



**PUBLIC POLICY No.:** WIOA-05-2016

**DATE:** AUGUST 29, 2016

**SUBJECT:** PUBLIC POLICY FOR THE PREPARATION OF BUDGETS SPONSORED WITH FUNDS DELEGATED TO THE MANATÍ-DORADO LWDA, INCLUDING THOSE OTHER THAN WIOA

**REFERENCE:** WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA PL 113-128)

## **I. LEGAL BASIS**

This Public Policy is enacted following the provisions of the following:

- A. WIOA PL 113-128 of July 22, 2014.
- B. Proposed WIOA Regulations.
- C. 2 CFR Part 200, Uniform Administrative Requirement, Cost Principles, and Audit Requirement for Federal Awards; Final Rule, of the Office of Federal Budget and Management.

## **II. PURPOSE**

The purpose of this Public Policy is to outline the form and manner in which the Department of Finance will annually prepare the budget for activities to be promoted with funds delegated to the MD-LWDA. This Public Policy will apply to all sources of funds received by the MD-LWDA during a given program year, although it is understood that it will take precedence over WIOA delegated funds.

In order to ensure that the process of planning, preparation and submission of the Local Plan corresponding to the Local Area for each Program Year, which includes the preparation of the operating budgets for the Programs under Title I of the WIOA Act, is carried out in an orderly manner and within a defined planning calendar, the Local Workforce Development Board of the Manatí-Dorado Local Area promulgates the following public policy. The planning structure shall also apply to other sources of funds that the Local Area receives as part of its responsibility to administer the Local Workforce Development System.

### **III. PROCEDURE FOR PLANNING AND PREPARATION OF OPERATIONAL BUDGETS FOR WIOA FUNDS**

- A. For purposes of this public policy, the Finance Department shall be the management component of the Local Area's administrative area responsible for preparing the Budget Information Summary (BIS) forms for each WIOA Title I Program delegated to the Local Area.
- B. Prior to the preparation of the BIS, the Director of Finance, in coordination with the Office of the Executive Director, will be responsible for identifying the amount of funds delegated to the Local Area under each of the WIOA Title I Programs for the planned Program Year.
- C. In the event that at the time of initiating the process of planning and preparing the Local Plan and its operating budgets, the Local Area has not been notified of the budget allocation for the planned Program Year, the Director of Finance shall use an estimate of funds, the basis of which shall be aligned with the amount of funds received in the Program Year prior to the planned Program Year.
- D. The Executive Director, in conjunction with the Program and Career Planning Area, shall be responsible for defining the programmatic service activities and associated costs to be included in the Local Plan. Once these activities have been identified, he/she will notify the Director of Finance of the amount of resources needed to address the planned service activities and the amount of resources available to be allocated to the budget line items related to the other eligible administration and operation activities for the Program Year.
- E. Each BIS shall be completed in all parts. The Finance Director shall be responsible for allocating all administrative and operating expenses on the BIS. Each BIS prepared shall be accompanied by a Narrative indicating by line item how the funds will be spent. The narrative should be explanatory of the activities to be supported by each line item.
- F. As part of the cost allocation process, the Salary and Fringe Benefit Cost Breakdown form shall be prepared. This document shall include the breakdown of costs associated with salaries and fringe benefits for officers and employees hired by the Local Area with Regular Funds, which, based on their duties, shall be allocated into Administration or Program Categories. Individuals working in the three programs shall reflect the percent of time and costs allocated in each program.
- G. Under no circumstances will BIS be prepared for an amount greater than the level of funds allocated or estimated, if at the time the allocation of funds has not been notified.
- H. Likewise, under no circumstances shall the Wage and Fringe Benefit Cost Breakdown be prepared for a period of time less than or greater than the term of time for which funds were officially delegated.

- I. In the event that, for some extraordinary reason, the Workforce Development Program issues instructions that the documents described above be prepared for less or more time than that covered by the planned Program Year, these guidelines shall be recorded in written form and included as part of the documentation of the programmatic and budgetary planning process carried out.
- J. The Director of Finance shall be responsible for ensuring that the budget distribution made complies with all expenditure limit requirements applicable to the various Programmatic Cost Categories.

#### **IV. PROCEDURE FOR PLANNING AND PREPARATION OF OPERATIONAL BUDGETS CORRESPONDING TO OTHER SOURCES DELEGATED TO THE LOCAL AREA**

- A. The provisions of this public policy shall be applicable to the programmatic and budgetary planning processes for additional Non-WIOA funding sources delegated to the Local Area for the applicable Program Year. The Director of Finance shall be responsible for distributing allocated funds within the limits applicable to the Cost Categories of eligible activities under the Program delegating the funds.
- B. In the event that an additional source of funds allows resources to be allocated for the payment of Salaries and Fringe Benefits of Local Area officers and employees who will provide services in the administration and operation of Program activities, these will be allocated taking into consideration a distribution of work time that they will devote to Program activities.
- C. The portion of the work time of these Local Area officers and employees in functions related to the activities of the additional delegated fund shall not be charged to the WIOA Salary and Fringe Benefit structure.
- D. All non-WIOA funds delegated to the Local Area shall be administered under a separate budget and accounting structure from the WIOA funds in order to meet the objective and requirement of maintaining separate and independent sources of funds.

#### **V. PLANNING ITINERARY AND PREPARATION OF THE LOCAL PLAN FOR THE CORRESPONDING PROGRAM YEARS**

- A. Local Plan planning and preparation activities for the planned Program Year shall be conducted in a manner that complies with the timelines established annually in the Planning Calendar prepared by the Workforce Development Program.
- B. The Executive Director and Director of Finance shall be responsible for meeting the deadlines established by the State Workforce Development Program for the submission of the following documents:

1. Program Work Specifications under WIOA Title I for the planned Program Year.
2. Annual report and Final Dispensations Usage report.
3. Notification of Change allowed for each program quarter.

4. Modification to the Allowable Work Specification during the program year.
5. Annual Report Narrative.

- C. The Executive Director and the Local Area Finance Director shall be responsible for complying with the requirements of the budget limits established by the Workforce Development Program to the appropriate notifications and modifications to the Job Specifications.
- D. The Executive Director and the Local Area Finance Director shall be responsible for submitting modifications or Work Specifications to the Local Board and Board of Mayors for proper approval and signature by the Presidents of both bodies.
- E. The Executive Director and the Local Area Finance Director shall be responsible for forwarding copies of Labor Notices submitted to the Job Development Program to the Local Board.
- F. For internal Local Area purposes, the Executive Director shall be responsible for submitting the Preliminary Work Specification Plan document for the Youth, Adult, Dislocated Worker Programs to the Local Board for review, recommendation, if any, and approval during the month of March of each year in which the planning process is conducted.

## **VI. AMENDMENTS TO PUBLIC POLICY**

In the event that policies promulgated and established by the Workforce Development Program or directly from the Federal Government represent a need to amend part or all of the content of this public policy, the Local Board through the Executive Committee may amend this public policy to be presented to the Board of Directors of Mayors for the purpose of adjusting the same to the policies promulgated for the fulfillment of the same.

## **VII. ACTIONS AND RESPONSIBILITIES WITH THE CONTENT OF THIS PUBLIC POLICY**

The Executive Director and the Finance Director of the Local Workforce Development Area shall be responsible for full compliance with the provisions contained in this Public Policy.

## **VIII. EFFECTIVE DATE**

This Public Policy shall be effective upon approval by the members of the Local Workforce Development Board and the Board of Directors of Mayors of the Manatí-Dorado Local Workforce Development Area.

Any public policy related to operational budget preparation processes related to service activities with funds delegated to the Manatí-Dorada Local Area existing at the time of approval of this public policy is hereby repealed at the time of approval of this public policy.

**IX. APPROVAL**

Signed and approved on Monday, August 29, 2016, in Manatí, Puerto Rico.

**SIGNED**

Mr. Erasmo Rafael Lamberty  
President  
Local Workforce Development Board

**SIGNED**

Hon. Wanda Judith Soler-Rosario  
President  
Board of Directors of Mayors