



TITLE I ADULT/DISLOCATED WORKER TRANSFER OF FUNDS PROCEDURE

Procedure Number: 2000

Effective Date: September 1, 2017

A request to transfer funds from the Title I Adult funding stream to the Title I Dislocated Worker funding stream, or from the Title I Dislocated Worker funding stream to the Title I Adult funding stream may be initiated by subrecipients or Workforce Snohomish staff when:

- A significant change in the economy, such as an unexpected economic downturn, requires the expansion of services to one of these categories of job seekers,
- A change in the funding formula or local allocation impacts the ability to serve job seekers in one category or the other,
- A significantly higher or lower than anticipated level of previous year carry-in resources from one funding stream or another makes necessary or prudent to transfer funds,
- The Workforce Snohomish Board of Directors makes changes in strategic direction that require greater investment from one of these funding streams than is currently available, or
- The presence of other grant resources significantly expands access for job seekers in one of these categories, freeing up resources to meet unmet needs in the other.

Subrecipients and WorkSource Snohomish staff will track the expenditure of Title I funds on a quarterly basis and watch trends in the economy in order to anticipate and provide sufficient notice of the need to transfer funds. Prior to making a transfer of Title I funds, approval must be obtained from the Workforce Snohomish Board and the Employment Security Department.

Requests of more than 30% from one funding stream to another will not be considered.

A request for funds transfer must be initiated in writing, submitted to Workforce Snohomish and include:

- The transfer fund source (i.e. from WIOA Title I Adult to Dislocated Worker or Dislocated Worker to Adult);
- The dollar amount of the transfer request, including the percentage share of the base allocation represented by that dollar amount;
- The reason(s) for the transfer request, including the surrounding circumstances creating the need for the request (i.e., a downturn in the economy, large number of job seekers to serve in a specific category), and
- A program impact analysis that
 - Shows the number of participants originally planned to be served by the base allocation compared to the number of participants planned to be served after funds are transferred;
 - Assurances that the transfer of funds will not adversely impact the provision of services to participants and that necessary services and client-planned activities will be maintained in the program from which funds are transferred;
 - An assessment of any known potential layoffs or closures and how these events will be addressed using existing funds if funds are transferred from the dislocated worker program.
- Workforce Snohomish Service Delivery and Fiscal staff will review the request. In addition to the potential need for the transfer, Workforce Snohomish will consider whether the request is likely to
 - Limit the region's access to state Rapid Response Additional Assistance funds. ESD may deny access to such funds for six months following the transfer of Dislocated Worker funds to the Adult funding pool, except in extreme or unforeseen local circumstances, as determined by ESD. Staff must consider whether the need for the transfer outweighs the potential need to access Rapid Response Additional Assistance funds.
 - Impact the region's ability to apply for National Dislocated Worker Grants. Transfers of more than 10% from the Title I Dislocated Worker fund to the Title I Adult funding pool may reduce the Department of Labor's willingness to provide National Dislocated Worker Grants.
 - Negatively impact the region's ability to obligate at least 80% of Adult and Dislocated Worker base allocations during the program year in which the allocations are made. The inability to obligate at least 80% of current year allocations will likely result in a requirement for Workforce Snohomish to return funding to the state, based on state policy.
- If the transfer is denied, Workforce Snohomish will inform the requestor in writing of the denial and the reason for denial.
- If the transfer is approved, Workforce Snohomish will document the reasons for its approval and refer the request to the Workforce Snohomish Board of Directors for consideration at the next regularly scheduled meeting or a special meeting, if time constraints create the need to take a vote sooner than the next regularly scheduled meeting. Sufficient notice of the request for board action will be provided in compliance with Workforce Snohomish's process for public notice.
- If the board approves the transfer, Workforce Snohomish staff will request a support letter from Chief Local Elected Official.

- If the Chief Elected Official supports the fund transfer, Workforce Snohomish will submit a written request to Employment Security Department for approval for the transfer. In addition to the materials identified above, Workforce Snohomish will include
 - Signed approval from the board of Directors requesting the transfer;
 - Revised “Participant Planning Forms” for both the Adult and Dislocated Worker programs to accompany a program impact analysis.
 - A discussion of Workforce Snohomish’s past history of transfer requests, including how previous transfers impacted participants and funds; and
 - Any additional assessment of potential layoffs or closures of which Workforce Snohomish is aware and how these events will be addressed using existing funds if funds are transferred from the dislocated worker program.
- Workforce Snohomish recognizes that ESD may request additional information in order to make a determination, and may choose to fund less than the full transfer request or deny to a request.