
DWD Policy 2024-12: Property Management and Surplus Property

To: Indiana's Workforce System
From: Indiana Department of Workforce Development (DWD)
Date: May 14, 2025

PURPOSE

This policy provides property management guidance for DWD and local workforce development areas.

RESCISSION

- DWD Policy 2015-02 *Property Management/Surplus Property Policy*
- DWD Policy 2007-21 *Property Management/Surplus Property Policy*

REFERENCES

- 2 CFR 200
- 89 FR 30046 *Guidance for Federal Financial Assistance*
- IC 4-20.5-6-3
- IC 5-22-21-4
- Indiana State Board of Accounts (SBOA), *Accounting and Uniform Compliance Guidelines Manual for State and Quasi Agencies*¹
- Indiana Department of Administration, *General Surplus Information, State Surplus Procedures Manual*²
- Indiana State Personnel Department, *Laws, Rules, and Standardized Policies*³

DEFINITIONS

See **Attachment A**.

CONTENT

Key Roles

The following roles are involved in property management, including but not limited to managing surplus property. These roles are referenced frequently throughout this guidance.

- **DWD Administrative Support Supervisor:** This individual receives and manages the DWD Request Form for Assets over \$10,000 (**Attachment B**). This form is also referenced as the "Request Form" throughout this guidance.

¹ <https://www.in.gov/sboa/state-agencies/>.

² <https://www.in.gov/idoa/state-resource-management/state-and-federal-surplus/general-surplus-information/>.

³ <https://www.in.gov/spd/policies-and-procedures/standardized-policies/>.

- **DWD Asset Manager:** This individual manages DWD's inventory, which includes collecting the DWD Asset Inventory template and enforcing the procedures for the disposal or transfer of property.
- **DWD Cost Center Manager:** These individuals work with their department leadership to submit the DWD Asset Inventory template to the DWD Asset Manager.
- **DWD Grant Manager:** This individual approves and processes grant requests.
- **Local Areas:** Local areas are responsible for administering federal funds through the leadership of local workforce development boards and are considered subrecipients as defined in 2 CFR 200.331(a).
- **Property Managers:** This includes DWD employees or employees from local areas authorized to purchase property using State or Federal funds. These individuals are also responsible for following the appropriate property management process.

Approval Process for Purchases Greater than \$10,000

In all cases, equipment purchases with a unit acquisition cost of \$10,000 or greater require prior approval from DWD's Chief Administrative Officer or their designee.⁴ Property Managers must submit the Request Form (**Attachment B**) along with the required information specified on the form to the DWD Grant Manager and DWD Administrative Support Supervisor via email at mgmtsvc@dwd.in.gov. The DWD Grant Manager will consult the grant contract to verify prior approval was written into the grant or that acceptable justification is provided as appropriate. When all levels of approval are complete, the approved Request Form will be sent back to the Property Manager who may then proceed with purchasing the item.

Local Area Property Management Requirements

Procedures developed by Local Areas for managing property acquired in part or entirely through a Federal award (including replacements) must meet the following requirements until disposition takes place:⁵

- Property records must include a description of the property, a serial number, or another identification number, the source of funding for the property (including the Federal Award Identification Number (FAIN)), the title holder, the acquisition date, the cost of the property, the percentage of the Federal agency contribution towards the original purchase, the location, use and condition of the property, and any disposition data including the date of disposal and sale price of the property. Local Areas are responsible for maintaining and updating property records when there is a change in the status of the property.⁶
 - Local Areas may use their own inventory system or the DWD Asset Inventory template to maintain property records, unless the overseeing DWD Grant Manager requires the Local Area to use the DWD Asset Inventory template. Electronic copies of the DWD Asset Inventory template can be requested by contacting the DWD Asset Manager via email at mgmtsvc@dwd.in.gov.

⁴ NOTE: 89 FR 30046: Guidance for Federal Financial Assistance changed the unit acquisition cost from \$5,000 to \$10,000 in April 2024.

⁵ 2 CFR 200.313(d).

⁶ 2 CFR 200.313(d)(1).

- All property with a unit acquisition cost of \$10,000 or more, (including shipping, setup, and support) must be recorded in the property records.
 - However, the DWD Grant Manager may require the tracking of property that falls below the \$10,000 threshold. In this case, that property must be tracked separately.
 - Property records must be maintained as long as the item is in service (or until 10 years after the item has been listed as transferred or disposed). Any transfers of equipment ownership also include the transfer of responsibility and inventory reporting.
- A physical inventory of the property is required to be taken every year, and the results must be reconciled with the property records.⁷ The completed Annual Inventory spreadsheet for property over \$10,000 in value is required to be submitted to the DWD Asset Manager no later than a month after the DWD Asset Manager formally requests these spreadsheets in September each year. For tracking and reconciling of items less than \$10,000, as may be required by the overseeing DWD Grant Manager, please contact the DWD Grant Manager at mgmtsvc@dwd.in.gov for reporting instructions.
 - Any difference determined by the physical asset inventory inspection and those shown in the property records must be investigated by the Local Area to determine the reason(s) for the difference. It is the responsibility of the Local Area to properly identify and provide documentation of any discrepancy between the actual physical inventory performed at each location and the official property records. All asset property will be accounted for, fully documented, or replaced by the responsible authority.
 - Replacement value will be the un-depreciated value of the property. The Local Area will certify all assets are accounted for during the annual fixed inventory by emailing the reconciled spreadsheet along with any additionally required documentation to the DWD Asset Manager.⁸ Examples of acceptable documentation include: a police report of any stolen property, insurance reports for casualty to property, signed approvals for property transfers to other Federal grant recipients, and/or signed approvals to transfer property to State Surplus or disposal using State Form 13812⁹ Notification of Surplus State-Owned Property.¹⁰
- A control system must be in place to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated and fully documented.¹¹ The Local Area must notify the Federal agency (for federal awards received directly) or the pass-through entity (i.e., DWD) of any loss, damage, or theft of equipment.

⁷ SBOA Manual.

⁸ Includes physical equipment or property.

⁹ State Form 13812 is available for download at <https://www.in.gov/idoa/state-resource-management/state-and-federal-surplus/general-surplus-information/>.

¹⁰ Additional information and example completed forms are available in the IDOA *State Surplus Procedures Manual*.

¹¹ 2 CFR 200.313(d)(3).

- Regular maintenance procedures must be developed to keep the property in good condition.¹²
- If the Local Area is authorized or required to sell the property, proper sale procedures must be established to ensure the highest possible return.¹³
- Property purchased with Federal funds may not be used in Fee for Service programs to provide services for a fee to compete unfairly with private companies that provide equivalent services.

DWD will review records and processes to ensure property records are properly maintained and that inventory is completed annually. In addition, some assets may be selected to be physically inventoried by DWD.

If Local Areas purchase property using external grant funds (such as those awarded through a non-profit), it is the responsibility of the Local Area to ensure that they are in compliance with all property management requirements affiliated with the external grant agreement.

DWD Property Management Processes

Property purchased by DWD with a unit acquisition cost over \$499.99 (including shipping, and support) will be marked with a DWD asset tag and entered into DWD's Asset Management System. Property with a unit acquisition of \$499.99 or less will not be tracked in DWD's Asset Management System. DWD asset tags will not be used to mark this equipment; however, DWD Cost Center Managers are required to maintain a DWD Asset Inventory template to track this property. DWD Asset Inventory templates are to be submitted to the DWD Asset Manager no later than a month after they are requested in September. The DWD Asset Manager will retain the DWD Asset Inventory templates and perform partial inventory of the items during the annual asset property inventory.

A physical asset inventory inspection¹⁴ is required on an annual basis for all property requiring a DWD Asset tag.¹⁵ The results will be reconciled with the property records and submitted to the DWD Asset Manager when requested. Any difference determined by the physical asset inventory inspection and those shown in the accounting records will be investigated by the DWD Cost Center Managers to determine the reasons for the differences. It is the responsibility of the DWD Cost Center Managers to properly identify and provide documentation of any discrepancy between the actual physical inventory performed at each location and the DWD's Asset Management System. All asset property must be accounted for and fully documented. Failure to do so may result in disciplinary action.¹⁶ The DWD Cost Center Managers will certify a complete DWD Asset Inventory Template and submit it along with required documentation to the DWD Asset Manager.

¹² 2 CFR 200.313(d)(4).

¹³ 2 CFR 200.313(d)(5).

¹⁴ A comparison of actual inventory against the asset spreadsheet.

¹⁵ IC 4-20.5-6-3.

¹⁶ See the Indiana State Personnel Department's *Discipline Policy Statement and Discipline Responsibilities & Procedures* for additional information.

Examples of acceptable documentation include police and State Form 54387¹⁷ Incident Report, insurance reports for casualty to property, approvals for property transfers to other units, signed approvals to transfer property to State Surplus, and/or disposal using State Form 13812 Notification of Surplus State-Owned Property.¹⁸

DWD Cost Center Managers should have a plan in place to ensure adequate safeguards to prevent loss, damage, or theft of the property, (e.g., storing unused laptops in a secure location). Any loss, damage, or theft of non-expendable personal property will be investigated, fully documented, (including a copy of State Form 54387 and a police report where appropriate) and submitted to the entities specified in the state form within ten (10) working days of the loss. If the property was purchased using any Federal funds, DWD must notify the Federal awarding agency of any loss, damage, or theft of equipment.

Disposition and Disposal¹⁹

When original or replacement equipment is no longer needed for the original project, program, or for other activities currently or previously supported by a State or Federal awarding agency,²⁰ disposition or disposal of the equipment may take place. Property Managers may use the property in the program or project for which it was acquired as long as needed, regardless of whether the project or program continues to be supported by the Federal or State award. For Federal awards, when the property is no longer needed for the original program or project, the equipment may be used in other activities following the priority guidelines below:²¹

1. Activities under a Federal award from the Federal awarding agency which funded the original program or project, then
2. Activities under Federal awards from other Federal awarding agencies. This includes consolidated equipment for information technology systems.

Disposition of Property

If the property has been deemed ready for disposition and was purchased through a Federal grant, the Property Manager will notify the Grant Manager, who must request disposition instructions from the awarding agency if this is required by their grant agreement.²² Disposition of the equipment will take place as follows, in accordance with Federal awarding agency disposition instructions.

1. Items of equipment with a current per unit fair market value of \$10,000 or less may be retained, sold, or otherwise disposed of with no further responsibility to the awarding agency.²³

¹⁷ State Form 54387 is available for download from the DWD Staff Portal.

¹⁸ State Form 13812 is available for download at <https://www.in.gov/idoa/state-resource-management/state-and-federal-surplus/general-surplus-information/>.

¹⁹ 2 CFR 200.313(e).

²⁰ Except as otherwise provided in Federal statutes, regulations, or Federal awarding agency disposition instructions.

²¹ 2 CFR 200.313(c)(1)(i and ii).

²² 2 CFR 200.313(e).

²³ 2 CFR 200.313 (e)(1).

2. Except as provided in 2 CFR 200.312(b), or if the Federal awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current per-unit fair market value in excess of \$10,000 may be retained by the non-Federal entity or sold.²⁴
 - a. However, if the property with a current per-unit fair market value in excess of \$10,000 is sold, the Federal agency is entitled to an amount calculated by multiplying the percentage of the Federal agency's contribution towards the original purchase by the current market value or proceeds from the sale. If the equipment is sold, the Federal agency or pass-through entity may permit the recipient or subrecipient to retain, from the Federal share, \$1,000 of the proceeds to cover expenses associated with the selling and handling of the equipment.
3. The non-Federal entity may transfer title to the property to the Federal Government or to an eligible third party provided that, in such cases, the non-Federal entity must be entitled to compensation for its attributable percentage of the current fair market value of the property.²⁵
4. In cases where a non-Federal entity fails to take appropriate disposition actions, the Federal awarding agency may direct the non-Federal entity to take disposition actions.²⁶

If the property has been deemed ready for disposition and was purchased by DWD, the Property Manager must reach out to the Asset Manager for disposition instructions. Any usable property must first be offered to other DWD Departments as long as this does not violate any existing grant agreements.²⁷ Request the Property Transfer Form from DWD Office Services²⁸ to begin this process. Email the completed documentation to the DWD Asset Manager. If there is no interest in the property, contact the DWD Asset Manager for disposition instructions.

Disposal of Property Purchased by DWD

The following rules for disposal apply:

- Remove all DWD asset tags.
- The property cannot be given or sold to employees, the public, or other entities. This would mean the property has market value and should be put through the sales process through the Department of Administration, Indiana State Surplus.
- If instructed to dispose of it locally, property may be taken to a recycling center, or if appropriate, it may be placed in the local office dumpster. If a dumpster is not available, the property must be either picked up by or delivered to a trash hauling firm, landfill, or dump. If there is a cost involved, the department requesting surplus of the items will pay for the disposal.

²⁴ 2 CFR 200.313(e)(2).

²⁵ 2 CFR 200.313(e)(3).

²⁶ 2 CFR 200.313(e)(4).

²⁷ Excludes monitors and computer equipment with memory.

²⁸ dwdofficeservices@dwd.in.gov.

- After disposal, the DWD tags and written verification as to the date and method of disposal must be submitted to the DWD Asset Manager, which will be retained and recorded in DWD's Asset Management System.
- All costs associated with approved disposal or transportation of surplus property are the responsibility of the agency.
- To transfer equipment over \$10,000 in value to another party, notify the DWD Asset Manager of current requirements and processing instructions. For transfer of equipment less than \$10,000, contact the overseeing DWD Grant Manager for current requirements and processing instructions.

Disposal of Monitors and Computer Equipment with Memory

Monitors. Monitors cannot be disposed of by the same means as other property. Monitors contain environmentally toxic material, and state agencies as well as Local Areas are prohibited from putting monitors in landfills, dumpsites, or dumpsters. After prior approval, monitors must be returned to State Surplus or taken to a recycling center for proper disposal.

Computer Equipment. Regarding computer equipment, all data and programs must be removed from electronic storage media, (e.g., computers, electronic tablets and notebooks, routers, firewalls, and switches), by State Surplus, IOT.²⁹ This applies to all computer equipment housing any data (especially but not limited to personally identifiable information) related to DWD programs such as WIOA or Unemployment Insurance. Therefore, after prior approval, this equipment must be returned to State Surplus.

ACTION

All appropriate DWD and local area staff must be familiar with and adhere to this policy.

ATTACHMENTS

Attachment A – DWD Property Management Definitions

Attachment B – Example DWD Request Form for Assets over \$10,000

EFFECTIVE DATE

Immediately.

ENDING DATE

Upon rescission.

ADDITIONAL INFORMATION

Questions regarding the content of this publication should be directed to policy@dwd.in.gov.

²⁹ Per State of Indiana, Indiana Office of Technology (IOT), IT security policies.

ATTACHMENT A

DWD PROPERTY MANAGEMENT DEFINITIONS³⁰

Acquisition cost³¹ means the cost of the asset including the cost to ready the asset for its intended use. Acquisition cost for equipment, for example, means the net invoice price of the equipment, including the cost of any modifications, attachments, accessories, or auxiliary apparatus necessary to make it usable for the purpose for which it is acquired. Acquisition costs for software include those development costs capitalized in accordance with generally accepted accounting principles (GAAP). Ancillary charges, such as taxes, duty, protective in transit insurance, freight, and installation may be included in or excluded from the acquisition cost in accordance with the non-Federal entity's regular accounting practices.

Asset tags mean the State of Indiana Fixed Asset Inventory tags with bar codes that are issued by the DWD Management Services Asset Manager. Only tags beginning with '510' are to be used on new equipment.³²

DWD Asset Management System means the PeopleSoft Fixed Asset System used to track assets as required by DOL and Indiana State Board of Accounts.

Non-expendable personal property means tangible personal property having a useful life of more than one (1) year and a unit cost of \$1000 or more per unit.

Non-expendable personal component property means any part, feature, device, or constituent element, internal or external, whose function is designed to support and/or enhance the unit's performance and is necessary to the operation of the unit as a whole. For example, a personal computer (a unit) consists of the component equipment of a monitor, central processing unit, keyboard, and any internal features.

Personal property means property other than real property. It may be tangible (having physical existence) or intangible.³³

Real property means land, buildings, and improvements to buildings and structures, excluding movable machinery and equipment.³⁴

Unit acquisition cost of purchased non-expendable personal property means the net invoice unit price of the property including cost of modifications, attachments, accessories, and auxiliary apparatus necessary to make the property usable for the purpose it was acquired and includes the cost of installations, transportation, taxes, and duty or protective intransient insurance.

³⁰ Includes state/agency defined.

³¹ 2 CFR 200.1.

³² Excludes laptops and computers.

³³ 2 CFR 200.1.

³⁴ 2 CFR 200.1.

Surplus property means property that is not usable by a state agency as determined under Indiana Statute.³⁵ Disposition of such property must be obtained from DWD Management Services Asset Manager.

Transportation costs mean the dollar amount to have equipment or furniture delivered to a Recycling Center, Department of Workforce Development, or State Surplus.

³⁵ IC 5-22-21-4.

ATTACHMENT B

DWD REQUEST FORM FOR ASSETS OVER \$10,000

Note: The editable form is available via [this link](#).