



PROPERTY – PURCHASING, INVENTORY, AND DISPOSAL

PURPOSE

This policy provides guidance regarding prior approval, purchasing, inventory, and disposal of property consistent with the requirements of the Uniform Guidance under Title 2 CFR Part 200, Uniform Guidance-DOL Exceptions under Title 2 CFR Part 2900, and State Directive WSD16-10.

SCOPE

The Workforce Development Board of Ventura County (WDBVC) and its subrecipients and contractors.

REFERENCES

Workforce Services Directive WSD16-10, Property-Purchasing, Inventory, and Disposal (November 10, 2016)

POLICY

The WDBVC will follow the procurement, inventory and disposal of property requirements contained in the County of Ventura General Services Agency (GSA) Procurement Guide and State Directive WSD16-10 dated November 10, 2016 (Attachment I and Attachment II), whichever is more restrictive.

The WDBVC's subrecipients shall follow the instructions contained in WSD16-10 dated November 10, 2016, unless the subrecipients' own written policies and procedures are more restrictive, in which case those should be followed.

The WDBVC and the County of Ventura Human Services Agency will review procurement and property through regular monitoring.

Inventory Records

WDBVC and its subrecipients must maintain accurate inventory records of all property purchased with federal funds (Attachment III). All property must have a unique identification mark to be used for inventory purposes. The inventory records must include the following information:

- A description of the property.
- Manufacturer's serial number, model number, or other identification number.
- WIOA Identification Number
- Source of funding for the property (including the Federal Award Identification Number).
- Whether the title is held by the subrecipient or by DOL.

- Acquisition date (or date received, if the property was furnished by the federal government).
- Cost of the property.
- Percentage of federal participation in the project costs for the federal award under which the property was acquired.
- Location, use, and condition of the property.
- Ultimate disposition data including the date of disposal and the sale price

WIOA Identification Number

All property shall have a WIOA Identification Number that is clearly visible. The WIOA Identification Number must follow the following naming convention:

WIOA (Agency Code) (#)

For example: *WIOA BGC 15*

In addition to the requirements above, WDBVC and its subrecipients must take a physical property inventory and reconcile the inventory with the property records at least once every year. Subrecipients must also develop a control system to ensure adequate safeguards to prevent loss, damage, or theft of the property; any loss, damage, or theft of property must be investigated. Further, subrecipients must develop adequate maintenance procedures to keep the property in good operating order. Finally, if the subrecipient is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

The WDBVC and its subrecipients must retain all property records for three years after the date of acquisition, through final disposition and then maintain the records for three years beyond that. Subrecipients must also retain those records for a period of three years from the date of their last expenditure report submitted to the WDBVC. If any litigation, claim, or audit is started before the expiration of the three-year period, ALL records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken. Refer to Uniform Guidance Section 200.333 for more information regarding retention requirements.

Disposition of Property

If any inventory is no longer needed for the original project or program, the subrecipient shall return the item(s) to the WDBVC and complete the Inventory Return Form (Attachment IV). If the WDBVC or subrecipient surpluses the item, the Inventory Surplus Form (Attachment V) shall be completed. Both forms shall be submitted to the WDBVC upon return and/or surplus.

ACTION

Bring this policy to the attention of all affected staff.

INQUIRIES

Inquiries regarding this policy can be addressed to the WDBVC at 805-477-5306.

/S/ Rebecca Evans, Executive Director
Workforce Development Board of Ventura County

ATTACHMENTS:

Attachment I - State Directive WSD16-10 dated November 10, 2016

Attachment II - County of Ventura General Services Agency (GSA) Procurement Guide

Attachment III - Inventory List

Attachment IV - Inventory Return Form

Attachment V - Inventory Surplus Form