poverty Guidelines](#)
- [WSD 17-07 Youth Program Requirements](#)
- [WSD 18-03 Pathway to Services, Referral, and Enrollment](#)

Right to Work Documents

All participants entering employment services or activities must have right-to-work documents meeting one of the criteria below:

- One Document from **List A**
- Two Documents: One each from **List B** and **List C**

List A: Documents that Establish Both Identity and Employment Eligibility

1. U.S. Passport (unexpired).
2. Permanent Resident Card or Alien Registration Receipt Card (Form I-551).
3. An unexpired foreign passport that contains a temporary I-551 stamp or temporary I-

551 printed notation on a machine-readable immigrant visa.

4. An unexpired Employment Authorization Document that contains a photograph (Form I-766).
5. In the case of a nonimmigrant authorized to work for a specific employer incident to status, a foreign passport with Form I-94 or Form I-94A, bearing the same name as the passport and containing an endorsement of the alien's nonimmigrant status, as long as the period of endorsement has not yet expired and the proposed employment is not in conflict with any restrictions or limitations identified on the form.
6. Passport from the Federated States of Micronesia (FSM) or the Republic of the Marshall Islands (RMI) with Form I-94 or Form I-94A indicating nonimmigrant admission under the Compact of Free Association between the United States and the FSM or RMI.

List B: Documents that Establish Identity

1. Driver's license or ID card issued by a state or outlying possession of the United States provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address.
2. ID card issued by federal, state, or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address.
3. School ID card with a photograph.
4. Voter's registration card.
5. U.S. Military card or draft record.
6. Military dependent's ID card.
7. U.S. Coast Guard Merchant Mariner Card.
8. Native American tribal document.
9. Driver's license issued by a Canadian government authority.

For persons under age 18 who are unable to present a document listed above:

1. School record or report card.
2. Clinic, doctor, or hospital record.
3. Day-care or nursery school record.

List C: Documents that Establish Employment Eligibility

1. U.S. Social Security card (other than a card stating it is not valid for employment).
2. Certification of Birth Abroad issued by the Department of State (Form FS-545).
3. Certification of Report of Birth issued by the Department of State (Form DS-1350).
4. Original or certified copy of a birth certificate issued by a state, county, municipal

authority, or territory of the United States bearing an official seal.

5. Native American tribal document.
6. U.S. Citizen ID Card (Form I-197).
7. ID Card for the use of Resident Citizen in the United States (Form I-179).
8. Unexpired employment authorization document issued by DHS (other than those listed under List A).

Administrative and Additional Requirements

H RTP: WIOA 3.0 is governed by WIOA and its associated federal regulations, state and federal directives, and the Federal Office of Management and Budget (OMB) Guidance for Grants and Agreements ([Uniform Guidance for Federal Awards 2 CFR Part 200](#)). Annual monitoring will be conducted by the EDD Compliance Review Office and follow a similar protocol as WIOA Title I monitoring. Funds awarded under H RTP: WIOA 3.0 cannot be used to purchase real property or construct buildings. A maximum of 10% of the total project budget will be allowed for administrative costs. The definition of administrative costs is provided in Appendix A of the H RTP: WIOA 3.0.

Code of Federal Regulations

All sections in the Code of Federal Regulations (CFR) Part 200 and 2900 require compliance from the awardee agency. There are specific sections of the CFR linked below for reference; however, it is the agencies responsibility to review all sections in the CFR to ensure all elements are understood and in compliance:

- [OMB Title 2 CFR Part 200: Uniform Administrative Requirements, Cost Principals, and Audit Requirements for Federal Awards](#)
- [OMB Title 2 CFR Part 2900: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

Directives & Information Notices

In addition, there are relevant EDD Directives and Information Notices which will pertain to WIOA 15% Discretionary programs. This RFA includes applicable ones and CWDB program staff may share additional ones as resources during the grant period.

- [EDD Directives](#)
- [EDD Information Notices](#)

Agencies using funds to serve participants must also comply with WIOA law and sections in CFR Title 20, Chapter V, Part 681, Subpart B and CFR Title 20, Chapter V, Part 680.

- [WIOA Law](#)
- [CFR Title 20, Chapter V, Part 680](#)

- [CFR Title 20, Chapter V, Part 681, Subpart B](#)

Monitoring and Audits

After grant approval, awardees also known as Subrecipients, will be referred to as Awardee/Subrecipient hereafter, and will be monitored and/or audited by the state, in accordance with existing policies, procedures, and requirements governing the use of WIOA funds. The Awardee/Subrecipient is expected to be responsive to all - compliance monitor's requests, provide reasonable and timely access to records and staff, facilitate access to subcontractors, and communicate with compliance monitors in a timely and accurate manner. If performance is insufficient or the project is not performing and making progress towards deliverables, the state will consider placing the agency on cash hold and possibly de-obligating funds.

The Awardee/Subrecipient must conduct regular oversight and monitoring of all contractors and their Subrecipients. The purpose of this requirement is to ensure that expenditures meet the cost category and cost limitation requirements of WIOA and the regulations, that there is compliance with other provisions of WIOA and the regulations, the Uniform Guidance, Title 2 CFR part 200 and part 2900, and other applicable laws and regulations, and to provide technical assistance as needed. It is the Awardee/Subrecipients responsibility to ensure that all awarded funds comply with all regulations.

The Awardee/Subrecipients and their Subrecipients, that are units of local government, or non-profit organizations, must ensure that audits required under OMB guidelines, CFR 200.501, are performed and submitted when due. All organizations that are Subrecipients under WIOA Title I and that expend more than the minimum level specified in OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards must have either an organization-wide audit conducted in accordance with Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards or a program-specific financial and compliance audit.

- [CFR 200.327 - 200.329 - Performance and Financial Monitoring and Reporting](#)
- [CFR 200.330 - 200.332 - Subrecipient Monitoring and Management](#)
- [CFR 200.501 - 200.507 - Audit Requirements](#)

Record Retention

Awardees/Subrecipients must maintain project and fiscal records sufficient to allow federal, state, and local reviewers to evaluate the project's effectiveness and proper use of funds. The record retention system must include both original and summary (e.g., computer-generated) data sources. Awardees/Subrecipients will retain all records pertinent to this contract for three years from the date of final payment on this subgrant.

- [CFR 200.333 – 200.337 – Record Retention](#)

Local Agency Policies

As a recipient of WIOA funds, agencies must have a series of local agency policies that comply with state and federal regulations. All administrative policies are required. Policies about serving participants are only needed when an agency is using grant funds to serve participants. There may be additional policies that are necessary in the future and some that are not listed here. The local agency policies will be reviewed during monitoring.

It is up to the Subrecipient to determine which policies are applicable and draft/implement them for their program. The state cannot do this on their behalf. CWDB staff can provide examples of local policies or connect Subrecipients to their local area.

Administrative Policies

- Accounting Systems
- Allowable Costs and Cost Classification
- Audits and Audit Resolution
- Budget Control and Modifications
- Cash Mgmt. (including minimizing cash on hand)
- Closeout – Grants and Contracts
- Complaints and/or Grievances (participants, staff, and bidders)
- Conflict of Interest
- Debt Collection
- Eligible Training Provider List
- Incident Reporting and Grievance
- Indirect Costs
- Internal Controls/Separation of Duties
- Matched and Leveraged Resources
- Subrecipient monitoring, including Personally Identifiable Information
- Operating Expense Payments
- Payroll (personnel services, compensations, salaries, and fringe)
- Procurement/Purchasing
- Program Income (if applicable)
- Property Management/Inventory Control and Disposition
- Operating Expense Payments
- Records Retention

- Salary and Bonus Limitations
- Travel
- WIOA Youth Waiver

Steven’s Amendment

Per the Steven’s Amendment pursuant to Public Law 101-166, Section 511, when issuing statements, press releases, requests for proposals, bid solicitations, and other documents describing projects or programs funded in whole or in part with Federal money, all non-Federal entities receiving Federal funds shall clearly state the following: a. The percentage of the total costs of the program or project which will be financed with Federal money; b. The dollar amount of Federal funds for the project or program; and c. The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources. Refer to [Steven’s Amendment FAQs](#) for additional information.

Participant Policies

Applicable for projects using funds to serve participants.

- Eligibility Determination
- Personally Identifiable Information
- Services and Training
- Supportive Services (Needs Related Payments, Incentives and Stipends)

Case Management

Case management is only applicable to projects using grant funds to serve participants.

While case management is a programmatic function, the lead agency is responsible for ensuring that all Awardee/Subrecipient staff and their Subrecipients serving participants with WIOA funds are performing case management in compliance with WIOA regulations. All participants must be eligible for the WIOA program, meet eligibility requirements as an Adult, Dislocated Worker or Youth, and complete the registration and enrollment process in CalJOBS. This must be verified before any funds are spent on a client. If a client is not eligible for the program and funds are spent, these funds could be deemed unallowable.

Examples of case management (not exhaustive) include:

- Eligibility verification – supporting documentation is required.
- Creation of a participant file and a clearly outlined service strategy plan.
- Detailed case notes explaining all supports to the client.
- Justification for all funds spent on the participant that align with the service strategy plan.
- Signed participant timesheets, if work experience or on-the-job training is provided.

During monitoring, a thorough review will occur to verify participant eligibility and confirm all funds spent align with the service strategy plan and are justifiable and allowable. The goal is to create participant files containing all the necessary documentation and details to describe how this participant was supported while enrolled in the WIOA program.

CalJOBS activity codes will need to be entered as services are provided to participants.

- [EDD Directive – CalJOBS Activity Codes](#)

Supportive Services

Supportive services are only applicable to projects using grant funds to serve participants.

Supportive services can only be provided when participants are participating in career and training services, are unable to obtain support from other programs, and are necessary to enable a participant to participate in career and education services. A local agency policy must be developed if using grant funds to provide supportive services to participants.

- [CFR Title 20, CH V, Part 680, Subpart G – Adult and Dislocated Worker Supportive Services](#)
- [CFR 681.570 – Youth Supportive Services](#)

Examples of supportive services rules and documentation requirements that a Subrecipient will be responsible for implementing include (list is not exhaustive):

- Receipts for all expenses. If items are purchased and given to the client, there needs to be a tracking system that shows the client received the items.
- Funds provided in the form of gift cards require receipts signed by the participant and the case manager for the full amount of the gift card with matching documentation for the specific amounts in the case notes. There needs to be a tracking system that shows the client received the gift card. Receipt from the gift card purchase must also be provided back to the organization along with the gift card if there are unspent funds.
- Funds for gas must be tracked in a log with mapped mileage and addresses to and from the worksite.

Reporting

Subrecipients must have the capability to report expenditures, participant data, and outcome data to the state in timely, thorough, and accurate manner through CalJOBS, the state's required reporting system. The state will provide training on how to use CalJOBS. If the Awardee/Subrecipient is a Local Board or RPU, work with the MIS Administrator for additional assistance.

All Awardee/Subrecipients will be required to access CalJOBS for financial reporting and perform cash drawdowns. Only the Awardee/Subrecipients using grant funds to serve participants will be required to enter participant data into CalJOBS, submit quarterly participant reports, enter project activities and perform case management. The CWDB will provide a

quarterly reporting template, and it is the expectation that reports provide a comprehensive narrative on project activities, information on expenditures, and metrics for participants, reflecting work done by all partners. Reports will be cross-checked with CalJOBS data entry.

The CWDB may request monthly reporting if there are concerns with meeting project outcomes or issues with expenditures. In some instances, a Subrecipient may be put on cash hold if reports are not being submitted on time, expenditures are a concern, or timely reporting in CalJOBS is not occurring.

Within 60 days of the project termination date, a project closeout report is due. The Monthly and Quarterly Financial Reporting Requirements and WIOA Closeout Requirements on the EDD website provide further guidance:

- [EDD Directive - Participant Reporting Information](#)
- [EDD Directive - Fiscal Reporting Information](#)
- [EDD Directive - Closeout Reporting Information](#)

Compliance

All funds are subject to their related state and federal statutory and regulatory requirements. These requirements are detailed in governing documents that include, but are not limited to, the WIOA and its associated federal regulations, OMB Circulars, CFRs Title 2, Title 20 and Title 29, and EDD Directives and Information Notices.

Evaluation

WIOA Sections 134 and 136 (e) provide for the ongoing evaluation of workforce development activities. A statewide activities assessment allows the state to determine the effectiveness of the Governor's 15% Discretionary funds in addressing the identified statewide needs. As part of this RFA, the state will be selecting a statewide evaluation organization, and the Awardee/Subrecipient will be required to participate in that evaluation by providing requested data and information. Therefore, all Awardees/Subrecipients are expected to document lessons learned and effective/promising practices ascertained through this project.

Fiscal

Awardees/Subrecipients must ensure that all federal and state fiscal requirements are being met by all agencies utilizing the funds awarded under this RFA. In the event that projects fall behind on spending or deliverables, the Awardee/Subrecipient may be put on a cash hold until the issues and concerns are remedied. If a resolution is not reached, there is a possibility that funds will be de-obligated.

Awardees/Subrecipients of WIOA funds will incur expenditures against the subgrant/award and those costs will need to be reimbursed through a Cash Draw in CalJOBS. Upon award, Awardees/Subrecipients will be asked to complete a cash request in the CalJOBS Cash Draw module in order to receive funds.

Prior to completing the application and exhibits, it is recommended to review the following EDD

Directives:

- [EDD Directive - CalJOBS Cash Request](#)
- [EDD Directive - Allowable Costs and Prior Written Approval Information](#)
- [EDD Directive - Procurement of Equipment and Related Services](#)

If leasing equipment is being considered, it must to be included in the procurement analysis. Review Federal Acquisition Regulations (FAR) section 7.400, for additional information on leasing:

- [Review Federal Acquisition Regulations](#)
- [EDD Directive - Subrecipient and Contractor Distinctions](#)
- [EDD Directive - Indirect Cost Rates](#)
- [EDD Directive – Guidance on Regional Awards](#)

Travel: [Uniform Guidance 200.474](#)

For additional information on administrative and allowable costs see Appendices A and B below.

Appendix A – Administrative Costs

There is an administrative cost limit of 10 percent of the total funds awarded under this contract.

The following WIOA Title I function and activities constitute the costs of administration subject to the administrative cost limitation:

- A. The costs of administration are expenditures incurred by direct grant recipients, as well as local grant recipients, local grant sub recipients, local fiscal agents, and which are not related to the direct provision of WIOA services, including services to participants and employers. These costs can be both personnel and non-personnel and both direct and indirect.
- B. The costs of administration are the costs associated with performing the following functions:
 1. Performing the following overall general administrative functions and coordination of those functions under WIOA Title I:
 - a) Accounting, budgeting, financial and cash management functions
 - b) Procurement and purchasing functions
 - c) Property management functions
 - d) Personnel management functions
 - e) Payroll functions
 - f) Coordinating the resolution of findings arising from audits, reviews, investigations and incident reports
 - g) Audit functions;
 - h) General legal services functions;
 - i) Developing systems and procedures, including information systems, required for these administrative functions; and
 2. Performing oversight and monitoring responsibilities related to WIOA administrative functions.
 3. Costs of goods and services required for administrative functions of the program, including goods and services such as rental or purchase of equipment, utilities, office supplies, postage, and rental and maintenance of office space.
 4. Travel costs incurred for official business in carrying out administrative activities or the overall management of the WIOA system.
 5. Costs of information systems related to administrative functions (for example, personnel, procurement, purchasing, property management, accounting and payroll systems) including the purchase, systems development and operating costs of such systems.
 6. Specific costs charged to an overhead or indirect cost pool that can be identified directly as administrative costs. Documentation of such charges must be maintained.

- C. Awards to sub-recipients or contractors that are solely for the performance of administrative functions are classified as administrative costs.
1. Personnel and related non-personnel costs of staff that perform both administrative functions specified in paragraph (b) of this section and programmatic services or activities must be allocated as administrative or program costs to the benefiting cost objectives/categories based on documented distributions of actual time worked or other equitable cost allocation methods.
 2. Specific costs charged to an overhead or indirect cost pool that can be identified directly as a program cost are to be charged as a program cost. Documentation of such charges must be maintained.
 3. Except as provided in paragraph (1) of this section, all costs incurred for functions and activities of sub-recipients and contractors are program costs.
 4. Costs of the following information systems including the purchase, systems development and operating (data entry) costs are charged to the program category
 - a) Tracking of performance information.
 - b) Information relating to supportive services and unemployment insurance claims for program participants.
 5. Continuous improvement activities are charged to administration or program category based on the purpose or nature of the activity to be improved. Documentation of such charges must be maintained.

Appendix B - Allowable Costs and Cost Items Matrix

An entity that receives funds under Title I of the Workforce Innovation and Opportunity Act (WIOA) is required to comply with the Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements Final Rule (Uniform Guidance) ([2 CFR Part 200](#)) and Department of Labor (DOL) exceptions ([2 CFR Part 2900](#)). In general, to be an allowable charge under WIOA, a cost must meet the following criteria:

- a. Be necessary and reasonable for the performance of the award.
- b. Be allocable to the award.
- c. Conform to any limitations or exclusions outlined in the award.
- d. Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-federal entity.
- e. Be accorded consistent treatment.
- f. Be determined in accordance with generally accepted accounting principles.
- g. Not be used to meet cost sharing or matching requirements of any other federally-financed program.
 - *Note: CWDB allows WIOA discretionary funds to be used towards match of other CWDB WIOA discretionary funded programs and with WIOA Title I formula funds.*
- h. Be adequately documented

Below is a high-level cost items matrix with six columns. The first four columns identify cost items and various entity types. The remaining two columns are reserved for the specific Uniform Guidance sections and DOL exceptions (if applicable). It should be noted that the matrix is intended to be used as an initial tool or quick reference guide rather than a final authority for deciding of whether or not a cost would be considered allowable.

The legend key below, along with the definitions, is intended to help the user understand whether a cost item is allowable or not.

Legend Key	Legend Key Definition
A	Allowable
AP	Allowable with Prior Approval
AC	Allowable with Conditions
U	Unallowable

Legend Key	Legend Key Definition
NS	Not Specified in the Uniform Guidance

If a cost item is denoted with two or more legend keys, users should delve further into the various information sources as they may provide the additional clarity that is needed. If this effort does not provide the necessary information, the project manager or Regional Advisor should be contacted.

The “NS” legend key means that information may not be readily available. In this event, other information sources should be sought out before contacting the project manager or Regional Advisor.

The “AP” legend key means that, in some instances, prior written approval will be required. In this event, the user should adhere to the Uniform Guidance Section 200.407, DOL exceptions Section 2900.16, and contact their project manager or Regional Advisor.

Cost Matrix

	Cost Item	Educational Institutions	Non-Profit Organizations	State, Local & Indian Tribal Governments	Uniform Guidance Section	DOL Exception Section
1	Advertising and public relations	A/U	A/U	A/U	200.421	
2	Advisory councils	AC/U	AC/U	AC/U	200.422	
3	Alcoholic beverages	U	U	U	200.423	
4	Alumni/ae activities	U	NS	NS	200.424	
5	Audit services	AC/U	AC/U	AC/U	200.425	
6	Bad debts	U	U	U	200.426	
7	Bonding costs	A	A	A	200.427	

	Cost Item	Educational Institutions	Non-Profit Organizations	State, Local & Indian Tribal Governments	Uniform Guidance Section	DOL Exception Section
8	Collection of improper payments	A	A	A	200.428	
9	Commencement and convocation costs	AC/U	NS	NS	200.429	
10	Compensation – personal services	A/U	A/U	A/U	200.430	
11	Compensation – fringe benefits	A /U	A /U	A /U	200.431	
12	Conferences	A	A	A	200.432	
13	Contingency provisions	AC/U	AC/U	AC/U	200.433	2900.18
14	Contributions and donations	U	U	U	200.434	
15	Defense and prosecution of criminal and civil proceedings, claims, appeals, and patent infringement	AC/U	AC/U	AC/U	200.435	
16	Depreciation	AC	AC	AC	200.436	
17	Employee health and welfare costs	A	A	A	200.437	

	Cost Item	Educational Institutions	Non-Profit Organizations	State, Local & Indian Tribal Governments	Uniform Guidance Section	DOL Exception Section
18	Entertainment costs	U/AP	U/AP	U/AP	200.438	
19	Equipment and other capital expenditures	AP/U	AP/U	AP/U	200.439	
20	Exchange rates	AP	AP	AP	200.440	
21	Fines, penalties, damages, and other settlements	U/AP	U/AP	U/AP	200.441	
22	Fundraising and investment management costs	U/AP/A	U/AP/A	U/AP/A	200.442	
23	Gains and losses on disposition of depreciable assets	AC	AC	AC	200.443	
24	General cost of government	NS	NS	U/A	200.444	
25	Goods or services for personal use	U/AP	U/AP	U/AP	200.445	
26	Idle facilities and idle capacity	AC/U	AC/U	AC/U	200.446	

	Cost Item	Educational Institutions	Non-Profit Organizations	State, Local & Indian Tribal Governments	Uniform Guidance Section	DOL Exception Section
27	Insurance and indemnification	AC/U	AC/U	AC/U	200.447	
28	Intellectual property	A/U	A/U	A/U	200.448	
29	Interest	AC/U	AC/U	AC/U	200.449	
30	Lobbying	U	U	U	200.450	
31	Losses on other awards or contracts	U	U	U	200.451	
32	Maintenance and repair costs	A	A	A	200.452	
33	Material and supplies costs, including costs of computing devices	A	A	A	200.453	
34	Memberships, subscriptions, and professional activity costs	A/U	A/U	A/U	200.454	
35	Organization costs	U/AP	U/AP	U/AP	200.455	
36	Participant support costs	AP	AP	AP	200.456	

	Cost Item	Educational Institutions	Non-Profit Organizations	State, Local & Indian Tribal Governments	Uniform Guidance Section	DOL Exception Section
37	Plant and security costs	A	A	A	200.457	
38	Pre-award costs	AP	AP	AP	200.458	
39	Professional services costs	A	A	A	200.459	
40	Application costs	A	A	A	200.460	
41	Publication and printing costs	A	A	A	200.461	
42	Rearrangement and reconversion costs	A/AP	A/AP	A/AP	200.462	
43	Recruiting costs	A/U	A/U	A/U	200.463	
44	Relocations costs of employees	AC/U	AC/U	AC/U	200.464	
45	Rental costs of real property and equipment	AC/U	AC/U	AC/U	200.465	
46	Scholarships and student aid costs	AC	NS	NS	200.466	
47	Selling and marketing	U/AP	U/AP	U/AP	200.467	
48	Specialized service facilities	AC	AC	AC	200.468	

H RTP: WIOA 3.0 – Applying for WIOA Funds

	Cost Item	Educational Institutions	Non-Profit Organizations	State, Local & Indian Tribal Governments	Uniform Guidance Section	DOL Exception Section
49	Student activity costs	U/AP	U/AP	U/AP	200.469	2900.19
50	Taxes	AC	AC	AC	200.470	
51	Termination costs	AC/U	AC/U	AC/U	200.471	
52	Training and education costs	A	A	A	200.472	
53	Transportation costs	A	A	A	200.473	
54	Travel costs	AC	AC	AP	200.474	
55	Trustees	A	A	NS	200.475	