


---

## EMPLOYERS' TRAINING RESOURCE

1600 E. Belle Terrace  
Bakersfield, CA 93307

POLICY BULLETIN: #ETR02c-17

TO: ETR & All ETR Providers of Service  
FROM: Teresa Hitchcock, Assistant County Administrative Officer   
DATE: May 22, 2017  
SUBJECT: Policy on use of ETR Funds for Food and Related Expenses

**This Policy Bulletin Supersedes Any Previously Issued Policy Statements Concerning the Use of ETR Grant Funds for Food and Related Expenses**

---

### THIS POLICY BULLETIN ONLY APPLIES TO ETR SUBRECIPIENTS

**In general, in order to be allowable, costs charged to a Federal grant, including the Workforce Innovation and Opportunity Act must be necessary, reasonable and adequately documented. Other than the instances specified below for conferences and travel, food is an unallowable cost.**

#### CONFERENCES

A conference is defined as a meeting, retreat, seminar, symposium, workshop or event whose primary purpose is the dissemination of technical information beyond the non-Federal entity (subrecipient) and is necessary and reasonable for successful performance under the Federal award. Allowable conference costs paid by the non-Federal entity as a sponsor or host of the conference may include rental of facilities, speakers' fees, **costs of meals and refreshments**, local transportation, and other items incidental to such conferences unless further restricted by the terms and conditions of the Federal award.

This provision does **not** include staff meetings, working luncheons, participant award ceremonies, or training provided by the subrecipient themselves.

#### TRAVEL

Travel costs are the expenses for transportation, lodging, **subsistence**, and related items incurred by employees who are in travel status on official business of the non-Federal entity. Such costs may be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to

an entire trip and not to selected days of the trip, and results in charges consistent with those normally allowed in like circumstances for the subrecipient's non-federally-funded activities and in accordance with the subrecipient's written travel reimbursement policies.

Costs incurred by employees and officers for travel, including costs of lodging, other **subsistence**, and incidental expenses, must be considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the subrecipient in its regular operations as the result of the subrecipient's written travel policy. In addition, if these costs are charged directly to the Federal award documentation must justify that participation of the individual is necessary to the Federal award and the costs are reasonable and consistent with the subrecipient's established travel policy. In the absence of an acceptable, written subrecipient policy regarding travel costs, the rates and amounts established under 5 U.S.C. 5701-11, ("Travel and Subsistence Expenses; Mileage Allowances"), or by the Administrator of General Services, or by the President (or his or her designee) pursuant to any provisions of such subchapter must apply to travel under Federal awards (48 CFR 31.205-46(a)).