




Orange County Workforce Development Board
Property – Purchasing, Inventory and Disposal Policy

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Effective:
April 29, 2026**SUBJECT:**

Information Notice No. 26-OCWDB-07
 Supersedes Information No. 16-OCDB-04 Addendum #1

APPROVED: ^{DS}

Nancy Cook, 
 Director of Workforce and Economic Development

PURPOSE

This policy provides guidance regarding management of property, purchasing, inventory, and disposal of property, that is obtained through Workforce Innovation and Opportunity Act (WIOA) funds.

EFFECTIVE DATE

This policy is effective on the date of issuance.

REFERENCES

- Title 2 Code of Federal Regulations (CFR) Part 200, Subpart E; Cost Principles: Special Considerations for States, Local Governments and Indian Tribes
- 2 CFR Part 200 Subpart D; Post Federal Award Requirements: Property Standards
- 2 CFR Part 200 Subpart F; Audit Requirements: Management Decisions, Appendix XI to Part 200-Compliance Supplement
- Workforce Services Directive (WSD) 16-10, Property-Purchasing, Inventory, and Disposal
- WSD16-16, Allowable Costs and Prior Written Approval
- Workforce Services Informational Notice (WSIN) 25-17, Federal Adjustment of Dollar Amounts and Rates
- [County of Orange 2026 Contract Policy Manual](#)
- OCWDB Policy: Allowable Costs and Prior Written Approval
- OCWDB Policy: Procurement Policy

BACKGROUND

On December 26, 2013, the U.S. Office of Management and Budget (OMB) issued the Uniform Guidance under Title 2 CFR Part 200, to streamline the guidance on administrative requirements, cost principles, and audit requirements for federal awards.

In October 2024, the U.S. Office of Management and Budget's (OMB) revised Uniform Guidance, [2 CFR Part 200](#), became effective. These revisions apply to all federal grant awards issued on or after October 1, 2024, including any amendments to grant awards that result in the award of additional funds, or any incremental funding awarded by the Department of Labor's Employment and Training Administration on or after October 1, 2024.

DEFINITIONS

Equipment - tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-federal entity for financial statement purposes, or \$10,000 (Uniform Guidance Section 200.33).

Intangible Property - property having no physical existence, such as trademarks, copyrights, patents and patent applications and property, such as loans, notes and other debt instruments, lease agreements, stock and other instruments of property ownership (whether the property is tangible or intangible) (Uniform Guidance Section 200.59).

Personal Property - property other than real property. It may be tangible, having physical existence or intangible (Uniform Guidance Section 200.78).

Property - real property or personal property (Uniform Guidance Section 200.81).

Real Property - land, including land improvements, structures and appurtenances thereto, but excludes moveable machinery and equipment (Uniform Guidance Section 200.85).

Supplies - all tangible personal property other than equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the nonfederal entity for financial statement purposes or \$10,000, regardless of the length of its useful life (Uniform Guidance Section 200.94).

POLICY

The Orange County Workforce Development Board (OCWDB) and Service Providers must follow the procurement, inventory and disposal of property requirements contained in the County of Orange Contract Policy Manual and applicable State Directive, whichever is more restrictive.

All Service Providers must submit the Prior Written Approval Request for the Cost of Property, with all required documentation, prior to the requested purchase. Reference OCWDB Allowable Cost and Prior Written Approval Policy for purchase considerations and guidance. OCWDB will monitor property procurement and disposal during program monitoring.

Property Management

For all WIOA funded purchases Service Providers must properly tag, record, safeguard, and track property purchased with WIOA funding. Inventory records must include property description, serial and model number, source of property, location and condition, acquisition date, maintenance schedule (if needed), and any other additional identifiable information of the property.

WIOA Identification Number

All property shall be tagged with a visible WIOA Identification Number, using the following naming convention:

WIOA (Provider Name) (#) - For example: WIOA OCWDB 15

Inventory Records

OCWDB Service Providers must:

- Conduct a physical inventory annually and submit the Inventory List along with an Inventory Completion Checklist to the assigned Program Manager.
- Maintain an internal control system to safeguard property from loss, damage, or theft. At minimum, the control system must include:
 - Acquisition records, such as receipts, must be retained for all purchases on the inventory list.
 - Secure storage and controlled access to equipment.
 - Check-in/check-out procedures for portable items.
 - Documentation of property location.
 - Timely updating of inventory records when equipment is relocated, reassigned, or removed from service.
- Implement and follow a documented maintenance schedule to ensure equipment remains in good working condition. The maintenance schedule must include:
 - Routine inspections (monthly, quarterly, or per manufacturing guidance).
 - Preventative maintenance tasks.
 - Timely repairs when issues are identified.
 - Documentation of all inspections, maintenance activities, and repairs.
 - Replacement planning for equipment nearing end-of-life or showing repeated issues.
- If property has been lost, stolen, or damaged Service providers must:

- Search for the missing property if lost.
- If property is not found a Report on Lost, Stolen or Damaged Property, along with any required police reports, must be submitted to Program Manager within five days of the discovery.
- Remove property from inventory records.

As an additional safeguard, OCWDB will conduct a physical property inventory and reconcile the inventory with the property records at least once every two years.

Record Retention

Property records must be retained for three years from the date of final expenditure, through property disposition, and then for three additional years. If any litigation, claim, or audit is started before the expiration of the three-year period, all records must be retained until all matters are resolved. Refer to Uniform Guidance Section 200.334 for more information regarding retention requirements.

Disposition of Property

Service Providers must notify OCWDB if property with a per unit fair market value of \$10,000 or more, or an inventory of unused supplies with a total aggregate fair market value of \$10,000 or more are no longer needed for the program. OCWDB may use those items for other DOL supported programs. If the property is no longer needed for any DOL programming, OCWDB may either retain or sell the property and reimburse the state for the WIOA federal funds per guidance on 2 CFR 200.313-200.314. If there is no further use for the property and OCWDB wishes to dispose of it in a manner other than selling, OCWDB must request disposition instructions from the state. If authorization is granted to sell the property, sale procedures must be conducted in a manner that ensures the highest possible return. All actions must follow the County of Orange Contract Policy Manual procedure for property disposition. All disposition records must still be kept in accordance with WIOA record retention requirements.

Calculation of “Fair Market” Value

The selling of any property that is sold through auction, advertisement, or a dealer must be established by fair market value regardless of any prior established estimates.

Intangible and Intellectual Property

If OCWDB Service Providers obtain title to intangible property, it must be used only for its originally authorized purpose and may not be encumbered without approval from the DOL. DOL has the right to obtain, reproduce, publish, or otherwise use any data produced under a federal award, and may authorize others to do the same for federal purposes, per 2 CFR 200.315[a],[d].

DOL requires intellectual property developed under a competitive federal award process to be licensed under a Creative Commons Attribution license per the guidance of DOL Exceptions Section 2900.13

ACTION

Bring this policy to the attention of all relevant staff, subrecipients, and partners to ensure full understanding and compliance with federal and state audit resolution requirements.

INQUIRIES

If you have any questions regarding this policy, please email info@ocworkforcesolutions.com.

ATTACHMENTS

Attachment I - OCWDB Report on Lost, Stolen, or Damaged Property

Attachment II - Inventory List

Attachment III - Inventory Completion Checklist