



# Northern Middle Tennessee Workforce Board Inc.

Effective Date: 10.01.2018

Duration: Indefinite

## Property Management Policy

### Purpose

This policy communicates methods used by Northern Middle Tennessee Workforce Board (NMWB) for the procurement of goods and services obtained with Workforce Innovation Opportunity Act (WIOA) funds. This policy will address how to ensure proper acquisition, management, and disposition of property purchased with WIOA funds. This policy also sets forth the requirements provided by: the Office of Management and Budget (OMB), Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule Title 2 of the Code of Federal Regulations, 2 CFR 200.

### Background

The Workforce Innovation and Opportunity Act requires State, Local Workforce Development Boards, and service providers receiving funds under WIOA to comply with applicable uniform cost principles, including Uniform Guidance of the federal Office of Management and Budget (OMB).

### Policy & Instructions

To ensure that funds are being spent in a fiscally prudent and efficient manner, sub recipients need to consider the following questions prior to requesting approval to direct-charge WIOA funds for the purchase of property:

- Is this purchase reasonable?
- Why is the purchase needed?
- Have the best products been selected?
- What procurement method was used?
- Was a lease option considered in lieu of the purchase?
- Does the State already provide the item, service, or software being considered for rent, purchase, or subscription?
- Can the purchaser show that the purchase and item is allowable under the applicable federal award?

### Definitions

- A. Equipment - Equipment means tangible, non-expendable, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. Uniform Guidance specifies that equipment include information technology systems, computing devices, software and services (including support services). This includes fees for licensing or subscriptions to software and software support services. This even includes monthly subscription fees under \$5,000 dollars if the total annual cost for the subscription exceeds \$5,000 dollars; for such subscriptions, prior approval must be obtained.
- B. General Purpose Equipment - This is 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).

- C. Information Technology Systems - This encompasses computing devices, ancillary equipment, software, firmware, similar procedures, services (including support services), licensing or subscriptions to software and software support services, and related services (2 CFR 200.58).
- D. Prior Approval - Written prior approval will be obtained from the Tennessee Department Labor Workforce Development (TNLWD) for acquisition of sensitive items and nonexpendable property with a unit acquisition cost of \$5,000 or more. In addition, any agreements or activities related to costs associated with real property must receive written approval by TDWLD. Sub-recipients must have prior approval from the fiscal entity for acquisition of sensitive items and nonexpendable property with a unit acquisition cost of \$5,000 or more.

### **Types of Property Which Require Accountability Maintenance**

- Tangible personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. Examples include furniture, machinery, office, operational and educational equipment, etc.
- Sensitive equipment having a unit cost of \$100 to \$5,000. Examples include typewriters, tape recorders, printers, computers, cameras, cell phones, and lap-tops.
- Personal computers will be tagged as a unit consisting of monitor, keyboard, and the computer itself. The printer will be tagged separately.

### **Equipment Property Management Procedures**

Property records will be maintained that include a description of the property, a serial number or other identification number, the source of property, information as to who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the cost of the property. These records will also include the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

- When property with a current per-unit value in excess of \$5,000 has been stolen or destroyed by fire (or another disaster), is considered obsolete, or is to be traded for new equipment the NMWB shall notify the State office of the particular event and request approval to remove the property from the Record Inventory.
- If any property is stolen a copy of a Police Report must accompany the Report of the Survey. If the stolen property has a current per-unit value of \$5,000 or more the Federal Bureau of Investigation must be notified and a copy of the report must accompany the Report of the Survey.
- If the property is destroyed by fire a copy of a Fire Marshall's Report must accompany the Report of the Survey. When the NMWB determines that the property is non-serviceable due to obsolescence, that NMWB will request the destruction of the equipment through Asset Works (the State system) at which time the State procurement office re-evaluates the condition of the equipment. All property records must be maintained for five years after final disposition of the property.
- The NMWB will tag all property with the appropriate tag and records will indicate the program under which the property was acquired. After tagging the equipment, the NMWB will add the new items to its inventory listing. The inventory records will contain the following information:
  - Tag number
  - Program funding the acquisition
  - Percentage federally funded (if not 100%)
  - Date of purchase or acquisition
  - Condition of the property (Cost or Fair Market Value)
  - Location

- Serial number or other identifying number should be added to other pieces of equipment acquired.
- Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award will be retained for a period of five years from the date of submission of the final expenditure report.

**Debarred and Suspended Parties**

The fiscal entity will not make any award or permit (sub grants or contracts) to any party debarred, otherwise suspended, or otherwise excluded from eligible for participation in Federal assistance programs in accordance with Department of Labor Regulation at 29 CFR Part 98.

**References**

2 CFR 200.48, 200.58, 200.194, 200.195, 200.405(c), 200.449, 200.452, 200.462; 20 CFR 683.200, 683.235; TEGL 15-14; WIOA Section 171 (c)(2)(A)(i); WIOA Section 184(a)(2)(A), Workforce Services Policy – Property Management

Authorized by:

Approved by:

DocuSigned by:  
*Marla Rye*  
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Marla Rye, Executive Director                      Date

DocuSigned by:  
*John Zobl*  
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John Zobl, Chairman                                      Date