



WDB

Workforce Development Board

Burlington

BURLINGTON COUNTY WORKFORCE DEVELOPMENT BOARD PURCHASE REQUEST POLICY

DATE: May 9, 2025

PURPOSE

The Burlington County Workforce Development Board, as the Governor's chosen administrative entity for the Workforce Innovation and Opportunity Act in Burlington County, is authorized to issue interpretations and exceptions as supported by applicable law, rules, and regulations of the Workforce Innovation and Opportunity Act (WIOA).

The purpose of this policy is to establish criteria by which the Burlington County WDB and/or its subrecipients, when looking to use WIOA funds for the purchase of equipment.

BACKGROUND

To use WIOA funds, the Workforce Development Board must obtain written approval from the Department of Labor and Workforce Development for all equipment purchases. Failure to secure approval may lead to disallowed costs.

POLICY

The Workforce Development Board must complete and submit an Equipment Purchase Approval Request Form, signed by the Workforce Development Board Director, to WIOAPOD@dol.nj.gov, along with supporting documentation. The Department of Labor and Workforce Development will review the submission to ensure compliance with this policy. A written response will be provided within seven business days, and additional documentation may be requested if needed.

Subrecipients looking to purchase equipment must submit their forms to the Workforce Development Board for review and approval prior to submission to WIOAPOD, along with supporting documentation.

A. Management Requirements

Below are the procedures for managing equipment, including replacement equipment acquired wholly or partially using WIOA funds, must at a minimum meet the following requirements until disposition.

- 1) Maintain property records that include a description, serial number or other identification number, funding source, including the Federal Award Identification Number (FAIN), title holder, acquisition date, cost, percentage of Federal participation in the project costs, location, use, condition, and any disposition data such as disposal date and sale price.
- 2) Conduct a physical inventory of the property and reconcile it with the property records at least once every two years.
- 3) Develop a control system to ensure adequate safeguards against loss, damage, or theft of the property. Investigate any loss, damage, or theft.
- 4) Establish maintenance procedures to keep the property in proper working condition, ensuring it is adequately maintained and safely used.
- 5) If authorized or required to sell the property, implement proper sales procedures to ensure the highest possible return.

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- 2) A physical inventory of the property must be conducted and the results reconciled with the property records at least once every two years.

B. Disposition

When equipment acquired using WIOA funds is no longer needed for its original project, program, or other activities currently or previously supported by Federal funds (except as specified in Federal requirements), the Workforce Development Board must request disposition instructions from the Department of Labor and Workforce Development as required by the award's terms and conditions.

Equipment must continue to be used by the Workforce Development Board (non-Federal entity) for the project or program for which it was acquired, as long as it is needed, regardless of ongoing Federal support. The Workforce Development Board must not encumber the property without prior approval of the Department of Labor and Workforce Development.

If the equipment is no longer needed for the original program or project, it may be used in other activities supported by WIOA, prioritized as follows:

- (i) Activities under WIOA from the original funding agency.
- (ii) Activities under WIOA from other agencies, including consolidated equipment for information technology systems.

Disposition of the equipment will follow the instructions of the Department of Labor and Workforce Development:

- 1) Equipment with a current per-unit fair market value of \$10,000 or less may be retained, sold, or otherwise disposed of without further obligation to the Department of Labor and Workforce Development.

- 2) For equipment valued over \$10,000, if the Department of Labor and Workforce Development office does not provide disposition instructions within 120 days, the Workforce Development Board may retain or sell the equipment. The Department of Labor and Workforce Development is entitled to a share of the current market value or sale proceeds, proportional to its participation in the original purchase cost. If sold, the Department of Labor and Workforce Development may allow the Workforce Development Board to deduct and retain \$1,000 or 10% of the proceeds. Whichever is less, for selling and handling expenses.

Capital expenditures for general-purpose equipment, buildings, and land are unallowable as direct charges without prior written approval from the Department of Labor and Workforce Development or pass-through entity. Special-purpose equipment expenditures are allowable as direct costs with prior written approval for items costing \$10,000 or more.

The Burlington County Workforce Development Board must ensure equivalent insurance coverage for real property and equipment acquired or improved with WIOA funds, matching coverage for property owned by the Board. Federally owned property does not require insurance unless specified by the award.

This policy is subject to change as Federal requirements are updated.

REFERENCES

- NJWIN PY14-5
- 2 CFR 200.1, 2 CFR 200.439, 2 CFR 200.310, 2 CFR 200.313(c-e)
- OMB Circular 19-12