

TITLE: Provision of Food and Refreshments for WIOA Youth Participants Policy # 3.3.5

Type: Program Policy

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Purpose

This policy outlines the criteria, procedures, and documentation requirements for the allowable use of WIOA Title I-B Youth funds to provide food and refreshments to eligible program participants. The goal is to ensure consistent treatment across all sites, align with federal cost principles under 2 CFR Part 200 (Uniform Guidance), and maintain proper accountability and documentation of expenditures.

Policy

Food and refreshments may be provided to WIOA Youth participants **only when clearly aligned with programmatic goals**, and where such provision is **reasonable, necessary, and allowable** under federal cost principles. All food-related expenditures must:

- Directly benefit WIOA Youth participants;
- Be pre-approved through proper internal procedures;
- Be supported by documentation; and
- Be consistent with policies for other federally or non-federally funded programs.

Policy Guidelines

1. Allowable Conditions for Providing Food

Food may be considered an allowable supportive service when:

- Program activities occur **during a standard mealtime** (e.g., 11:00 AM–1:00 PM or 5:00–7:00 PM);
- Youth are engaged in **program services for more than 3 consecutive hours**;
- Participation in events such as training, orientations, job readiness workshops, work-based learning, or career exploration activities requires nourishment to **maintain engagement and retention**;
- The provision of food reduces barriers to participation for youth who may be experiencing food insecurity.

- Program staff should make reasonable efforts to accommodate dietary restrictions, including allergies and cultural or religious dietary practices. This may include offering alternative food options or clearly labeling food items.

Food must not be provided solely for convenience, staff meetings, or general office events.

2. Spending Guidelines

Per Participant Limit:

Food expenses must remain reasonable and consistent with program goals. Any per-participant cost that exceeds typical expectations must receive prior approval from PacMtn.

Event/Activity Thresholds:

Total food expenditures for any single event or activity must remain within reasonable limits. Higher-cost events require pre-authorization and appropriate justification.

Frequency:

The provision of food must be time-limited and justified based on the nature and duration of the program activity. Food should not be provided on a recurring or daily basis unless it is part of a structured, approved program design that addresses a specific participant need (e.g., a six-week work readiness academy with daily sessions that include lunch as part of the service delivery plan).

3. Required Documentation

All food expenses charged to the WIOA Youth grant must be supported by the following documentation:

- **Original itemized receipts or invoices** for all purchases;
- **Sign-in sheets** listing all participants who received food;
- **Event agendas** or service plans showing the date, time, and duration of the activity;
- **Approval forms or pre-authorization** (as required by internal fiscal procedures);
- **Justification memo**, if the amount exceeds thresholds or the situation falls outside normal parameters.

All documentation must be retained in accordance with PacMtn's records retention schedule and available upon request for monitoring or audit review.

4. Staff Training and Oversight

- All staff involved in administering, authorizing, or overseeing youth program costs must be trained on this policy annually.
- Contractors and subrecipients must ensure their staff are familiar with this policy and implement it consistently across all sites.
- Monitoring will include a review of food-related expenses to ensure compliance with this policy.

5. Non-Compliance

Improper use of WIOA funds for unallowable food costs may result in disallowed costs and required repayment. Continued non-compliance may lead to corrective action or contract modification

Definitions

Agenda:

A program schedule outlining the structure and duration of services or events provided to WIOA participants.

Allowable Cost:

A cost that is permissible under federal regulations (2 CFR Part 200 – Uniform Guidance), WIOA program rules, and PacMtn policies. The cost must be necessary, reasonable, allocable, and properly documented.

Documentation:

Records (digital or physical) that validate the need for and use of program funds, such as receipts, sign-in sheets, agendas, and approval forms.

Food and Refreshments:

Items intended for immediate consumption such as meals, snacks, and non-alcoholic beverages. This does not include grocery items intended for later use or meals provided for staff-only events.

Meal Period:

A defined window of time generally recognized as a typical mealtime (e.g., lunch from 11:00 AM–1:00 PM or dinner from 5:00–7:00 PM). Activities occurring during these hours may justify the provision of food if they exceed 3 hours or interfere with access to meals.

Necessary Cost:

A cost that is essential to the delivery of WIOA Youth services and directly contributes to the achievement of program goals and participant outcomes.

Participant:

An individual who has been determined eligible and enrolled in WIOA Title I-B Youth services and is receiving program services beyond initial intake and eligibility determination.

Pre-Approval:

Formal authorization required before incurring a food-related expense. This may involve submission of a justification and cost estimate to program management or fiscal staff depending on internal protocols.

Program Activity:

Any structured service, training, workshop, orientation, or event provided as part of a participant's WIOA Youth service plan, including but not limited to work-readiness training, job search assistance, GED prep, career exploration, or work-based learning.

Reasonable Cost:

A cost that does not exceed what a prudent person would pay under similar circumstances and is consistent with the market value of the goods or services received.

Sign-in Sheet:

A dated record listing names of participants who attended a program activity where food was provided. Used to verify attendance and support cost allocation.

Subrecipient:

An entity that receives WIOA funds from the grantee (PacMtn) to carry out part of the grant-funded program. Subrecipients are responsible for following applicable WIOA regulations, Uniform Guidance, and PacMtn policies.

Supportive Services:

Services provided to eligible WIOA participants that are necessary to enable participation in program activities. Supportive services may include transportation, childcare, housing assistance, and food under allowable circumstances.

Uniform Guidance (2 CFR Part 200):

A set of federal regulations that govern the use of federal grant funds, including cost principles, administrative requirements, and audit requirements. All WIOA-funded expenditures must comply with the Uniform Guidance.

WIOA (Workforce Innovation and Opportunity Act):

A federal law designed to help job seekers access employment, education, training, and supportive services. WIOA Title I-B specifically addresses services to youth, adults, and dislocated workers.

References

Workforce Innovation and Opportunity Act of 2014

WIOA Final Rule; 20 CFR Parts 676,677, and 678; Federal Register, Vol. 81, No. 161, August 19, 2016, WIOA Final Rule; 20 CFR Parts 603, 651, 652, et al; Federal Register, Vol. 81, No. 161, August 19, 2016, Public Law 113-128, including Title I-B – Youth Program Provisions, Regulations at 20 CFR Parts 675–699

2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

(Also known as the **Uniform Guidance**):

- §200.403 – Factors affecting allowability of costs
- §200.404 – Reasonable costs
- §200.405 – Allocable costs
- §200.412 – Classification of costs
- §200.434 – Contributions and donations (to clarify unallowable costs)

U.S. Department of Labor Employment and Training Administration (USDOL-ETA) Guidance

- **TEGL 21-16, Change 1:** Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance
- **TEGL 23-19, Change 2:** Guidance on Pay for Performance Activities in WIOA Title I Programs (for context on allowable outcomes-based payments)
- **TEGL 02-12:** Allowable Use of WIA Title I Funds for Employer Outreach and Other Business Services

Washington State WIOA Policies and Guidelines

- **WorkSource System Policy 1019 (Rev12) – Eligibility Policy and Handbook**

PacMtn Youth Support Service Policy #3.3.4-R1

PacMtn Procedure # 3.3.2-P

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