

GRWDB Subrecipient Youth Food Reimbursement Policy and Monitoring Procedure

Purpose: This policy provides guidance on procedures for reimbursing food costs for Youth participants enrolled in the Greater Raritan Workforce Development Board's (GRWDB) procured Youth programs. It was approved by the GRWDB Youth Committee at its May 23 meeting, and subsequently approved by the GRWDB Board during its June 27 meeting.

Background: The Workforce Innovation and Opportunity Act 2014 (WIOA) permits the provision of food on a limited basis and in specific situations. Food at a reasonable cost may be provided to Youth-serving program participants as a supportive service. The N.J. Department of Labor Department of Internal Audit advised the GRWDB as part of its 2024 audit that a local policy on this should be adopted.

Policy: In accordance with TEGL 9-22, the Employment and Training Administration has determined that supportive services enabling a WIOA participant to engage in training can be considered part of training expenditures. Purchased food may be provided to eligible Youth when it facilitates their participation in allowable Youth program activities and assists them in reaching their employment and training goals, (which also contributes to the program's overall performance objectives). The use of grant funds for food is limited to the amount specified in the contract for the current year per student. Youth participants are eligible for food reimbursement if they are enrolled in a GRWDB-approved contracted Youth service during the approved budget period.

Guidelines

- 1. Food Purchases:**
 - Food may be purchased as a meal, and supplemental items like beverages and snacks can be acquired in bulk, provided they are in single-serve packs.
 - When providing a snack in addition to a meal, it is recommended to package the daily food bag for ease of tracking expenses.
- 2. Cost Limitations:**
 - All food purchases must be equated to a per-student cost.
 - **Daily per student cost for food cannot exceed \$15** (including tip and delivery charges) and must adhere to the maximum weekly rate specified in youth contract.
 - When purchasing food for a group (i.e., pizza), determine the per-student cost by dividing the receipt by the total number of students consuming the meal.
 - Incidental costs such tip and delivery charges, may be reimbursed. The tip may not exceed 15% of total food cost. The incidental cost will be divided by the number of meals purchased and allocated per student.

Procedure

Procured Youth providers seeking participant food reimbursement must adhere to the following:

1. **Sign-in Sheet:**
 - Create a daily sign-in sheet with the date, participant names, a column indicating provided food, per student cost, and supervisor approval.
2. **Participant Sign-In:**
 - Participants must acknowledge receipt of food by providing their signature and date in indicated column on sign-in sheet.
3. **Bulk Purchases Monitoring:**
 - Bulk purchases for food and drink are permissible provided they include single-serve packs.
 - Bulk purchases must be monitored by a staff member for daily distribution and inventory tracking.
4. **Non-Reimbursable Items:**
 - Alcoholic beverages.
 - General purchase food items such as condiments, tea and coffee not consumed immediately.
5. **Expense Submission:**
 - The vendor will provide completed sign-in sheet and receipts for all participant food purchased during the training activity as part of their monthly invoice due on the 15th of month. These back-up documents should display the date, time, location, and cost of food per student. For example, January's sign-in sheets and receipts should be submitted no later than February 15.
 - Ensure that the items submitted for reimbursement are clearly specified.
 - Submit reimbursement requests for the actual expenses incurred on food, adhering to the maximum weekly rate specified in the current Youth contract.
Daily food cost per student may not exceed \$15.
 - Reimbursement requests must include proper documentation and be submitted in accordance with the GRWDB contract for services during the contract period.
6. **Timely Reimbursement:**
 - Reimbursement will be issued by check approximately three to four weeks after receipt of all required documentation, except during the Somerset County Finance Department closure at the end of the calendar year. Failure to adhere to these guidelines may result in reimbursement delay/denial.

Reference: [WorkforceGPS Food as a Supportive Service in the WIOA Youth Program](#)

GRWDB Subrecipient Youth Provider Food Reimbursement Monitoring Procedure

The Subrecipient Youth Provider Food Reimbursement Monitoring Procedure established by the Greater Raritan Workforce Development Board is crucial for ensuring compliance with federal regulations and the appropriate use of funds. Its goal is to enhance accountability and effectiveness in the processes related to Youth food reimbursement. The implementation of this procedure reflects the GRWDB's commitment to upholding the highest standards of fiscal responsibility and operational efficiency in managing workforce development funds. The Subrecipient Youth Provider Food Reimbursement Monitoring Procedure is effective as of July 1, 2024.

Review of Invoices:

The GRWDB Business and Finance Manager will review each monthly invoice from the youth vendor, and when appropriate, check for compliance with the Youth Food Reimbursement, verifying that the per-student cost does not exceed the stipulated limit and that all supporting documentation is included. The invoice and supporting documentation also will be reviewed by the GRWDB Director.

Feedback and Corrections:

Any questions or concerns regarding submitted invoices and supporting documentation will be directed to the youth provider prior to the submission of the invoice for payment so that the youth provider has time to resolve the discrepancies, make corrections and resubmit documentation if required.

Recordkeeping:

The vendor and the GRWDB will maintain a record of all submitted invoices, supporting documentation, and related communications for audit and compliance purposes.

Timely Reimbursement:

Process approved reimbursements within three to four weeks of receiving all required documentation, excluding Somerset County Finance Department closure periods.