
Executive Summary

Workforce Services Policy –

(Allowable and Unallowable Costs, Including Food) – WIOA

1. What is the purpose of this policy?

The purpose of this policy is to provide guidance concerning allowable and unallowable expenditure of Workforce Innovation Opportunity Act (WIOA) funds, including purchasing food and beverages. This policy also provides foundational guidance to define reasonable and necessary principles when spending WIOA Title I-B Funds and contains concrete examples of unallowable costs.

2. What main areas of expenditure does this policy cover?

This policy provides guidance for spending on:

- General costs associated with the furtherance of business
- Alcohol (never allowed)
- Conferences and training
- Travel
- Working lunches
- Banquets
- Sponsorship Events
- Food

3. How are WIOA funds monitored to discourage fraud and abuse?

To discourage fraud and abuse the Program Accountability Review Team (PAR) of the Tennessee Department of Labor and Workforce Development Workforce Service Division will conduct desktop and on-site monitoring (e.g. document and facility reviews) at a minimum of once a year. Further monitoring guidelines can be found in

the Monitoring Guide 2017 in the following link:
www.tn.gov/assets/entities/labor/attachments/et_monitor_review2015_2016.pdf

The 2017 Monitoring Guide is pending General Service approval and will be electronically stored in the same location as the 2016 Monitoring Guide.

4. What types of food and beverage are allowable during a conference?

Food and beverages, otherwise known as “light refreshments” in the policy, that are allowed during a conference include (but are not limited to): coffee, tea, milk, juice, soft drinks, donuts, bagels, fruit, pretzels, cookies, chips or muffins. However, light refreshments are only to be provided if they are reasonable and necessary to accomplishing program goals. Documentation of expenditures must be readily available by each local board, and each grant recipients, concerning operations and expenditures.

5. When are food and beverages an allowable purchase?

Food and beverages are an allowable expense when technical assistance is being provided between two parties, namely a State administrative staff member and subgrantees and/or service delivery staff. However, the food is considered allowable as a “working lunch” only in the context where logistics or time constraints would place a burden on productivity (e.g. heavy traffic).

Funds for food and beverage purchases using WIOA funds are allowable in instances where subgrantees and/or service delivery staff are invited to a meeting/training session where the majority of intended invitees are external customers. These individuals are considered to be outside of the organization’s influence but share common interests and goals. External customers are defined as (but not limited to):

- Program participants
- Employers
- Board members

The spirit or purpose of the event must be in accordance with activities that incorporate progressive development of the WIOA program.

For further clarification please reference page 4 of the policy.