

Area 14 Workforce Development Board

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Use of WIOA Funds for Food Purchases

Area 14 Policy 14-17.01

Effective: May 6, 2026



Workforce Development Area 14
Athens, Meigs & Perry Counties

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Purpose

This policy establishes the conditions under which the Local Workforce Development Board (LWDB) may use Workforce Innovation and Opportunity Act (WIOA) Title I funds to purchase food. The intent is to ensure compliance with federal cost principles, promote consistent local decision-making, and support programmatic activities, governance responsibilities, and staff development when food is necessary, reasonable, and properly documented.

Background

WIOA and the Uniform Guidance do not categorically prohibit food purchases. Instead, allowability depends on whether the cost is necessary for the performance of the grant and meets federal cost principles. Food may be allowable when tied to participant engagement, required governance functions, or structured staff training. The ODJFS Office of Workforce Development (OWD) affirmed this interpretation in its March 27, 2026 letter, rescinding prior restrictive guidance and authorizing local areas to determine allowability within federal per diem limits.

OWD requires that local areas:

- Apply federal per diem meal rates as the maximum allowable cost.
- Establish written policies defining criteria, thresholds, and documentation requirements.
- Demonstrate that costs benefit participants of U.S. Department of Labor–funded programs.

This policy fulfills those requirements.

Definitions

Food Costs

Expenses for meals, snacks, or refreshments provided during programmatic activities, board governance meetings, or staff training.

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Modest Food

Simple, non-lavish items such as light refreshments, boxed lunches, or basic working meals. Food should be “modest and directly tied to structured program activity.”

Working Meal

A meal provided during an official meeting or training where participants cannot reasonably leave without disrupting required business or instruction.

Participant-Focused Food

Food provided to support participation in WIOA Youth program activities or to support engagement in allowable programmatic activities.

Federal Per Diem Rate

The maximum allowable meal cost per individual, based on the U.S. General Services Administration (GSA) rate for the applicable Ohio region. OWD requires that “expenditures may not exceed the federal cap.”

Policy

1. General Allowability Standard

Food purchases using WIOA funds are allowable when the cost is:

- **Reasonable, necessary, and allocable** to the WIOA program.
- **Modest**, not entertainment, and not ceremonial.
- **Adequately documented** and supported by local policy.
- **Within federal per diem limits** for the applicable meal.

2. Allowable Situations Food may be purchased in the following circumstances:

A. Participant-Focused Activities

Food is allowable when it:

- Removes barriers to participation.
- Supports participation in WIOA Youth program activities
- Is tied to structured program activity.

B. Workforce Development Board Meetings

Food is allowable when:

- The meeting is an official, required LWDB or committee meeting.

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- The meeting spans a meal period and breaking would disrupt business.
- Food is modest and incidental to governance.

C. Staff Training and Professional Development

Food is allowable when:

- The training is official, job-related, and required.
- The session spans several hours or a full day.
- Participants cannot leave without disrupting instruction.

3. **Prohibited Situations** Food may **not** be purchased with WIOA funds for:

- Holiday parties, celebrations, or morale events.
- Entertainment or social gatherings.
- Alcohol or luxury catering.
- Meals exceeding federal per diem limits.

4. **Cost Limits**

- The **federal per diem rate** for the applicable Ohio region is the **maximum allowable cost per individual**.
- Local areas may adopt stricter limits but may not exceed the federal cap.

Procedures

1. **Pre-Approval**

- Staff must request approval prior to incurring food costs.
- Requests must document the purpose, agenda, expected duration, and justification for food.

2. **Documentation Requirements** The following must be retained:

- Meeting or training agenda showing duration and purpose.
- Sign-in sheets or attendance records.
- Explanation of why participants could not reasonably leave.
- Itemized receipts and invoices.

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- Cost allocation method, if applicable.
3. **Cost Reasonableness**
- Staff must ensure food is modest and cost-effective.
 - Restaurants should be avoided unless justified by location or logistics.
 - No entertainment components may be included.
4. **Per Diem Compliance**
- Staff must verify the current GSA per diem rate for the region.
 - Total cost per individual must not exceed the applicable meal rate (breakfast, lunch, dinner).
 - Incidental amounts may be included if permitted under federal per diem rules.
5. **Training of Staff**
- All staff involved in purchasing or approving food must be trained on this policy.
6. **Audit and Monitoring**
- Compliance will be reviewed during internal monitoring and external audits.

References

- **2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards**
(Reasonable, necessary, allocable, consistently treated, and adequately documented costs.)
- **WIOA Title I – Governance, program administration, and supportive services provisions.**
- **Guidance on the Use of WIOA Title I Funding for Food-Related Purchases** (OWD Memo issued March 27, 2026).