

GLOW Workforce Development Board (WDB) Policy

Under the Workforce Innovation and Opportunity Act (WIOA)

(Rescinds GLOW WDB Recapture Policy and Procedure for Meeting Required WIOA Expenditure Goals)

Name of Policy: **GLOW WDB Policy and Procedure for Meeting Required WIOA Expenditure of Funds**

Approval Date: ~~4/8/20~~, 3/17/26

Effective Date: ~~4/8/20~~, 3/18/26

Background: The GLOW WDB requires ALL GLOW service providers/contractors to expend 100% of their WIOA funds.

Purpose: This procedure is to ensure funds are expended by GLOW and includes the process to recapture if benchmarks for spending percentages are not met by contractors. New York State (NYS) Workforce Development System Technical Advisory (WDS TA) #16-03 requires that the WDB must obligate at least 80% of the formula funds by the end of the Program Year (PY) in which they were issued. This policy covers all WIOA Title I funds.

Policy:

Expenditures will be monitored monthly by the WDB Executive Director (WDB ED) and the Workforce Development Board Grant Recipient Principal Account Clerk and will be discussed monthly at the service providers/contractors meeting. WDS TA #16-03 requires the review of total obligations and expenditures at each WDB meeting compared to the approved budget. If the GLOW contractors are not meeting 50% total accrued or cash expenditure rate for the current available PY funding **by the December Expenditure Monitor Reports (EMRs)**, the GLOW WDB ED will alert the GLOW WDB Finance Committee and the service provider/contractor will be required to present a Corrective Action Plan/Timeline to the WDB Finance Committee within 10 business days of the notification by the ED. This process will assist GLOW at meeting the 80% Obligation levels required by WDS TA #16-03.

Process:

- Each month the GLOW service providers/contractors and the GLOW WDB ED will meet and review the Total Cash Expenditures reported by each contractor on the EMR provided by the GR the fiscal agent for each contractor by individual program (Adult, Dislocated Worker, and Youth).
- For the period 7/1-12/31 in the current PY, the total accrued and cash expenditure rate should be at **50% by 12/31** for the current PY funds in order to reach the 100% benchmark by 6/30 of the current PY. If not, the GLOW WDB ED will send notice to the individual contractors who **are not** meeting that requirement to inform them and request reasons why low spending is occurring. A Corrective Action Plan/Timeline will be required and due to the GLOW WDB Finance Committee chairperson within 10 business days indicating how the remaining allocation will be spent] to meet the required benchmark of 100% accrued expenditure by 6/30.
- If any of the contractors are not meeting the requirement of **75% obligation rate by the March EMRs**, a Corrective Action Plan/Timeline will be required and due to the GLOW WDB Finance Committee chairperson within 10 business days indicating how the remaining allocation will be spent in order to meet the required benchmark of 100% by 6/30.
- A report will be provided to the contractors at the monthly meetings showing the expenditures to date. This report will be shared with the entire Board at scheduled meetings and by email in months that there is no meeting scheduled.
- **Accrual Liquidation** – As service providers/contractors submit incurred expenses on a reimbursement basis, cutoff must be observed. All expenses reportable to a contract year must be incurred and accrued by 6/30. There is a close out period of 60 days permitted to liquidate accruals reported as of 6/30 of each PY. To ensure contract fiscal integrity, separate vouchers claiming reimbursement for accruals must be submitted by 8/30 for payment under the closed out contract. Contractors not submitting by that deadline will not be reimbursed, any unliquidated accruals will be reversed, and funding of the expense will become the responsibility of the contractor.