

## **Updated WIOA Infrastructure Costs Resources**

### List of attachments

Attachment I: Department of Education and Department of Labor directives, Sample MOU and Infrastructure Cost Toolkit, FAQs, WIOA MythBusters, Uniform Guidance Grant Management training and other web based resources

Attachment II: Statutory and Regulatory Citations

Attachment III: Examples of Cost Pools and Possible Allocation Bases

Attachment IV: Paying for the One-Stop Delivery System

Attachment V: Infrastructure Costs: Funding Sources

Attachment VI: One-Stop Operating Costs

## **LABOR**

Training and Employment Guidance Letter (TEGL) 17-16 dated January 18, 2017  
[https://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=4968](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=4968)

## **EDUCATION**

Technical Assistance Circular – RSA-TAC-17-03 dated January 18, 2017  
<https://www2.ed.gov/policy/speced/guid/rsa/subregulatory/tac-17-03.pdf>

### **Sample MOU and Infrastructure Costs Toolkit**

[https://ion.workforcegps.org/resources/2017/03/23/13/30/Sample\\_MOU\\_Infrastructure\\_Costs\\_Toolkit](https://ion.workforcegps.org/resources/2017/03/23/13/30/Sample_MOU_Infrastructure_Costs_Toolkit)

### **FAQs - WIOA Infrastructure and One-Stop Partners**

<https://www.doleta.gov/wioa/FAQs.cfm>

### **WIOA MythBusters including Infrastructure Costs**

<https://ion.workforcegps.org/resources/2018/01/26/16/32/WIOA-MythBusters>

### **ION Network:**

**Infrastructure Part I:** [https://www.workforcegps.org/events/2016/09/09/17/00/WIOA\\_One-Stop\\_Infrastructure\\_Funding\\_Part\\_1](https://www.workforcegps.org/events/2016/09/09/17/00/WIOA_One-Stop_Infrastructure_Funding_Part_1)

**Infrastructure Part II: Local vs State Funding Mechanism -**

<https://ion.workforcegps.org/sitecore/content/global/events/2017/02/14/10/58/WIOA-Wednesday-MOU-Part-II-Local-vs-State-Funding-Mechanism>

**Infrastructure Part III: Wisconsin's Cost Database**

(<https://www.workforcegps.org/events/2017/05/31/13/51/WIOA-Wednesday-Infrastructure-Part-III-Wisconsin-s-Cost-Database>)

**Financial and Grants Management Track Presentations and Resources from the WIOA Convenings including on the following workshops:**

*I Have to Compete my One-Stop Operator, Now How Does This Work?,*

*WIOA Infrastructure: Comparing the Local vs State Funding Mechanisms,*

*Transparency in the Workforce System: Establishing Firewalls & Internal Controls*

*Key Elements for Oversight & Management of Local Areas & Sub-Recipients:*

[https://ion.workforcegps.org/resources/2017/03/20/10/21/Financial\\_Grants\\_Management\\_Presentations](https://ion.workforcegps.org/resources/2017/03/20/10/21/Financial_Grants_Management_Presentations)

**Uniform Guidance – Grant Management and Cost Allocation training**

<https://grantsapplicationandmanagement.workforcegps.org/> and

<https://www.workforcegps.org/ForGrantees>

## **Statutory and Regulatory References**

- Workforce Innovation and Opportunity Act (Pub. L. 113-128). July 22, 2014;
- Workforce Innovation and Opportunity Act; Final Rule published at 81 FR 56,072. August 19, 2016;
- WIOA Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions; Final Rule published at 81 Federal Register 55,791. August 19, 2016;
- Resource Sharing for Workforce Investment Act One-Stop Centers: Methodologies for Paying or Funding Each Partner Program's Fair Share of Allocable One-Stop Costs; Notice. Published at 66 Federal Register 29,638. May 31, 2001;
- Office of Management and Budget (OMB) CFR Chapter II, Part 200, et al. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards: Final Rule. December 26, 2013; and
- Department of Labor (DOL) CFR Chapter II, Part 2900 et al. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. December 19, 2014.

### Attachment III

### Examples of Cost Pools and Possible Allocation Bases

Cost Pool	Possible Allocation Bases
<b>Facilities:</b> Building rent, maintenance costs, utilities, tenant improvements, or any other similar costs related to the physical structure housing the one-stop center.	Square footage occupied by each partner agency as compared to the total space, workstation usage by partners as compared to total workstations.
<b>Telecommunications:</b> Monthly telephone costs, telephone system equipment, data lines, T-1 lines, and other similar costs.	Dedicated telephone units as compared to all units.
<b>Information Technology:</b> Shared equipment, software, IT maintenance costs, Internet access, and other similar costs.	Number of dedicated computers (including all necessary equipment) as compared to total.
<b>Resource Center:</b> Costs of shared equipment, displays, computer learning, specialized software for computer learning, furniture, copier, fax machine; may also include related staff costs.	Number of program participants or reportable individuals utilizing the resource center.
<b>Common Intake System:</b> Costs of developing common intake data formats, preparation and interview of customers, and similar costs.	Use of common data formats and data elements required for each program. Use of number of customer or participant records maintained by each partner program.
<b>One-Stop Center Management Staff:</b> Costs of the center director.	Number of partner program staff FTEs. Square footage of partner program benefit or number of program participants and reportable individuals served.
<b>One-Stop Center General Operations Staff:</b> Costs of the receptionist, staff of the resource center.	Number of partner program participants.
<b>Shared Equipment and Supplies:</b> Staff copier, fax, associated supplies, and furniture.	Usage by staff of each partner program. Occupancy (square footage) basis; numbers of staff workstations.
<b>Career Services:</b> Staff and benefit costs, development of common forms for case management, and similar costs.	Time distribution system (time sheets, work sampling, time and motion studies); numbers of clients eligible for specific program; weighted participation numbers.

## Attachment IV: Paying for the One-Stop Delivery System

### GOVERNOR GUIDANCE

*WIOA sec. 121(h)(1)(B); 20 CFR 678.705, 34 CFR 361.705, 34 CFR 463.705*

Governors must issue guidance regarding the infrastructure funding of a one-stop delivery system after consultation with chief elected officials (CEO), State workforce development board (WDB), and Local WDB. The guidance must be consistent with guidance and policies provided by the State WDB.

### LOCAL DELIVERY SYSTEM

*WIOA sec. 121; 20 CFR 678.300, 34 CFR 361.300, 34 CFR 463.300*

- The Local WDB and CEOs finalize the list of one-stop delivery system partners in a local area
- The local WDB, CEO(s), and partners:
  - Identify one-stop delivery system locations and determine types of locations (comprehensive, affiliate, specialized one-stop centers, etc.),
  - Determine services to be provided through the one-stop delivery system, and
  - Develop and agree on a one-stop delivery system operating budget(s).

### MEMORANDUM OF UNDERSTANDING (MOU)

*WIOA sec. 121(c); 20 CFR 678.500, 34 CFR 361.500, 34 CFR 463.500*

- The local WDB, with the agreement of the CEO, develops and enters into a signed umbrella memorandum of understanding (MOU) or individual MOUs with the one-stop partners.
- MOUs must, at a minimum, describe the services to be provided, contain the one-stop operating budget, outline how infrastructure and additional costs will be funded, and contain several other elements outlined in WIOA sec. 121(c) and 20 CFR 678.500, 34 CFR 361.500, and 34 CFR 463.500.
- An **Infrastructure Funding Agreement (IFA)** is established that describes a reasonable cost allocation methodology, where infrastructure costs are charged to each partner based on partners' proportionate use of the one-stop center, relative to the benefits received from the use of the one-stop center consistent with Federal Cost Principles in the Uniform Guidance at 2 CFR part 200 and the Department of Labor exceptions at 2 CFR part 2900.
- The IFA must be consistent with the partner programs' authorizing laws and regulations, and other applicable legal requirements.
- Changes in the one-stop partners or an appeal by a one-stop partner's infrastructure cost contributions will require an update of the MOU.
- The IFA is a part of the MOU; it is not a separate document.

### Was consensus on the IFA obtained?

Consensus Obtained Local Funding Mechanism	No Consensus Obtained State Funding Mechanism
<i>WIOA sec. 121(h); 20 CFR 678.715 – 678.745, 34 CFR 361.715 – 361.745, and 34 CFR 463.715 – 463.745</i>	
<ul style="list-style-type: none"> <li>▪ Continue one-stop operations and service delivery.</li> <li>▪ Periodically reconcile IFA with actual costs.</li> <li>▪ Modify other costs, such as shared costs budget, and partner contributions, as appropriate.</li> <li>▪ Modify allocation methods, if necessary.</li> </ul>	<ul style="list-style-type: none"> <li>▪ When local negotiations for PY 2017 (and subsequent PYs) are unable to reach consensus, notify Governor by deadline established in Governor's guidance to trigger state funding mechanism<sup>1</sup>.</li> <li>▪ Once partner contributions are determined, periodically reconcile IFA with actual costs.</li> <li>▪ Modify other costs, such as shared costs budget, and partner contributions, as appropriate.</li> <li>▪ Modify allocation methods, if necessary.</li> </ul>

<sup>1</sup> For PY 2016, continue one-stop operations and service delivery as long as possible, using processes established under WIA.

## Types of One-Stop Delivery System Costs

### INFRASTRUCTURE COSTS

WIOA sec. 121(h)(4); 20 CFR 678.700(a)-(b), 34 CFR 361.700(a)-(b), 34 CFR 463.700(a)-(b)

- Non-personnel costs
- Costs necessary for the general operation of the one-stop center, including but not limited to:
  - Applicable facility costs (such as rent) including costs of utilities and maintenance
  - Equipment (including assessment-related products and assistive technology for individuals with disabilities)
  - Technology to facilitate access to the one-stop center, including technology used for the center's planning and outreach activities
  - May consider common identifier costs as costs of one-stop infrastructure
  - May consider supplies as defined in the Uniform Guidance at 2 CFR 200.94, to support the general operation of the one-stop center.

### ADDITIONAL COSTS

WIOA sec. 121(i)(1); 20 CFR 678.760(a)-(b), 34 CFR 361.760(a)-(b), 34 CFR 463.760(a)-(b)

(Applicable career services, shared operating costs, and shared services)

- Must include the costs of the provision of career services in WIOA sec. 134(c)(2) applicable to each program consistent with partner program's applicable Federal statutes and allocable based on Federal cost principles in the Uniform Guidance at 2 CFR part 200.
- May include shared operating costs and shared services that are authorized for, and may be commonly provided through, the one-stop partner programs, including initial intake, assessment of needs, appraisal of basic skills, identification of appropriate services, referrals to other one-stop partners, and business services.

### INFRASTRUCTURE FUNDING TYPES

20 CFR 678.720 and 678.760, 34 CFR 361.720 and 361.760, 34 CFR 463.720 and 463.760

Cash	Non-Cash	Third-Party In-Kind
<ul style="list-style-type: none"> <li>▪ Cash funds provided to the local board or its designee by one-stop partners, either directly or by an interagency transfer.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Expenditures incurred by one-stop partners on behalf of the one-stop center; and</li> <li>▪ Non-cash contributions or goods or services contributed by a partner program and used by the one-stop center.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Contributions of space, equipment, technology, non-personnel services, or other like items to support the infrastructure costs associated with one-stop operations, by a non-one-stop partner to:               <ul style="list-style-type: none"> <li>• Support the one-stop center in general; or</li> <li>• Support the proportionate share of one-stop infrastructure costs of a specific partner.</li> </ul> </li> </ul>
<p>Must be valued consistent with 2 CFR 200.306 to ensure they are fairly evaluated and meet the partners' proportionate share. Partners must fairly value contributions on a periodic and annual basis.</p>		

## Attachment V: Infrastructure Costs: Funding Sources

Partner Program	Required/ Additional Partner	Funds to Pay for Infrastructure Costs		State Funding Mechanism <sup>1</sup> Applicable
		Admin. <sup>2</sup>	Program	
<b>U.S. Department of Labor</b>				
WIOA Title I programs:	Required	Yes	Yes	Yes
• Adult, Dislocated Worker, & Youth				
• Job Corps	Required	No	Yes	Yes
• YouthBuild	Required	Yes	Yes	Yes
• NFJP	Required	Yes	Yes	Yes
• Native American programs <sup>3</sup>	Required	Yes	Yes	No
Wagner-Peyser Act ES	Required	N/A <sup>4</sup>	Yes	Yes
SCSEP	Required	Yes	Yes	Yes
TAA program	Required	Yes	Yes	Yes
UC programs	Required	N/A <sup>4</sup>	Yes	Yes
JVSG programs	Required	N/A <sup>4</sup>	Yes	Yes
REO programs authorized under sec. 212 of the Second Chance Act of 2007 (42 U.S.C. 17532) and WIOA sec. 169	Required	Yes	Yes	Yes
<b>U.S. Department of Education</b>				
AEFLA program, authorized under WIOA title II	Required	Yes	No	Yes
The State VR program authorized under title I of the Rehabilitation Act of 1973 (29 U.S.C.720 et seq.), as amended by WIOA title IV	Required	N/A <sup>4</sup>	Yes	Yes
Career and technical education programs at the postsecondary level, authorized under the Carl D. Perkins Career and Technical Education Act of 2006	Required	Yes	No	Yes
<b>U.S. Department of Housing and Urban Development</b>				
Employment and training activities carried out by HUD	Required	Consult partners' authorizing documents.		Yes
<b>U.S. Department of Health and Human Services</b>				
Employment and training activities carried out under the CSBG programs	Required	Consult partners' authorizing documents.		Yes
TANF	Either <sup>5</sup>	Yes	No	Yes/No <sup>6</sup>
<b>Additional Partners</b>				
Partners as outlined by WIOA sec. 121(b)(2)(B) and 20 CFR 678.410 <sup>7</sup>	Additional	Consult partners' authorizing documents.		No

## Attachment VI:

### LIMITATIONS:

<sup>1</sup> Statutory caps for infrastructure funds is applicable only if the State Funding Mechanism is being implemented.

<sup>2</sup> Partners' funding contributions for infrastructure costs are subject to the partner programs' administrative cost limitations and restrictions. The definition of administrative costs may also differ from one partner program to the next.

<sup>3</sup> Native American programs, as required One-stop partners, are strongly encouraged to contribute to infrastructure costs, but they are not required to make such contributions under WIOA.

<sup>4</sup> These programs do not distinguish between program or administrative funds since there is only one allotment from which all expenditures – administrative costs and program costs – must be paid. Although the VR program imposes no limits on the amount of funds that may be spent on administrative costs, VR agencies must report funds spent for infrastructure costs as administrative costs.

<sup>5</sup> At the discretion of the Governor, in accordance with WIOA sec. 121(b)(1)(C) and 20 CFR 678.405.

<sup>6</sup> The Governor may determine that TANF will not be a required partner.

<sup>7</sup> Additional partners are required to share in infrastructure costs when participating in the one-stop service delivery system; however, the State funding mechanism is not applicable to additional partners.

## One-Stop Operating Costs

**Figure 1:** The figure below diagrams the organization of one-stop operating costs.

