



## Ohio Administrative Code

### Rule 5101:9-31-17 Cost allocation requirements for workforce innovation and opportunity act (WIOA) stand alone local areas.

Effective: April 20, 2025

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(A) "Local area" means the subrecipient as designated by the governor responsible for administering workforce development activities as defined by department of labor (DOL) federal regulations. For the purposes of this rule, "WIOA stand alone local areas" are defined as local areas that receive only DOL funding from ODJFS to administer workforce development services. This rule provides guidelines to assist WIOA stand alone areas in the tracking of time spent on all direct workforce development services and activities for the purpose of appropriately allocating costs to the benefiting programs.

Combined local areas allocate staff costs as described in rule 5101:9-7-20 of the Administrative Code.

#### (B) Local areas performing solely WIOA administrative functions

If a stand alone local area's operations are limited to the performance or coordination of functions classified as general administrative functions as listed in this paragraph, the stand alone area reports all costs associated with the stand alone area as direct charges to WIOA administration.

##### (1) These functions include the following:

(a) Accounting, budgeting, financial and cash management functions.

(b) Procurement and purchasing functions.

(c) Property management functions.

(d) Personnel management functions.

(e) Payroll functions.



(f) Coordinating the resolution of findings arising from audits, reviews, investigations and incident reports.

(g) Audit functions.

(h) General legal services functions.

(i) Developing systems and procedures, including information systems, required for these administrative functions.

(j) Fiscal agent responsibilities.

(k) Performing oversight and monitoring responsibilities related to WIOA administrative functions.

(2) Staff completes a certification documenting that they work solely on WIOA administration functions.

(a) Certifications are completed every six months, in January and July.

(b) Certifications are signed by the employee or a supervisor having firsthand knowledge of the work performed by the employee.

(c) The stand alone area maintains the certifications at the local level.

(C) Local areas performing both WIOA administrative and program functions

A stand alone local area that performs any functions not covered in paragraph (B) of this rule may develop a cost allocation plan, such as the ones outlined in paragraphs (D) and (E) of this rule, and in accordance with 2 C.F.R. 200, or may track time spent on all activities (including administration) using random moment sampling (RMS). If a stand alone local area chooses to use RMS, the executive director and all staff in that local area participate in RMS. This requirement is an exception to rule 5101:9-7-20 of the Administrative Code, which states administrative positions are generally



excluded from the time study.

(1) Stand alone local areas allocating costs by RMS track time spent on all activities using the workforce random moment sample (WFRMS). The WFRMS is designed to identify activities directly related to program functions benefiting one or more WIOA programs (e.g., adult, youth, dislocated worker) or the administration of those programs. This information will not be reported to ODJFS but will be used to allocate costs for the stand alone area and documentation will be maintained to support those costs.

(2) Stand alone local areas follow the established WFRMS process for completing the time study. The stand alone local area uses the results of the RMS to allocate their costs by completing the following steps:

(a) Enter the names of the RMS participants in the RMS roster. The system will generate the appropriate sample.

(b) Staff participating in the RMS will complete observation forms in accordance with rule 5101:9-7-20 of the Administrative Code.

(c) The stand alone local areas will enter results in the RMS system.

(d) Stand alone local areas are not required to report this information to ODJFS.

(3) Stand alone local areas use the RMS statistics produced by the RMS system to allocate the costs incurred by the stand alone area.

(D) Exception for special grants

A stand alone local area that receives a grant for a specific program activity may exercise the option to direct charge the costs associated with that grant, including costs of a staff member who works solely on that activity. The exception will be reserved for when a stand alone local area's usual chosen method of allocation would not appropriately allocate costs (or distribute expenditures) in accordance with relative benefits received.



- (1) Cost associated with that staff member will be removed from the other costs of the local area.
- (2) Staff completes a certification documenting that they work solely on a specific program or special grant or WIOA administration functions associated only with a specific program or special grant.
  - (a) Certifications will be completed every six months, in January and July, unless the certification can be completed through normal payroll coding and time and attendance certifications associated with normal payroll activities.
  - (b) Certifications will be signed by the employee or a supervisor having firsthand knowledge of the work performed by the employee.
  - (c) Certifications will be maintained for auditing purposes.
- (3) Stand alone local areas may allocate the costs associated with the employee working on a special grant directly to the special grant.

(E) Activity report exception

A stand alone local area that performs more than one activity and performs those activities for long periods of time may choose to identify effort spent on multiple activities or programs by the completion of personnel activity reports.

- (1) Activity reports are an actual accounting of work performed and not an estimate of work that is expected to be performed.
  - (a) Staff completes activity reports after the fact and must reflect actual activities performed.
  - (b) Staff completes the report for the total time for which they are compensated.
  - (c) Staff prepares the activity reports at least monthly, to coincide with a pay period.



(d) Staff completing the activity report signs the completed activity report.

(2) Stand alone local areas use the results of the completed activity reports to allocate the costs incurred by the stand alone local area.

(F) Documentation supporting the allocation of costs in a stand alone local area will not be submitted to ODJFS but shall be maintained by the stand alone local areas for auditing purposes.

(G) Allocated expenditures will be submitted to the county finance information system (CFIS) and will continue to be reported as described in rule 5101:9-7-29 of the Administrative Code.

(H) Financial, programmatic, statistical, recipient records, and supporting documents will be retained by the local area in accordance with rule 5101:9-9-21 of the Administrative Code.