# SAN JOAQUIN COUNTY WORKNET
# EMPLOYMENT AND ECONOMIC DEVELOPMENT DEPARTMENT
# POLICIES AND PROCEDURES DIRECTIVE

| DIRECTIVE NO. | EFFECTIVE DATE | APPLICABILITY | PAGE |
|---|---|---|---|
| 25-03 | July 1, 2025 | FMD | 1 of 5 |
| SUBJECT: | **PROPERTY MANAGEMENT, INVENTORY CONTROL AND DISPOSITION** | | |

## I. PURPOSE

The purpose of this directive is to establish policies and procedures for the acquisition, control, maintenance, shared use, and disposition of equipment and supplies purchased with WIOA and other federally funded resources.

This policy applies to property having a useful life of more than one year and a per-unit acquisition cost of $10,000 or more, as well as federally purchased supplies with a residual inventory value exceeding $10,000.

## II. GENERAL INFORMATION

All procurement of equipment shall follow applicable federal, state, and local rules, including the County's WIOA Procurement Policy and Procedures Directive. Property acquired with WIOA or other federal funds must be used, managed, and disposed of in a manner that ensures its continued availability for federally authorized purposes.

This PPD supersedes PPD D-33 Controls for Property Management Safeguards and Disposal, dated April 1, 2017.

References

2 CFR 200.310–200.316, Property Standards
2 CFR 200.334-344, Record Retention and Closeout
TEGL02-24, Application Instructions and Program Guidance for Department of Labor for FY 2024 Community Project Funding/Congressionally Directed Spending

WSD16-16, Allowable Costs and Prior Written Approval
WSD16-10, Property – Purchasing, Inventory, and Disposal

## III. POLICY

It is the administrative policy of EEDD that the following procedures be followed to ensure compliance with all applicable property management regulations, internal controls, and documentation requirements.

## IV. PROCEDURE

### 1. Prior Approval for Equipment Purchases

Prior written approval from the Employment Development Department (EDD) must be obtained before charging WIOA grant funds for equipment purchases with a per-unit acquisition cost of $10,000 or more, in accordance with TEGL02-24.

### 2. Receiving and Tagging Property

Upon receipt, property will be tagged with a County asset tag. Details will be recorded on both the procurement source document as well as the Property Inventory Sheet.

### 3. Property Inventory Requirements

FMD maintains a **Property Inventory Spreadsheet** that is updated as needed to reflect equipment acquisitions and disposals:

- Description of property
- Serial number or other ID number
- Source of funding
- Titleholder
- Acquisition date and unit cost
- Percentage of federal participation
- Location
- Use and condition
- Disposition data (date, method, sale price if applicable)

Reports will be printed periodically to validate the accuracy of input and to support federal and state audit reviews.

### 4. Physical Inventory

A full physical inventory of all federally funded equipment will be conducted annually, exceeding the federal requirement of every two years. The completed inventory will be reconciled with inventory records and filed with the Auditor-Controller and General Services Department.

5. **Annual WIOA Inventory Report**

Data from the annual County inventory is used to update the WIOA Inventory Report, ensuring alignment with EDD reporting guidelines.

6. **Loss, Theft, or Damage**

Any incident of property loss, theft, or damage must be reported immediately. An internal investigation must be conducted, and a police report filed if applicable. The Agency must document findings and any corrective actions taken.

7. **Shared Use of Equipment**

Equipment purchased with WIOA or other federal funds may be shared among multiple programs provided such use does not interfere with the original program purpose. The primary program's needs must take precedence. All shared use arrangements must be documented in the property record.

8. **Maintenance of Equipment**

Equipment must be maintained in good working condition throughout its lifecycle. All maintenance activities should be documented and tracked. The Fiscal or Property Management Unit will coordinate with program staff to:

- Conduct regular inspections
- Schedule preventative maintenance
- Arrange for repairs as needed

9. **Disposition of Equipment**

Equipment with a per-unit fair market value of less than $10,000 may be retained, sold, or otherwise disposed of with no further obligation to the awarding agency. Documentation of fair market value at the time of disposition is required.

For equipment with a per-unit fair market value of $10,000 or more that is no longer needed for WIOA or other DOL-supported programs, the following must occur:

- State approval must be obtained prior to disposal or sale.
- If sold, the federal share of the sale proceeds must be reimbursed to the awarding agency based on the current fair market value.
- Documentation must be maintained on the disposal method, date, and sale value.
- County property disposal procedures will be followed after receiving required approvals.

10. **Disposition of Unused Supplies (> $10,000 Value)**

Supplies purchased with federal funds that have a residual inventory value of more than $10,000 at the end of the project must be:

- Used in other allowable federally funded programs (if applicable), or
- Disposed of with proceeds (or equivalent compensation) returned to the awarding agency in proportion to the federal share.
- All actions and fair market valuations must be documented.

11. **Documentation for Closeout**

Upon grant closeout, EEDD must ensure all federally funded property and equipment are:

- Properly transferred or retained with written compensation agreements (if required), or
- Disposed of according to state and federal rules.

All records and justifications must be retained per retention requirements.

12. **Record Retention**

All records related to equipment and property, including inventory records, purchase and disposition documentation, and maintenance logs, must be retained for at least three years after final disposition of the property. If any litigation, audit, or claim is ongoing, records must be retained until resolution is complete.

13. **Contact for Prior Approvals or Disposition Requests**

All requests for approval to purchase or dispose of property with a value of $10,000 or more must be submitted, along with all necessary supporting documentation, to the Regional Advisor:

Employment Development Department
Workforce Service Division, MIC 50
Employment Development Department
P.O. Box 826880 Sacramento, CA 94280-0001

V. QUESTIONS REGARDING THIS DIRECTIVE

May be referred to the Executive Director of EEDD via Managers or designee.

VI. UPDATE RESPONSIBILITY

The Executive Director of EEDD and/or designee shall be responsible for updating this directive, as appropriate.

VII. APPROVED

Patricia Virgen

PATRICIA VIRGEN
EXECUTIVE DIRECTOR

PV:jl