



Mississippi Valley Workforce Development Board

Outreach Expense Policy

Approved Date: August 21, 2023

Effective Date: August 21, 2023

PURPOSE

To provide information and guidance for the Local Workforce Development Board and sub-recipients regarding the use of state and federal funds to conduct outreach and promote/market local workforce services.

BACKGROUND

Title 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (the Uniform Guidance), restricts the use of federal funds for advertising and public relations (see 2 CFR 200.421).

DEFINITIONS

- **Program Outreach:** Program outreach is an activity conducted by workforce boards and sub-recipients to educate the public about services available and how to access those services. Program outreach also includes activities designed to inform and recruit individuals that have particular needs and have been targeted for services.
- **Outreach/Informational Item:** An outreach/informational item is purchased for distribution to job seekers and employers to reinforce the program outreach that a Local Workforce Development Board does.
- **Promotional/Marketing Item:** An item purchased for distribution to the general public that promotes the organization (only contains the name of the Local Workforce Development Board, Iowa*WORKS*, or Accelerate Iowa).
- **Public Relations:** Include activities dedicated to maintaining the image of the organization and promoting relationships with the community or public at large.
- **Connection to Programs/Services:** A statement that connects a business, partner, or job seeker to services offered at the workforce board. For example, “Call [phone #] or visit [website] for assistance in locating employment or job training,” etc.

APPLICABILITY

The policy and procedures contained in this guidance apply to the use of federal or state grant funding received from DOL. It does not apply to outreach/informational and promotional/marketing items purchased with non-federal and non-state funds.

This policy does not apply to the following items that are not considered “outreach/informational.” These items may include the name and/or the logo of the

organization and tagline, so long as the cost of adding that information is not significantly different from the cost of the supplies unmarked, and those supplies are used only for the conduct of grant business and not as outreach/informational purposes. The Local Workforce Development Board and/or sub-recipient should maintain cost comparison data between the items marked and unmarked to demonstrate that the cost variance was reasonable. These items include:

- Office supplies such as pens, pencils, pads of paper, business cards, stationary, post-it note pads, mouse pads, lanyards, or similar items used by staff, board members, or individuals participating in workforce program activities.
- Balloons, banners, and table skirts that include the organization's name used to identify the organization at events such as job fairs and other community events.
- T-shirts and other types of uniform materials worn by staff or participants used to identify staff and participants as members of the local workforce team.
- Supportive services such as grooming supplies (pocket valets) and other similar items that may be used to help participants successfully interview for jobs, etc.
- Supplies, materials, booklets, and videos purchased for resource rooms, job readiness classes, and Rapid Response.

ADVERTISING AND PUBLIC RELATIONS ALLOWABILITY

2CFR 200.421(e)(4) identifies "Costs of advertising and public relations designed solely to promote the non-Federal entity" as unallowable advertising and public relations costs. The only allowable advertising costs are those which are solely for:

- The recruitment of personnel required by the non-Federal entity for the performance of a Federal award (See also § 200.463).
- The procurement of goods and services for the performance of a Federal award.
- The disposal of scrap or surplus materials acquired in the performance of a Federal award except when non-Federal entities are reimbursed for disposal costs at a predetermined amount.
- Program outreach and other specific purposes necessary to meet the requirements of the Federal award.

The term "public relations" includes community relations and means 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. The only allowable public relations costs are:

- Costs specifically required by the Federal award.
- Costs of communicating with the public and press about specific activities or accomplishments which result from the performance of the Federal award (these costs are considered necessary as part of the outreach effort for the Federal award).
- Costs of conducting general liaison with news media and government public relations officers, to the extent that such activities are limited to communication and liaison

necessary to keep the public informed on matters of public concern, such as notices of funding opportunities, financial matters, etc.

Unallowable advertising and public relations costs include the following:

- Costs of meetings, conventions, convocations, or other events related to other activities of the entity (see also § 200.432 Conferences), 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; and
 - Salaries and wages of employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings.
- Costs of promotional items and memorabilia, including models, gifts, and souvenirs.
- Costs of advertising and public relations designed solely to promote the non-Federal entity.

PROGRAM OUTREACH AND INFORMATIONAL ITEMS ALLOWABILITY

Federal regulations allow costs associated with advertising to conduct program outreach activities. Allowable advertising includes TV and radio spots, billboards, spots on transit media, signage, social media, websites, brochures, etc. Program outreach should be a coordinated activity that supports and benefits the various workforce grants operated by the local workforce development board.

Allowable advertising should be targeted to businesses, job seekers, and/or community partners and: 1) connects job seekers, businesses, and/or community partners to programs and services offered by the Local Workforce Development Board, or 2) serves a business purpose by assisting job seekers to obtain employment, and for employers to find qualified job seekers. In order to be allowable, program outreach/informational items must meet the following criteria:

- Be reasonable in price and necessary to assist in outreach to businesses, community partners, and job seekers. Only the number of items determined necessary to support outreach efforts planned for the program year should be purchased.
- Any outreach/informational items purchased for distribution as giveaways must be intended for businesses and community partners in the context of doing business with the Local Workforce Development Area, or for job seeker customers as part of program recruitment, participation, or follow-up.
- Outreach items provided to businesses/community partners should be items that can be used in the work environment and have the added benefit/value of connecting the business/community partner to the programs and services provided by the Local Workforce Development Board.
- Outreach items provided to job seekers should be useful during the search for employment while connecting the individual back to employment programs and services.

All outreach and informational items must include:

- Contain a phone number, e-mail address, web address, or street address for customers to contact.
- Trackable QR codes or another type of tracking system should be used when possible.
- Include the Iowa*WORKS* brand “Iowa*WORKS* Mississippi Valley” logo and follow the style guide when applicable.
- The Accelerate Iowa Logo should be used for youth programming outreach in conjunction with the Iowa*WORKS* logo.
- Include a tagline (call to action) that connects a business, partner, or job seeker to services offered at the workforce board. For example, “Call [phone #] or visit [website] for assistance in locating employment or job training,” etc.
- Funding Acknowledgement. The following statement shall be included on all products developed in whole or in part with WIOA Funds:
 - "This project [is being] [was] supported, in whole or in part, by the federal award number [enter project FAIN] award to the State of Iowa by the U.S. Department of the Treasury."
 - When space is limited, the tagline may be shortened to “Funded by DOL, WIOA Title I-B programs.”

The following are some examples of allowable outreach/informational items, provided that the items meet the criteria outlined above:

- Any outreach items paid for with federal funds must be intended for general workforce business use by staff or partners, or business or job seeker customers as part of program recruitment, participation, or follow-up. Please note that the costs of promotional items and memorabilia including models, gifts, and souvenirs are unallowable.
- Folders purchased for distribution to job seekers to assist them in seeking employment. These items should include information on available workforce services (brochures, pamphlets, etc.).
- Pens and pencils purchased for distribution to job seekers and participants to assist them in seeking jobs and participating in program services and/or for distribution to businesses and community partners to remind them of services available through the Local Workforce Development Board.
- USB drives that include pre-loaded information about available services purchased for distribution to job seekers and participants to assist them in seeking jobs and participating in program services and/or for distribution to businesses and community partners to remind them of services available through the Local Workforce Development Board.
- Tote bags for distribution to job seekers at job fairs and community events. Tote bags and other similar items purchased for distribution to job seekers should include information on available workforce services (brochures, pamphlets, etc.).

- Cups/Water Bottles – Cups are generally not as acceptable as water bottles. Water bottles are more related to program participation. (For example, working on resumes at a computer in a workforce center.)
- Disposable items are not allowable.
- The Buy American Act must be followed when applicable. All attempts should be made to buy American except when the price and delivery time are deemed to be unreasonable.

The following are examples of items that are not allowed to be purchased from state or federal grant resources:

- Balloons purchased for distribution to the general public at job fairs or community events. These and other promotional/marketing items intended to be distributed to the general public as a “giveaway” are not allowable.
- Hairbrushes/other personal items purchased for distribution as a marketing item to the general public or job seekers. These and other promotional/marketing items intended to be distributed to the general public as a “giveaway” are not allowable.
- Umbrellas purchased for distribution to businesses and community partners to engage and remind them of services available through the Local Workforce Development Board. Although the item may be intended for distribution to only businesses targeted for recruitment, the item is determined to have limited value/benefit and has a high cost per item for that limited benefit.

ALLOWABILITY OF EMPLOYER OUTREACH AND JOB DEVELOPMENT ACTIVITIES

Allowable employer outreach and job development activities must be directly related to training individuals, such as:

- Development of work-based learning opportunities.
- Contracts with potential employers for the purpose of placement of WIOA Title I-B participants.
- Participation in business associations such as chambers of commerce, economic development boards, joint labor-management committees, labor associations, and resource centers.
- Have contact with potential employers for purpose of placement of WIOA Title I-B participants.
- Provide information about WIOA Title I-B programs.
- Coordinate regional or local activities to promote entrepreneurial training and microenterprise services.
- Assist in making informed decisions about job training needs.
- Actively participate in local business resource centers (incubators) to provide technical assistance to small and new businesses to reduce the rate of business failure.
- Subscribe to relevant publications.

- Conduct labor market surveys.
- Conduct other allowable WIOA activities in the private sector.

FUNDING ALLOWABILITY

Generally, USDOL Employment and Training Administration programs like the Workforce Innovation and Opportunity Act allow for the purchase of outreach and informational materials. Other programs depend on grantor preference on the issue or the nature of the services provided. The “Outreach/Informational Items Decision Tree” in Attachment I is provided as a resource tool for determining funding allowability. All outreach expenses may be subject to audit.

PRIOR WRITTEN APPROVAL

Prior written approval is not required to purchase allowable program outreach activities. Prior written approval is required for any purchases of allowable outreach/informational items exceeding 5,000 in total for the program year. Exceptions can be made to this policy on a case-by-case basis by the Executive Director.

DOCUMENTATION

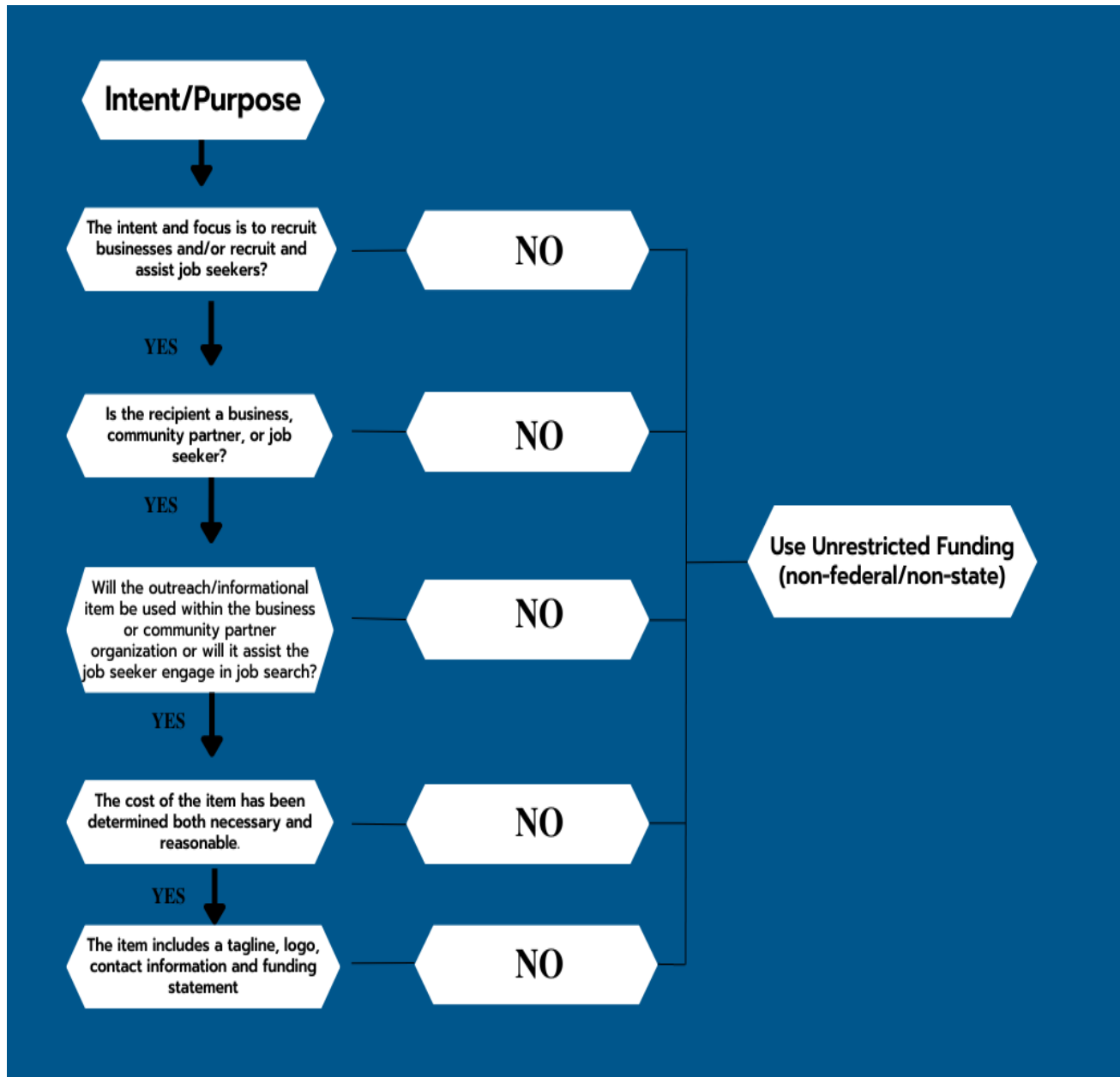
The Board and sub-recipients must have good, clear supporting documentation for all costs associated with program outreach and informational activities. Good, clear supporting documentation establishes that the expenditure:

- meets the cost principles (is necessary and reasonable for proper and efficient performance and administration of the grant);
- is allocable to the grant based upon benefits received.
- is authorized or not prohibited under federal, state, or local laws or regulations.
- conforms to any limitations or exclusions outlined in the principles, federal laws, terms and conditions of the federal award, or other governing regulations as to types or amounts of cost items; and
- is consistent with policies, regulations, and procedures that apply.

REFERENCES

- Workforce Innovation and Opportunity Act (WIOA; 29 U.S.C. 2701 et seq.)
- Regulations for the Workforce Development Systems Under Title I of WIOA (20 C.F.R. Part 675 et seq.)
- Title 2 C.F.R. Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (the Uniform Guidance).

**Attachment I Outreach/Informational Items
Decision Tree**



Attachment II Questions and Answers

1. What's the intent or purpose of the transaction (items purchased)?

- Transactions benefitting the client: the intent or purpose should be to assist the client in their employment and training activities or to direct the client to the services provided by the federal program(s).
- Transactions benefitting the program(s) offered: the information included should be clear and purposeful. For example, if the item purchased is a banner showcasing Veterans Services, the banner should clearly display the programs and/or services offered.
- Transactions benefitting businesses and other stakeholders: the intent should be to highlight the services that the federal program(s) can provide to the business. For example, testing prospective employees or providing an overview of the program/s available, etc.

2. Who will benefit from the transaction?

As you analyze this question, think about the benefits to the targeted audience. The transaction might benefit the job seeker/client by increasing their awareness of the program or services. Employers might be drawn into using programs or services when they are reminded of the provided transaction. Also, the transaction will hopefully enhance or create new relationships with employers. And lastly, advertisements for outreach efforts should be designed to draw in those customers seeking services, such as job seekers looking for employment and training opportunities or employers who are considering hiring staff.

- Will the items purchased benefit the job seeker/client?
- Will they create relationships with potential employers?
- In the case of ads in the local media outlets, are the ads designed to draw in those seeking our services, or are they designed to reach out to local businesses that may be contemplating hiring?

3. Can the items be intended solely for personal use?

Items purchased using federal monies are not intended solely for personal use. Items purchased for clients should assist the client in finding a job or completing the program objectives as intended by the grant or program. Gadgets and toys that don't support program activities should be purchased with money or awards that are not from federal sources.

4. What programs, services, and organizations must be identified?

Outreach, advertising, public relations, and informational activities may highlight the programs or services provided by the grants, but may **not** focus on an organization including workforce centers, a governmental agency, a business, a partner or sub-contractor, or any other service provider.

- Those clients or businesses receiving materials should be able to understand what programs and services are available.
- Organizations (such as a workforce center or Local Area) should not be the main

focus of the outreach materials. Focus on the organization may not provide enough detail and understanding of the programs and services available at the organization. An organization must be a part of the design, but programs and services must be included to make the messaging meaningful.

- When including information about the programs, a locally branded name can be used to describe that program; however, contact information must be added to the design so that the recipient will know how to take further actions and whom to contact.

5. What level of detail is acceptable when there is “limited space available” on the item purchased?

At a minimum, there should be a URL that directs the user to specific information on the program or service from which they will receive the benefit.

6. When including a website in the design, what URL is acceptable?

The pages that the user is directed to must contain information on the programs/ services offered and the funding source. Including basic contact information such as an address, phone number, and business hours is encouraged. For example, if your outreach item will be funded with WIOA Youth program money, the appropriate link to include would direct the client to the WIOA Youth page on the website.

Equal Opportunity Programs/Employer

Auxiliary aids and services are available upon request for individuals with disabilities.