

Region VI Workforce Development Board 17 Middletown Road White Hall, WV 26554	Classification: Requirements for Pass-through Entities Subawards and Public Communications
	Date: November 6, 2020

Region VI Guidance Letter 27-18, R-1

Purpose: To establish a policy on the requirements of providing certain information in all public communications and Subrecipient Awards in Region VI.

References: P.L. 115-31, Division H, Title V, Section 505; 2 CFR 200.300(b); 2 CFR 200.332

Background: The Region IV Workforce Development Board (WDB), being a subrecipient of DOL Federal funds under the Workforce Opportunity and Innovation Act (WIOA), is responsible for developing policies demonstrating compliance with specific administrative requirements to provide certain information in public communications which are included in the terms and conditions of the WIOA Federal Grant Award.

Policy: The Region IV Workforce Development Board will include the required Federal funding language in all issued statements, press releases, requests for proposals, bid solicitations and any other documents that describe projects or programs funded in whole or part with Federal funds to clearly state:

1. Public Policy and Program Requirements per 2 CFR 200.300(a) The Federal awarding agency must manage and administer the Federal award in a manner to ensure that Federal funding is expended, and associated programs are implemented in full accordance with U.S. statutory and public policy requirements, including but not limited to:
 - a. Those protecting public welfare
 - b. The environment
 - c. Prohibiting discrimination

The Federal awarding agency must communicate to the non-Federal entity all relevant public policy requirements, including those general appropriations provisions, and incorporate them either directly or by reference in the terms and conditions in the Federal award.

2. All information required by 2 CFR 200.331(a)(1): (13 Elements)
 - a) Subrecipient Name (which must match registered name in DUNS)
 - b) Subrecipient's Data Universal Numbering System (DUNS) number
 - c) Federal Award Identification Number (FAIN)
 - d) Federal Award Date
 - e) Subaward Period of Performance Start and End Date
 - f) Amount of Federal Funds Obligated by this action;
 - g) Total Amount of Federal Funds Obligated to the subrecipient;
 - h) Total Amount of the Federal Award;

- i) Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA)
 - j) Name of Federal awarding agency, pass-through entity, and contact information for awarding official,
 - k) CFDA Number and Name; the pass-through entity must identify the dollar amount made available under each Federal award and the CFDA number at time of disbursement;
 - l) Identification of whether the award is R&D; and
 - m) Indirect cost rate for the Federal award (including if the de minimis rate is charged per § 200.414 Indirect (F&A) costs)
3. Language requirements to provide certain information in Public Communications as required by Public Law (P.L.) 115-31, Division H, Title V, Section 505
- 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 financed by non-governmental sources.

Region VI Workforce Development Board will further ensure that the above Federal Funding language is included in all of the Region IV sub-contracts and that all Region VI sub-contractors are compliant with this policy while utilizing WIOA funds.

Expiration Date: Effective until rescinded or modified by the Region VI Workforce Development Board.