PURPOSE:
This policy provides direction for the management and inventory control measures for property other than real property (i.e., land and buildings). This policy applies to purchases made with grants issued to WorkForce and its subrecipients and contractors.

This policy applies to equipment such as, but not limited to furniture, fixtures, software, cell phones, technology equipment (e.g., laptops, tablets, monitors), printers, and other items with an acquisition cost of $5,000 or less.

This policy was revised to:
- Update the process for WorkForce Central and its subrecipients and contractors to request property and equipment purchases.
- Non-substantive edits for clarity.

BACKGROUND:
WorkForce Central adheres to the property management standards in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards Subpart D-Post Federal Award Requirements, Property Standards (2 CFR 200).

POLICY:
WorkForce Central, its subrecipients and contractors must comply with this policy and maintain property management inventory systems that safeguard against loss while ensuring the integrity of purchases made with federal and other grants.

WorkForce Central will maintain a Property Inventory Team who is responsible for ensuring the security and integrity of equipment and property purchases. The Property Inventory Team can be reached at support@workforce-central.org.
INVENTORY LOGS:

Inventory logs must be maintained for all items purchased with WorkForce Central issued grants. To ensure compliance with federal property inventory requirements and consistency with WorkForce Central inventory tracking, subrecipients and contractors are encouraged to use this inventory log (hyperlink). If a subrecipient or contractor chooses to use their own inventory log, the following must be documented in accordance with 2 CFR 200.33(d)(1):

- Tag number
- Description of the purchase
- Serial number
- Source of funding, including FAIN
- Title holder
- Acquisition date
- Cost of the purchase
- Percentage of federal funds
- Location of the item
- The use and condition of the item
- Disposition date
- Sale price, if applicable

WorkForce Central’s Property Inventory Team will maintain their own inventory logs for WorkForce Central, its subrecipients and contractors. The Property Inventory Team ensures WorkForce Central’s inventory logs align with the subrecipient and contractor’s inventory logs, and reviews the logs for accuracy and compliance with federal property inventory regulations and this policy. When applicable, the Property Inventory Team will work with the subrecipient or contractor to resolve issues and provide assistance to ensure the subrecipient or contractor’s inventory logs are brought into compliance.

PROCEDURES:

1. Requesting a purchase:
   
   i. For technology purchases, WorkForce Central staff, its subrecipients and contractors must first consult WorkForce Central’s Property Inventory Team at support@workforce-central.org to ensure the technology meets WorkForce Central’s security and other standards.
   
   ii. After a proposed technology purchase is approved by WorkForce Central’s Property Inventory Team, and for non-technology purchases, WorkForce Central staff will complete WorkForce Central’s internal online procurement request. WorkForce Central’s subrecipients and contractors will complete WorkForce Central’s external online property purchase request that includes:

   a. Type of property or equipment to be purchased.
   b. Purpose of the item to be purchased.
   c. Staff assigned to the item.
   d. Location where the item will be used and stored.
   e. Percent of grant funds allocated to the item.
   f. An uploaded document identifying the make, model, and cost of the item.
g. The subrecipient’s or contractors current inventory log.
   o WorkForce Central’s Property Inventory Team will have up to five (5) business days to review the inventory log for accuracy and compliance with federal property management inventory requirements. If applicable, the subrecipient or contractor must remedy issues identified on the inventory log prior to WorkForce Central authorizing the requested purchase.

iii. Following the submittal of the online purchase request, and for WorkForce Central subrecipients and contractors, approval of their inventory log, WorkForce Central staff, its subrecipients and contractors will receive an automated email notifying them of the approval or denial of the purchase request.

2) Tagging Items: Inventory must be easy to locate, properly tagged and in good condition at all times. Upon receipt of the approved purchased item, WorkForce Central staff, its subrecipients and contractors must notify the WorkForce Central Property Inventory Team to coordinate the tagging of the item. WorkForce Central, its subrecipients and contractors must then record the tag number on their inventory log.

3) Property status changes: WorkForce Central’s Property Inventory Team must be notified of the following and inventory logs must be updated to reflect:
   i. Change of the primary location of the item.
   ii. Change in assigned staff.
   iii. If the item is no longer needed.
   iv. The item no longer functions properly or is broken.
   v. Property is missing from inventory records.
   vi. When items are missing, damaged, or are stolen.
   vii. When an item is ready for disposal.

4) Missing, damaged or stolen property: Missing, damaged, or stolen property must be reported immediately to the WorkForce Central Property Inventory Team via phone at 253-732-1704 or email at support@workforce-central.org. Any loss, damage, or theft must be investigated immediately. The following must be adhered to:
   i. Document steps taken to search for the missing property.
   ii. Take action to minimize the loss.
   iii. Assess whether the lost property contained any personal information, and if the loss constitutes a data breach (RCW 42.56.590), notify individuals and businesses affected by the breach, and if the security breach affects more than 500 Washington residents, the Attorney General’s Office.
   iv. Ensure investigations are not hampered.
   v. Implement appropriate personnel actions if necessary.
vi. Comply with [RCW 43.09.185](https://app.leg.wa.gov/RCW/43.09.185) and immediately report losses to the office of the State Auditor (SAO).

vii. Maintain records of losses in accordance with this policy.

5) **Contract termination:** Upon completion of a contract, the subrecipient or contractor may return property to WorkForce Central or purchase the item at the depreciation value with non-WorkForce Central issued grant funds.

6) **Property Disposal:** WorkForce Central staff, its subrecipients and contractors must notify the WorkForce Central Property Inventory Team when an item is ready for surplus or disposal. The Property Inventory Team will:
   
   i. Cleanse the equipment to remove confidential, sensitive, and personally identifiable information.
   
   ii. Designate items for surplus.
   
   iii. Assign the condition as obsolete, poor, or scrap.
   
   iv. Determine the method of disposal, including appropriate E-waste recycling options.
   
   v. Dispose of the item in compliance with applicable funding regulations which may include:
      
      a. Offering the item to subrecipients or contractors for which the item was originally purchased.
      
      b. Offer the item to WorkSource partners.
      
      c. Donate or sell the item.
   
   vi. Use procedures to gain highest possible return on sold items.
   
   vii. Record disposal status in the WorkForce Central inventory system.
   
   viii. Notify the WorkForce Central fiscal department of the disposal of property.

7) **Records Retention:** Acquisition and disposal records must be retained for all purchases on the inventory list for a period of at least six (6) years after contract closeout.

**CALCULATING DEPRECIATION**

WorkForce Central is required to follow the WA State Office of Financial Management (OFM), section 30.50.10.a Capital Asset Class and Local Code Table Schedule A for capital assets in new condition. Estimating an items useful life is dependent on factual circumstances, replacement policies, or industry practices. WorkForce Central is responsible for establishing and utilizing appropriate useful life for assets acquired in less than new condition.

WorkForce Central will calculate depreciation using the straight-line method in the OFM State Administrative and Accounting Manual (SAAM) section 30.20.70.b. To calculate depreciation using the straight-line method:
Annual Depreciation = \frac{\text{Cost-Salvage Value}}{\text{Asset Useful Life}}

Salvage value is an estimate of the amount that will be realized at the end of the useful life of a depreciable asset.

RISK ASSESSMENT

As required in WA State Office of Financial Management (OFM) chapter 30.40.20, WorkForce Central’s Property Management Team will conduct a risk assessment on assets purchased for WorkForce Central, its subrecipients and contractors that are at risk or vulnerable to loss. Operational risks include risks associated with data security on mobile or portable computing devices that store or have access to State data. See OFM Small and Attractive Capital Asset Risk Assessment Guidelines for more information.

COMPLIANCE MONITORING

WorkForce Central conducts ongoing and annual monitoring of its subrecipients and contractors’ compliance with federal, state, and local property management and inventory policies. The following must be made available upon request by authorized federal, state, and local monitors or auditors:

- Purchases funded with grants issued through WorkForce Central
- Inventory records
- Evidence of minimum annual physical inventory reviews, and outcomes of the reviews.

REFERENCES

- Public Law 113-128- WIOA
- 2 CFR Part 200, Subparts D, E and F
- Federal Register Vol. 65, No. 124
- Generally Accepted Accounting Principles (GAAP)
- OFM State Administrative and Accounting Manual, Section 30
- WA State Office of Financial Management (OFM) Policy and Procedures
- ESD Policy 5407-Property Management and Inventory

APPROVED

Katie Condit (Mar 1, 2024 06:51 PST)  
Katie Condit, WorkForce Central CEO  
Date  
Mar 1, 2024

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