

**THE MISSISSIPPI PARTNERSHIP  
WORKFORCE DEVELOPMENT AREA**

**PROPERTY MANAGEMENT  
POLICY**

Revised July 1, 2015

## **MISSISSIPPI PARTNERSHIP WORKFORCE DEVELOPMENT AREA PROPERTY MANAGEMENT POLICY**

### **I. Purpose and Scope**

The purpose of this policy is to provide property management requirements for each subgrantee for all federal programs administered by the Mississippi Partnership Workforce Development Area under the Workforce Innovation and Opportunity Act (WIOA).

- A.** All fiscal policies and guidance letters published for WIOA are governed as appropriate under:
  - 1. WIOA Law and Regulations
  - 2. 29 CFR Parts 95 and 97
  - 3. 48 CFR Part 31
  - 4. OMB Circulars:
    - a. A-21 Cost Principles for Educational Institutions
    - b. A-87 Cost Principles for State and Local Governments
    - c. A-122 Cost Principles for Non-Profit Organizations
      - (1) 102 Administrative Requirements for State and Local Governments
      - (2) 110 Administrative Requirements for Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations
  - 5. Generally Accepted Accounting Principles (GAPP)
  - 6. Mississippi State Government Policies and Procedures
  - 7. Mississippi Department of Employment Security, Office of Grant Management, Policies and Procedures
  
- B.** All property purchased with WIOA Title I-B grant funds, WIA Title I-B grant funds and JTPA grant funds shall be maintained and managed in accordance with the federal regulations at 29 CFR Part 97.31 and 97.32 and 97.33, or at 29 CFR 95.30 through 37, whichever is applicable. Additionally, where applicable, the provisions of 29 CFR Part 667.200 shall apply.

### **II. Requirements**

Property is defined at both 29 CFR 97.3 and 95.2 as tangible, nonexpendable personal property having useful life of more than one year and an acquisition cost of \$5000 or more per unit, including all costs related to the property's final intended use.

**A. Acquisition of Nonexpendable Personal Property**

Nonexpendable personal property, acquired either through purchase or lease- purchased, with a unit purchase price of \$5000 or more shall require prior approval from **Mississippi Partnership Workforce Development Area**. Standards used in determining whether to grant approval include the necessity of such purchases to achieve program goals and the planned expenditure for such purposes as compared to other available prices.

**B. Inventory Control**

**The Mississippi Partnership Workforce Development Area** shall be responsible for inventory units of nonexpendable personal property with an acquisition cost of \$5000 or more. Grantees/subgrantees shall provide inventory information to the MPWDA on the “**Mississippi Partnership Development Area Personal Property Inventory Control Form**” (**Attachment A**) within 30 days of the acquisition of the property. Records shall be maintained in accordance with the federal regulations at 29 CFR Part 97. 31 and 97.32 and 97.33, or at CFR 95.30-37, whichever is applicable. Additionally, where applicable, the provisions of 20 CFR Part 667.200(c) shall apply.

**C. Physical Inventory**

The acquiring subgrantee must meet the following minimum management standards.

1. Property records must be maintained that include the following data on each piece of property; description; serial number; purchase date and cost; percentage of Federal participation in the cost; location, use and condition of the property; and, any ultimate disposition data including date of disposal and sale price. (**See Attachment B**)
2. A control system must be developed to ensure adequate safeguards to prevent any loss (Including acts of nature such as floods, and earthquakes), damage, or theft of the property. Any loss, damage or theft shall be investigated and fully documented; if the property was owned by the Federal Government, the subgrantee shall promptly notify the Federal-awarding agency. (**See Attachment C**)
3. A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years. Any differences between quantities determined by the physical

inspection and those shown in the accounting records shall be investigated to determine the causes of the difference. The subgrantee shall, in connection with the inventory, verify the existence, current utilization, and continued need for the property.

4. An adequate maintenance procedure must be developed to keep the property in good condition.
5. If property is sold, proper sales procedures must be established to provide competition to the extent practicable and result in the highest possible return.

**D. Lost, Damaged, or Stolen Property**

When loss, theft, or damage to grant property occurs, a “Report of Lost, Stolen, of Damaged Property” (Attachment C) shall be forwarded by the subgrantee to the Mississippi Partnership Workforce Development Area within 10 days to be discovery of loss. In the case of stolen property, a police report must accompany the report to the Mississippi Partnership Workforce Development Area, or a fire department report in the case fire damaged property.

**E. Disposition of Nonexpendable Personal Property**

1. The **Mississippi Partnership Workforce Development Area** Property Manager should be contacted for disposition instructions for dispositions of property having an acquisition cost of \$5000 or more when the WIOA grantee/subgrantee, relationships ends or the property is no longer needed. This notification shall be given via the “**Report of Excess/Unserviceable Non-expendable Personal Property**” (Attachment D). In no event should property having an acquisition cost of \$5000 or more be transferred from control of the grantee without written approval from **Mississippi Partnership Workforce Development Area**.
2. Property shall be used by the subgrantee in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by Federal funds. When no longer needed for the original program or project, the property may be used in other activities currently or previously supported by a federal agency.
3. The subgrantee shall also make property available for use on other project or programs currently or previously supported by the federal government, providing such use will not interfere with the work on the projects or programs for which it was originally acquired. First

preference for use of the property shall be given to other programs or projects supported by the awarding agency. User fees should be considered if appropriate.

4. Nonexpendable personal property with an acquisition cost of less than \$5000 will be disposed of in one of the following ways. Disposition options include:
  - a. Transfer of property to other federal grant grantee/subgrantees;
  - b. Sale of the property (net proceeds to be returned to the program as program income);
  - c. Donation of property to public schools or community-based organizations;
  - d. "Junking" of property which is obsolete, unusable, or in a state of disrepair.

A written request should be made to the MPWDA with the appropriate forms completed, depending on which disposition option is being requested. The MPWDA must approve the disposition of all property. Appropriate documentation must be maintained in the MPWDA property file and in the subgrantee property file.

### III. DEFINITIONS

- A. **Expendable personal property** means all tangible personal property other than nonexpendable personal property.
- B. **Fair market value** means:
  1. For currently used vehicles, the "low" Kelly Blue Book price, adjusted for vehicle condition;
  2. For older vehicles, a quote from a dealer with the name of the dealership and price quote submitted in writing;
  3. For heavy equipment, the Green Book price or an oral dealership quote which will then be submitted in writing;
  4. For real property, a written appraisal by a licensed appraiser;
  5. For all other property, oral quotations by dealers which will be then submitted in writing.

- C. Nonexpendable personal property** is tangible personal property having a useful life of one or more years and an acquisition cost of \$5000 (State requirement) or more.
- D. Personal Property** is property of any kind except real property. It may be tangible having physical existence, or intangible, having no physical existence. Tangible property may be expendable or nonexpendable. For the purpose of this policy, a unit of property is defined as a single piece of property, except in the case where more than one piece of property is needed to make an entire system functional such as a computer or telephone system. For example, when purchasing a computer, the monitor, keyboard, printer, and hard drive are all to be considered as a component of the total system, with the total system defined as a unit of property. Likewise with a telephone system, the switchboard along with all phones required to make up the system shall be considered the unit of property. After initial acquisition of such a system, any component part upon replacement shall be considered as a single unit of property for the type of transaction.
- E. Real Property** means land, including land improvements, structures and appurtenances thereto, but excludes movable machinery and equipment.

#### **IV. Effective Date**

This policy is effective immediately.

- Attachments:**
- A Nonexpendable/Personal Property Inventory Control
  - B Comprehensive Property Inventory
  - C Report of Lost, Stolen, or Damaged Nonexpendable Personal Property
  - D Report of Excess/Unserviceable Nonexpendable Personal Property

**STATE OF MISSISSIPPI  
MISSISSIPPI PARTNERSHIP WORKFORCE DEVELOPMENT AREA  
WIOA NONEXPENDABLE/PERSONAL PROPERTY INVENTORY CONTROL  
FORM**

Subgrantee Name:	Date:
Brief Description of Property:	
Location of Property:	
Serial Number:	Date of Purchase:
Purchase Price:	Condition: <input type="checkbox"/> New <input type="checkbox"/> Used
Vendor Name & Address:	
Signature of Subgrantee Property Officer	Date:

FOR MPWDA USE ONLY		
Tag#	MPWDA approval letter on file? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Date of Letter:
On-site verification date:	Property Mgr's Name:	Initials:
Comments:		
MPWDA		
Date received by MPWDA		
Signature of MPWDA Property Officer:		
Comments:		

**MISSISSIPPI PARTNERSHIP WORKFORCE DEVELOPMENT AREA  
COMPREHENSIVE PROPERTY INVENTORY**

Subgrantee: \_\_\_\_\_ Date: \_\_\_\_\_ Date of Last Physical Inventory: \_\_\_\_\_

A complete property listing of all items with a **value of \$5000 or more and/or a useful life of one year or longer** must be maintained. The list must include all items purchased with funds from programs administered by the Mississippi Partnership Workforce Development Area.

Description	Serial Number	Tag Number	Cost of Property	Purchase Date	Title Holder	% of Federal Funds	Specific Location of Property	Use & Condition Property	Disposition

1. I certify that the above property inventory list contains all property having a value of \$5000.00 or more where DOL reserves the right to take title. This list includes property purchased under the Job Training Partnership Act, Workforce Investment Act, and Workforce Innovation and Opportunity Act.

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Typed Name and Title

\_\_\_\_\_  
Date

2. I certify that no property having a value of \$5000.00 or more was purchased with federal funds. Therefore, we (grantee / subgrantee) have no further obligation to DOL. This list includes items purchased under the Job Training Partnership Act, Workforce Investment Act, and Workforce Innovation and Opportunity Act.

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Typed Name and Title

\_\_\_\_\_  
Date

**MISSISSIPPI PARTNERSHIP WORKFORCE DEVELOPMENT AREA  
Report of Lost, Stolen, or Damaged Nonexpendable Personal Property**

Subgrantee Name					
Location of Property at time of loss:					
Description of Property from WIOA Inventory Listing	MPWDA Tag#	Serial #	Acquisition Date	Acquisition Cost	Condition of Equipment

<b>DETAILS OF INCIDENT</b>	
Type of Incident: ( ) Theft    ( ) Fire    ( ) Accident    ( ) Other (indicate)	
Explain the circumstances associated with the loss, including date, time, and person's name discovering the loss: (attach additional pages if needed)	
Was the property loss covered by insurance?            ( ) Yes            ( ) No (If yes, indicate insurance carrier, policy number, and intent to replace)	
If the loss was uninsured, how will the loss be financially repaid?	
Signature of Subgrantee Property Officer:	Date:

**Attach Police, FBI, or Fire Dept. Report**

<b>MPWDA USE ONLY: PROPERTY MANAGER COMMENTS</b>

**MISSISSIPPI PARTNERSHIP WORKFORCE DEVELOPMENT AREA  
REPORT OF EXCESS/UNSERVICABLE NONEXPENDABLE PERSONAL  
PROPERTY**

Subgrantee Name:					
Location of Property at time of loss:					
Description of Property from MPWDA Inventory Listing	MPWDA Tag #	Serial #	Acquisition Date	Acquisition Cost	Condition of Equipment
Signature of Subgrantee Property Officer:			Date:		

<b>MISSISSIPPI PARTNERSHIP WORKFORCE DEVELOPMENT AREA: RECOMMENDATION FOR DISPOSITION</b>	
Supervisor's Signature:	Date: