
PROCUREMENT / PROPERTY MANAGEMENT POLICY

This policy serves as a resource to assist the local area in maintaining fiscal integrity in the administration of Workforce Innovation and Opportunity Act (WIOA) funds and other funding awarded by the Commonwealth. It ensures that public resources are managed transparently, efficiently, and in compliance with all applicable laws and regulations. This policy applies to the Chief Local Elected Officials (CLEOs), local board members, local board staff, other local area grant recipients, fiscal agent, administrative entities, subrecipients of funds, non-local area grantees, and other workforce system partners contributing to the Commonwealth's public workforce system.

Procurement Overview:

All procurement methods must comply with the Procurement Standards (2 CFR 200.318). Purchases must:

- a) Comply with the non-federal entity's documented procedures in place;
- b) Be deemed necessary;
- c) Provide open competition (to the extent required by each method);
- d) Comply with the [NWPA Job Connect Conflict of Interest policy](#); and
- e) Have proper documentation.

Procurement Thresholds:

One of the following methods must be used for procurement purposes. NWPA Job Connect must determine the appropriate method for procurement that aligns with 2 CFR 200.320 and TEGL 15-16.

- **Micro-purchases Under \$2,500**
 - Acquisition of supplies and services in which the aggregate dollar amount does not exceed \$2,500. To the extent practicable, the following conditions apply:
 - Non-federal entity must distribute micro-purchases equitably among qualified suppliers.
 - Micro-purchases may be awarded without soliciting competitive quotes if the non-federal entity considers the price to be reasonable.
 - All purchases or procurement of services require the best combination of price and quality be obtained for the items purchased.
 - Cost comparison documentation will be maintained by the purchaser and provided to the fiscal agent upon request.
 - All WIOA property must be properly identified.
- **Small purchases \$2,500-\$23,200**

- Small purchases require three written quotes.
- All supporting documentation must be attached to the purchase.
- The fiscal agent must approve the purchase.
- Excess property and equipment available for transfer will take precedence over new purchases.
- Prior approval from BWDA must be obtained for purchases with a unit cost of \$10,000 or more. BWDA reserves the right to deny a request for purchase.
- **Competitive Proposal Purchases Over \$23, 200**
 - This is normally conducted with more than one source submitting an offer, and either a fixed price or cost reimbursement type contract being awarded.
 - Used when conditions are not appropriate for the use of sealed bids.
 - Requirements for competitive proposal requirements are referenced in 200.319 and 200.320.
 - Procurement will only be made with contractors/providers who possess the ability to successfully perform the terms and conditions of the proposed procurement.
 - All bidders must provide documentation showing they are not debarred or suspended from receiving federal grants, contracts, or assistance.
- **Noncompetitive purchases (Single Source Purchases)**
 - Must be approved by L&I
 - May only be used when one or more of the following circumstances apply:
 - The item is available only from a single source;
 - The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
 - The federal awarding agency or pass-through entity expressly authorizes noncompetitive procurement in response to a written request from the non-federal entity; or
 - After solicitation of several sources, competition is determined inadequate.
- **Sealed Bids Purchases More than \$250,000**
 - Publicly solicited.
 - A firm, fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming to all the material terms and conditions of the invitation for bids, is the lowest in price.

The following conditions apply to Sealed bidding requirements:

- The invitation for bids will be publicly advertised and sufficient response time prior to the date set for opening the bids.
- Bids must be solicited from an adequate number of known suppliers.
- The invitation for bids must define the items or services so the bidder can properly response.

- All bids will be publicly opened at the time and place noted in the invitation for bids.
- A firm, fixed-price contract award will be made in writing to the lowest responsive and responsible bidder.
- Any or all bids may be rejected if there is a sound documented reason.

Conflict of Interest/Code of Conduct:

Code of Conduct and Conflict of Interest requirements are included in contracts and purchase orders. Contracts or purchase orders will be reviewed prior to entering into such agreements to ensure there is no conflict of interest, real or perceived. See [NWPA Job Connect Conflict of Interest policy](#).

Contract (Agreement) Requirements:

Grantees must comply with all federal, state, and local contract requirements. All agreements between the local board and government entities involved with the contract must follow cost/reimbursement basis (20 CFR 683.200). Contract information criteria includes, but is not limited to, the:

- Scope of work describing the good(s) and/or service(s) being procured
- Federal and state employer's tax identification number and nature of the company
- Certifications, assurances, clauses, and conditions required by U.S. DOL, state, or local policies
- Required budget
- Statement of financial capability, certified financial statements or single audit report
- Required performance measures
- Reporting requirements
- All applicable provisions and assurances in accordance with Appendix II to Part 200 of the Federal Uniform Administrative Requirements (2 CFR §200, et. Seq.), which must be individually delineated.
- Administrative, contractual, or legal remedies for violations, default, and/or breach of contract
- Termination for cause and for convenience
- Ownership and access to records and retention requirements
- Audit requirements
- Access by the grantee, federal, and state personnel to books, documents papers, and records that are directly pertinent to the specific contract for audit, examination, excerpts, and transcriptions.
- Modifications

Actions to Correct Contracts:

If NWPA Job Connect identifies a contract that is not in compliance, the board must begin implementing the following:

- a. Notify the training provider or contractor immediately that there is an issue.
- b. NWPA Job Connect may want to ensure the contract templates allow for unilateral termination of the contract.
- c. Notify the awarding agency if the board is working with pass-through funds.
- d. Enter into a settlement agreement with the affected party to pay for goods or services received to date; and
- e. Follow the local, state, and federal procurement policies (as appropriate) to ensure compliance.

Pre-Award Review Procedures:

Awards will be made to responsible contractors possessing the ability to successfully perform under the terms and conditions of proposed procurement. Each organization being considered for funding must meet all federal, state, and local requirements for program services. Bidding organizations are evaluated for elements such as contractor integrity, financial and technical resources, past performance, adherence to monitoring procedures, etc. This evaluation is done either during the procurement process or prior to award of contract. NWPA Job Connect will ensure grant funds are not awarded to suspended or debarred organizations.

Negotiation and Award:

Profit amount must be negotiated as a separate element for contracts that allow for a profit to be generated.

Protest Process:

NWPA Job Connect allows for bidders to protest administrative and contractual issues arising out of NWPA Job Connect procurements. Protest dispute sources may include but are not limited to unfair competition in the decision-making process; illegal/improper act or violation of law; and unruly restrictive clauses.

The protest process is included in the Request for Proposal (RFP). All protests, appeals, or complaints must be submitted in writing to the NWPA Job Connect Director before the RFP period has ended. The Director will review to determine merit. For an appeal to be found to have merit, it must show that any substantial portion of the RFP process or federal procurement guidelines was violated. Only appeals that cite the specific section(s) of the RFP that have been violated will be considered.

If protests, appeals or complaints are found to have merit, the appeal will be evaluated by the Executive Committee and then by the NWPA Job Connect board. The decision made by NWPA Job Connect will be final.

Post- Award Administration:

NWPA Job Connect will provide technical assistance and perform financial programming and performance monitoring, as well as a review of documentation and reports following award of contract.

Closeout:

NWPA Job Connect and/or Fiscal Agent will maintain a closeout contract file that includes an official notice of closeout (specify the last invoice date and payment date); all necessary records and appropriate releases of liabilities, records, or payments: and the transfer of financial and customer records.

Record Retention:

NWPA Job Connect will retain records and documentation created and used during the procurement process for a period of three (3) years from the date of the final expenditure report for the funding period. Records must include the rationale for the method of procurement, selection of contract type, contractor selection or rejection, basis for the contract price, bid or RFP notice, evaluation score sheets, and other supporting materials. (See 29 CFR 97.36 (i)(10).

Any litigation, claim, negotiation, audit, or other action involving the records that has been started before the expiration date of the three-year period will necessitate retaining the records until completion of the action and resolution of all issues that arise from it.

Public Communications- Stevens Amendment:

NWPA Job Connect will include Stevens Amendment language to statements, press releases, requests for proposals, bid solicitations, and other documents describing projects or programs funded in whole or in part with federal funding. The following information must clearly state:

- a. The percentage of the total costs of the program or project which will be financed with Federal money;
- b. The dollar amount of Federal funds for the project or program; and
- c. The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.

General Policy of Competition

All procurement transactions must ensure open and free competition. The bidding procedures must meet applicable federal requirements. Procurement procedures must not restrict or eliminate competition. When possible, the board must avoid the requirement that a brand name be specified. Actions must be taken to ensure that small and minority owned businesses are utilized when possible as sources of supplies and services.

Selection of One Stop Operator:

One-stop operators must be designated, certified, and selected through an open and free competitive procurement process. The competitive process used by NWPA Job Connect to procure one-stop operators must be conducted at least every four (4) years and follow the principles of competitive procurement set forth in Uniform Administrative Guidance at 2 CFR §200-318-326.

The procurement process must promote efficiency and effectiveness; ensure regular consideration of system operator(s) performance and costs; ensure continuous improvement by evaluation of performance and fiscal responsibility; and ensure compliance with all applicable federal and state laws.

Operator Procurement Process

The stages or phases of the procurement process are organized as described in multiple federal-level resources including WIOA and its regulations, the Uniform Guidance and 29 CFR Part 97, as well as the PA Department of Labor and Industry's current WSP Financial Management Policy. The phases of procurement may include:

1. Planning Phase –May include Identifying need(s), conducting research, determining key factors to base a procurement solicitation (e.g. Request for Proposal), developing evaluation and scoring factors, identifying scoring team, and determining signatory authority.
2. Release and Evaluation Phase – May include publicizing solicitation, bidders conferencing, collecting proposals, and evaluating and scoring proposals.
3. Negotiation and Selection Phase – May include negotiating operator roles and responsibilities/performance levels/fair and reasonable profit/payment details/contract term including inclusion of option years and gain approval of authority(s) if applicable, making offer and obtaining acceptance, protesting process, certifying/designating one stop operator and executing contract.
4. Implementation Phase – May include post-award administration activities such as conducting oversight and monitoring, issuing invoices, making payments, monitoring performance and deliverables, and evaluating/improving any contract modifications.
5. Closeout Phase – May include reconciling costs/payments/performance goals with actual performance, securing/retaining participant and financial records, and preparing closeout documents.

NWPA Job Connect will determine the appropriate method for procurement. The local board's process will adhere to the PA Department of Labor and Industry's WSP PA CareerLink® System Operator Policy, Financial Management Guide, and any other regulations regarding procurement and One Stop Operators.

WIOA Title I Services Providers Procurement Process:

NWPA Job Connect will procure for WIOA Title I Services Providers at minimum every five (5) years. The same procurement process used for the One Stop Operator provider will be followed.

WIOA Title I Youth Services Providers Procurement Process:

NWPA Job Connect will procure for WIOA Title I Youth Services Providers at minimum every five (5) years. The same procurement process used for the One Stop Operator provider will be followed. The local board must ensure that each of the 14 youth program elements are available in the local area and use youth service providers best positioned to provide program elements resulting in strong economic growth outcomes. Bidders must demonstrate the ability to successfully meet federal and state accountability measures.

Procurement Standards:

Compliance- NWPA Job Connect will comply with the principles of competitive procurement in the Uniform Guidance 2 CFR §200-3.18-§200.326; 20 CFR §678.600-

§678.635; Federal Management Guide; WSP Procurement Policy; and other applicable federal, state, and local laws, regulations, policies, and procedures.

Documentation of action toward procurement-NWPA Job Connect will maintain the documentation that describes the research and assessment conducted that led to the drafting of the procurement request.

Contract Requirements- The contract will contain the required information applicable to federal statutes and regulations and will also include an initial six-month assessment, and then, an annual assessment of the Operator(s) and/or Service Provider (s) thereafter. Assessments may include participating partner surveys, oversight and monitoring activities, performance measures. All will be consistent with PA CareerLink® Certification requirements and applicable MOU agreements.

Determination of Roles and Responsibilities- For the operator role, NWPA Job Connect will adopt the following:

- a. Coordination of service providers across the one-stop delivery system
- b. Determine if the One Stop Operator will be responsible for only one PA CareerLink® center of more than one center.
- c. Determine if the local area wants to secure more than one operator.
- d. Additional roles and responsibilities may include coordinating service delivery in multi-center area, affiliated sites, or regionally.
- e. See the PA CareerLink® System Operator Policy for additional information

Documentation Post Selection- The procurement process used by NWPA Job Connect must provide a detailed history of the process used for the local area in our local plan and any subsequent local plan modifications. While not required to detail the procurement history of any WIOA Title I service providers in the local plan, NWPA Job Connect will add this detail for transparency.

Performance and Oversight-Bidders must demonstrate the ability to successfully meet federal and state performance measures. Bidders must commit to successful outcomes for all contracted services. NWPA Job Connect must monitor all sub-recipients and contractors for quality of services and achievement based on the primary indicators of performance.

NWPA Job Connect may issue joint requests for procuring the one-stop operator and Title I-B services providers. When the joint procurement occurs and the same entity is selected to serve as the one stop operator and WIOA Title I-B Services provider, NWPA Job Connect will award separate contracts. A firewall agreement will be required to describe the expectations on distinct roles, clear methods of tracking execution and accountability for the distinct roles, and how responsibilities will be carried out while complying with WIOA and corresponding regulations.

NWPA JOB CONNECT PROPERTY MANAGEMENT

Inventory Record Requirements

1. Grantees must maintain adequate inventory records for all property acquired with WIOA funds or acquired from other sources and used in WIOA programs. WIOA property must be properly identified. Inventory records must contain the following standards:
 - a. Records include descriptions, serial numbers, acquisition dates, costs, and funding sources.
 - b. All items with a unit acquisition cost of \$10,000 or more must be added to the list.
 - c. Optional to maintain inventory records for purchases with a lower acquisition cost if local requirements are more restrictive.
2. Each grantee/fiscal agent will conduct a physical inventory of all property with acquisition cost of \$2,500 or more annually. Inventory records must be reconciled during this process.
3. Records must be maintained until disposition.
4. The annual property inventory list of items purchased using federal funds allocated by L&I must be forwarded to BWDA by October 1 of each year. This includes property located outside the grantee/fiscal agent office, such as PA CareerLink® centers and subgrantees. Written inventory submitted must be cumulative.

Annual Property Inventory Form

All property with a unit acquisition cost of \$10,000 or more must be reported, whether purchased or transferred into the grantee/fiscal agent's local area, on the Annual Property Inventory Form. This form must be completed and forwarded to BWDA by October 1 of each year.

Identification of Equipment

Each grantee/fiscal agent is required to ensure that all non-expendable personal property purchased with funds allocated by L&I is identified as WIOA property. The following tagging requirements apply:

1. Effective October 1, 2024, property with a unit acquisition cost of \$10,000 or more must be identified with WIOA property identification tags issued by BWDA;
2. Property with a unit acquisition cost of between \$5,000 and \$9,999.99 must be identified with either local property tags or BWDA-issued WIOA Property tags; and
3. Property with a unit acquisition cost under \$5,000 may be identified with property tags at the discretion of the grantee/fiscal agent.

Inventory identification tags must be placed on non-expendable, personal property in an area that is easily accessible for identification and protected against wear, damage, or loss. Inventory records maintained by the grantee/fiscal agent must be revised immediately to reflect changes in tag numbers and the reason for the change noted. Any

changes in the tag number of an item with a unit acquisition cost of \$10,000 or more must be reported on the next inventory submitted to BWDA.

Transfer of Property

NWPA Job Connect is required to establish procedures for transferring property per the BWDA's Financial Management Technical Assistance Guide using the Property Transfer Report Form. The transfer of property will be handled by the fiscal agent, on behalf of NWPA Job Connect.

Property Safeguard Procedures

All WIOA property must be properly maintained, secured, and adequately insured. When property with a unit acquisition cost of \$10,000 or more has been damaged, lost, or stolen, a *Property Incident Report* must be submitted to BWDA within ten days of determination of loss. The implementation of property safeguard procedures will be handled by the fiscal agent on behalf of NWPA Job Connect. The fiscal agent must follow their formally documented fraud policy.

Final Disposition of Property

The WIOA Property Disposition Plan ensures that all WIOA property with a unit acquisition cost of \$10,000 or more is properly disposed of in accordance with federal and state guidelines. The grantee/fiscal agent will prepare and submit a WIOA Property Disposition Plan to BWDS requesting disposition instructions. Grantee/fiscal agent will follow the Financial Management Guide Section 9 Procurement Types of Property for Disposition guidelines.

REFERENCES

WIOA Section 107(h)

20 CFR 678.605

20 CFR 683.200(c)(5)

2 CFR Part 200 Uniform Guidance

PA Department of Labor & Industry's WSP Financial Management Policy July 29, 2025

[Financial Management Guide, Section 9 Procurement](#)

Name	Date	Rev. Level	Description of Change	Effective Date
Deb O' Neil	10/20/2014	A	Policy approved by CLEOs and new LWIB	12/17/2014
Deb O'Neil	03/01/2017	B	Update to WIOA changes	08/11/2017
Deb O'Neil	03/01/2018	C	Update thresholds to align with County of Venango	04/27/2018
Deb O'Neil	01/29/2021	D	Update to include One Stop Operator Specific Procurement	03/12/2021

Susan Richmond	1/26/2022	E	Update thresholds to align with County of Venango	03/11/2022
Susan Richmond	1/2/2024	F	Updated Thresholds to align with County of Venango	03/08/2024
Susan Richmond	9/26/2025	G	Updates to include Procurement for Title I Youth, AD, and DW programs and change in thresholds	10/09/2026

Appendix A

Responsibilities of the Fiscal Agent

- Maintain an inventory system to account for property acquired with WIOA funds or acquired from other sources and used in the WIOA program.
- Perform an annual physical inventory of all property purchased using WIOA funds or funds from any prior federal program. The results of this physical inventory must be reconciled with records maintained by the fiscal agent and, where applicable, Bureau of Workforce Development Administration (BWDA).
- Verify, prior to any acquisition, that needed property is not available through any alternative source.
- Implement the formal bidding procedures established by NWPA Job Connect, for establishing levels for dollar amounts that require procedures such as advertising, sending out formal letters requesting bids from vendors, obtaining sealed bids, etc., as identified below under Procurement Thresholds.
- Obtain written approval from BWDA for the purchase of any property with a unit acquisition cost of \$10,000 or more. The approval request must include justification and all identifying information.
- Approve or disapprove all subrecipient requests for the purchase of property in accordance with the applicable requirements. Copies of all approvals and the proper documentation and local WIOA tag number(s) assigned must be maintained at the fiscal agent's office and will be made available for review by authorized representatives upon request.
- For subrecipient purchases with a unit acquisition cost of \$10,000 or more, the fiscal agent must obtain BWDA's approval.
- Notify BWDA of excess property with a unit acquisition cost of \$10,000 or more. Notification will be distributed to all fiscal agents so that items no longer needed in one area may be made available for use by other LWDA's. All other miscellaneous excess property will be disposed of to the highest bidder obtained by public advertisement if it cannot be utilized within the system. The resulting program income will be utilized and reported within the funding stream from which the purchase was initially made.
- Establish a control system that will safeguard all property against loss, damage or theft.
- All leasing or renting of any type of asset as outlined above will be evaluated by the fiscal agent and possible options as well as the resulting recommendation will be presented prior to contract execution by the fiscal agent.