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Phoenix Business and Workforce Development	<i>Date Approved:</i> 05/19/19	<i>Subject # &amp; Title:</i> 411 SWFI Leverage Resources	

### I. APPLICABILITY/SCOPE

This policy applies to programs and services delivered for the U.S. Department of Labor, Employment and Training Administration, H-1 B funded Strengthening Working Families Initiative (SWFI) grant on behalf of the City of Phoenix Human Services Department, Business and Workforce Development Division (HSD BWD) and impacts all internal and external partners who are part of service delivery.

### II. PURPOSE

This policy addresses leveraged resources that support SWFI grant activities as required by Federal regulations during the grant period from July 1, 2016 through June 30, 2020.

### III. BACKGROUND

The SWFI grant requires the use of leverage resources to supplement federally funded services to eligible grant participants. Grant recipients must leverage cash or in-kind resources amounting to at least 25 percent of the total grant award. Leveraged resources are all resources used to support SWFI program activities and desired grant outcomes but are not charged to the DOL-ETA grant.

### IV. POLICY

A. Leveraged resources may be paid with either federal or non-federal funds. Leveraged resources may fund a SWFI participant's provided services or pay for facilities or equipment used to further the goal of the grant activities.


B. Leveraged resources can be categorized as Personnel Services, Volunteer Services, or Goods. Personnel Services occur when an organization furnishes the services of an employee. Volunteer Services are furnished by third-party professional and technical personnel, consultants, and other skilled and unskilled labor. Goods are any non-personnel/volunteer -based resources.

Examples of leveraged resource activities include, but are not limited to:

1. Personnel Services
2. Volunteering of time
3. Training services
2. Tuition Grants – including discounts
3. Other Job Readiness Activities and Service
4. Assistance with exam and certification fees
5. Funding for tools or other required job-specific supplies
6. Rental or utility assistance
7. Donated supplies, equipment, or space.

C. Types of Funding Sources for Leveraged Activities:

1. Federal Pell Grants
2. Public programs authorized by the Workforce Innovation and Opportunity Act (WIOA) of 2014
3. Trade Adjustment Assistance (TAA) program
4. USDOL National Dislocated Worker Grants (DWG)

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5. Arizona State Funding (not from federal funds granted to the State)
6. Private sector funding
7. Head Start
8. Child Care and Development Block Grant of 2014
9. Low Income Home Energy Assistance Program (LIHEAP)
10. Rental Assistance


#### D. Leverage Value Calculation

The method for calculating leverage is dependent on the type of resource used to support SWFI activities. Leverage must be calculated and assigned based on the Goods/Service category listed below.

1. Personnel Services should be calculated based on the number of hours of service to the grant multiplied by the Individual's Overall Value. The Individuals Overall Value is comprised of the individual's pay rate plus fringe plus other allocable costs.
2. Volunteer Services value should be calculated based on the rates paid for similar work to non-SWFI related entities. The value must be consistent with those paid for similar work in the local area. Paid fringe benefits that are reasonable, necessary, allocable, and otherwise allowable may be included in the valuation.
3. Goods are calculated at the value of the merchandise or services provided based on provider published rate or standard charges. Any service provided to the grant that cannot be valued as Personnel or Volunteer services should be categorized as Goods and valued accordingly.
4. The value assessed of Personnel Services, Volunteer Services, or Goods cannot exceed fair market value at the time of provision.

#### E. Leverage Resource Documentation, Tracking and Reporting

1. All purchases, rentals, and donations must be reasonable and must not exceed fair market value. Fair market value of donated services must be computed as described in 2 CFR 200.306 Cost Sharing or Matching.
2. All leveraged resources to the program must be documented.
  - a. Documentation must include:
    1. The funding source;
    2. The amount leveraged;
    3. The service, activity or item provided or supported;
    4. The name of the participant who benefitted, if applicable; and
    5. The name of the service provider.
  - b. Examples of acceptable documentation may include, but are not limited to:
    1. A commitment letter or written agreement from an employer or training provider regarding a scholarship;
    2. A copy of the Individual Training Account or Occupational Training Authorization funding approval;
    3. A training agreement with an employer detailing the employer's contribution;
    4. A copy of the Pell Grant award letter; and

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5. Completed and signed timesheets.
3. Leverage Resource Approvals: HSD’s Management Services and Business and Workforce divisions will make all final decisions on activities and costs that qualify as a leveraged resource.

Supporting Documentation for Leveraged Resources:

- a. Records must be maintained that support the cash match costs within the grantee’s accounting system and be available for audit and review. For third-party contributions, the documentation for the value must be verifiable from sub-grantee records or be maintained by the grantee, including the methods used to determine the value.
- b. Supporting documentation must meet the requirements that are in place for all costs charged to the grant program (i.e., time and effort records, proposal letter reflecting discounts or student aid award, and original invoices).
4. Reporting Leveraged Resources
  - a. Leveraged resources must be tracked for each month and documented throughout the grant period.
  - b. When total leveraged resources are reported, they should include expended and unliquidated obligations.
  - c. HSD’s Business and Workforce Division will compile, as needed or required, and audit all SWFI reports for consolidation into the quarterly ETA 9130 report sent to USDOL Employment & Training Administration (ETA).

**VI. POLICY MANAGEMENT REQUIREMENTS**

Administrative revisions to the policy may be made by the Phoenix Business and Workforce Development (PBWD) Board Executive Director, with notice to the PBWD Board’s Executive Leadership Committee. All other substantive revisions will go to the PBWD Board’s Executive Leadership Committee for review and recommendation to the PBWD Board for approval.

**VII. REFERENCES**

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR Part 200 and 2 CFR 2900
- U.S. Department of Labor, Employment and Training Administration, ETA-FOA-16-05