

Advertising and Outreach – Questions and Answers

PURPOSE:

The purpose is to provide enhanced guidance and clarification to Workforce regions regarding designing, preparing, and purchasing materials for the purpose of outreach, advertising, public relations and informational activities. This **Questions and Answers** section will help regions make sound decisions when determining whether certain items or materials meet USDOL and Federal funding requirements. These questions and answers further explain the questions identified in the “Decision Tree” model (**Attachment 3**).

Question #1

Does the cost conform to any limitations or exclusions set forth in the Federal cost principles, Federal laws, terms and conditions of grant award, or the governing regulations?

Answer: This is the overall guiding principle in determining whether it’s appropriate to go forward with development of any materials and activities for the purpose of outreach or advertising. This may mean reviewing the PGL on Advertising and Outreach and other state policies, Expenditure Authorization funding provisions, the Federal Cost Principles, or any of the laws, regulations, citations, and other documents referenced at the beginning of the PGL on Advertising and Outreach.

Question #2:

What’s the intent or purpose of the transaction (items purchased)?

Answer:

- Transactions benefitting the client: the intent or purpose should be to assist the client in their employment and training activities, or to direct the client to the services provided by the federal program(s).
- Transactions benefitting the program(s) offered: the information included should be clear and purposeful. For example, if the item purchased is a banner showcasing Veterans Services, the banner should clearly display the programs and/or services offered.
- Transactions benefitting businesses and other stakeholders: the intent should be to highlight the services that the federal program(s) can provide to the business. For example, testing prospective employees or providing an overview of the program/s available, etc.

Question #3:

Who will benefit from the transaction?

Answer: As you analyze this question, think about the benefits to the targeted audience. The transaction might benefit the job seeker/client by increasing their awareness of the program or services. Employers might be drawn into using programs or services when they are reminded by the provided transaction. Also, the transaction will hopefully enhance or create new relationships with employers. And lastly, advertisements for outreach efforts should be designed to draw in those customers seeking services, such as job seekers looking for employment and training opportunities or employers who are considering hiring staff.

- Will the items purchased benefit the job seeker / client?
- Will they create relationships with potential employers?
- In the case of ads in the local media outlets, are the ads designed to draw in those seeking our services or are they designed to reach out to local business that may be contemplating hiring?

Question #4:

Can the items be intended solely for personal use?

Answer: Items purchased using federal monies are not intended solely for personal use. Items purchased for clients should assist the client in finding a job or completing the program objectives as intended by the grant or program. Gadgets and toys that don't support program activities should be purchased with money or awards that are not from federal sources.

Question # 5:

Are the costs reasonable, necessary and appropriate?

Answer: Regions should always consider the costs, the appropriateness of the transaction, and whether the transaction is necessary, for all purchases. In addition, regions should consider the benefit to the program or service and whether this transaction will make a difference in benefitting the overall program objectives. Procuring goods and services (or other specific purposes) should be necessary to meet the requirements and performance of the Federal Award. Certain grants require some level of outreach or outreach activities while others don't. For example, when a region is considering a full page advertisement in a newspaper, could the message within the advertisement be portrayed with a half page advertisement instead to reduce the costs of the transaction? (2 CFR Section 225, Appendix B, paragraph 1)

Question #6:

What programs, services and organizations must be identified?

Answer: Outreach, advertising, public relations, and informational activities may highlight the programs or services provided by the grants, but may **not** focus on an organization including workforce centers, a governmental agency, a business, a partner or sub-contractor, or any other service provider.

- Those clients or businesses receiving materials should be able to understand what programs and services are available.
- Organizations (such as a workforce center or region) should not be the main focus of the outreach materials. Focus on the organization may not provide enough detail and understanding of the programs and services available at the organization. An organization can be a part of the design, but programs and services must be included to make the messaging meaningful.
- When including information about the programs, a locally branded name can be used to describe that program; however, contact information must be added into the design so that the recipient will know how to take further actions and who to contact.

Question #7:

What funding source(s) will be used to pay for it?

Answer: USDOL funds can be used to purchase outreach materials when they are found to be necessary and reasonable, and not solely for personal use. The outreach materials should identify programs and services, and include the appropriate messaging that recognizes the federally funded grant money. In all other cases, non-federal sources of funds should be utilized.

Question #8:

Can a region show the concept/proof to the CDLE Audit Unit before purchasing the item?

Answer: WDP is open to reviewing proofs before the transaction is made. Workforce Programs would like to support regions in becoming more successful and to avoid any potentially disallowed costs. Please share concepts and proofs with the WDP monitoring team.

Question #9:

Can the CDLE Audit Unit provide some “one-liners” that are acceptable?

Answer: Due to the diverse types of transactions, it would be difficult to provide an acceptable blanket statement. The overall message of each item must be evaluated on a case-by-case basis to ensure that all requirements are met.

Here are a few examples of acceptable statements:

- Funded by the US Dept of Labor
- Supported by Wagner-Peyser program funding

Question #10:

What level of detail is acceptable when there is “limited space available” on the item purchased?

Answer: At a minimum, there should be a URL that directs the user to specific information on the program or service from which he will receive benefit. Please consult with the WDP monitoring team as needed regarding specific purchases you are considering.

Question #11:

When including a website into the design, what URL is acceptable?

Answer: The pages that the user is directed to must contain information on the programs/ services offered and the funding source. WDP encourages including basic contact information such as address, phone number and business hours. For example, if your outreach item will be funded with WIA Youth program money, the appropriate link to include would direct the client to the WIA Youth page on your website.

Common Outreach Items Purchased by Workforce Centers

Here are some acceptable ways to address the requirements for some items commonly purchased for outreach activities. These items may be allowable under limited circumstances per the PGL (Section IV, A, 3). Regions are encouraged to consult with the WDP monitoring team for additional guidance.

Cups/Water Bottles – Cups are generally not as acceptable as water bottles. Water bottles are more related to program participation. (For example, working on resumes at a computer in a workforce center.) However, either of these items could be questioned by an auditor.

Giveaways – Any giveaway items paid for with federal funds must be intended for general workforce business use by staff or partners, or for business or job seeker customers as part of program recruitment, participation, or follow-up. Please note that costs of promotional items and memorabilia including models, gifts, and souvenirs are unallowable.

Flash Drives – Because flash drives have very limited outside surface area for advertising, they should be imprinted with a website that directs the user to the programs/services offered and the funding source. WDP encourages including additional information on programs and services in a document stored on the flash drive itself. This information should describe the programs/services and the funding source. Please note that it is more important to have program/service information contained in the flash drive than it is to have anything on the outside.

Supplies – Supplies are items that are considered to be a normal part of business operations and would not be included as part of outreach and advertising. Supplies may have the name and/or logo of the organization as long as the cost of adding that information is not significantly different from the cost of the supplies unmarked and those supplies are used only for the conducting of grant business. Supplies include pens, pencils, pads of paper and similar items.