

Good afternoon, everyone. As Tara mentioned, my name is Cassandra Grilli-Clark, and I'll be providing a status update on a soon to be created Public Outreach Guidance. Throughout this presentation, please feel free to drop your questions in the chat or you may hold them for the Q&A Opportunity at the end.



## Discussion Points

Guidance Alignment, Local Workforce Development Board (Local Board) Feedback, and Future Planning

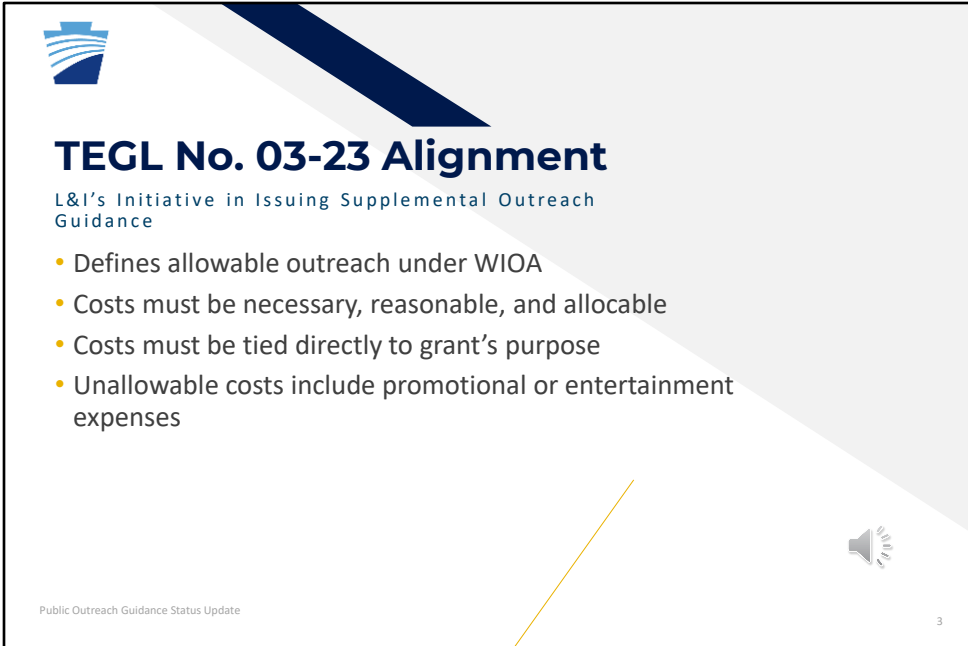
- Training and Employment Guidance Letter (TEGL) No. 03-23 Alignment
- Challenges in Outreach Cost Allocation
- Insights from Local Board Work Group Discussions
- Summary of Survey Results: Local Board Input
- Tentative Next Steps



Public Outreach Guidance Status Update

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Today we will cover several key components related to public outreach guidance and its alignment with federal expectations. I will provide a high-level overview of TEGL 03-23 titled *Allowable Uses of Funds for Outreach Activities for Federal Formula and Competitive Grant Awards*, followed by a discussion of common challenges related to the justification and documentation of outreach expenditures. I'll then share key insights from recent collaborative discussions with local workforce development boards, or local boards, along with survey results that reflect current outreach practices, gaps in guidance, and areas where additional technical assistance is needed. Finally, I'll give a status update on the development of outreach guidance designed to support each local board moving forward.

The slide features a blue and white geometric design in the top left corner. The title "TEGL No. 03-23 Alignment" is prominently displayed in a large, bold, dark blue font. Below it, the subtitle "L&I's Initiative in Issuing Supplemental Outreach Guidance" is written in a smaller, dark blue font. A bulleted list follows, detailing the guidance's focus on allowable outreach under WIOA, the necessity and allocability of costs, and the exclusion of promotional or entertainment expenses. A small speaker icon is located in the bottom right corner of the slide area. The footer contains the text "Public Outreach Guidance Status Update" on the left and the number "3" on the right.

**TEGL No. 03-23 Alignment**

L&I's Initiative in Issuing Supplemental Outreach Guidance

- Defines allowable outreach under WIOA
- Costs must be necessary, reasonable, and allocable
- Costs must be tied directly to grant's purpose
- Unallowable costs include promotional or entertainment expenses

Public Outreach Guidance Status Update

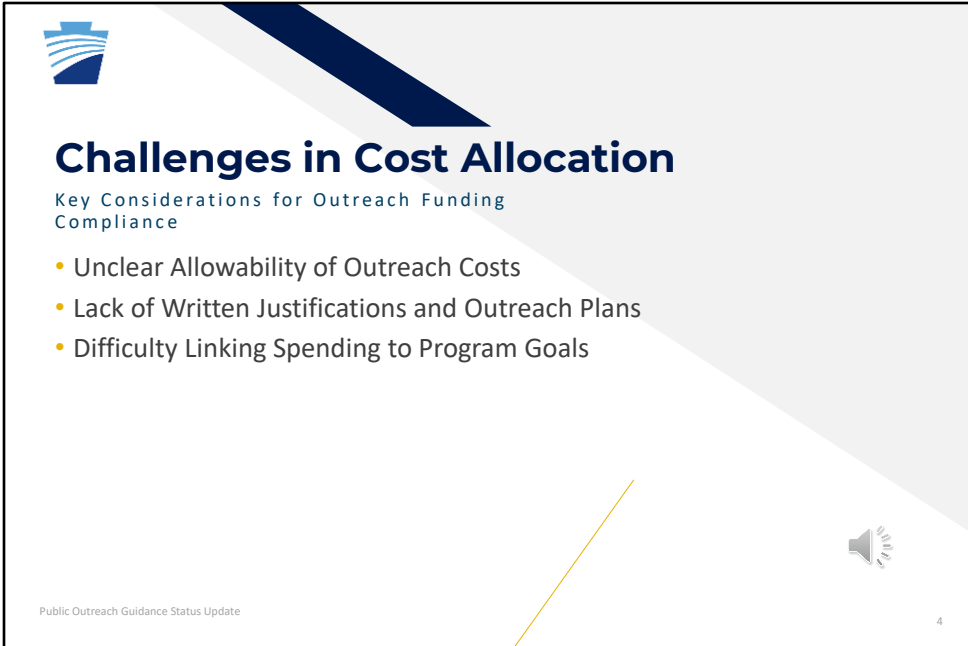
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Before I begin, I want to provide an overview of TEGL 03-23, and explain why the Pennsylvania Department of Labor & Industry (L&I) determined that developing supplemental guidance was both timely and necessary. TEGL 03-23 is federal guidance issued by the U.S. Department of Labor that outlines what types of outreach activities are considered allowable under the Workforce Innovation and Opportunity Act, or WIOA, and other federal workforce grants. The guidance was designed to help states and grantees ensure that their outreach efforts are compliant with federal cost principles and effectively support workforce program goals.

Recognizing that the federal guidance is broad, L&I wanted to develop supplemental outreach guidance to provide clearer, Pennsylvania-specific direction and practical examples to help local boards and partners apply these federal principles consistently and correctly.

One of the key takeaways from TEGL 03-23 is that outreach costs must be necessary, reasonable, and allocable—meaning the cost must be directly tied to the grant's purpose and reflect what a prudent person would pay under similar circumstances. This aligns with federal regulations under 2 CFR §200.403 and §200.421, which are part of the Uniform Administrative Requirements that all grantees must follow.

TEGL 03-23 also clarifies what is not allowable. Costs that are purely promotional in nature, entertainment-based, or not clearly aligned with the goals of the grant are considered unallowable. To stay in compliance, all outreach activities and associated costs must follow the Uniform Guidance, adhere to relevant cost principles, and fall within the scope of the grant agreement.





## Challenges in Cost Allocation

Key Considerations for Outreach Funding Compliance

- Unclear Allowability of Outreach Costs
- Lack of Written Justifications and Outreach Plans
- Difficulty Linking Spending to Program Goals

Public Outreach Guidance Status Update

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Across Pennsylvania’s workforce system, there is a clear opportunity to strengthen support for local boards in identifying which outreach expenses are allowable and how to properly document them. Providing clarity in this area will help ensure outreach activities are both impactful and fully compliant with federal and state requirements.

As referenced on the last slide, under federal guidelines, including TEGL 03-23 and 2 CFR §200, outreach costs must meet the standards of being **necessary, reasonable, and allocable** to the purpose of the grant. While these principles provide a foundation, questions often arise—especially when it comes to expenses related to promotional items, event sponsorships, and broader community engagement. Without consistent understanding and documentation, local boards risk unintentional non-compliance or disallowed costs during monitoring or audit reviews.

To support effective use of outreach funds, local boards are strongly encouraged to provide **written justification** for all outreach expenditures. Developing a clear outreach plan that connects specific activities to program goals and performance outcomes can serve as a central source of documentation. Taking this proactive approach not only promotes accountability and transparency, but also positions local

boards to make strategic decisions, remain audit-ready, and demonstrate responsible stewardship of public funding.



 **Insights from Local Board Work Group Discussions**

Partnering with Local Boards to Shape Effective Outreach Strategy

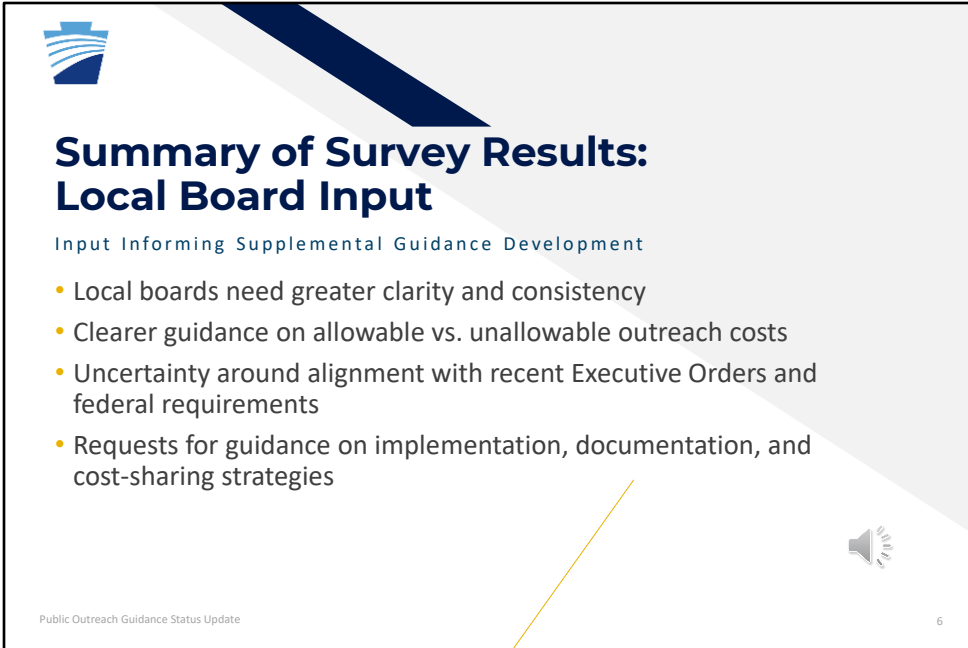
- Workgroup Launched in Response to TEGL 03-23
- Local Board Volunteers Engaged as Collaborative Partners
- Initial Meeting Focused on Stakeholder Input and Priorities
- Survey Developed to Guide Next Steps in Drafting Guidance

Public Outreach Guidance Status Update  5

In September 2024, L&I announced that the Bureau of Workforce Development Administration (BWDA) would convene a workgroup to draft supplemental guidance in response to TEGL 03-23.

By October 2024, BWDA informed all local boards that several members of their cohort had volunteered to collaborate on this effort. While L&I would oversee communications for the project, these local board "champions" were expected to help disseminate information and gather feedback from peers across the local workforce delivery system.

The primary goal of the initial meeting was to gather input on the types of content stakeholders would like to see included in the supplemental guidance. During the discussion, participants reached a consensus that the best first step would be to distribute a survey to all local boards. Together, the group collaborated to finalize the survey questions that guided the next phase of this effort.

A presentation slide with a blue and white geometric background. In the top left corner is a logo consisting of three blue horizontal bars of increasing length. The main title is "Summary of Survey Results: Local Board Input" in a large, bold, dark blue font. Below the title is a subtitle "Input Informing Supplemental Guidance Development" in a smaller, lighter blue font. A bulleted list of four items is centered on the slide. At the bottom left, there is a small text label "Public Outreach Guidance Status Update". At the bottom right, there is a small speaker icon and the number "6".

**Summary of Survey Results:  
Local Board Input**

Input Informing Supplemental Guidance Development

- Local boards need greater clarity and consistency
- Clearer guidance on allowable vs. unallowable outreach costs
- Uncertainty around alignment with recent Executive Orders and federal requirements
- Requests for guidance on implementation, documentation, and cost-sharing strategies

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On January 24, 2025, all local boards received a link to a voluntary survey, which they, or their designated fiscal staff, were encouraged to complete by Friday, February 10. The following provides a high-level summary of the key themes and insights from the survey responses.

Local boards that participated in the survey expressed a clear and consistent message: there is a strong need for greater clarity and uniformity in interpreting and implementing TEGL 03-23, particularly in relation to the allowable use of WIOA funds for outreach activities. Respondents emphasized the need for more detailed guidance, practical examples, and better alignment with federal directives such as recent Executive Orders and the Americans with Disabilities Act (ADA). Three themes summarize the most pressing areas of concern:

### **1. Clarification on Allowable and Unallowable Outreach Costs**

Local boards requested a comprehensive list outlining both allowable and unallowable uses of WIOA funds for outreach. Current guidance, which offers only select examples, has led to uncertainty—especially around items like branded giveaways (e.g., pens, tote bags), board-level branding, and use of third-party



marketing firms. This lack of clarity has contributed to inconsistent interpretations and practices across regions. These specific areas will be clarified in the forthcoming supplemental guidance to ensure greater consistency and compliance.

## **2. Alignment with Executive Orders and Federal Mandates**

Respondents noted discrepancies between TEGL 03-23 and recent Executive Orders concerning inclusivity and equity in outreach. They recommended incorporating specific language from these Orders, as well as from the Stevens Amendment and ADA, into supplemental guidance to ensure legal alignment and operational clarity. In response, L&I has consulted with its legal department and is currently awaiting their recommendations.

## **3. Implementation, Documentation, and Cost Allocation**

There were multiple requests for clearer direction on what documentation is needed to demonstrate compliance with the TEGL. Respondents also sought guidance on how to allocate shared outreach costs that benefit multiple programs or partners. These topics will be addressed in the forthcoming supplemental guidance.



## Tentative Next Steps

Advancing the Supplemental Guidance

- Draft guidance shared with Local Board Workgroup for review
- Workgroup provided feedback for improvement
- Final version will be posted under Financial Management on Workforce Policies and Forms webpage



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On Friday, June 20th, L&I shared a draft version of the guidance with the Local Board Workgroup, incorporating areas identified in the survey as needing further clarification. The workgroup was invited to review the draft and provide feedback to help refine and strengthen the final version. Feedback was collected through close of business on July 7th. L&I is in process of consolidating the input into a single working draft and will schedule a follow-up meeting to review the near-final version collaboratively with the workgroup.

Once finalized, the guidance will be published on the Workforce Policies and Forms webpage under the **Financial Management policy** subheading. This placement was selected since the guidance focuses on the allowability of outreach-related costs—an area that directly impacts fiscal planning, budgeting, and compliance with federal funding requirements under WIOA. Including it within the Financial Management section ensures that local boards and fiscal staff can easily locate and reference it alongside related topics.



## Question & Answer Opportunity

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Policy & Planning Coordination  
Services



Thank you all very much for your time and attention. I will now open the floor to questions.

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Note: If a local area has a specific area-related question, those inquiries can be emailed to our unit's resource account at: [RA-LI-BWDA-Policy@pa.gov](mailto:RA-LI-BWDA-Policy@pa.gov)