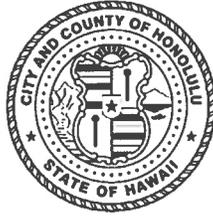


OAHU WORKFORCE DEVELOPMENT BOARD
CITY AND COUNTY OF HONOLULU

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July 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #20-25**

SUBJECT: POLICY ON TRANSFER OF FUNDS BETWEEN ADULT AND
DISLOCATED WORKER ALLOCATIONS

PURPOSE:

The purpose of this policy is to provide guidance regarding the transferring of funds between the Adult program and the Dislocated Worker program local formula allocations. Additionally, this policy is to outline the process to request the transfer of funds between the Adult and Dislocated Worker programs.

BACKGROUND:

In accordance with Section 133(b)(4) of the Workforce Innovation and Opportunity Act of 2014 and 20 CFR 683.130 the Local Workforce Development Board ("LWDB") is authorized to approve the transfer of up to 100% of funds between the Adult and the Dislocated Worker programs. Funds may not be transferred to or from the Youth program.

POLICY:

Objective for transferring of funds.

The ability to transfer funds between the Adult and Dislocated Worker programs is intended to provide greater flexibility to the service provider to meet the workforce needs of the City and County of Honolulu. The transfer of funds should be driven by a demonstrated need in a program, the ability to utilize the funds more effectively to achieve the objectives of the City and County of Honolulu, and the ability to better meet the needs of the customers.

Performance Outcomes.

The service provider is accountable for meeting the negotiated WIOA performance measures for the Dislocated Worker and Adult programs and for meeting enrollment and expenditure targets.

Transferring funds does not relieve the local area of its obligation to achieve any of the performance targets for that program.

GUIDELINES FOR TRANSFER REQUESTS:

- a. The transfer must not adversely impact an area's capacity to adequately provide appropriate services to individuals in need of such services provided by the program subject to the reduced funding.
- b. The transfer must not adversely impact the area's ability to achieve program performance measures established for the current or subsequent years.
- c. The Oahu Workforce Development Board must obligate, at a minimum, 80% of all funds budgeted to the receiving funding stream by the end of the first program year. Funds must be 100% expended by the end of the second program year
- d. Funds not eligible for transfer requests: Youth program funds; Adult or Dislocated Worker funds re-allocated by WDC; and other discretionary dislocated worker grants
- e. Funds may not be transferred between program years.
- f. Transfer requests may be submitted anytime during the first year of the life of the funds but must be submitted at least 60 days before the end of the second year.
- g. If a transfers includes 100% of its Dislocated Worker formula funds allocation, and a dislocation event occurs in the area, the request for Rapid Response funds will be considered on a case by case basis
- h. Program costs must not be shifted to or from another federal program to overcome fund deficiencies or avoid restrictions imposed by law, regulations or agreements
- i. All transfers of funds are subject to the priority of service requirement. Section 134(c)(3) (E) requires that priority of service be given to recipients of public assistance, other low income individuals, and individuals who are skills deficient. Additionally, TEGL 3-15 further emphasizes that local areas must give priority of services regardless of the levels of funds.

Transfer requests must include the following information:

- a. WIOA program year;
- b. the amount of the proposed transfer;
- c. the impact analysis describing the impact to the program from which funds are being moved and the impact to the program which will receive the funds

The impact analysis must include the following:

1. The situation necessitating the transfer, including local conditions, labor market, economic, etc.
2. How the funds transfer will impact participant levels in both programs.
3. A description of how the receiving program's participants will benefit from the transfer as well as how the impact on the contributing program will be mitigated, including how the remaining participants will be served.
4. The transfer's effect on current providers on training and other services
5. A description of the expected impact on WIOA performance outcomes for both programs.

To request the transfer, the following documents must be submitted:

(These forms are available at <http://labor.hawaii.gov/wdc/wia-docs/>)

1. Adult Program
 - Budget Detail A and related Budget Detail forms A-1 to A-5
 - Budget Detail B
 - Budget Information Summary
2. Dislocated Worker Program
 - Budget Detail A and related Budget Detail forms A-1 to A-5
 - Budget Detail B
 - Budget Information Summary
3. Narrative of the transfer request items stated previously.
4. Transfer requests must be signed by the Chair of the OWDB
5. Direct the request to:

**Bennette Misalucha, Executive Director
Workforce Development Council
830 Punchbowl Street, Room 417
Honolulu, HI 96813**

UNIFORM GUIDANCE:

Subrecipients and subgrantees must follow the federal cost principles in 2 CFR Part 200, Subpart E and Appendices III through IX, including any USDOL exceptions identified in 2 CFR Part 2900.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.

REFERENCES:

- Title I of the Workforce Innovation and Opportunity Act (WIOA) of 2014, Sections 133(b)(4) and 134(c)(3)(E)
- TEGL 19-16, March 1, 2017
- 20 CFR Part 677 and Part 680
- 20 CFR 683.130
- 2 CFR Part 200, Uniform Administration Requirements, Cost Principles, and Audit Requirements for Federal Awards, Final Rule



Harrison Kuranishi
Executive Director