

GLOW WORKFORCE DEVELOPMENT BOARD POLICY

NAME OF POLICY: **GLOW WDB Recapture Policy and Procedure for Meeting Required WIOA Expenditure Goals**

APPROVAL DATE: **9/16/14**

EFFECTIVE DATE: **9/16/14**

Background: **The GLOW WDB requires ALL GLOW individual counties to expend 100% of their WIOA carry in funds and obligate 80% of their current program year (PY) WIOA funds.**

Purpose: This procedure is to ensure funds are expended by all GLOW individual Counties and includes the process to recapture if benchmarks for spending percentages are not met. This policy covers WIOA Adult and Dislocated Worker Funds and Youth Framework Funds (not Contracted Youth Funds).

NOTE: Any client in GLOW can receive assistance for training at any GLOW office, regardless of their resident county. If one county does not have funding available, another county can pay for the participants' training.

Policy:

Expenditures will be monitored monthly at the GLOW Directors meeting. For any county that is not at the 60% Total Obligated Expenditure rate for the current program year (PY) funding by 3/31, the GLOW WDB Director will alert the GLOW WDB Finance Committee and an Action Plan/Timeline will be required to be presented to the WDB Finance Committee and FOTA for fiscal review and monitoring. This will assist all GLOW individual counties at meeting the 80% Obligation levels required by the GLOW WDB.

Process:

- Each month the GLOW individual county Directors and the GLOW WDB Director will meet and review the Total Obligated Expenditures reported on the Expenditure Monitor Reports (EMR) provided by the Grant Recipient – Livingston County at the GLOW Directors/WDB Director meetings.
- For the period 7/1-3/31 in the current Program Year, individual counties should be at a Total Obligated Expenditure rate of 60% for the current program year funds in order to reach the 80% Benchmark by 6/30. If not, an Action Plan/Timeline will be required and due to the GLOW WDB Director by 4/31 indicating how the remaining allocation will be spent in order to meet the required benchmark of 80% by 6/30.
- The WDB Finance Committee will review the action plan and make the decision as to whether recapture is necessary. The WDB Finance Committee review will be completed by 5/15 and recapture will be initiated after the May GLOW WDB Meeting in which a vote will be required by the WDB on the Recapture. If a county(ies) has funds recaptured, those funds will be re-allocated through formula amongst the other counties who are meeting their expenditure goals as of 3/31 and are willing to receive the additional re-allocated funds.

Process for Recapture:

If the overall GLOW still fails to hit the 80% Benchmark in any funding stream, and the State recaptures' funds for that Program Year, funds will be recaptured from the county(ies) who failed to meet the Benchmark and distributed back to the NYS Department of Labor.