

## **WIOA MOU Infrastructure/Shared Delivery Cost Guidance for DWD Directors and Supervisors for Program Year 2023-2024**

DWD-DET and DWD-DVR local Directors/Supervisors are the first point of contact in discussions with local Board and Partner staff regarding Infrastructure and Shared costs for a Job Center. DWD will not be charging Partners for DWD equipment and staff in the Resource Room for PY2023-2024. This includes staffing, computer equipment, internet connectivity, phones, and phone lines. The following are instructions and serves as a guide to assist in your preliminary discussions.

### **Procedures:**

- During local negotiations, if the Director or Supervisor have questions on any costs, they should contact the Job Service, OVES, or DVR Bureau Director, outlining their question or issue along with their contact information. DWD Central Office staff will contact them to discuss.
- All questioned costs and/or cost allocation methodology issues that were provided to the local Director/Supervisor will be discussed with the local Board and Partners to obtain further information or to eliminate the cost from the budget. DWD Central Office staff will be available to assist in the discussion with local Board members and Partners, as needed.
- Local Directors/Supervisors must provide a response to the Job Service, OVES, or DVR Bureau Director explaining (or describing how the questioned cost/allocation methodology was resolved) or provide the justification for maintaining those costs in the local MOU Budget.
- Once all questioned costs and issues have been resolved, DWD Directors/Supervisors will be authorized to approve the Job Center MOU/Budgets. WDB staff have been instructed to share draft documents either in SOLAR, or to use the print functionality in SOLAR.

### **Costs that DWD will not agree to pay**

The following is a list of budget items that DWD Directors and Supervisors should not agree to and should not be included in SOLAR Budgets.

- **Rent or Leasing Agreements** – All rent costs are covered by individual Partner lease agreements. There should be no shared rent costs.
- **Utilities** – These costs are the responsibility of individual Partners.
- **Building Maintenance** – General building maintenance costs are to be included in individual lease agreements. Building service costs (such as Cleaning services/Janitorial) should first be discussed and verified with DWD Central Office before agreeing to those types of shared costs.

- **Pest Control or Related Costs** – Building Pest Control services may be included in individual lease agreements. Need and payment of these types of services will be addressed on an individual basis.
- **Job Centers that are not Comprehensive or Affiliate-** –DWD will not pay for any costs in Partner job centers that are not defined as either a comprehensive or affiliate job center. These costs include, but are not limited to, staffing, equipment, copiers, paper/materials, software, furniture, internet connectivity, phones, or phone lines. Please note that this does not include Receptionist costs. Receptionist costs are allowable (see next section regarding Receptionist costs).
- **IT Services** – DWD provides its own IT support service. In addition, since DWD computers have direct connectivity through the BadgerNet system (paid directly by DWD), there are no outside IT support services needed.
- **Insurance** – The state is self-insured. Any insurance claims will be handled on an individual basis and through the appropriate state established process. Breakage of equipment/furniture/etc. by consumer or staff will be addressed on an individual basis to determine payment liability and payment proportions between the Partners.
- **Job Center Pooled funds** – These are defined as a pooled or set-aside funds to be used for discretionary Job Center items. These types of pooled funds are not allowable.
- **Depreciation or Interest** – This is not an allowable shared cost and is the responsibility of the building owner.
- **Locations with No DWD Staff Presence** – DWD will not cover any shared costs at locations where it has no staff or equipment. DWD will not cover any shared costs at locations where DWD only has provided equipment. In those equipment only locations, DWD is not allocating those costs to Partners therefore, it will not cover any other costs at such locations. Exceptions may be considered on a case by case basis and should be communicated to the Bureau Directors.

The above is not an exhaustive list. If you have questions regarding a specific cost or if a local Partner is insistent on retaining any of the above Budget items, please obtain their written justification and/or rationale for including the cost and forward to the local Job Service, OVES, or DVR Director. All questions on cost item determinations will be reviewed by DWD Central Office staff who will issue a final determination.

#### **Costs that local DET/OVES/DVR Directors and Supervisors must review in detail**

The following MOU Budget Lines and Allocation Methodologies should be reviewed in-depth and may require the Partner to provide detailed information and justification as to why it should be included in the local MOU Budget.

- **One-Stop-Operator** – WIOA requires local WDBs, with the agreement of the CEO, to competitively procure an OSO in accordance with the Uniform Guidance and state Policy 2.7.1: <https://dwd.wisconsin.gov/wioa/policy/02/02.7.1.htm>. The OSO must have a minimum budget of \$3,500.00 as required in Policy 2.7.1 and may be cost-shared among one-stop partners through the One-Stop Delivery System MOU local negotiation process. DWD will contribute up to \$3,500.00 per WDA to support OSO costs, subject to locally-agreed cost allocation methodologies. DWD also supports the consortium model and will provide staff time as an in-kind contribution.
- **Receptionist** – The cost for a local Job Center Receptionist is an allowable shared cost. However, DWD Directors and Supervisors should identify if any DWD staff (Resource Room staff or other) are being provided as back-up for the Receptionist and the duties provided. In some cases, consumers are directed to Resource Room staff to cover high consumer volume or if the Receptionist is not available. If DWD is providing significant DWD staff time to Receptionist duties, then a credit or cost reduction should be considered. This may mean a manual allocation methodology.
- **Security** – Security is an allowable shared cost. However, there are several details that should be provided before being included in the MOU Budget. In some cases, security is covered in individual lease agreements; DWD also has a direct contract for security services at certain locations. Shared security costs have to be for shared areas and should be adequately proportioned if the security service is provided for other non-shared areas. In addition, the allocation methodology used should be based on the benefit received by each Partner.
- **Outreach** – DWD provides a significant amount of Outreach for local Job Centers. Details as to what type of shared outreach activities a Partner is providing is required before DWD will share in these types of costs.
- **Building Services** – This is defined for such things as cleaning services, janitorial services, snow removal, etc. These services may already be included in individual lease agreements. Directors/Supervisors should discuss and verify with DWD Central Office to determine if such costs are within existing lease agreements.
- **Membership Dues** – This is another Budget item that, in some cases, DWD covers the cost for one membership while the WDB/Partner provides the cost for another. Detailed description of the membership and how this is considered a shared cost should be provided.
- **Indirect/Overhead/ De Minimis** – Directors/Supervisors should obtain additional information regarding these types of non-direct costs. Individual agency approved in-direct cost plans must be applied but there are certain restrictions on how these costs can be applied. DWD Central Office will assist Directors and Supervisors in reviewing these costs and if they should be included in local Budgets.
- **Miscellaneous Supplies** – This has become a too general catch-all cost allocation for Partners. Other than Resource Room supply costs (which DWD is not charging at this time), DWD Directors/Supervisors should include in the MOU

Budget any other supply costs that is provided and supporting documentation. Please note that DWD has set up specific coding to track these types of costs. If you are charging shared cost supplies, please contact the DET/DVR Budget Unit for the applicable coding.

- **Other** – Any cost placed in the Other Line category is required to have a detailed description of that cost in the SOLAR description section. In addition, DWD Directors/Supervisors are to be provided a detailed description and justification as to what the Other costs contain and justification how that cost is considered a Shared Cost. Directors/Supervisors may be asked to provide the detailed description when the DET/DVR Budget Unit reviews the MOU Budget.
- **Allocation Methodology** – DWD Directors and Supervisors should review the type of allocation methodology that is used for each Budget cost. The type of allocation methodology used should be reasonable and applied consistently by all partners for the Budget item. If Customer Count is used as an allocation methodology, the method by which this data was obtained should be reasonable. Details of how the data was acquired, time frame, and the actual data itself should be provided for Partner review and approval.

The above is not an exhaustive list. If you have questions regarding a specific cost or allocation methodology, please contact the Job Service, OVES, or DVR Director and it will be reviewed and discussed with DWD Central Office staff.