

## Advertising and Marketing

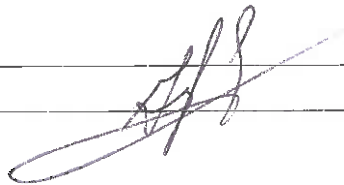
### Policy

1. Reference 2 CFR 200.421 Advertising and Public Relations
  - a. Advertising
    - i. The term advertising costs means the costs of advertising media and corollary administrative costs. Advertising media include magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals, and the like.
    - ii. The only allowable advertising costs are those which are solely for:
      1. The recruitment of personnel required by the non-Federal entity for performance of a Federal award (See also §200.463 Recruiting costs);
      2. The procurement of goods and services for the performance of a Federal award;
      3. The disposal of scrap or surplus materials acquired in the performance of a Federal award except when non-Federal entities are reimbursed for disposal costs at a predetermined amount; or
      4. Program outreach and other specific purposes necessary to meet the requirements of the Federal award.
  - b. Public Relations
    - i. The term “public relations” includes community relations and means 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.
    - ii. The only allowable public relations costs are:
      1. Costs specifically required by the Federal award;
      2. Costs of communicating with the public and press pertaining to specific activities or accomplishments which result from performance of the Federal award (these costs are considered necessary as part of the outreach effort for the Federal award); or
      3. Costs of conducting general liaison with news media and government public relations officers, to the extent that such activities are limited to communication and liaison necessary to keep the public informed on matters of public concern, such as notices of funding opportunities, financial matters, etc.
  - c. Unallowable Advertising and Public Relations Costs
    - i. All advertising and public relations costs other than as specified in paragraphs (a) and (b) of this section;
    - ii. Costs of meetings, conventions, convocations, or other events related to other activities of the entity (see also §200.432 Conferences), including:
      1. Costs of displays, demonstrations, and exhibits;
      2. Costs of meeting rooms, hospitality suites, and other special facilities used in conjunction with shows and other special events; and

- 3. Salaries and wages of employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings;
  - iii. Costs of promotional items and memorabilia, including models, gifts, and souvenirs;
  - iv. Costs of advertising and public relations designed solely to promote the non-Federal entity.
- d. Documentation
- i. West Piedmont Workforce Development Area will document how the purchase directly benefits both the Workforce Innovation and Opportunity Act program and the potential participant.
  - ii. All items purchased must have identifiable direct benefit to the workforce program they are promoting.
  - iii. Any items purchased to distribute to business customers and community partners must have a direct useful benefit within the work environment.
  - iv. Materials purchased with an intent to distribute to participants, should have a direct useful benefit in their job search as well assist them in learning about the types of programs and assistance available.

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Approval Signature:

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Revision Date: June, 2017