

## **RFP/RFQ Questions Received as of February 23, 2026**

### **WIOA Title I, EARN, and Discretionary Grants RFP**

1. In the WIOAADW and EARN services RFP questions 4.3 and 4.4 are duplicated. Is it preferred to leave blank or provide a duplicate response?

**4.4 is listed incorrectly. Attachment 1 RFP Response Application has been updated and uploaded on [www.lvwib.org](http://www.lvwib.org) under the WIOA Adult, Dislocated, and EARN services RFP section.**

2. The order of documents beginning on page 16 states that Attachment 3 is the Required Federal and Commonwealth Forms, however those are listed again after Attachment 9. Can you please confirm where the required forms should be placed in the order of documents.

**Attachment 9 on Page 17 is listed as the Reference Forms which are only required of proposers that have not contracted with the WBLV in the past three (3) years. Section (f)(ii) on Page 17 is a list of the Required Federal and Commonwealth Forms that are included in Attachment 3.**

3. Regarding the submission of a Word version of the proposal, are you requesting just the application (provided Attachment 1) in Word, or the entire proposal including the excel budget, required attachments and PDF forms to also be converted to a Word document for submission?

**The application should be submitted in Word and PDF. The budget should be submitted in Excel and the attachments should be submitted as PDF.**

4. Within the PA CareerLink®, to confirm the staffing for this RFP – there are 20 WIOA staff and 6 EARN staff? Can you provide the breakdown of job titles?

**Please see the organizational chart posted as Exhibit A on [www.lvwib.org](http://www.lvwib.org) with the RFP.**

5. Can we use elect to charge the federally approved de minimis rate (2 CFR 200.414 in the Uniform Guidance) if we do not have a federally approved indirect cost rate?

**Not-for-profit, non-federal public and government agencies which have never had a negotiated indirect cost rate may opt for the de-minimus ICR of 15%. Opting for the de minimus rate will still require a cost allocation plan.**

**For-profit entities without an indirect cost rate approved by a federal cognizant agency, will have to negotiate a rate with the WBLV in accordance with 2 CFR 200 guidance.**

6. Can you provide current program performance, include Adult and Dislocated Worker enrollments year-to-date?

**We are currently meeting all performance measures. Enrollment for Adult is 172 and 126 for Dislocated Worker.**

7. How many participants were sent to training ytd?

**WBLV would like proposers to identify their plan for ITAs, OJTs, and other trainings in their submission.**

8. What is the amount spent for ITAs and Work-Based Learning? Supportive Service?

**In alignment with the Commonwealth of PA's expectations, 40% of funds should be spent on training.**

9. "What line item in the WIOA/EARN budget template do we enter the funds for ITA, OJT, work experience, OJT and other training funded activities?"

**Please see the revised budget forms uploaded on [www.lvwib.org](http://www.lvwib.org).**

10. Section 10.13.b (p. 25) of the RFP states, "Contract budgets may include an indirect cost rate if an indirect cost rate was negotiated and approved by a cognizant Federal agency."

**OMB's Final Rule on Uniform Guidance, effective October 1, 2024, reinforces that pass through entities may approve either a 15% de minimis rate or a negotiated indirect cost rate for subrecipients without a federally approved rate [2 CFR 200.332(b)(4)]. Note that subrecipients who are not direct**

**recipients of federal funds are generally not eligible to obtain a federally approved indirect cost rate—unless their grantor is willing to facilitate and support the approval process.**

**Could you please confirm whether your organization will allow subrecipients without a federally approved indirect cost rate to use the de minimis indirect rate or negotiate an indirect cost rate with your organization, in accordance with the Uniform Guidance?**

**Not-for-profit, non-federal public and government agencies which have never had a negotiated indirect cost rate may opt for the de-minimus ICR of 15%. Opting for the de minimus rate will still require a cost allocation plan.**

**For-profit entities without an indirect cost rate approved by a federal cognizant agency, will have to negotiate a rate with the WBLV in accordance with 2 CFR 200 guidance.**

**For-profit entities without an indirect cost rate approved by a federal cognizant agency, WBLV will negotiate.**

11. Section 10.13.c (p. 26) of the RFP states, “WBLV will only pay up to five percent (5%) for administrative costs.”

**DOL/ETA’s “WIOA Admin vs. Program Costs vs. Indirect” handout (July 6, 2018) indicates that, except for subrecipients that are direct recipients or those performing solely administrative functions, subrecipient costs should generally be charged as program costs. [Reference: Page 2 of the document, available at <https://cms.workforcegps.org/-/media/Communities/grantsapplicationandmanagement/Files/WIOA-Admin-vs-Program-Costs-vs-Indirect-Handout---07,-d-,06,-d-,2018.ashx>]**

Could you please confirm whether your organization will adhere to the above administrative guidance?

**While the WBLV may charge career services costs to the Program Cost Category we are concerned that funds at the sub recipient level are not supporting administratively heavy infrastructures rather than being spent on participants. So we want to see what proposers are charging for administrative overhead.**

12. What is the anticipated award notification date for this contract?

**Response: We have not yet determined the notification date.**

13. What is the file size of your email box? If our proposal response exceeds that limited, may we send multiple emails labeled file 1 of X, 2 of X, etc?

**Response: Yes, multiple emails may be sent. If sending multiple emails include the appropriate subject line as noted in the RFP and with (Email 1 of x) after it.**

14. Regarding 13. b Agreement Type and Budget on page 26 of the RFP, please confirm that if a company does not have a Federal Cognizant Agency approved Indirect Cost Rate Plan, they may use the de minimis indirect cost rate as outlined in eCFR Part 200.414(f).

**Response: Not-for-profit, non-federal public and government agencies which have never had a negotiated indirect cost rate may opt for the de-minimus ICR of 15%. Opting for the de minimus rate will still require a cost allocation plan.**

15. To accurately inform our proposed staffing structure can you please clarify the staffing numbers provided on page 7 versus those described on page 19?

**Response: Please see the organizational chart that has been provided for current staffing numbers.**

16. At the bidder's conference it was discussed that the selected provider will interview current staff. Attachment 1, page 14, #6.4 asks a yes/no question "if the proposer agree to retain current direct staff services for at least six (6) months in consultation with the WBLV?" Is this a requirement?

**Response: This is a mis-statement proposers are only requested to interview current staff there is no requirement to retain staff.**

17. RFP page 27 states "d. Proposal budgets may not include consolidated overhead. All "overhead," "corporate costs" or similarly named consolidated or aggregated costs must be detailed in the budget or the proposal response will be deemed non-responsive." Our interpretation of this statement is that the board would like a narrative (in the budget) that explains our company's indirect cost rate. If that is not correct, please clarify.

**Response: That is not a correct interpretation. If costs are not indirect in accordance with a proper indirect cost rate they need to be itemized and direct charged with proper substantiating documentation provided when invoiced if the costs are agreed to during negotiations. See d below.**

**Further to be clear please see the guidance below.**

**a. For profit entities may not use the de minimus rate because**

**The de minimis rate is only available to “non-Federal entities”. For profit entities are not included in the definition of non federal entities per 2 CFR 200.1 as follows:**

**2 CFR 200.1 The definition of non-Federal entity includes:**

**States**

**Local governments**

**Indian tribes**

**Institutions of higher education**

**Nonprofit organizations**

**This position is confirmed by the U.S. Department of Labor (DOL) Indirect Cost Rate Guide as follows:**

**DOL Indirect Cost Rate Guide for Non-Federal Entities**

**In the section describing eligibility for the de minimis rate the guide explicitly states:**

**“For-profit entities are not eligible to use the 10 percent de minimis rate.”**

**{Note: written prior to the increase to 15%}**

**Further, Federal agencies including the U.S. DOL, HHS Cost Allocation Services, and the Department of Energy among others all explicitly state in their published indirect cost guidance that for-profit organizations are not eligible to use the [ 10% ] de minimis rate under 2 CFR 200.414(f).**

**b. If your company does not have an indirect cost rate that was negotiated with a federal cognizant agency and you cannot direct charge costs your entity will have to negotiated the rate with us per 2 CFR 200.**

- c. **If your company has a negotiated indirect cost rate from a federal cognizant agency please provide the agreement negotiated and the documents submitted to support the rate**
- d. **Do not provide us with an indirect cost rate proposal or letter signed by an Audit Firm stating that if you had negotiated with a federal cognizant agency the rate would be as detailed in the document submitted to us. If you do that the proposal response will be deemed non responsive and will not be read as this does not meet 2 CFR 200 guidelines**

**2 CFR 200 requires an actual indirect cost proposal — not a hypothetical rate which does not provide us with the detail for the rate which would include**

- **Identification of the indirect cost pool**
- **Identification of the allocation base**
- **A distribution of the pool across all benefiting activities**
- **A cost allocation methodology**
- **Supporting financial statements**
- **A signed certification under §200.415 signed by an Official of the Organization not an auditor or audit firm**
- **A rate calculation based on actual costs, not hypothetical costs**

**See: 2 CFR 200.412–414 (classification, treatment, and allocation of costs)**

**2 CFR 200.405 (allocability requires proportional benefit)**

**2 CFR 200.415 (required certification)**

**A letter saying “this would be our rate if we had negotiated one” is not an indirect cost rate proposal, does not meet the requirements of 2 CFR 200 and cannot be accepted by the WBLV.**