



Oklahoma Office of Workforce Development  
900 N. Portland Ave.  
Oklahoma City, OK 73107

**OKLAHOMA WORKFORCE DEVELOPMENT ISSUANCE #07-2016**

**TO:** Workforce Development Board Chairs  
Workforce Development Board Staff  
Workforce Development Fiscal Agents

**FROM:** Erin E. Risley-Baird, Executive Director

**DATE:** December 19, 2016

**SUBJECT:** Transfer of Formula Funds Policy

**PURPOSE:** To provide staff with specific policy, procedures, and guidelines for the transfer of funds between the Title I Adult and Dislocated Worker Programs of the Workforce Innovation and Opportunity Act (WIOA, or “the Act”).

**REFERENCES:**

- The Workforce Innovation and Opportunity Act of 2014 (Public Law (Pub. L. 113-128)) Title I, enacted July 22, 2014.
- Federal Register/Vol. 81. No. 161, Parts 677 and 683

**MESSAGE:** This Oklahoma Workforce Development Issuance (OWDI) is to provide official policy guidance to the workforce system on the transfer of formula funds between the Title I Adult and Dislocated Worker Programs.

**INSTRUCTIONS:** WIOA allows a local board to transfer, if such a transfer is approved by the Governor, up to and including 100 percent of the fiscal year funds allocated to the local area for adult and dislocated worker employment and training services between the Adult Program and DLW Program. Local boards must submit a written Transfer of Funds Request to the Oklahoma Office of Workforce Development (OOWD) who, as the Governor’s designated operating entity for workforce development, approves the transfer of funds between the Adult and Dislocated Worker Programs.

In an effort to ensure services are available to adults and dislocated workers, each local area must consider how adjusted levels of performance for the primary indicators will be met before requesting such a transfer. A rationale for the transfer of funds between the programs must address the impact on jointly funded employment and training programs, the usage of the

<b>RESCISSIONS</b> OWDI #12-2013	<b>EXPIRATION DATE</b> Continuing
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funds to be transferred, and the consistency of usage with the local strategic plan. Rationales shall also include justifications for the transfer supported by local data, including the number of TAA petitions and Rapid Response events in the local area, anticipated layoffs based on local economic conditions, and current and predicted program performance.

Local areas must also guarantee the transfer of funds will not unfavorably impact: (1) the employment and training activities of the program that funds are being transferred from; (2) the program that funds are being transferred to; and (3) The WIOA Title I performance measures for the WIOA Adult or Dislocated Worker programs.

Local areas must submit a copy of the LWDB approved minutes showing the Board's approval of the transfer of funds and a Transfer of Funds Request form, Attachment A, along with the rationale and guarantees to the Oklahoma Office of Workforce Development at [workforce@osuokc.edu](mailto:workforce@osuokc.edu).

**Approval Process:**

- OOWD, as the Governor's designated operating entity, has the authority to approve or disapprove all transfer of funds requests. Approving status and any additional guidance will be issued upon receipt of all proper documentation.
- Notification of status will be made by e-mail within 15 days of receipt of request.

**After a Request is Approved:**

- Under no circumstances will the budget change on the "From" or "To" title/part.
- To adequately document the approved transfer within your accounting records, make a journal entry within the funding stream where the funds will come "From" showing the expense in the full amount. This will require that you establish a "Transfer" code in your chart of accounts for tracking purposes.
- Also, in your records, show the individual expenditures as they occur for approved activities under their associated account codes from your chart of accounts. These should be tracked under the funding stream being transferred "From". **Note:** For monitoring purposes it will be necessary for the Fiscal Agent to run a financial report that lists only those expenditures incurred as part of the approved transfer.  
**Recommendation:** Establish account codes specific to these expenditures.
- When entering the monthly expenditure report in OKGrants (Oklahoma's grant management database for fiscal processes) for the month the request is approved, enter the amount of the approved transfer under "TRANSFERS" on the monthly expenditure report where funds are being transferred "FROM". Splitting the expenditures between admin and program, enter under "Current Month."

**Terms and Conditions:**

- The transfer of funds cannot result in an overall deficit in any program.
- The transferred funds only change activity identity and not monetary identity. Therefore, a contract modification is not required.
- WIOA law allows for transfer of funds, therefore submission of budget modifications will not be required. However, expenditure reports and on-site monitoring should reflect actions taken to implement the approved request for the transfer.
- The transferred funds are subject to all rules of the receiving title/part, including cost limitations and eligibility requirements.
- Expenditures associated with transferred funds are tracked in the title/part from which they were transferred.
- Unless approved in writing by OOWD, performance standards for each title remain unchanged.
- Only current program year funds may be transferred between titles, no carryover funds may be transferred.
- Transfer of funds may be done only once per program year.
- Funds may not be transferred to avoid recapture procedures or grant under/over procedures.
- Funds transferred to the adult employment and training activities or the dislocated worker employment and training activities will be a part of the base amount for determining compliance with Section 128(c) and 133(c) of the Act for reallocation of unobligated funds in excess of 20 percent.

**ACTION REQUIRED:** This Oklahoma Workforce Development Issuance (OWDI) is to become a part of your permanent records and made available to appropriate staff and sub-recipients.

**INQUIRIES:** If you have any questions about this issuance, please contact Policy and Program staff in the Oklahoma Office of Workforce Development. Contact information can be found at <http://www.oklahomaworks.gov/about/>.

**ATTACHMENT A:** Transfer of Funds Request

## Transfer of Funds Request

1. Local Area \_\_\_\_\_

2. Subgrant Number \_\_\_\_\_ 3. Request Date \_\_\_\_\_

4. Program Year \_\_\_\_\_

5. Direction of Transfer (Check One)

Adult to Dislocated Worker

Dislocated Worker to Adult

6. Amount of Transfer \_\_\_\_\_

7. Contact Person \_\_\_\_\_

8. Contact E-Mail & Telephone Number \_\_\_\_\_

9. All transfer requests must be approved by the Local Board.

Date of Local Board approval \_\_\_\_\_

10. By signing below, the Local Area Director requests a transfer of funds and certifies that this transfer request was approved at the Local Board Meeting on the date indicated above.

Signature \_\_\_\_\_

Name \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

11. Please address the criteria described in the Instructions section of OWDI #07-2016, and describe the Local Board's rationale for the Transfer of Funds Request. \_\_\_\_\_

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**Instructions for Completing the  
Transfer of Funds Request Form**

- Line 1. Enter the Local Area name.
- Line 2. Enter the subgrant number.
- Line 3. Enter the date of the request
- Line 4. Enter the program year.
- Line 5. Check the appropriate block regarding the direction of transfer. Only one type of transfer can be entered on each form.
- Line 6. Provide the amount of the transfer. Do not include any amount previously transferred.
- Line 7. Enter the contact person's name.
- Line 8. Enter the contact person's telephone number.
- Line 9. Enter the date of the Local Board meeting in which the transfer of funds was approved by the Board.
- Line 10. Have the Local Area Director sign the form. Also enter Local Area Director's name, title, and the date the Director signed the Transfer of Funds Request forms.
- Line 11. Provide the reason(s) for the transfer of funds along with any other pertinent data, as required by OWDI #07-2016.