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MEMORANDUM

TO: Farmworker Career Development Program (FCDP) Sub-Recipients

FROM: Kevin O'Farrell, Ph.D.

DATE: June 9, 2025

SUBJECT: FCDP Policy for Allowable Uses of FCDP Funds for Outreach and Recruitment Activities

The purpose of this guidance clarifies the allowable uses of funding to perform outreach and recruitment activities and provides examples of how sub-recipients can use project funding effectively to conduct outreach and recruitment to meet the needs of businesses and participant job seekers. This policy is in response to the action requested in the Training and Guidance Letter (TEGL) No. 03-23 from the United States Department of Labor (USDOL) available in the following link:

<https://www.dol.gov/agencies/eta/advisories/tegl-03-23>.

Summary: This guidance aims to inform sub-recipients in strategies to maximize the reach of program development services. A quick reference list of allowable and unallowable uses of funds for program outreach and recruitment is provided. The list includes federal, state and FCDP regulations and policies and procedures from multiple reference materials.

Background for service providers: Each sub-recipient is required to collaborate with local agencies that will provide services to the farmworker population. Each sub-recipient project award includes a special condition that a local advisory board must be established to assist participants obtain meaningful employment. Members of the board should be comprised of key stakeholders in the community who will be able to inform sub-recipients of any career opportunities for FCDP participants. Conducting program outreach is essential to find providers of program services and to obtain local advisory board members.

Background for recruitment: In each sub-recipient's project application, it is required that sub-recipients describe the methods/strategies to recruit participants and share information about the proposed project to appropriate populations. Information should include services to be offered, where and when services can be obtained and information on eligibility for receipt of services. Recruitment visits should incorporate proactive outreach and recruitment efforts, such as the following:

- Agriculture community
- Day labor and health care organizations serving farmworkers and their families
- School visits
- Attendance of interagency meetings.
- The use of radio, television and print media

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Conditions: Sub-recipient awards, special conditions for WIOA, Section 167 and federal and state fiscal management best practices remain applicable. The costs must be necessary, reasonable and allocable for proper and efficient performance and administration of the project. All costs must be allowable by federal regulations, state laws and procedures and the local policies of each sub-recipient agency. In the event of conflict, the strictest policy must be adhered to. The funding must be allocable, meaning there must be an approved budget line item the expense can be disbursed to and the funding for the expenses must be available.

*Allowable and Unallowable Items List:	
Allowable	Unallowable
Costs of printing FCDP materials for outreach (Brochures, business cards, posters, etc.).	Costs of printing non-FCDP materials.
Costs of exhibit and display materials for outreach (Bulletin boards, brochures holders, office supplies, etc.).	Costs of non-FCDP exhibit materials.
Electronic devices for outreach (Laptops, portable scanners, printers, etc.).	Electronic devices for non-FCDP activities.
Travel costs for outreach (Mileage, car rental, hotels, per diem and meals, etc.).	Travel costs for non-FCDP purposes.
Costs of media including newspapers, radio, television and direct mail for outreach if services are not available through service providers.	Costs of non-FCDP media.
	Refreshments and/or food.
	Costs of promotional items and memorabilia including models, gifts and souvenirs.
	Decorative items (globes, statues, potted plants, picture frames, desk plaques, etc.).

**The allowable list must also be specified within your local policies. In the event your local policies differ from state and/or federal allowability, you must adhere to the stricter policy.*

Examples of maximizing the reach of program development services would be amending unspent funds to increase budget line items for the following purposes:

- Increasing travel funds to attend additional outreach and recruitment opportunities.
- Purchase laptops, portable scanners and/or printers for outreach and recruitment.
- Purchase display boards and office supplies for outreach and recruitment materials.
- Printing services for business cards and brochures for outreach and recruitment.

Amendment forms can be located on the following links:

[Project Amendment Request \(DOE150\)](#),

[Budget Amendment Narrative Form \(DOE 151\)](#)

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Allowable and Unallowable Items Reference Charts for FCDP Outreach and Recruitment Purposes:

Allowable and Unallowable Items Reference Chart Federal Regulations 200.421			
Item/Activity/Reference	Allowable	Unallowable	Conditions
200.421 (a) Advertising: Cost of media including magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals and the like.	200.421 (b), (2) Procurement of goods and services for the performance of a federal award. 200.421 (b) (4) Program outreach and other specific purposes necessary to meet the requirements of a federal award.	200.421 (e), (4) Costs of advertising and public relations designed solely to promote the non-federal entity. Procurement of non-FCDP goods and services. Non-FCDP program outreach or recruitment.	Must be allowable by FDOE, FCDP and local sub-recipient agencies. Costs of goods and services are not allowable if funded or supplied by other service providers. Costs must be allocable (line items included in the approved budget).
200.421 (c) Public Relations: includes community relations and those activities dedicated to maintaining the image of the non-federal entity or maintaining or promoting understanding and favorable relations with the community or public at large or any segment of the public.	200.421 (d), (1) Costs specifically required by the federal award. 200.421 (d) (2) Costs of communicating with the public and press pertaining to specific activities or accomplishments.	200.421 (e), (2), (I) Costs of meetings, conventions, convocations or other events related to other activities of the entity including: (i) Costs of displays, demonstrations and exhibits (for non-FCDP). (ii) Costs of meeting rooms, hospitality suites and other special facilities used in conjunction with shows and other special events (for non-FCDP). 200.421 (e), (3) Costs of promotional items and memorabilia, including models, gifts and souvenirs.	

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Allowable and Unallowable Items Reference Chart Reference Guide for State Expenditures (RG) REFERENCE GUIDE FOR STATE EXPENDITURES			
Item/Activity/Reference	Allowable	Unallowable	Conditions
Reference Guide, Page 74 Prohibited Expenditures		Refreshments such as coffee and doughnuts. Decorative items (globes, statues, potted plants, picture frames, desk plaques, etc.).	
Reference Guide, Page 75 Promotional Items: FDOE does not have an advertising category. outreach/recruitment narrative must specify program need to be allowable.	Expenditures included in the sub-recipient's approved budget.	Expenditures that are not included in the approved budget.	Promotional items are generally prohibited unless expressly provided by statute or proviso. Must be allowable by sub-recipient's agency.
Reference Guide, Page 82 Public Relations: Travel	FCDP Registration payments, reimbursements of mileage, per diem and subsistence allowance, transportation and other incidental expenses.	Non-FCDP travel costs	Funding must be available in the sub-recipient's budget. Must be allowable by sub-recipient's agency.

The FCDP is a recipient of the National Farmworker Jobs Program (NFJP) federal grant.

Additional information in the NFJP Guide is available in the following link:

<https://farmworker.workforcegps.org>.

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