



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

## POLICY ISSUANCE

Date: October 4, 2019 Number: 2019-09

### PROPERTY MANAGEMENT AND INVENTORY POLICY

#### INTRODUCTION

This policy provides guidance to the Workforce Development Board (WDB) of Solano County for property management and inventory. This policy applies to all subrecipients of Workforce Innovation and Opportunity Act (WIOA) funds, to ensure allowable uses of property and proper management and inventory of property funded with WIOA funds.

#### QUESTIONS

Questions relating to this policy should be directed to Tracy White, One Stop Manager, at [twhite@solanowdb.org](mailto:twhite@solanowdb.org) or (707) 863-3520.

#### ATTACHMENTS

N/A

#### POLICY

The Uniform Guidance provides fiscal and administrative guidance for the administration of the WIOA program. The intent is to ensure that assets are managed according to proper inventory, maintenance, and disposition procedures.

##### *Intangible and Intellectual Property*

Subrecipients of a federal award obtain the title to intangible property once it has been acquired. The subrecipient must use the property for the originally-authorized purpose and must not encumber the property without approval from the Department of Labor (DOL). Further, DOL has the right to obtain, reproduce, publish, or otherwise use the data produced under a federal award, and authorize others to receive, reproduce, publish, or otherwise use such data for federal purposes. In addition, DOL requires intellectual property developed under a competitive federal award process to be licensed under a Creative Commons Attribution license. This license allows subsequent users to copy, distribute, transmit and adapt the copyrighted work and requires such users to attribute the work in the manner specified by the recipient.

##### *Inventory Records*

The WDB and subrecipients must maintain accurate inventory records of all property purchased with federal funds. All property should have a unique identification mark to be

used for inventory purposes. The inventory records must include the following information:

- A description of the property.
- Manufacturer's serial number, model number, or other identification number.
- Source of funding for the property (including the Federal Award Identification Number).
- Whether the title is held by the subrecipient or by DOL.
- Acquisition date (or date received, if the property was furnished by the federal government).
- Cost of the property.
- Percentage of federal participation in the project costs for the federal award under which the property was acquired.
- Location, use, and condition of the property.
- Ultimate disposition data including the date of disposal and the sale price.

In addition to the requirements above, WDB and subrecipient staff must take a physical property inventory and reconcile the inventory with the property records at least once every two years. Staff and subrecipients must also develop a control system to ensure adequate safeguards to prevent loss, damage, or theft of the property; any loss, damage, or theft of property must be investigated. Further, staff and subrecipients must develop adequate maintenance procedures to keep the property in good operating order. Finally, if the WDB or subrecipient is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

The WDB and subrecipients must retain all property records for three years after the date of acquisition, through final disposition and then maintain the records for three years beyond that. Subrecipients must also retain those records for a period of three years from the date of their last expenditure report submitted to the California Employment Development Department's (EDD) Central Office Workforce Services Division. If any litigation, claim, or audit is started before the expiration of the three-year period, all records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken. Refer to policy "2019-08 Record Retention" for further information.

### *Disposition of Property*

When reporting any property on the Property Closeout Inventory Certification Form required by EDD, all similar items should be grouped together by category for inventory and fair market value purposes (e.g., computers, furniture, etc.). If equipment with a per unit fair market value of \$5,000 or more, or an inventory of unused supplies with a total aggregate fair market value of \$5,000 or more, is no longer needed for the original project or program, the WDB or subrecipient may use the property for other activities currently or previously supported through DOL funds. Otherwise, if the property is not needed for the original program/project or other DOL supported activities, the WDB or subrecipient may

either retain or sell the property and reimburse the state for the WIOA federal funds' share. The amount of reimbursement is computed by applying the percentage of WIOA federal funds used to purchase these items to the current "fair market" value of the property. If only WIOA federal funds were used, then use 100 percent for the calculation. The WDB and subrecipients may deduct and retain from the WIOA share \$500 or 10 percent of the proceeds of the sale, whichever is less, for selling and handling expenses. The balance of funds must be submitted within 30 days. The name of the entity, subgrant number, year of appropriation, and the funding stream must be provided when submitting the funds. Funds received from the sale of property must be sent to the following address:

Attn: Cash Control Unit Fiscal Programs Division,  
MIC 70 Employment Development Department  
P.O. Box 826217  
Sacramento, CA 94230-6217

If the WDB or subrecipient has no further use for the property and wishes to dispose of it (in a manner other than selling), they must request disposition instructions from the state. If the per unit cost of equipment or total aggregate inventory of unused supplies is less than \$5,000, the WDB or subrecipient may retain the property with no further obligation. Disposition records must still be kept in accordance with WIOA record retention requirements.

#### Calculation of "Fair Market" Value

The selling price of an item that is sold through auction, advertisement, or a dealer is the fair market value of the item regardless of any prior estimates. An item that is not sold but retained by the entity has a fair market value based on similar items that are offered for sale, using the selling price if known. Methods for determining fair market value include, but are not limited to, the following:

- Auctions
- Classified advertisements for similar used items
- Dealers
- Licensed appraisers

For automobiles, trucks, and vans, the standard authority on the value of used vehicles is the Kelley Blue Book. Depreciated value is not "fair market" value, nor a determining factor in establishing the "fair market" value.

#### **DISCLAIMER**

This policy is based on WDB's interpretation of the statute, along with the Workforce Investment and Opportunity Act; Final Rule released by the U.S. Department of Labor and federal and state policies relating to WIOA implementation. This policy will be reviewed and updated based on any additional federal or state guidance.

## REFERENCES

### Law

- Workforce Innovation and Opportunity Act of 2014 (WIOA)

### Federal Guidance

- Title 2 Code of Federal Regulations (CFR) Part 200: “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (Uniform Guidance)
- Title 2 CFR Part 2900: “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (Department of Labor [DOL] Exceptions)

### State Guidance

- California Workforce Services Directive (WSD) 16-10 – [Property Purchasing and Disposal Directive](#)

### Approved by

Workforce Development Board of Solano County

## Definitions

**Equipment**—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 non-federal entity for financial statement purposes, or \$5,000 (Uniform Guidance Section 200.33).

Uniform Guidance specifies that equipment includes information technology systems, computing devices, software and services (including support services). This includes fees for licensing or subscriptions to software and software support services. Even if a monthly subscription fee is under \$5,000, if the total annual cost for the subscription exceeds \$5,000, then prior approval must be obtained.

**General Purpose Equipment**—equipment which is not limited to research, medical, scientific or other technical activities. Examples include office equipment and furnishings modular offices, telephone networks, information technology equipment and systems, air conditioning equipment, reproduction and printing equipment, and motor vehicles (Uniform Guidance Section 200.48).

**Information technology systems**—computing devices, ancillary equipment, software, firmware, and similar procedures, services (including support services), licensing or subscriptions to software and software support services, and related services (Uniform Guidance Section 200.58).

**Intangible Property**—property having no physical existence, such as trademarks, copyrights, patents and patent applications and property, such as loans, notes and other debt instruments, lease agreements, stock and other instruments of property ownership (whether the property is tangible or intangible) (Uniform Guidance Section 200.59).

**Personal Property**—property other than real property. It may be tangible, having physical existence or intangible (Uniform Guidance Section 200.78).

**Property**—real property or personal property (Uniform Guidance Section 200.81).

**Real Property**—land, including land improvements, structures and appurtenances thereto, but excludes moveable machinery and equipment (Uniform Guidance Section 200.85).

**Subrecipient**—a non-federal entity that receives a subaward from a pass-through entity to carry out part of a federal program, but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other federal awards directly from a federal awarding agency (Uniform Guidance Section 200.93).

**Supplies**—all tangible personal property other than equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the nonfederal entity for financial statement purposes or \$5,000, regardless of the length of its useful life (Uniform Guidance Section 200.94).



**WORKFORCE DEVELOPMENT BOARD**  
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EMPLOYEE ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING FOR:  
PROPERTY MANAGEMENT AND INVENTORY POLICY

(Issued October 4, 2019)

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The Workforce Development Board (WDB) of Solano County's Property Management and Inventory Policy contains important information pertaining to my employment and duties at the WDB.

A copy of this policy has been given to me to retain for future reference, and I have been provided with the location on the Shared Drive for the policy where I can obtain an electronic copy.

Since the information and policies described in the policy are necessarily subject to change, I acknowledge that revisions to the policy may occur. All such changes will be communicated through official notices. I understand that revised information may supersede, modify, or eliminate existing policies.

I have received the Property Management and Inventory Policy and I understand that it is my responsibility to read and comply with the information contained in this policy and any revisions made to it.

I understand that I should consult my supervisor if I have any questions about the information contained in the policy. I understand that failure to comply with the information contained in the policy could lead to disciplinary action or termination.

Employee's Name (printed): \_\_\_\_\_

Employee's Signature: \_\_\_\_\_ Date: \_\_\_\_\_