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Office of Compliance Issuance

40-2026

Release Number-Program Year

Active Date: 04/14/2026
Effective Date: 04/14/2026
Expiration Date: Continuous, until further notice

Family and Workforce Centers of America (FWCA) is the fiscal agent and workforce support organization for Saint Louis County Workforce Development.

SUBJECT:

Inventory of Equipment & Property Management

ATTACHMENTS (if any): (N/A)

This Issuance is an official policy of St. Louis County Workforce Development.

This Issuance Affects:

- Workforce Innovation and Opportunity Act (WIOA) Programs
Title I: Adult
Title I: Dislocated Worker
Title I: Youth

FOR THE ATTENTION OF:

All applicable WIOA staff or subcontractors—Implementation of this policy is immediate and continuous.

RESCISSIONS: N/A

REFERENCES:

2 CFR 200.1

SUMMARY

St. Louis County Workforce Development (STLCOWD) policy is to provide requirements for the use of technology for individuals, applicants, workforce staff, training providers, recipients, and visitors.

BACKGROUND

Equipment purchased and maintained by STLCOWD should be used for its intended purpose.

SUBSTANCE

A. FIXED ASSET & PROPERTY MANAGEMENT

I. Capitalization Policy and Fixed Asset Inventory

All purchases of furniture and equipment over \$500 should be capitalized. All fixed assets are depreciated on straight-line basis over a period of five to ten years. All fixed assets should be routinely inventoried and properly tagged with an identification number. The inventory document should also denote physical location of the item and be updated in the event that said item is relocated.

II. Fixed Asset Categories

Based on the nature of STLCOWD's business, the following fixed asset categories are used for financial reporting purposes:

1. Computer Equipment
2. Other Fixed Assets (ie. Alarms)
3. Furniture and Fixtures
4. Machinery and Equipment

III. Property Management Standards

Will maintain equipment records, which include the following information:

1. A description of the equipment;
2. Manufacturer's serial number, model number and/or any other identifying number;
3. Source of the equipment, including the award number;
4. Whether title vests with STLCOWD, the Federal Government, or other funding organization;
5. Acquisition date (or date received, if the equipment was furnished by the Federal Government) and cost;
6. Location and condition of the equipment and the date the information was reported;
7. Unit acquisition cost; and
8. Ultimate disposition data, including date of disposal and sale price or the method used to determine current fair market value where a recipient compensates the awarding agency for its share.

Equipment owned by the Federal Government shall be identified to indicate Federal Ownership.

STLCOWD will conduct a physical inventory of equipment annually and the results will be reconciled with the equipment records. Any differences between quantities determined by the physical inspection and those shown in the accounting records shall be investigated to determine the causes of the difference. During the inventory, all equipment's existence, current utilization, and continued need will be verified.

All equipment will be kept in STLCOWD's offices and may not be moved to another location without prior approval by STLCOWD's designated staff (Executive Directory and FWCA Executive Management). Equipment will be secured when staff are not on the premises. Sufficient property insurance will be maintained to cover all equipment. Any loss, damage, or theft of equipment shall be investigated and fully documented. If the Federal Government owns the equipment, the awarding agency should be properly notified. The equipment will be maintained in good working order.

If STLCOWD is authorized or required to sell the equipment, proper sales procedures will be used including the determination of fair market value at the time of purchase, proper advertising of equipment availability, and proper recording in the accounting records including appropriate recognition of gain or loss.

B. EQUIPMENT OBTAINED WITH FEDERAL FUNDS

STLCOWD will not use equipment acquired with Federal funds to provide services to nonfederal organizations for a fee that is less than private companies charge for equivalent services, unless specifically authorized by the Federal statute, for so long as the Federal Government retains an interest in the equipment.

For equipment owned by the Federal Government, used on other activities not sponsored by the Federal Government, shall be permissible only if authorized by the awarding agency. Any resultant user charges will be treated as program income.

Equipment will be used in the projector program for which it was acquired as long as needed, whether or not the project or program continues to be supported by federal funds. The property will not be encumbered without approval of the awarding agency. When no longer needed for the original project or program, the equipment will be used in connection with other federally sponsored activities, if any, in the following order of priority:

1. Programs, projects, or activities sponsored by the awarding agency
2. Programs, projects, or activities sponsored by the other awarding agencies, then
3. Programs, projects, or activities sponsored by other Federal Government agencies

During the time that equipment is used on the program, project or program is of such other use will not interfere with work for which the equipment was originally acquired. First preference for such other use shall be given to other programs, projects, or activities sponsored by other Federal Government agencies.

When acquiring replacement equipment, the equipment to be replaced may be used as a trade-in or sold to use the proceeds to offset the costs of the replacement equipment subject to the approval of the awarding agency.

If the equipment is no longer needed, it may be used for other activities as follows:

For equipment with a current fair market value of \$5,000 or more, the equipment may be retained for other uses provided that compensation is made to the original awarding agency or its successor. The amount of compensation made is computed by applying the percentage of awarding agency's share in the cost of the original project or program to the current fair market value of the equipment. If STLCOWD has no need for the equipment, disposition instructions will be requested from the awarding agency.

TIMELINE

Immediate and continuous

INQUIRIES

Please direct all questions or comments regarding this Issuance document to stlcowd@fwca-stl.com. All active, expired, or rescinded Issuances are available upon request.