

I. Purpose

The Code of Federal Regulations requires non-federal entities receiving federal awards to have written procedures for determining the allowability of costs in accordance with the Uniform Grant Guidance Cost Principles. (2 CFR 200.302(b)(7)) As a recipient of such funds, WorkForce West Virginia (WFWV) has established the Allowable Cost Policy to prescribe spending guidelines for recipients and subrecipients of federal funds.

II. Summary

The Allowable Cost Policy addresses:

a. Allowable activities for Section 134: Adult and Dislocated Worker Program, Use of Funds

Local areas must use WIOA funds to provide allowable career and training services to eligible adults and dislocated workers. There are three types of career services: basic career services, individualized career services, and follow-up services.

b. Allowable activities for Section 129: Youth Workforce Investment Activities, Use of Funds

Local areas must use WIOA funds to provide allowable youth workforce investment activities to eligible youth participants.

c. In addition to the requirements in Local Uses of Funds outlined in Sections 129 and 134 of WIOA Title I-B, all expenditures of WIOA funds must meet the allowable cost principles outlined in 2 CFR Part 200 Subpart E – Cost Principles. The cost principles of 2 CFR Part 200 Subpart E are the basic guidelines describing allowable ways federal funds may be spent.

d. This policy also addresses common costs to carry out an allowable WIOA activity, so long as the expenditure satisfies the basic cost principles of 2 CFR Part 200.

III. References

- a. Workforce Innovation and Opportunity Act (Pub. L. 113-128)
- b. United States Department of Labor, Workforce Innovation and Opportunity Act; Final Rule, 20 CFR, §§ 683.235, 245, 250, 260, 290, Administrative Provisions Under Title I of the Workforce Innovation and Opportunity Act
- c. United States Department of Labor, Office of Management and Budget Guidance for Grants and Agreements; Final Rule, 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

IV. Policy

a. Introduction

1900 Kanawha Blvd. East * Building 3 Suite 300 * Charleston, WV 25305

An agency of the Department of Commerce

An equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.

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All expenditures under the Workforce Innovation and Opportunity Act (WIOA) must comply with the federal requirements associated with those funds. For WIOA Title I-B, this includes allowable activities identified in the WIOA statute and governing regulations, as well as the general requirements for managing federal grant funds that can be found in the Uniform Grant Guidance. Local areas must adhere to the required uses of funds (Section 129 Use of Funds for Youth Workforce Investment Activities and Section 134 Use of Funds for Employment and Training Activities), the basic cost principles of the Uniform Guidance found in 2 CFR Part 200, as well as the federal program regulations under Title 20 of the Code of Federal Regulations, when making WIOA expenditures.

In addition, local areas may not use more than ten (10) percent of the allocated award for administrative activities. (WIOA Section 128(b)(4)(A))

b. WIOA Adult and Dislocated Worker Activities and Use of Funds

Section 134: Adult and Dislocated Worker Program, Use of Funds

Local areas must use WIOA funds to provide allowable career and training services to eligible adults and dislocated workers. There are three types of career services: basic career services, individualized career services, and follow-up services. Refer to WIOA Section 134(c)(2) and 20 CFR § 678.430 for a full description of allowable career services and WIOA Section 134(c)(3)(D) and 20 CFR § 680.200 for a full description of allowable training services.

Local areas may also use WIOA funds on permissible activities, including work support activities for low-wage workers and supportive services, but are not required to. Refer to WIOA Section 134(d)(1)-(5) for a full description of permissible activities.

Under WIOA Title I-B, funds to provide workforce investment activities must be directed at eligible adults and dislocated workers. A one-stop operator or partner must spend funds on career services and training services and may spend funds on permissible activities identified in the statute.

i. Career Services

There are three types of career services: basic career services, individualized career services, and follow-up services. Refer to WIOA Section 134(c)(2) and 20 CFR § 678.430 for a full description of allowable career services.

1. Basic Career Services

Allowable activities must include, but are not limited to:

- a. Determinations of whether the individual is eligible to receive assistance from the adult, dislocated worker, or youth programs
- b. Outreach, intake (including worker profiling), and orientation to information and other services available through the WFWV system
- c. Initial assessment of skills levels, including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and support service needs
- d. Labor exchange services, including:

- i. Job search and placement assistance, and, when needed by an individual, career counseling, including the provision of information on nontraditional employment and in-demand industry sectors and occupations
- ii. Appropriate recruitment and other business services on behalf of employers, including information and referrals to specialized business services not traditionally offered through the WFWV system
- e. Provision of referrals to and coordination of activities with other programs and services, including programs and services within the WFWV system and, when appropriate, other workforce development programs
- f. Other allowable basic career services activities identified in 20 CFR § 678.430(a)

2. **Individualized Career Services**

Allowable activities must include, but are not limited to:

- a. Comprehensive and specialized assessments of the skills levels and service needs of adults and dislocated workers, which may include:
 - i. Diagnostic testing and use of other assessment tools
 - ii. In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals
- b. Development of an individual employment plan to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve his or her employment goals, including the list of and information regarding eligible training providers
- c. Group counseling
- d. Individual counseling
- e. Career planning
- f. Short-term prevocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for unsubsidized employment or training
- g. Other allowable individualized career services activities identified in 20 CFR § 678.430(b)

3. **Follow-Up Services**

Follow-up services must be made available, as appropriate—including counseling regarding the workplace—for participants in adult or dislocated worker activities who are placed in unsubsidized employment for a minimum of 12 months after the first day of employment.

ii. Training Services

WIOA is designed to increase participant access to training services. Training services are provided to equip individuals to enter the workforce and retain employment.

Examples of allowable training services include:

1. Occupational skills training, including training for nontraditional employment
2. On-the-job-training (OJT), as described in WIOA Section 3(44)
3. Registered apprenticeship
4. Incumbent worker training in accordance with WIOA Section 134(d)(4)
5. Workplace training and cooperative education programs
6. Private sector training programs
7. Skills upgrading and retraining
8. Entrepreneurial training
9. Job readiness training provided in combination with other training described above
10. Adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, in combination with training
11. Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of training

iii. Permissible Local Activities

WIOA Title I funds may also be used to provide the additional services described below:

1. Job Seeker Services

- a. Customer support to enable individuals with barriers to employment (including individuals with disabilities) and veterans to navigate among multiple services and activities
- b. Training programs for displaced homemakers and for individuals training for nontraditional occupations (as defined in WIOA Section 3(37): occupations or fields of work in which individuals of one gender comprise less than 25 percent of the individuals so employed), in conjunction with programs operated in the workforce area
- c. Work support activities for low-wage workers, in coordination with local areas, that will provide opportunities for these workers to retain or enhance employment
- d. Work support activities may include any activities available under the WIOA adult and dislocated worker programs in coordination with activities and

resources available through partner programs. These activities may be provided in a manner that enhances the worker's ability to participate, for example by providing activities during nontraditional hours or providing on-site childcare

- e. Support services, including needs-related payments, as described in WIOA Section 134(d)(2) and (3). Needs-related payments provide financial assistance to participants to enable them to participate in training. Unlike other support services, to qualify for needs-related payments, a participant must be enrolled in training

2. Employer Services

- a. Customized screening and referral of qualified participants in training services to employers
- b. Customized employment-related services to employers, employer associations, or similar organizations on a fee-for-service basis that are, in addition to labor exchange services, available to employers under the Wagner-Peyser Act
- c. Activities to provide business services and strategies that meet the workforce investment needs of employers, as determined by the local area, and are consistent with the local area plan

3. Coordination Activities

- a. Employment and training activities in coordination with any of the following:
 - i. Child support enforcement activities, as well as child support services and assistance activities, of the state and local agencies carrying out part D of Title IV of the Social Security Act (42 U.S.C. § 651, et seq.)
 - ii. Cooperative extension programs carried out by the U.S. Department of Agriculture
 - iii. Activities to facilitate remote access to services provided through a one-stop delivery system, including facilitating access through the use of technology
- b. Activities to:
 - i. Improve coordination between workforce development and economic development and to promote entrepreneurial skills training and microenterprise services
 - ii. Improve services and links between the local workforce system and employers, including small employers
- c. Improving coordination between employment and training activities and programs carried out in the workforce area for individuals with disabilities

4. Other Allowable Activities

- a. Technical assistance for one-stop operators, one-stop partners, and eligible providers of training services regarding the provision of services to individuals with disabilities in local areas, including the development and training of staff, the provision of outreach, intake, assessments, and service delivery, the coordination of services across providers and programs, and the development of performance accountability measures
- b. Activities to adjust the economic self-sufficiency standards for local factors, or activities to adopt, calculate, or commission for approval, economic self-sufficiency standards for the local areas that specify the income needs of families, by family size, the number and ages of children in the family, and substate geographical considerations
- c. Implementation of promising services to workers and businesses, which may include support for education, training, skill upgrading, and statewide networking for employees to become workplace learning advisors and maintain proficiency in carrying out the activities associated with such advising

c. WIOA Youth Activities and Use of Funds

Section 129: Youth Workforce Investment Activities, Use of Funds

Local areas must use WIOA funds to provide allowable youth workforce investment activities to eligible youth participants. Refer to Section 129(c)(1)-(2) for program elements and a full description of allowable youth workforce investment activities.

When a local area receives funds, it may use those funds to carry out programs that meet the requirements of WIOA Section 129(c)(1) to provide workforce investment activities for eligible youth. A program that meets these requirements may provide the following services to eligible youth participants:

- i. Tutoring, study skills training, instruction, evidence-based dropout prevention and recovery strategies that lead to completion of a secondary school diploma or equivalent, or a recognized postsecondary credential
- ii. Alternative secondary school services or dropout recovery services
- iii. Paid and unpaid work experiences that provide academic and occupational education, including:
 - 1. Summer employment opportunities and other employment opportunities available throughout the school year
 - 2. Pre-apprenticeship programs
 - 3. Internships and job shadowing
 - 4. On-the-job training opportunities

- iv. Occupational skills training, with priority to those that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area
- v. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster
- vi. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate
- vii. Supportive services, such as transportation, childcare, dependent care, housing, referrals to healthcare and needs-related payments that are necessary to enable an individual to participate in activities
- viii. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months
- ix. Follow-up services for not less than 12 months after the completion of participation, as appropriate
- x. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate
- xi. Financial literacy education
- xii. Entrepreneurial skills training
- xiii. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services
- xiv. Activities that help youth prepare for and transition to postsecondary education and training (WIOA Section 129(c)(2))

d. Basic Cost Principles

In addition to the requirements in Local Uses of Funds outlined in Sections 129 and 134 of WIOA Title I-B, all expenditures of WIOA funds must meet the allowable cost principles outlined in 2 CFR Part 200 Subpart E – Cost Principles. The cost principles of 2 CFR Part 200 Subpart E are the basic guidelines describing allowable ways federal funds may be spent. Allowable costs are:

- i. **Reasonable and necessary** (meaning that, for example, sound business practices were followed, and purchases were comparable to market-prices)
 - 1. A cost may be reasonable if the nature of the goods or services acquired, and the amount involved reflect the action that a prudent person would have taken under the circumstances prevailing at the time the decision to incur the cost was made.
 - 2. A cost is necessary if it is required for the performance or administration of the grant and included in the budget.

- ii. **Allocable to the federal award** (meaning that the federal grant program, in this case WIOA, received a benefit in proportion to the funds charged to the program. For example, if fifty percent (50%) of an employee's salary is paid with WIOA funds, then the employee must spend at least fifty percent (50%) of his or her time on a WIOA program.)
- iii. **Conforming to any limitations or exclusions** set forth in these principles or in the federal award as to types or amount of cost items
- iv. **Consistent with policies and procedures** that apply uniformly to both federally financed and other activities of the non-federal entity
- v. **Treated Consistently as either a direct or indirect cost**
- vi. **Legal under state and local law**
- vii. **Properly Documented** (and accounted for on a consistent basis with generally accepted accounting principles)
- viii. **Consistent with the provisions of the grant program** (WIOA Title I-B)
- ix. **Not used for cost-sharing or matching** any other grant agreement, except where otherwise authorized by statute (2 CFR § 200.403)
- x. **Incurred during the approved budget period**

e. Allowable Costs

A local area may use its WIOA grant funds on the following common costs to carry out an allowable WIOA activity, so long as the expenditure satisfies the basic cost principles of 2 CFR Part 200.

i. Contracts

Contracts with potential employers for the purpose of placement of WIOA Title I-B participants.

ii. Advertising, Public Relations/Outreach, Marketing

1. *Advertising costs* means the costs of advertising media and corollary administrative costs.
2. *Advertising media* means magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals, and the like.
3. *Public relations* mean community relations and those activities dedicated to maintaining the image of the non-federal entity or maintaining or promoting understanding and favorable relations with the community or public at large or any segment of the public. (2 CFR § 200.421)

iii. Allowable Advertising Costs

WIOA Title I-B funds may only be used for certain allowable advertising costs, as permitted by 2 CFR § 200.421(b). These include:

1. The recruitment of personnel required by the non-federal entity for performance of the WIOA Title I-B award

2. The procurement of goods and services for the performance of the WIOA Title I-B award
3. The disposal of scrap or surplus material acquired in the performance of the federal WIOA Title I-B award, except when non-federal entities are reimbursed for disposal costs at a predetermined amount
4. Program outreach and other specific purposes necessary to meet the requirements of the WIOA Title I-B award

iv. Allowable Public Relations Costs

WIOA Title I-B funds may only be used for certain allowable public relations costs, as permitted by 2 CFR § 200.421(d). These include:

1. Costs specifically required by WIOA Title I-B
2. Costs of communicating with the public and press pertaining to specific activities or accomplishments which result from performance of WIOA Title I-B programs (these costs are considered necessary as part of the outreach effort for the federal award)
3. Costs of conducting general liaisons with news media and government public relations officers, to the extent that such activities are limited to communication and liaisons necessary to keep the public informed on matters of public concern, such as notices of funding opportunities, financial matters, etc.

v. Equipment

Local areas may use WIOA funds to purchase equipment if the equipment purchase is necessary, reasonable, and allocable to the grant. Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the local area for financial statement purposes, or \$5,000. (2 CFR § 200.1) (*Equipment*) For each equipment and computing device purchased with WIOA funds, local areas must maintain the following:

1. Serial number or other identification number
2. Source of funding for the property (including the FAIN)
3. Who holds title
4. Acquisition date and cost of the property
5. Percentage of federal participation in the project costs for the federal award under which the property was acquired
6. Location, use, and condition of the property
7. Any ultimate disposition data including the date of disposal and sale price of the property (2 CFR 200.313(d)(1))

Local areas must take a physical inventory of equipment purchased with WIOA funds and the results must be reconciled with property records at least once every two years.

vi. Use of Equipment

Local areas must use the equipment in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the federal award, and must not encumber the property without prior approval of the federal awarding agency and WFWV. When no longer needed for the original program or project, the equipment may be used in other activities supported by the Federal awarding agency, in the following order of priority: (1) activities under a Federal award from the Federal awarding agency which funded the original program or project; then (2) activities under Federal awards from other Federal awarding agencies. (2 CFR § 200.313(c)(1))

During the time equipment is used on the project or program for which it was acquired, the equipment will also be made available for use on other projects or programs currently or previously supported by the Federal government, provided that such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use must be given to other programs or projects supported by the Federal awarding agency that financed the equipment. Second preference is given to programs or projects under Federal awards from other Federal awarding agencies. Use for non-Federally funded programs or projects is also permissible. (2 CFR § 200.313(c)(2))

vii. Disposal of Equipment

When it is determined that original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, the local area must contact the awarding agency for disposition instructions.

Generally, disposition of equipment is dependent on its fair market value (FMV) at the time of disposition. If the item has a current FMV of \$5,000 or less, it may be retained, sold, or otherwise disposed of with no further obligation to the Federal awarding agency. If the item has a current FMV of more than \$5,000, the Federal awarding agency is entitled to the Federal share of the current market value or sales proceeds.

If acquiring replacement equipment, the local area may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property. (2 CFR § 200.313(e))

viii. Food

The purpose of the WIOA Title I-B funds is to provide skills training to the workforce, find employment for individuals, and assist businesses to fulfill labor demands and needs. Food, refreshments, and other items are not part of the purpose of these grants. Food and refreshments are narrowly permitted under one element of 2 CFR Part 200's Selected Items of Costs, Conferences. Therefore, there is limited justification for recipients of WIOA Title I-B funds to expend funds on food, refreshments or other consumables. It is the responsibility of the local area that is expending the funds on any activity to ensure the expenditures:

1. Meet the objectives of the WIOA statute and regulations
2. Benefit the grant
3. Meet the urgency of the situation
4. Are necessary, reasonable, and allocable consistent with the standards of federal grant requirements

In cases where these basic conditions are not met, the local area must find other sources of funding. Alcoholic beverages are an unallowable cost. (2 CFR § 200.423)

ix. Memberships

Organizational memberships and subscriptions in business, professional, technical groups/associations (not at the individual level) to carry out a WIOA activity are allowable. See also 2 CFR § 200.454.

x. Professional Services

Costs of professional services, like consultants, are allowable when reasonable in relation to the services rendered and when not contingent upon recovery of the costs from the federal government. Fees paid to retain professional services that do not have an accompanying invoice or where the local area does not receive such services in reasonable proportion to the amount paid under the grant are unallowable. (2 CFR § 200.459)

xi. Technical Assistance Meetings and Conferences

The cost of meetings and conferences, where the primary purpose is to provide technical assistance and is necessary and reasonable for successful performance under the federal award is allowable.

xii. Travel Costs

Travel costs are the expenses for transportation, lodging, subsistence, including meals, and related items incurred by employees who are traveling on pre-approved, official business, and are allowable. Official business travel must be approved using the local area travel policy.

f. Unallowable Costs

All costs associated with an unallowable activity are considered unallowable costs, regardless of their allowability under other circumstances. WIOA Title I-B funds cannot be used on unallowable costs.

i. WIOA Title I-B funds cannot be used on:

1. The wages of incumbent employees during their participation in economic development activities provided through a statewide workforce development system.
2. Public service employment, except when authorized under Title I of WIOA such as when public employment is offered as on-the-job training, transitional employment, or work experience. Public service employment is defined as work normally provided by governments and includes, but is not limited to, work in the field of human betterment and community improvement; childcare; healthcare;

education; crime prevention; public transportation; streets and parks; solid waste removal; housing and neighborhood improvement; and rural development. (20 CFR § 683.250)

3. Subawards or contracts with parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal programs or activities. (20 CFR § 683.250)
4. Contracts with persons falsely labeling products made in America. (20 CFR § 683.250)
5. Foreign travel. (20 CFR § 683.250)
6. Employment-generating activities, investment in revolving loan funds, capitalization of businesses, investment in contract bidding resource centers. (20 CFR § 683.245)
7. Employment or training programs for sectarian activities. This section does not prohibit the provision of services by faith-based organizations, unless those services are sectarian in nature.
8. Expenses prohibited under any other Federal, State or local law or regulation. (20 CFR § 683.250)

ii. Advertising, Public Relations/Outreach, Marketing

WIOA Title I-B funds must not be used for the following advertising, public relations, and selling/marketing costs, in accordance with 2 CFR §§ 200.421(e) and 200.467:

1. All advertising and public relations costs other than as specified in the Allowable Costs section above
2. Costs of meetings, conventions, convocations, or other events related to other activities of the entity, including:
 - Costs of displays, demonstrations, and exhibits
 - Costs of meeting rooms, hospitality suites, and other special facilities used in conjunction with shows and other special events
 - Salaries and wages of employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings
3. Costs of promotional items and memorabilia, including models, gifts, and souvenirs
4. Costs of advertising and public relations designed solely to promote the local area. (2 CFR 200.421(e))
5. Costs of selling or marketing any products or services of the non-federal entity, except as direct costs, with prior approval by the federal awarding agency when necessary for the performance of the federal award. (2 CFR 200.467)

iii. Business Relocations

WIOA Title I-B funds are prohibited for business relocations that result in the loss of an employee's job at the original location in the U.S. WIOA funds must not pay for customized training, skill training, on-the-job training, incumbent worker training, transitional employment, or company specific assessments, of job applicants for employees of any business, or part of a business, that has relocated from any location in the U.S., until the company has operated at the location for 120 days, if the relocation has resulted in any employees losing their job.

To verify that a business establishment that is new or expanding is not, in fact, relocating the business domicile or employees from another area, a standardized pre-award review must be completed and documented by the LWDA and the business, as a prerequisite to WIOA Title I-B assistance.

The pre-award review must include:

1. Names under which the establishment does business, including the predecessors and successors in interest
2. The name, title, and address of the company official certifying the information
3. Whether WIOA Title I-B assistance was sought in connection with past or impending job losses at other facilities, including a review of whether Worker Adjustment and Retraining Notification Act (WARN) notices relating to the employer have been filed. The review may include consultations with labor organization in the affected local area(s). (20 CFR § 683.260)

iv. Capital Expenditures, Equipment

Capital expenditures for general purpose equipment are unallowable as a direct cost except with prior approval from the awarding agency or pass-through entity. (2 CFR § 200.439) All single item vehicles and other equipment purchases that cost \$5,000 or more must receive prior approval from the Division. The Grantee must submit the following to the Division:

1. A list of the equipment to be purchased
2. A description of the purpose for which it is to be used, including participants expected to be served with the purchased equipment
3. The cost of the equipment

v. Construction

The costs of construction or the purchase of facilities or buildings or other capital expenditures for improvements to land or buildings are unallowable for all WIOA Title I-B programs, except with prior written approval from the U.S. Department of Labor. (20 CFR § 683.235)

vi. Entertainment

Costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sporting events, meals, lodging, rentals, transportation, and gratuities) are unallowable. (2 CFR § 200.438)

vii. Legal Expenses

Any legal expenses incurred for the prosecution of claims against the government are unallowable. This includes appeals to the Administrative Law Judge of disallowed costs or other claims and civil actions where the federal government is a defendant. (2 CFR § 200.435(g)) In addition, general retainer fees to law firms which fail to delineate how the legal services directly benefitted the WIOA program are unallowable.

viii. Leasehold Improvements/Renovation Costs

Capital expenditures for improvements to land, buildings, or equipment which materially increase their value or useful life are unallowable as a direct cost except with prior written approval of the U.S. Department of Labor. See 2 CFR § 200.439(b)(3).

ix. Telecommunications

Covered telecommunications costs for equipment and services described in Public Law 115-232, section 889 are unallowable. Covered telecommunications and video surveillance equipment or services are those produced by Huawei Technologies Company, ZTE Corporation, Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company, or any subsidiary or affiliate of such entities. (2 CFR § 200.216)

x. Additional Unallowable Expenditures

1. Audits other than the Single Audit; and interest paid or other financial costs
2. Bad debts (from uncollectible accounts)
3. Contingency or “petty cash” funds
4. Contributions or donations
5. Copyrights/patents
6. Delivery fees (Delivery costs for equipment/supplies are an integral part of those assets and are allowable.)
7. Dues/memberships to professional organizations or societies (for individuals)
8. Equipment – expenditures for equipment that are not specifically used for approved WIOA activities; not used for general administrative or personal use; that is mounted or becomes a part of a building or structure; equipment and supplies needed for building maintenance
9. Goods and services for personal use
10. Interest and other financial costs
11. Fines and penalties
12. Fundraising
13. Gifts, door prizes, etc.

14. Insurance - (building, equipment or personal/institutional insurance is not allowable)
15. Lobbying and other political activities
16. Monetary awards
17. Travel unrelated to the WIOA program

g. Selected Items of Costs

The following table lists the selected items of cost identified in 2 CFR Part 200. An item that has an “M” means that it is allowable only under certain conditions and/or may require prior approval.

Item of Cost	Citation of Allowability Rule	Yes, No, Maybe
Advertising and public relations costs	2 CFR § 200.421	M
Advisory councils	2 CFR § 200.422	M
Alcoholic beverages	2 CFR § 200.423	N
Alumni/ae activities	2 CFR § 200.424	N
Audit services	2 CFR § 200.425	M
Bad debts	2 CFR § 200.426	N
Bonding costs	2 CFR § 200.427	M
Collection of improper payments	2 CFR § 200.428	Y
Commencement and convocation costs	2 CFR § 200.429	M
Compensation – personal services	2 CFR § 200.430	M
Compensation – fringe benefits	2 CFR § 200.431	M
Conferences	2 CFR § 200.432	M
Contingency provisions	2 CFR § 200.433	M
Contributions and donations	2 CFR § 200.434	N
Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements	2 CFR § 200.435	M
Depreciation	2 CFR § 200.436	M
Employee health and welfare costs	2 CFR § 200.437	M
Entertainment costs	2 CFR § 200.438	M
Equipment and other capital expenditures	2 CFR § 200.439	M
Exchange rates	2 CFR § 200.440	M
Fines, penalties, damages and other settlements	2 CFR § 200.441	M
Fund raising and investment management costs	2 CFR § 200.442	M
Gains and losses on disposition of depreciable assets	2 CFR § 200.443	M
General costs of government	2 CFR § 200.444	N
Goods and services for personal use	2 CFR § 200.445	N

Idle facilities and idle capacity	2 CFR § 200.446	M
Insurance and indemnification	2 CFR § 200.447	M
Intellectual property	2 CFR § 200.448	M
Interest	2 CFR § 200.449	M
Lobbying	2 CFR § 200.450	M
Losses on other awards or contracts	2 CFR § 200.451	N
Maintenance and repair costs	2 CFR § 200.452	M
Materials and supplies costs, including costs of computing devices	2 CFR § 200.453	M
Memberships, subscriptions, and professional activity costs	2 CFR § 200.454	M
Organization costs	2 CFR § 200.455	M
Participant support costs	2 CFR § 200.456	M
Plant and security costs	2 CFR § 200.457	Y
Pre-award costs	2 CFR § 200.458	M
Professional services costs	2 CFR § 200.459	M
Proposal costs	2 CFR § 200.460	M
Publication and printing costs	2 CFR § 200.461	M
Rearrangement and reconversion costs	2 CFR § 200.462	M
Recruiting costs	2 CFR § 200.463	M
Relocation costs of employees	2 CFR § 200.464	M
Rental costs of real property and equipment	2 CFR § 200.465	M
Scholarships and student aid costs	2 CFR § 200.466	M
Selling and marketing costs	2 CFR § 200.467	M
Specialized service facilities	2 CFR § 200.468	M
Student activity costs	2 CFR § 200.469	M
Taxes (including Value Added Tax)	2 CFR § 200.470	M
Telecommunications and video surveillance costs	2 CFR § 200.471	N
Termination costs	2 CFR § 200.472	M
Training and education costs	2 CFR § 200.473	Y
Transportation costs	2 CFR § 200.474	Y
Travel costs	2 CFR § 200.475	M
Trustees	2 CFR § 200.476	Y

V. Procedures

This requirement takes effect upon approval.