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STATE OF HAWAII
WORKFORCE DEVELOPMENT COUNCIL
830 Punchbowl Street, Suite 417, Honolulu, Hawaii 96813
Phone: (808) 586-8630 / Web: <http://labor.hawaii.gov/wdc/>

(SN15)
WIOA BULLETIN NO. 15-17

DATE: September 20, 2017
TO: WIOA Partners
SUBJECT: Policy on Transfer of Funds Between Adult and Dislocated Worker Allocations

I. PURPOSE:

- A. Provide guidance regarding the transferring of funds between the Adult program and the Dislocated Worker program local formula allocations; and
- B. Provide the process to request the transfer of funds between the Adult and Dislocated Worker programs.

II. BACKGROUND:

In accordance with Section 133(b)(4) of the Workforce Innovation and Opportunity Act of 2014 and 20 CFR 683.130 the Workforce Development Council (WDC) is authorized to approve the transfer of up to 100% of funds between the Adult and the Dislocated Worker programs. Funds may not be transferred to or from the Youth program.

III. POLICY:

Objective for transferring of funds: The ability to transfer funds between the Adult and Dislocated Worker programs is intended to provide greater flexibility to the Local Workforce Development Boards (LWDBs) to meet the workforce needs of their local area. The transfer of funds should be driven by a demonstrated need in a program, the ability to utilize the funds more effectively to achieve the objectives of the local area, and the ability to better meet the needs of local area customers.

Performance Outcomes: Local areas are accountable for meeting the negotiated WIOA performance measures for the Dislocated Worker and Adult programs and for meeting enrollment and expenditure targets. Transferring funds

does not relieve the local area of its obligation to achieve any of the performance targets for that program.

IV. GUIDELINES FOR TRANSFER REQUESTS

- a) The transfer must not adversely impact an area's capacity to adequately provide appropriate services to individuals in need of such services provided by the program subject to the reduced funding.
- b) The transfer must not adversely impact the area's ability to achieve program performance measures established for the current or subsequent years.
- c) The local area must obligate, at a minimum 80% of all funds budgeted to the receiving funding stream by the end of the first program year. Funds must be 100% expended by the end of the second program year.
- d) Funds not eligible for transfer requests: Youth program funds; Adult or Dislocated Worker funds re-allocated by WDC; Rapid Response funds; and other discretionary dislocated worker grants.
- e) Funds may not be transferred between program years.
- f) Transfer requests may be submitted anytime during the first year of the life of the funds, but must be submitted at least 30 days before the end of the second year.
- g) If a local area transfers 100% of its Dislocated Worker formula funds allocation, and a dislocation event occurs in the area, the request for Rapid Response funds will be considered on a case by case basis.
- h) Program costs must not be shifted to or from another federal program to overcome fund deficiencies or avoid restrictions imposed by law, regulations or agreements.
- i) All transfers of funds are subject to the priority of service requirement. Section 134(c)(3)(E) requires that priority of service be given to recipients of public assistance, other low income individuals, and individuals who are skills deficient. Additionally, TEGL 3-15 further emphasizes that Local Areas must give priority of services regardless of the levels of funds.

V. Transfer requests must include the following information:

- a) WIOA program year;
- b) the amount of the proposed transfer;
- c) an impact analysis describing the impact to the program from which funds are being moved and the impact to the program which will receive the

funds.

The impact analysis must include the following:

- 1) The situation necessitating the transfer, including local conditions, labor market, economic, etc.
- 2) How the funds transfer will impact participant levels in both programs.
- 3) A description of how the receiving program's participants will benefit from the transfer as well as how the impact on the contributing program will be mitigated, including how the remaining participants will be served.
- 4) The transfer's effect on current providers on training and other services.
- 5) A description of the expected impact on WIOA performance outcomes for both programs.

To request the transfer, the following documents must be submitted:

(These forms are available at: <http://labor.hawaii.gov/wdc/wia-docs/>)

- 1) Adult Program
 - a) Budget Detail A and related Budget Detail forms A-1 to A-5
 - b) Budget Detail B
 - c) Budget Information Summary
- 2) Dislocated Worker Program
 - a) Budget Detail A and related Budget Detail forms A-1 to A-5
 - b) Budget Detail B
 - c) Budget Information Summary
- 3) Narrative of items in Section V above (Attachment I)
- 4) Transfer requests must be signed by the Chair of the Local Workforce Development Board
- 5) Direct the request to:
Allicyn Tasaka, Executive Director
Workforce Development Council
830 Punchbowl Street, Room 417
Honolulu, HI 96813

VI. UNIFORM GUIDANCE

Subrecipients and subgrantees must follow the federal cost principles in 2 CFR Part 200, Subpart E and Appendices III through IX, including any USDOL exceptions identified in 2 CFR Part 2900.

VII. Effective Date

This policy is effective immediately.

VIII. INQUIRIES:

Inquiries regarding this bulletin may be directed to Kim Saito, Kim.A.Saito@hawaii.gov or (808) 586-8903 and Jeanne Ohta, Jeanne.Y.Ohta@hawaii.gov or (808) 586-9170.

IX. REFERENCES:

- Title I of the Workforce Innovations and Opportunity Act (WIOA) of 2014, Sections 133(b)(4) and 134(c)(3)(E)
- Training and Employment Guidance Letter (TEGL) 19-16, March 1, 2017
- 20 CFR Part 677 and Part 680
- 20 CFR 683.130
- 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Final Rule

X. ATTACHMENT I: Transfer of Funds Request Narrative



ALLICYN C.H. TAsAKA
Executive Director

**TRANSFER OF FUNDS REQUEST NARRATIVE
LOCAL WORKFORCE DEVELOPMENT BOARD**

Choose a WDB.

Program Year: [Click here to enter year.](#)

Amount of the transfer request: [Click here to enter amount.](#)

From: [Choose a program.](#) **To:** [Choose a program.](#)

Impact Analysis

- 1. The situation necessitating the transfer, including local conditions, labor market, economic, etc.**

[Click here to enter text.](#)

- 2. How the funds transfer will impact participant levels in both programs.**

[Click here to enter text.](#)

- 3. A description of how the receiving program's participants will benefit from the transfer as well as how the impact on the contributing program will be mitigated, including how the remaining participants will be served.**

[Click here to enter text.](#)

- 4. The transfer's effect on current providers of training and other services.**

[Click here to enter text.](#)

- 5. A description of the expected impact on WIOA performance outcomes for both programs.**

[Click here to enter text.](#)

- 6. Other impacts:**

[Click here to enter text.](#)

Signature: _____ Print Name: _____

Chair of the _____ Workforce Development Board

Date: _____