



ADWS Policy Number: WIOA 5.4 Effective Date: March 15, 2024

Arkansas Division of Workforce Services (ADWS) WIOA Allowable Outreach Policy

Purpose:

The purpose of this policy is to establish guidelines and procedures for allowable outreach activities conducted under the Workforce Innovation and Opportunity Act (WIOA) to facilitate access to workforce development programs and services for eligible individuals. WIOA requires grantees to inform the public about services, conduct proactive outreach to underserved populations, and make individuals aware of services that can support their employment needs. Grantees and subgrantees, including local workforce development boards, are encouraged to conduct outreach activities to meet the needs of their customers and fulfill grant objectives.

Background:

Training and Employment Guidance Letter (TEGL) 03-23 aims to empower grantees to maximize the reach of workforce development services by providing clarity on how formula and discretionary grant funds can be used to conduct outreach activities.

The public workforce system plays a critical role in connecting talent with opportunity, connects diverse customers to employment and training opportunities, and helps employers recruit skilled employees that match their employment opportunities. To fully communicate the workforce system's value and expand awareness of its services to job seekers and employers, the system must conduct effective and targeted outreach.

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The Uniform Guidance regulates the administrative and financial requirements of federal grant funds, including WIOA formula grants and the Department of Labor's (DOL) competitive grants; see 2 CFR part 200 and DOL's exceptions at 2 CFR part 2900. Specifically, 2 CFR 200.421 allows for grantees to recruit program participants and to engage businesses by communicating with them. The American Job Center

(AJC) brand was created to increase awareness of the services of the public workforce system and to facilitate outreach.

This policy seeks to demonstrate the flexible uses of both formula and competitive grant funds to conduct outreach activities and to empower the workforce system to maximize its reach, specifically, to those in underrepresented communities who are most in need of employment and training services.

Policy Statement:

ADWS is committed to ensuring that all outreach activities conducted under WIOA comply with the guidelines and regulations outlined in Training and Employment Guidance Letter (TEGL 03-23), the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR part 200), and U.S. Department of Labor (DOL) exceptions at 2 CFR part 2900.

Policy Guidelines:

1. Compliance with TEGL 03-23, 2 CFR part 200 and DOL exceptions 2 CFR part 2900:

All grantees and sub-grantees must adhere to the provisions of TEGL 03-23, 2 CFR part 200, and DOL exceptions 2 CFR part 2900, when conducting outreach activities. State and local workforce development boards must develop and implement policies and procedures that guide the allowable use of funds for outreach activities to meet program goals.

2. Eligibility Determination:

Outreach activities must be targeted toward individuals who are potentially eligible for WIOA services, including but not limited to, dislocated workers, low-income adults, and youth. This includes individuals with barriers.

3. Non-Discrimination:

Grantees and sub-grantees must not engage in discriminatory outreach practices and must provide equitable access to its programs and services regardless of race, color, religion, sex, national origin, disability, or any other protected status.

4. Outreach Methods:

Outreach activities may include, but are not limited to, public awareness campaigns, community events, social media, and partnerships with local organizations. All outreach methods must be cost-effective and in alignment with the objectives of WIOA. Reference TEGL 03-23 part 4. *Allowable Outreach Activities.*

5. Documentation and Record Keeping:

Each grantee and sub-grantee must maintain records of all outreach activities, including documentation of the target audience, nature of the outreach, costs incurred, and outcomes achieved. These records must be retained in accordance with applicable federal and state regulations.

6. Cost Allowability:

All costs associated with outreach activities must be reasonable, necessary, and allocable per 2 CFR §200.421 (Definitions for “advertising and public relations”). Each grantee and sub-grantee

must ensure that outreach costs are adequately documented, tracked, and reported in compliance with federal regulations. **The key is to make sure that the grantee is promoting federally-funded activities, services, and programs and is not solely promoting the organization's name recognition or image.** Reference TEGL 03-23 part 4.a. *Defining Advertising and Public Relations.*

7. Required Approvals:

All purchases of advertising and outreach activities must comply with current State and ADWS procurement procedures. Advertising and outreach expenditures must be budgeted and have a marketing plan. In addition, ADWS has determined that all purchases in excess of \$5,000.00 must have prior approval by the state.

8. Monitoring and Oversight:

ADWS will conduct periodic (at least annually) reviews of outreach activities to ensure compliance with TEGL 03-23 and 2 CFR part 200. Any identified issues or instances of non-compliance will be addressed promptly.

9. Funding Requirements:

Funds awarded for WIOA allowable outreach activities must be utilized for additional outreach activities and not to supplant WIOA formula funds awarded for youth, adult, and dislocated worker programs.

Responsibilities:

Grantees and subgrantees are responsible for ensuring compliance with this policy and for providing oversight of all outreach activities conducted under WIOA.

Review and Revision:

This policy will be reviewed annually and updated as necessary to reflect changes in federal regulations or organizational practices.

Implementation:

This policy must be communicated to all employees and partners involved in outreach activities under WIOA, and they will be expected to adhere to its guidelines.

General rules of thumb – The first step in assessing if a cost is allowable cost to a WIOA grant is to determine if the cost is necessary. Some questions to consider are: Is this cost necessary for the performance of the grant? Will this cost assist the organization in achieving its grant's outcomes and goals?

Another step in assessing an allowable cost to a WIOA grant is reasonableness. When testing for reasonableness of a cost, consider the prudent person theory. In the prudent person theory, your organizations must consider:

- Would a prudent person use Federal funds to purchase such items?
- Would you have used your own funds to purchase such items?
- Do internal controls (MOU/IFA, policies, sub-recipient agreements, contracts, etc.) exist that designate/describe outreach activities and/or limits?

- Is the federal grant receiving a benefit and if so, are costs properly allocated based on the relative benefit received?
- If costs are to be shared with other funding streams, are costs being allocated properly?

Ways to conduct outreach – Below is a list of several examples of activities and platforms allowed with grant funds. See [TEGL 03-23](#) for more detail on each of the following:

- In-Person Outreach:* Such as attending job fair, meeting participants at community locations, rapid response events, mobile one-stop centers, high school/college career days, etc. For each type of special or targeted population, the grantee may need a unique method or strategy for locating, attracting, and retaining participants for your program. If the grantee does not have enough staff, consider conducting outreach through organizations that are willing and able to spread the grant’s key messages to their audience.
- Print:* Include a variety of materials including advertising and written articles in the local newspaper or neighborhood newsletter, informational postcards, brochures and flyers, doorknob hangers, pamphlets, and leaflets. Other examples include bus stop signage, advertising on benches, banners, billboards, vehicle wraps, etc. QR codes may be used in print media to direct potential participants to online information on the grant-funded activities, services, or programs.
- Radio and TV:* Examples include advertising or stories on local radio and TV stations, public service announcements and press releases, on-air interviews with local radio or TV stations, etc.
- Websites:* The organization or program website is an excellent way to provide practical information about how participants and community members can engage with the organization and receive services. Note that all websites funded with federal funds must meet the accessibility requirements established by Section 508 of the Rehabilitation Act of 1973.
- Email Communication:* Signature lines can include an additional website link, QR code, or description of an upcoming event or workforce activities, services, and/or program offerings. Use plain language wherever possible.
- Text Messaging (SMS) Applications:* These may be particularly well-suited to grantees who need to communicate with participants in real time. In addition, this is a way to remind participants of upcoming appointments or outstanding documents, to promote a new program/service offering, or to blast out employment opportunities. Some texting tools have functions to automate messages to go out at certain times to groups of people, and track analytics such as if and when the messages are opened or website links clicked. As with all activities, grantees must ensure participant data privacy. It is also important to review the data privacy policies of these text messaging applications and other social media platforms.

- g. *Social media*: The use of grant funds to create social media accounts, such as Instagram, Facebook, LinkedIn, and other platform accounts to promote the grant services offered, raise awareness of the program, and strengthen relations with the community is an effective way to virtually connect with customers regardless of distance. Please note there may be Federal or state laws that prohibit the use of certain platforms, so grantees should be aware of any restrictions before use. In addition, grant award terms may prohibit certain activities, such as lobbying and these restrictions apply to social media as well. For more ideas on how to develop social media strategies, view the webinar: [Yes, WIOA Can! Post, Like, Follow, Share! Using Social Media as an Outreach and Marketing Tool](#).
- h. *Quick Response (QR) codes*: QR codes are a square holding a barcode-like graphic, comprised of machine-readable information. When someone uses a cell phone to take a picture of the QR code, the phone recognizes the machine-readable information, and can then go to a specific website. QR codes require minimal space, are easy to scan, can store a good amount of information, and can be used to link to text, digital business cards, multimedia, and social media channels.
- i. *Influencers*: Influencers are people that have often amassed large followings via different types of media platforms and use their power of influence to communicate information. Influencers may be able to assist grantees in conducting outreach activities by communicating to potential participants what programs and services they offer. Grantees using a contracted personality should provide details/speaker's notes to the influencer to promote the Federal award's activities, services, and programs. When considering whether to use an influencer for outreach, the grantee should consider the Uniform Guidance's Cost Principles. Other things that might be considered are the influencer's reputation, follower base, any state or local vetting requirements, the receptivity of potential participants, the technology access of participants and the cost-benefit compared to a more traditional outreach modality.
- j. *Blog and Podcast Interviews*: These platforms are usually interactive content that may be individually or serially posted and can discuss a Federally-funded activity, service, or program offering to a specifically targeted audience. The frequency of use, potential participant cost, and availability of ongoing content should all be considered when using this outreach strategy.
- k. *Mobile American Job Centers (AJCs) or workforce service delivery vehicles*: To reach people where they live, shop, and gather, particularly in more rural areas, grantees may consider purchasing a vehicle to conduct outreach as well as provide employment and training services. The Uniform Guidance considers motor vehicles as general-purpose equipment, which are allowable under the Cost Principles. Costs to repair and maintain the vehicle are also allowable. The costs of the vehicle and its maintenance must meet all the "factors of allowability" outlined in [2 CFR 200.403](#), and in some circumstances, prior written approval from DOL-ETA may be required. Prior written approval from DEED is always required if the equipment unit price is \$5,000 or more. If the motor vehicle benefits two or more programs, the cost of the mobile AJC and the costs to maintain the

vehicle must be allocated to the other programs based on the relative benefit received ([2 CFR 200.405\(d\)](#)). ETA encourages grantees to leverage relationships with other partners that serve the same community and may have the same purpose or mission when purchasing, staffing, and maintaining a mobile AJC unit.

Outreach in Multiple Languages - Grantees can use funds to create materials in multiple languages or to procure translation and interpretation services. Offering materials translated into the languages used in the community is a key effort to improve outreach and, indeed, may be required depending upon the circumstances. See [29 CFR 38.9](#). Additionally, consider expanding outreach efforts to individuals who have Limited English Proficiency (LEP) through the use of a language access guide (called the “I Speak Card”). The “I Speak Card” is a language identification card/poster that will assist in identifying a preferred language for potential participants that speak a language other than English, so they can obtain the necessary assistance. Organizations can use such a card to pinpoint the appropriate speakers for anyone that requests services through the organization. Also, visit the LEP website (<https://www.lep.gov/>) for tips on addressing language barriers. Finally, consider partnering with local organizations that serve a diverse population for assistance in drafting culturally competent outreach materials in a variety of languages as this will help build a stronger relationship and presence with the local community.

Accessibility – Grantees must make information about their services accessible to individuals with disabilities by providing auxiliary aids and services, including information in alternative formats, and can use funds to ensure outreach materials (including, for example, printed materials, forms, and presentations) are accessible. In addition, when developing, procuring, maintaining, or using electronic and information technology with Federal funds, including websites and electronically stored documents or information, grantees should provide access to and use of information and data for individuals with disabilities that is comparable to what is provided for individuals without disabilities. Grantees can refer to Government Services Administration’s (GSA) website on electronic and information technology accessibility (www.Section508.gov) as a resource. Please note that specific accessibility standards apply to QR codes. DOL’s Office of Disability Employment Policy, DOL’s Civil Rights Center, and ETA have created a WIOA 188 guide to nondiscrimination for individuals with disabilities, available at <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/statutes/section-188-workforce-innovation-opportunity-act/guide>. The guide provides several examples of making materials, space, and services more fully accessible for individuals with disabilities.

This guidance provides examples but does not address every potential scenario. Grantees are encouraged to review their outreach plans and consider the examples to most effectively reach and best serve jobseekers and employers.