



**DIVISION OF FINANCE AND  
ADMINISTRATION  
OFFICE OF GRANTS  
MANAGEMENT**

**FG-OGM-84**

<b>TITLE:</b>	Guidance on Use of Funds for the Purchase of Outreach/Informational Items
<b>RESPONSIBLE OFFICE:</b>	Division of Finance and Administration, Office of Grants Management
<b>EFFECTIVE:</b>	May 23, 2014 (revised July 22, 2014)

**I. PURPOSE/SCOPE**

To provide information and guidance for the Regional Workforce Boards regarding the use of state and federal funds to conduct outreach and promote/market local workforce services.

**II. BACKGROUND**

OMB Circulars A-87, A-122, and 2 CFR Part 200 which supersedes A-87 and A-122 effective December 26, 2014 (which govern allowable and non-allowable costs for state and local governments, and non-profit organizations) restrict the use of federal funds for advertising and public relations.

Each year the Florida Legislature, in its General Appropriation Act (GAA), requires that:

....[A]ny expenditure by regional workforce boards for “outreach,” “advertising,” or “public relations,” must have a direct program benefit and shall be spent in strict accordance with all applicable federal regulations and guidance.

The Legislature also requires that any purchases (in total for the program year) of promotional items (allowable outreach/informational items) which exceed \$5,000 must be approved prior to purchase.

This guidance has been developed based on the provisions of the OMB circulars, and state legislative intent to limit the use of federal and state funds by regional workforce boards for “promotional items.”

### III. REVISION INFORMATION (if applicable)

This guidance clarifies and replaces the “Promotional Items Prior Approval Process Questions and Answers (Q&A)” guidance paper.

### IV. AUTHORITY

Title I of the Workforce Investment Act (WIA) of 1998; WIA Final Rules - 20 CFR Part 652, et al., published at 65 Fed. Reg. 49294 (August 11, 2000); Wagner-Peyser Act of 1933 as amended by Title III of the Workforce Investment Act (WIA) of 1998; 20 CFR 652.8 State Employment Service System Administrative Provisions; OMB Circulars A-87, A-122 and 2 CFR Part 200 which supersedes A-87 and A-122 effective December 26, 2014.

### V. DEFINITIONS

A. **Program Outreach:** Program outreach is an activity conducted by workforce boards to educate the public about services available and how to access those services. Program outreach also includes activities designed to inform and recruit individuals that have particular needs and have been targeted for services. The federal circulars allow costs associated with advertising to conduct program outreach activities. Allowable advertising includes TV and radio spots, billboards, spots on transit media, signage, social media, websites, brochures, etc. Program outreach should be a coordinated activity that support and benefits the various workforce grants operated by the regional workforce boards.

Allowable advertising should be targeted to businesses, job seekers and/or community partners and: 1) connects job seekers, businesses, and/or community partners to programs and services offered by the RWB and 2) serves a business purpose by assisting job seekers obtain employment and employers find qualified job seekers. All advertising for program outreach must include the organization’s name, a connection to programs/services, and contact information (such as a web site or telephone number). The purchase of allowable advertising for the purpose of program outreach does not require prior approval.

B. **Outreach/Informational Item:** An outreach/informational item is something purchased for distribution to job seekers and employers as a way to reinforce the program outreach advertising that a regional workforce board does.

C. **Promotional/Marketing Item:** An item purchased for distribution to the general public that promotes the organization (only contains the name of the regional workforce board).

D. **Connection to programs/services:** A statement that connects a business, partner or job seeker to services offered at the workforce board. For example, “Call [phone #] or visit [website] for assistance in locating employment or job training, etc.

## **VI. APPLICABILITY**

The policy and procedures contained in this guidance apply to the use of federal or state grant funding received from DEO. It does not apply to outreach/informational and promotional/marketing items purchased with non-federal or non-state funds.

This policy does not apply to the following items that are not considered "outreach/informational." These items may include the name and/or the logo of the organization and a statement connecting it to the program/service as long as the cost of adding that information is not significantly different from the cost of the supplies unmarked, and those supplies are used only for the conduct of grant business and not as outreach/informational purposes. The RWB should maintain cost comparison data between the items marked and unmarked to demonstrate that the cost variance was reasonable. These items include:

- Office supplies such as pens, pencils, pads of paper, business cards, stationary, post-it note pads, mouse pads, lanyards, or similar items used by either staff, board members, or individuals participating in workforce program activities.
- Balloons, banners, and table skirts that include the organization's name used to identify the organization at events such as job fairs and other community events.
- T-shirts and other type uniform materials worn by staff or participants used to identify staff and participants as members of the local workforce team.
- Supportive services such as grooming supplies (pocket valets) and other similar items that may be used to help participants successfully interview for jobs, etc.
- Supplies, materials, booklets, and videos purchased for resource rooms, job readiness classes, and Rapid Response.

## **VII. PROCEDURES/POLICY**

The purchase of outreach/informational items to conduct program outreach to inform employers and job seekers of the availability of services through local workforce boards is an allowable use of funds as an advertising cost when it meets the requirements of this policy. In order to be allowable, program outreach/informational items must meet the following criteria:

- Provide contact information regarding the RWB. The minimum information would be the RWB name, website and/or phone number, and/or other information that would direct the user to the regional workforce board for services.
- Include a statement that connects a business, partner or job seeker to services offered at the workforce board. For example, "Call [phone #] or visit [website] for assistance in locating employment or job training, etc.
- Be reasonable in price and necessary to assist in outreach to businesses, community partners and job seekers. Only the amount of items determined

necessary to support outreach efforts planned for the program year should be purchased.

- Any outreach/informational items purchased for distribution as giveaways must be intended for businesses and community partners in the context of doing business with the regional workforce board, or for job seeker customers as part of program recruitment, participation, or follow-up.
- Outreach items provided to businesses/community partners should be items that can be used in the work environment and have the added benefit/value of connecting the business/community partner to the programs and services provided by the regional workforce board.
- Outreach items provided to job seekers should be useful during the search for employment, while connecting the individual back to employment programs and services.

The following is a list of allowable outreach/informational items, provided that the items meet the criteria outlined above within section VII:

- Portfolios/folders purchased for distribution to job seekers to assist them in seeking employment. These items should include information on available workforce services (brochures, pamphlets, etc.).
- Pens and pencils purchased for distribution to job seekers and participants to assist them in seeking jobs and participating in program services and/or for distribution to businesses and community partners to remind them of services available through the RWB.
- Flash drives that include pre-loaded information about available services purchased for distribution to job seekers and participants to assist them in seeking jobs and participating in program services and/or for distribution to businesses and community partners to remind them of services available through the RWB.
- Tote bags for distribution to job seekers at job fairs and community events. Tote bags and other similar item purchased for distribution to job seekers should include information on available workforce services (brochures, pamphlets, etc.).

Additional items not on this list of allowable items may be approved on a case-by-case basis in very limited, unique situations with prior approval from DEO. Items purchased for distribution to the general public that promote the organization (only contains the name of the regional workforce board) are promotional/marketing items and are not allowed.

The following are examples of items that are not allowed to be purchased from state or federal grant resources:

- Balloons purchased for distribution to the general public at job fairs or community events. These and other promotional/marketing items intended to be distributed to the general public as a "give away" are not allowable.
- Hairbrushes/other personal items purchased for distribution as a marketing item to the general public or job seekers. These and other promotional/marketing

items intended to be distributed to the general public as a “give away” are not allowable.

- Umbrellas purchased for distribution to businesses and community partners to engage and remind them of services available through the RWB. Although the item may be intended for distribution to only businesses targeted for recruitment, the item is determined to have limited value/benefit and has a high cost per item for that limited benefit.

#### **VIII. FUNDING ALLOWABILITY**

Generally, USDOL Employment & Training Administration programs like the Workforce Investment Act and Wagner-Peyser Act allow for the purchase of outreach and informational materials. Other programs depend on grantor preference on the issue or the nature of the services provided. Because many grants are limited, uses of cost pools should be avoided. A matrix of the workforce funding sources and whether the grant allows these types of purchases is included in Attachment I. The “Outreach/Informational Items Decision Tree” in Attachment II is provided as a resource tool in determining funding allowability. Outreach/informational items purchased for distribution will be subject to audit and are allowable only under limited circumstances. Regions are encouraged to first find non-federal/non-state resources to pay for such items, or seek donations for these items by community partners.

#### **IX. PRIOR APPROVAL**

Prior approval is not required to purchase advertising for allowable program outreach activities (see Section V. A.). Prior approval is required for any purchases (in total for the program year) of allowable outreach/informational items listed within section VII. in excess of \$5,000. Prior approval is also required for any purchases of other allowable outreach/informational items not specifically included in the list of allowable items within section VII, regardless of total cost. Items not on the list of allowable items may be approved on a case-by-case basis in very limited, unique situations. The specific purchase, exact message to be included on the items, the intended recipients of the items, and specific funding sources with supporting justification, must be sent to the Department of Economic Opportunity at [priorapprovalrequest@deo.myflorida.com](mailto:priorapprovalrequest@deo.myflorida.com) using the Prior Approval Request Form – Other Individual Items, and/or the Annual Prior Approval Request Form, as applicable. A region must note the anticipated volume of items and timeframe for which the items will be distributed.

#### **X. DOCUMENTATION**

Regions must have good, clear supporting documentation for all costs associated with program outreach and informational activities. Good, clear supporting documentation establishes that the expenditure:

- meets the cost principles (is necessary and reasonable for proper and efficient performance and administration of the grant);

- is allocable to the grant based upon benefits received;
- is authorized or not prohibited under State or local laws or regulations;
- conforms to any limitations or exclusions set forth in the principles, federal laws, terms and conditions of the federal award, or other governing regulations as to types or amounts of cost items; and
- is consistent with policies, regulations, and procedures that apply.

**XI. FORMS/ATTACHMENTS**

- Attachment I - Grant Allowability Matrix
- Attachment II – Outreach/Informational Items Decision Tree

**Attachment I**  
**Grant Allowability for Purchases of Outreach/Informational Items**

Program Title	Allowable to Purchase Informational Items?
Supplemental Nutrition Assistance Program	No
Wagner Peyser Employment Services	Yes
Unemployment Insurance (UI)	No
Reemployment and Eligibility Assessments	No
Trade Adjustment Assistance	No
WIA Formula awards (Adult, Dislocated Worker and Youth)	Yes
WIA State Level	Note 1
Disabled Veterans' Outreach Program (DVOP)	No
Local Veterans' Employment Representative Program (LVER)	No
Veteran's Incentive Awards	Yes, Note 2
Welfare Transition	No
Other grant awards	Note 3

**Notes:**

- (1) Allowable, unless restricted due to special terms in the NFA.
- (2) Veteran's Incentive Awards are unrestricted funding that are not subject to prior approval requirements.
- (3) Depends on the specific grant requirements. Contact the Grant Manager listed on the NFA with any questions.

## Attachment II Outreach/Informational Items Decision Tree

