

# **GUIDANCE**

# COMMONWEALTH OF KENTUCKY DEPARTMENT OF WORKFORCE DEVELOPMENT

**GUIDANCE NAME:** Closeout of Workforce Innovation Opportunity Act (WIOA)

grants

**GUIDANCE NUMBER:** 24-004

**EFFECTIVE DATE:** November 1, 2024

**APPLIES/OF INTEREST TO:** Kentucky Career Center (KCC) Staff, Local Workforce Boards, Local Workforce Development Area (LWDA) staff and Local Area Fiscal Agents.

**POINT OF CONTACT:** Department of Workforce Development (DWD) – Grants Management @ oetlwiarequest@ky.gov.

**HISTORY:** Recipients and sub-recipients of Department of Labor (DOL) grant awards are responsible for developing a closeout process for their sub-awards and contract agreements. In accordance with the requirements of <u>Uniform Guidance Section 200.344</u>, this guidance addresses the steps the DWD will take to close out a grant agreement. The WIOA closeout period refers to the 90 days after a grant agreement has reached its term end date or its funding has been fully utilized.

**PURPOSE:** The financial reconciliation/closeout process is of utmost importance to ensure that allowable reportable costs and payments reconcile. To close a grant effectively and to avoid cost overruns and deficits, DWD has established the following procedures:

- 1. A final expenditure report must be submitted in Workforce Online Reporting for the Kentucky System (WORKS) within 90 calendar days of the grant's period of performance end date.
- 2. Subrecipients must liquidate all accruals incurred no later than 90 calendar days of the grant's period of performance end date.
- 3. For any draw requests, a final DWD-105 form must be submitted to DWD within 60 calendar days of the grant's period of performance end date.
- 4. Program income earned shall be fully expended. If not expended, remaining funds shall be remitted to DWD within 60 days of the grant's period of performance end date.
- 5. DWD will review each grant during the WIOA closeout period or once funding has been fully executed and determine the following:
  - a. Total expenditures reported in WORKS.
  - b. Percentage of administrative funds spent in relation to program funds where applicable.
  - c. Total cash was requested from the Electronic Management Administrative Reporting System (eMARS).
  - d. Any unobligated funds.
- 6. DWD will initiate closeout procedures with all subrecipients, recognizing their integral role, by sending a closeout packet for review.

- 7. Subrecipients must terminate all activities at 11:59 PM EST on the end date of the grant's period of performance and reconcile all financial activity related to the grant/award prior to closing the grant with DWD.
- 8. Authorized representation must review the closeout packet and reconcile it with their records.
  - a. If a discrepancy is noted by the authorized representation, the subrecipient must respond to DWD within ten business days, providing details and supporting documentation.
  - b. Once reconciled, the subrecipient must sign the grant closeout worksheet and return it to DWD using the OET mailbox at <a href="mailto:oetlwiarequest@ky.gov">oetlwiarequest@ky.gov</a> within five (5) business days of receiving the closeout packet.
- 9. All refunds due to DWD must be made before the 90 day closeout period or submitted with the closeout packet within the five (5) business days timeframe.

**Closeout Packet:** The closeout packet from DWD for signature will include:

- 1. Grant Closeout Worksheets (Attachment A)
- 2. Payment Confirmation Report from EMARS (Attachment B)
- 3. WORKS Monthly Financial Report Summary (Attachment C)

### **Local Workforce Development Areas must complete the following:**

- 1. Government Property Certification (Attachment D)
- 2. Property Listing (Attachment E)

**Post Closeout:** The closeout of an award does not affect the following:

- 1. DWD has the right to determine disallowed costs and recover funds based on a later audit or other review.
- 2. The grant recipient should return any funds due as a result of later refunds, corrections, or other transactions, such as adjustments due to errors in the original financial reports or changes in the grant agreement.
- 3. 3-year record retention requirement.

DWD will not be liable for any costs the subrecipient failed to pay before the closeout date. Additionally, DWD will not be liable for any late claims received by subrecipients. DWD will not have funds available after the 90 day closeout period for those claims. Failure to meet these requirements may result in financial penalties or loss of future funding opportunities.

The subrecipient shall ensure that all program/grant liabilities are paid before the closeout date. No unpaid invoice can be paid with the federal funds after closeout. Any such invoices will be the sole responsibility of the subrecipient and shall not be paid with federal funds received from the DWD.

**ACTION:** Local Areas must follow the requirements in this guidance to close out their subawards and contract agreements. This guidance is designed to support and guide you through the process.

REFERENCES: CFR:: 2 CFR 200.344 -- Closeout.

# WORKFORCE INNOVATION AND OPPORTUNITY ACT Grant Closeout Worksheet

(Use for all closeouts)

Sub	precipient Name and Address		
Act	tivity Number		
Pro	gram Funds		(Ex. PY 2022 Youth Funds)
Gra	ant Number		(Ex. 274YT24)
Per	iod of Performance	t	0
Tot	al allocation for this grant number:		
1.	How much cash has been drawn down under this grant number?	l	
2.	Total expenditures reported in the WO Expenditure Report	ORKS	
3.	Unexpended balance to be de-obligated	d?	
		Sub recip	pient's Authorized Representative
		Name (p)	ease print)
		Signature	<b>;</b>
		 Title	

# PY 2021 - FY 2022 Closeout Payment Confirmation Report

Vendor Legal Name

The sum of Posting Amount									
Program Code Total									
270AD22	\$	159,972.92							
271DW22	\$	684,344.20							
272DW22	\$	160,810.51							
273AD22	\$	695,692.95							
274YT22	\$	796,771.75							
Grand Total	\$	2,497,592,33							

# ATTACHMENT C SAMPLE

PY Youth - Financial Report 2021

Organization:

Workforce Investment Area

Financial Report Summary

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Budgeted	Previous	Current	Cumulative	Balance
\$796,771.75	\$796,771.75	\$0	\$796,771.75	\$0
<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	\$0
<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	\$0
\$796,771.75	\$796,771.75	<b>\$0</b>	\$796,771.75	\$0
<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	\$0
\$375,000.00	\$375,000.00	<b>\$0</b>	\$375,000.00	\$0
<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	\$0
<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	\$0
OTAL \$796,771.75	\$796,771.75	<b>\$0</b>	\$796,771.75	\$0
	\$796,771.75 \$0 \$0 \$796,771.75 \$0 \$375,000.00 \$0 \$0	\$796,771.75 \$796,771.75 \$0 \$0 \$0 \$0 \$796,771.75 \$796,771.75 \$0 \$0 \$375,000.00 \$375,000.00 \$0 \$0 \$0 \$0	\$796,771.75 \$796,771.75 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$796,771.75 \$796,771.75 \$0 \$0 \$0 \$0 \$0 \$0 \$375,000.00 \$375,000.00 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$796,771.75

### **Financial Report Summary**

	Budgeted	Previous	Current	Cumulative	Balance
Adult Program Expenditures Total	\$159,972.92	\$159,972.92	<b>\$0</b>	\$159,972.92	\$0
Adult Program Expenditures	\$144,072.92	\$144,072.92	\$0	\$144,072.92	\$0
Local Administration	\$15,900.00	\$15,900.00	\$0	\$15,900.00	\$0
Incumbent Workers Training	\$0	\$0	\$0	\$0	\$0
Pay-for-Performance Contracts	\$0	\$0	\$0	\$0	\$0
Transfer from Adult to Dislocated Worker	\$0	\$0	\$0	\$0	\$0
SWR1	\$0	\$0	\$0	\$0	\$0
SWR2	\$0	\$0	\$0	\$0	\$0
SWR3	\$0	\$0	\$0	\$0	\$0
TOTA	L \$159,972.92	\$159,972.92	<b>\$0</b>	\$159,972.92	<b>\$0</b>

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Organization:

Workforce Investment Area

### **Financial Report Summary**

	Budgeted	Previous	Current	Cumulative	Balance
Dislocated Worker Program	\$160,810.51	\$160,810.51	<b>\$0</b>	\$160,810.51	<b>\$0</b>
Expenditures Total					
Dislocated Worker Program	\$144,810.51	\$144,810.51	\$0	\$144,810.51	\$0
Expenditures					
Local Administration	\$16,000.00	\$16,000.00	\$0	\$16,000.00	\$0
Incumbent Workers Training	\$0	\$0	\$0	\$0	\$0
Pay-for-Performance Contracts	\$0	\$0	\$0	\$0	\$0
Transfer from Dislocated Worker to Adult	\$0	\$0	\$0	\$0	\$0
Rapid Response Total	\$0	\$0	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
Rapid Response Local Activities	\$0	\$0	\$0	\$0	\$0
Rapid Response Additional	\$0	\$0	\$0	\$0	\$0
Assistance					
Rapid Response Trade Case	\$0	\$0	\$0	\$0	\$0
Management					
SWR1	\$0	\$0	\$0	\$0	\$0
SWR2	\$0	\$0	\$0	\$0	\$0
SWR3	\$0	\$0	\$0	\$0	\$0
тот	AL \$160,810.51	\$160,810.51	\$0	\$160,810.51	\$0

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### Financial Report Summary

	Budgeted	Previous	Current	Cumulative	Balance
Adult Program Expenditures Total	\$695,692.95	\$695,692.95	<b>\$0</b>	\$695,692.95	<b>\$0</b>
Adult Program Expenditures	\$643,637.63	\$643,637.63	\$0	\$643,637.63	\$0
Local Administration	\$52,055.32	\$52,055.32	\$0	\$52,055.32	\$0
Incumbent Workers	\$0	\$0	\$0	\$0	\$0
Training					
Pay-for-Performance Contracts	\$0	\$0	\$0	\$0	\$0
Transfer from Adult to Dislocated Worker	\$0	\$0	\$0	\$0	\$0
SWR1	\$0	\$0	\$0	\$0	\$0
SWR2	\$0	\$0	\$0	\$0	\$0
SWR3	\$0	\$0	\$0	\$0	\$0
TOTA	L \$695,692.95	\$695,692.95	\$0	\$695,692.95	\$0

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### **Financial Report Summary**

	Budgeted	Previous	Current	Cumulative	Balance
Dislocated Worker Program	\$284,344.20	\$284,344.20	<b>\$0</b>	\$284,344.20	\$0
Expenditures Total					
Dislocated Worker Program	\$215,944.20	\$215,944.20	\$0	\$215,944.20	\$0
Expenditures					
Local Administration	\$68,400.00	\$68,400.00	\$0	\$68,400.00	\$0
Incumbent Workers Training	\$0	\$0	\$0	\$0	\$0
Pay-for-Performance Contracts	\$0	\$0	\$0	\$0	\$0
Transfer from Dislocated Worker to Adult	\$400,000.00	\$400,000.00	\$0	\$400,000.00	\$0
Rapid Response Total	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
Rapid Response Local Activities	\$0	\$0	\$0	\$0	\$0
Rapid Response Additional	\$0	\$0	\$0	\$0	\$0
Assistance					
Rapid Response Trade Case	\$0	\$0	\$0	\$0	\$0
Management					
SWR1	\$0	\$0	\$0	\$0	\$0
SWR2	\$0	\$0	\$0	\$0	\$0
SWR3	\$0	\$0	\$0	\$0	\$0
TOTA	AL \$684,344.20	\$684,344.20	<b>\$0</b>	\$684,344.20	<b>\$0</b>

### ATTACHMENT D

# **Department of Workforce Development**

# Grant Recipient Name and Address: Grant Number: 1. I certify that the attached government property inventory list contains all property with a current per-unit fair market value of S5.000 or more, where DOL reserves the right to take title. 2. I certify that no government property was purchased with a current per-unit fair market value of S5.000 or more. Therefore, we (grant recipients) have no further obligation to DOL. Certified By: Date:

Authorized Representative

### **Government Property Certification Instructions**

This document is to be used by recipients to limit the use of federal funds to purchasing item(s) that meet the Uniform Guidance definition for equipment (see 2 CFR 200.1). This is in accordance with 2 CFR 200.313 Equipment.

- A. Grant Recipient Name and Address: Enter the complete name and address of the grant recipient as they were listed in the grant application.
- B. Grant Number: Enter the full grant award number.
- C. Certification:

Check the applicable box indicating that the recipient's organization:

- 1. Certifies the possession of property meeting the definition of equipment
- 2. Certifies to having no property meeting the definition of equipment
- D. Certified by: Print the first and last name of the Authorized Representative for the recipient organization in this block.
- E. Date: Input the date that the document was completed in this block.

Please Note: If the recipient certifies possession of property meeting the definition of equipment (checks box 1) on this Government Property Certification, a Property Listing Form also needs to be completed and submitted.

Department of Workforce Development  EMPLOYMENT AND TRAINING ADMINISTRATION  Property Listing  Grant recipients must receive prior approval from the DOL/ETA Grant officer to purchase equipment with a per-unit acquisition cost of \$5000.00 or more and a useful life of more than one year. This includes the purchase of Automated Data Processing (ADP) equipment. The equipment must be made in accordance with 2 CFR 200.313 and 2 CFR 200.439.										
	Grant Recipient:							Date:		
	Grant #:					]	Grant period:			
Item No.	Item Description	Serial No.	Acquisition Date	Purchase Price	Current Fair Market Value	Condition	Retain for Other Sponsored Purposes	Retain for Non- Federal Use	Sell	Scrap
Remarks		•			•					
Certified	oy:		Т							
A41 .	1D ('									
Authorize	Authorized Representative:									

### **Property Listing Form Instructions**

### **General Instructions**

Recipients must use the Property Listing Form to provide a final property report for the closeout of Federal assistance awards. Completing this form communicates important information pertaining to items purchased using award funds. It assists in determining, if necessary, the specific disposition instructions for handling federally owned property and acquired equipment.

Generally, at the end of a Federal assistance award, recipients are required to:

- a. Submit a report on federally owned property.
- b. Provide a listing of equipment items with a current fair market value of \$5,000 or more when the awarding agency has reserved the right to transfer the equipment's title to the Federal Government or a third party.
- c. c. Compensate the awarding agency for residual unused supplies with a total aggregate fair market value greater than S5.000 that are not needed for any other Federally sponsored programs or projects.

# **Specific Instructions**

The Property Listing Form should be completed as follows:

- A. Grant Recipient: Enter the complete grant recipient's name as it was listed in the grant application.
- B. Grant Number: Enter the full grant award number.
- C. Date: Input the date that the document was completed in this block.
- D. Grant Period: Input the start and end date of the grant period of performance.
- E. Inventory:
  - For each item of property, enter the following information in the appropriate column of the table provided.
- 1. Item No.: i.e., 1, 2, 3, etc.
- 2. Item Description: Describe the property, e.g., van.
- 3. Serial No.: Provide the serial number or any other identification number for the item.
- 4. Acquisition Date: Date on which the grant recipient assumed responsibility for the property.
- 5. Purchase Price: Enter the item's original purchase value.
- 6. Current Fair Market Value: Enter the item's current fair market value.
- 7. Condition: Provide the condition of the item:
  - i. Good
  - ii. Fair
  - iii. Poor
- 8. Indicate your organization's intention regarding this item:
  - i. Retain for Current Grant Purposes
  - ii. Retain for Other Federally Sponsored Purposes
  - iii. Retain for Non-Federal Use
  - iv. Sell
  - v. Scrap
- F. Remarks: Provide any necessary explanations or additional information in this block.
- G. Certified by: Print the first and last name of the Authorized Representative for the recipient organization in this block.