



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
**Department of Labor and Training**

Center General Complex  
1511 Pontiac Avenue  
Cranston, RI 02920

Telephone: (401) 462-8000  
TDD: (401) 462-8006

Donald L. Carcieri  
Governor  
Sandra M. Powell  
Director

## **WORKFORCE INVESTMENT NOTICE: 09-19**

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**TO:** WORKFORCE INVESTMENT AREAS

**FROM:** Donna Treglia, Administrator-Workforce Investment Office

**SUBJECT:** Allocations for TANF ARRA

**DATE:** May 17, 2010

**1. PURPOSE.** To provide estimated allocations for TANF ARRA Emergency Contingency Funds in conformity with Section 403 (c) of the Social Security Act.

**2. REFERENCES.** Memorandum of Agreement dated May 13, 2010 between DHS, DLT, and DOR; WIN 09-13.

**3. BACKGROUND.** An allocation of \$42.6 million is potentially available to DHS, DLT, and DOR for the period February 1, 2010 through September 30, 2011 to support costs for both Administrative and Programmatic staff to develop and provide oversight of the TANF ARRA initiative, and for wage reimbursements. Funds are allocated incrementally based on awards from the U.S. Department of Health & Human Services. In accordance with the first TANF ARRA award, \$7,055,899 has been made available through June 30, 2010. It is anticipated that an additional funding increment will be available for the final quarter of Federal Fiscal Year 2010, ending September 30, 2010. The Support Costs listed below in the budget allocation section of this WIN includes allocations for the full six month period and should not be impacted by any supplemental incremental awards. In addition, potentially \$41,105,250 will be potentially available to the locals for wage reimbursements.

**4. POLICY.** Local Workforce Investment Areas receiving TANF ARRA Funds for Program Years 2009 - 2010 (including the chief elected official of the local area), and providers receiving funds under this title, shall comply with the applicable Circulars and Regulations of the Office of Management and Budget for the type of entity receiving Federal WIA funds and all applicable State and Local Laws.

Nothing in this policy shall preclude the entity that is receiving TANF ARRA funds from adopting new policies and procedures or utilizing existing policies and procedures provided they are at least as restrictive as the Federal Circulars and Regulations. The State Workforce Investment Office, therefore, prescribes, at a minimum, the following administrative and fiscal requirements as State Policy:

- ◆ **Fiscal/Administrative Requirements:** The applicable requirements per federal citations listed below must be complied with by all subrecipient/vendors for both WIA JDF, and TANF allocations.

Cross Reference of Administrative Requirements

Requirement	State/Local Government	Nonprofit Organizations	Institutions of Higher Education	Commercial Organizations
Audit	29 CFR Part 99	29 CFR Part 99	29 CFR Part 99	20 CFR 667.200 (b) (ii) (WIA Regulations)
Audit Resolution	29 CFR Part 96	29 CFR Part 96	29 CFR Part 96	20 CFR 667.500 et. seq. (WIA Regulations)
Cost Principles	A-87	A-122	A-21	48 CFR Part 31
Allowable Costs	A-87	A-122	A-21	48 CFR Part 31
Uniform Administrative Requirements	29 CFR Part 97	29 CFR Part 95	29 CFR Part 95	29 CFR Part 95
Lobbying Restrictions	29 CFR Part 93	29 CFR Part 93	29 CFR Part 93	29 CFR Part 93
Suspension and Debarment	29 CFR Part 98	29 CFR Part 98	29 CFR Part 98	29 CFR Part 98
Drug-Free Workplace	29 CFR Part 98	29 CFR Part 98	29 CFR Part 98	29 CFR Part 98

- ◆ **Additional Administrative Requirements:**
- ◆ **Procurement-** Procurement transactions under the TANF ARRA grants between local boards and units of State or local governments shall be conducted only on a cost-reimbursable basis. All procurements will be “open and competitive” in compliance with the applicable OMB-Circular listed above.
- ◆ **Administrative Cost Limit-** Administrative costs for sub-recipients receiving TANF ARRA shall not exceed the allocations listed in the budget section of this WIN.
- ◆ **Administrative Cost Definition-** the definition of administrative costs is pursuant to Section 667.220 of the Workforce Investment Act’s (WIA) Final Regulations dated August 11, 2000. If the cost of a function or activity in question is not listed as an administrative cost in 20 CFR 667.220, then such cost will be considered a programmatic cost.
- ◆ **Cost Allocation-** all costs will be appropriately allocated between all benefiting programs per the referenced and applicable federal guidance.
- ◆ **Monitoring** - The State will conduct on-site fiscal and programmatic monitoring of each local area within the State to ensure compliance with the uniform administrative requirements. In addition, the local Workforce Investment Boards shall conduct both internal and on-site monitoring of each of their vendors to ensure compliance with both programmatic and the uniform administrative requirements. The Workforce Development Boards will forward a copy of the monitoring reports to the State Workforce Investment Office along with documented corrective action.
- ◆ A local plan modification must be submitted for approval by each Workforce Investment Area.
- ◆ **Action by the Governor** --- If the Governor determines that a local area is not in compliance with the uniform administrative requirements and/or State or Local Law, he shall:
  - (A) require corrective action to secure prompt compliance; and
  - (B) impose the sanctions; to include recapture of funds and termination of the grant award, etc.

5. **BUDGET.** The chart below is per the terms of the Memorandum of Agreement between DHS, DLT, and DOR and breaks out the allocations for support costs for each organization.

<b>Organization</b>	<b>Amount</b>
<b>DHS</b>	<b>\$150,165</b>
<b>DLT</b>	<b>\$701,919</b>
<b>DOR</b>	<b>\$32,666</b>
<b>Workforce Solutions of P/C</b>	<b>\$500,000</b>
<b>Equip/Supplies/Marketing</b>	<b>\$110,000</b>

The funds reserved for wage reimbursements will be distributed to the LWIBs based on the Adult WIA Formula allocation percentages for PY10. The allocation percentages for each LWIB are: WPGRI 63.19% and WSPC 36.81%. Costs not accrued and/or earned as of September 30, 2010 are not allowable.

6. **INQUIRIES.** Questions regarding this WIN may be directed to me at 462-8784 ([dtreglia@dlt.ri.gov](mailto:dtreglia@dlt.ri.gov)) or Bob Garofano at 462-8149 ([bgarofano@dlt.ri.gov](mailto:bgarofano@dlt.ri.gov)).