



**COUNTY OF LOS ANGELES  
WORKFORCE DEVELOPMENT, AGING AND  
COMMUNITY SERVICES**



**CONTRACT COMPLIANCE DIRECTIVE**

DATE: April 30, 2019

NUMBER: CCD 18-08

**PROPERTY MANAGEMENT –EQUIPMENT PURCHASES,  
INVENTORY, MAINTENANCE AND DISPOSAL**

**EXECUTIVE SUMMARY**

The purpose of this Directive is to provide all Workforce Development, Aging and Community Services (WDACS) subrecipients with the policy and procedural guidance on property management-equipment purchases, inventory, asset management, inventory maintenance and disposal.

This Directive supersedes CCD-15-6, dated July 1, 2016, "Property Management-Equipment Purchases, inventory, Maintenance and Disposal" and is effective on the date of release.

**APPLICATION**

This Directive applies to all WDACS subrecipients.

**REFERENCES**

- 2 CFR Chapter I and Chapter II, Parts 200, 215, 220, 225, and 230 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule.

**BACKGROUND**

On December 26, 2013, the Office of Management and Budget revised the Uniform Administrative Requirements for Federal grants, combining those requirements with those of the audit requirements and cost principles. These regulations are codified at 2 CFR Chapter I and Chapter II, Parts 200, 215, 220, 225, and 230, became effective December 26, 2014, and are referred to as the Uniform Guidance. These rules contain the requirements for the County-funded purchase, inventory, maintenance, and disposal of property and supplies by subrecipients. The intent of these rules is to ensure that the purchase of property and/or equipment using federal, State or County funds is approved and performed through fair and open competition, and managed according to proper inventory, maintenance, and disposition procedures.

## DEFINITIONS

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Acquisition cost 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 includes 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. (2 CFR 200.2)

Capital assets means tangible or intangible assets used in operations having a useful life of more than one year which are capitalized in accordance with GAAP. Capital assets include:

- (a) Land, buildings (facilities), equipment (i.e. vehicles), and intellectual property (including software) whether acquired by purchase, construction, manufacture, lease-purchase, exchange, or through capital leases; and
- (b) Additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations, or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance). (2 CFR 200.12)

Capital expenditures means expenditures to acquire capital assets or expenditures to make additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations, or alterations to capital assets that materially increase its value or useful life. (2 CFR 200.13)

Contractor is an entity which has a contractual obligation with WDACS to render services in exchange for funding, as defined in 2 CFR 200.93. The Contractor is also known as a subrecipient and/or agency.

Cost sharing or matching - the portion of project costs not paid by Federal funds (unless otherwise authorized by Federal statute). See also Sec. 200.306 Cost sharing or matching. (2 CFR 200.29)

For all Federal awards, any shared costs or matching funds and all contributions, including cash and third party in-kind contributions. (2 CFR 200.306)

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-federal entity for financial statement purposes, or \$5,000. (2 CFR 200.33)

General purpose equipment means equipment which is not limited to research, medical, scientific or other technical activities. Examples include office equipment and furnishings, modular offices, telephone networks, information technology equipment and systems, air conditioning equipment, reproduction and printing equipment, and motor vehicles. (2 CFR 200.48)

Information technology systems means computing devices, ancillary equipment, software, firmware, and similar procedures, services (including support services), licensing or subscriptions to software and software support services, and related resources. (2 CFR 200.58)

Intangible property means property having no physical existence, such as trademarks, copyrights, patents, and patent applications and property, such as loans, notes and other debt instruments, lease agreements, stock and other instruments of property ownership (whether the property is tangible or intangible) (2 CFR 200.59).

License Fee means payment for authorization allowing use of property, equipment, or proprietary software.

Personal Property – property other than real property. It may be tangible, having physical existence or intangible (2 CFR 200.78).

Property means real property or personal property (2 CFR 200.81).

Real property means land, including land improvements, structures and appurtenances thereto, but excludes moveable machinery and equipment (2 CFR 200.85).

Software means programs, procedures, data, and routines used, accessed, and/or stored by computers.

Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity. It does not include payments to a subrecipient or payments to an individual that is a beneficiary of a federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract (2 CFR 200.92).

Subrecipient means a non-federal entity that receives a funds through a subaward from a pass-through entity to carry out part of a federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other federal awards directly from a federal awarding agency. (2 CFR 200.93)

Subscription refers to the regular remittance of pay for the licensed use of services, software, equipment, or property with a cost of \$5,000 or more per unit, or cumulative cost of \$5,000 within a twelve month period.

**Supplies** means all tangible personal property other than those described in Sec. 200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-federal entity for financial statement purposes or \$5,000, regardless of the length of its useful life. (2 CFR 200.94)

WDACS describes supplies as items that are consumed during the normal course of business, have a unit acquisition cost that is less than \$500, or less than \$300 if purchased under a Predecessor Agreement(s), are necessary for the subrecipient to effectively and efficiently to carry out objectives, tasks and activities of the program and are purchased with Subaward Sums and/or were acquired by Suprecipient under a Predecessor Agreement(s).

See Attachment 3- Exhibit S (Purchase, Inventory and Disposal Requirements for Fixed Assets, Non-Fixed Assets and Supplies) for specific program for further description/definition of terms.

## **POLICY AND PROCEDURES**

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WDACS requires all subrecipients to comply with the requirements set forth in these regulations for the management of all property purchased with contract funds. If there are specific Program guidelines governing purchases, inventory, maintenance and disposal of equipment, subrecipients shall adhere to the guidelines governing their Program.

### **PURCHASE OF PROPERTY:**

Subrecipients must request prior approval from WDACS for the purchase with contract funds of any property or licensing/subscription with a cost of \$5,000 or more per unit, or cumulative cost of \$5,000 for a twelve month period.

The following considerations must be made prior to requesting approval from WDACS. These considerations are also on the approval form attached to this Directive.

- Why is the purchase needed?
- Is this purchase reasonable?
- Have the best products been selected?
- What procurement method will be used?
- Was a lease option considered in lieu of the purchase?
- What other costs are associated with the purchase?
- If costs are shared, is there a cost sharing agreement between multiple partners that will share the cost of the purchase? If so, see "Cost Sharing Information" section below if costs are being shared.
- Does the County already provide the item, service, or software being considered for rent, purchase, or subscription?

Prior authorization is required for purchases that exceed \$5,000. Requests for approval must be forwarded to WDACS in accordance with administrative requirements.

#### **Cost Sharing Information**

When a subrecipient plans to enter into a "cost sharing" agreement for the purchase of property with a per unit (or cumulative cost for a twelve month period) purchase price of \$5,000 or more, the subrecipient must obtain prior approval no matter the portion it plans to contribute. See the definition of matching in the "Definitions" section of this directive.

#### **Vehicle Purchases and Maintenance:**

Vehicles purchased or leased for Program use must be registered to the Subrecipient with the County of Los Angeles named as the lienholder. The vehicle title (pinkslip) is maintained by the County Internal Services Department Fleet Management Division; and the subrecipient is required by WDACS Contracts Compliance and Program Management to maintain and operate the registered vehicles in accordance and compliance with the California Department of Motor Vehicles operation and standards, to include providing copies of documentation for smog certificates, maintenance records, and vehicle care to WDACS Internal Support Services Division.

#### **Leasing Considerations**

The decision to lease or buy personal property must be governed by considerations of economy. Consideration may differ by property type and according to market conditions. The length of the contract period of the lease should also be considered. Leasing with an option to purchase is generally preferable to straight leasing. However, for real property, administrative requirements make leasing the only option, as the construction or purchase of real property is not allowed except in certain limited circumstances. These limited circumstances are described in the "Capital Assets and Construction Costs" section of this directive.

#### **Prior Approval Process**

The following steps must occur for any property purchase, including software purchases, licenses, or subscriptions, with a cost of \$5,000 or more per unit or cumulative cost of \$5,000 for a twelve month period:

- Subrecipients must complete a 'Request for Approval to Purchase Property' (copy attached).

- Documentation describing item(s) to be purchased, leased, or subscribed to, as well as an explanation of functionality, must be submitted along with the request.
- If purchasing or subscribing software, documentation must be submitted detailing how the new software will deliver functionality not already provided by County.
- The completed form must be submitted to the Program Manager of the respective County-funded program.
- The Program Manager will review the request form and either approve or disapprove the request. If approved, it will be forwarded to the WDACS Contracts Management Division (CMD).
- If the request for purchase is \$5,000 or more, CMD will forward the request to the State funding source for final approval. When a response is received, the subrecipient will be notified by CMD of either approval or disapproval by the State funding source.

See Attachment 3-Exhibit S (Purchase, Inventory and Disposal Requirements for Fixed Assets, Non-Fixed Assets and Supplies) for specific program information on purchases.

### **Budget Plans**

Assets purchased by the subrecipient shall match the assets reported on the Budget. A subrecipient may occasionally submit budget plans that include an equipment request. The approval of the budget plan **DOES NOT** constitute approval of the equipment - request. A separate request to purchase equipment must be submitted for approval to WDACS prior to the time of purchase.

### **Capital Assets and Construction Costs**

WDACS prohibits the expenditure of its subaward funds on construction or purchase of facilities or buildings, except to provide physical and programmatic accessibility and reasonable accommodation as required by the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990.

### **INVENTORY CONTROL**

Subrecipients must maintain accurate inventory records of all equipment purchased with federal, State and County funds. **Equipment purchased with California Department of Aging (CDA) funds with an acquisition cost of \$500.00 must be inventoried. (See attachment 2 for detailed information.) Equipment purchased with WIOA funds with an acquisition cost of \$150.00 must be inventoried.** Further, a WDACS identification tag must be affixed to all applicable inventory in an area or space where the tag is visible or easily accessible to examine as part of the inventory process. A physical property inventory must be taken and reconciled with the property records at least once

every two years. The equipment records shall include the following information:

- A description of the equipment (computer, printer, desk, etc.);
- Manufacturer's serial number;
- Manufacturer's model number, federal stock number, if applicable, or other identification number (VIN);
- Funding Source of the equipment, including the subaward number;
- Percentage of federal participation in the cost of the property (cost allocation);
- Whether title vests with the County or subrecipient;
- Acquisition date;
- Per unit cost at acquisition;
- Location and use of the inventory;
- Condition of the equipment;
- Date the information was reported; and
- Disposition date, sale price, loss, theft, etc.

Annually, and no later than July 31, the subrecipient must submit a copy of the inventory displaying the above information to:

Workforce Development Aging, and Community Services  
Internal Support Services Division  
Asset Management Section  
First Floor  
3175 W. Sixth Street, Room 100  
Los Angeles, CA 90020

Failure to submit a property/equipment inventory form and tag program inventory as required, will result in contractual noncompliance. Noncompliance penalties include sanctioning, which consist of suspension or withholding of invoice payments and/or disallowed costs.

### **Protection of Subaward Property**

The subrecipient must, at a minimum, provide the equivalent insurance coverage for equipment acquired or improved with WDACS subaward funds as provided to property owned by the subrecipient.

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 reported to WDACS.

Adequate maintenance procedures must be in place to keep property and equipment in good condition.

### **Replacement of Equipment**

When acquiring replacement equipment, the subrecipient may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property. Any such changes must be documented and made available for review.

### **PROPERTY DISPOSAL:**

#### **Equipment**

For and all other inventory with a residual fair market value of \$5,000 or more, the subrecipient must request disposition instructions in writing from WDACS.

In the event property or equipment with a fair market value of less than \$5,000 is deemed salvage, a subrecipient may retain, sell or otherwise dispose of any of equipment and inventory upon approval from WDACS. Salvage is defined as property and equipment, including any fixed asset or portable item of equipment, purchased with federal, State, and/or County funds (program funds) which is obsolete, broken, a safety hazard, or otherwise no longer usable. The fair-market value of salvage equipment must be determined prior to disposal. Disposition record must be kept for any disposal transaction in accordance with record retention requirements. To request to dispose of salvage inventory or equipment, subrecipients must submit a request in writing that includes the following information:

1. Quantity
2. WDACS identification tag number
3. Purchase date
4. Purchase price
5. Item description
6. Serial number
7. Funding source

Disposal request should be forwarded to:

Workforce Development, Aging and Community Services  
Internal Support Services  
Clara Magana  
cmagana@wdacs.lacounty.gov  
3175 W. 6<sup>th</sup> Street  
Los Angeles, CA 90020



All inventory records (including purchase orders) must be retained for a minimum of three years from the date of acquisition through final disposition (salvage disposal) and be available for collection and/or viewing by WDACS monitors, if required. Additionally, all disposal records must be retained for a minimum of five years.

### **Supplies**

Title to supplies will vest in the suprecipient upon acquisition, unless there is a residual inventory of unused supplies exceeding \$5,000 in total aggregate value upon termination or completion of the project or program and the supplies are not needed for any other WDACS funded subaward, then the suprecipient must provide those supplies to WDACS.

### **Calculation of "Fair Market" Value**

The selling price of an item that is sold through auction, advertisement, or a dealer is the fair market value of the item regardless of any prior estimates. An item that is not sold but retained by the entity has a fair market value based on similar items that are offered for sale, using the selling price if known. Methods for determining fair market value include, but are not limited to:

- Auctions
- Classified advertisements for similar used items
- Dealers
- Licensed appraisers
- For automobiles, trucks, and vans, the standard authority on the value of used vehicles is the Kelley Blue Book.

### **Property Records Retention:**

Subrecipients shall make property records available for collection and/or viewing by Federal, State and County authorities upon request.

All property records must be maintained from the date of acquisition, through final disposition. The subrecipient must also retain these records for a period of five years from the date of their last expenditure report submitted to WDACS. If any litigation, claim, or audit is started before the expiration of the five-year period, all records must be retained until all findings have been resolved and final action taken. Subrecipients must also have maintenance procedures on file that detail how the equipment and inventory will remain in good operating order.

**ACTION:**

WDACS and its subrecipients shall follow this policy. This policy shall remain in effect until such time that a revision is required.

**INQUIRIES**

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Inquiries regarding this directive and the policies and procedures described herein should be directed to [ewolfe@wdacs.lacounty.gov](mailto:ewolfe@wdacs.lacounty.gov).



**Paul Goldman, Assistant Director  
Contracting Services Branch**

**Attachments:**

- #1 AAA Equipment Approval Process
- #2 Request for Approval to Purchase Property
- #3 CDA Equipment Disposal and Transfer

Attachment 1

**AAA Equipment Approval Process**

**METHOD 1: EQUIPMENT REQUEST SUBMITTED WITH BUDGET**

Upon review of budget/MPS, when Subrecipient reports equipment purchase, proceed as follows:

1. CMD forwards budget, which includes equipment purchase request, to Program Division
2. Program Division:
  - a. Reviews request
  - b. If additional clarification/justification is needed, Program Division will work directly with Subrecipient
  - c. Requests under \$500, are approved/denied by Program Division
  - d. Requests over \$500, are submitted to CDA for approval
3. Program Division notifies:
  - a. Subrecipient of approval/denial of equipment
  - b. CMD (including CMD Invoice Section), ISSD, FMD, and Budget Division of approval/denial of equipment
4. If approved:
  - a. CMD will:
    - i. Proceed with approval of budget/MPS
    - ii. Update GetCare to account for equipment purchase (i.e., reduce funding allocation)
    - iii. Obtain supporting documents (e.g., purchase order, invoice, receipt, etc.) from Subrecipient and forward to CMD Invoice Section
  - b. ISSD will complete inventory process (note: all purchases of computing devices regardless of cost including but not limited to workstations, servers, laptops, personal digital assistants, notebook computers, tablets, smartphones, and cell phones) and portable electronic storage media regardless of cost (including but not limited to thumb/flash drives, portable hard drives, etc.) shall be tagged)
5. If denied, CMD will request Subrecipient's revision of submitted budget/MPS documents

6. Invoice Processing
  - a. FMD will provide CMD Contract Analyst manual invoice
  - b. CMD will provide manual invoice to Subrecipient
  - c. Subrecipient shall submit completed invoice along with supporting documentation to CMD Invoice Section

## **METHOD 2: SPECIAL FUNDING EQUIPMENT REQUEST**

Upon receipt of additional funding (such as One-Time-Only), proceed as follows:

1. Budget Division notifies Program Division regarding additional funds and restrictions/options for use
2. Program Division:
  - a. Notifies/surveys Subrecipients
  - b. Obtains completed Equipment Request Form from Subrecipients who agree to accept funds/use for equipment
  - c. Reviews requests  
If additional clarification/justification is needed, Program Division will work directly with Subrecipient
  - e. Requests under \$500, are approved/denied by Program Division
  - f. Requests over \$500, are submitted to CDA for approval
3. Program Division:
  - a. Notifies Subrecipient of approval/denial of equipment
  - b. CMD (including CMD Invoice Section), ISSD, FMD, and Budget Division of approval/denial of equipment
4. If approved:
  - a. CMD will:
    - i. Proceed with amendment (including completion of new budget/MPS)
    - ii. Update GetCare to account for equipment purchase (i.e., reduce funding allocation)
    - iii. Obtain supporting documents (e.g., purchase order, invoice, receipt, etc.) from Subrecipient and forward to CMD Invoice Section
  - b. ISSD will complete inventory process (note: all purchases of computing devices regardless of cost including but not limited to workstations, servers, laptops, personal digital assistants, notebook computers, tablets, smartphones, and cell phones) and portable electronic storage media regardless of cost (including but not limited to thumb/flash drives, portable hard drives, etc.) shall be tagged)
5. If denied, Budget Division will re-allocate/re-distribute funds (if needed) then proceed with Step 2
6. Invoice Processing
  - a. FMD will provide CMD Contract Analyst manual invoice
  - b. CMD will provide manual invoice to Subrecipient
  - c. Subrecipient shall submit completed invoice along with supporting documentation to CMD Invoice Section

Attachment 2

**REQUEST FOR APPROVAL TO PURCHASE PROPERTY**

Date: \_\_\_\_\_

Subrecipient Name \_\_\_\_\_ Subaward No. \_\_\_\_\_

Fund Source(s) (DW, Youth, AAA) \_\_\_\_\_

Is there a cost sharing agreement with multiple partners?      Yes    No

For Shared Costs - % of Fund Source Share \_\_\_\_\_

Estimated Total Cost \_\_\_\_\_

Reason for Property Purchase. Is it necessary?

\_\_\_\_\_  
\_\_\_\_\_

Lease option considered in lieu of the purchase? Yes No If Leased,  
Describe Option

\_\_\_\_\_  
\_\_\_\_\_

Costs (Set Up, Installation, etc.) Associated With the Purchase

\_\_\_\_\_  
\_\_\_\_\_

Name and Address of Entity Where Property Will Be Located

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Authorized Subrecipient Representative

\_\_\_\_\_  
Signature

Not Approved – Reason: \_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Approved by Program Manager

\_\_\_\_\_  
Date

\_\_\_\_\_  
Approved by Contracts Manager

\_\_\_\_\_  
Date

## Attachment 3

### **CDA EQUIPMENT DISPOSAL AND TRANSFER**

In order to dispose or transfer any equipment purchased with California Department of Aging (CDA) funds with an acquisition value of \$500 or more (regardless of the year of purchase), the AAA contract agency (AAA C/A) needs to first obtain CDA approval.

The \$500 threshold refers to the purchase price, not the current fair market value of the equipment.

WDACS Asset Management (AM) is the point of contact for AAA C/A for equipment disposals or transfers.

Contact: Clara Magana at (213) 351-8977 or [cmagana@wdacs.lacounty.gov](mailto:cmagana@wdacs.lacounty.gov)

#### **EQUIPMENT DISPOSAL:**

**When an AAA C/A wants to dispose of equipment/vehicles, the following procedures should be adhered to:**

1. AAA C/A will forward to AM a completed CDA 248 Request to Dispose of Property form.
2. AM will review the CDA 248 form and forward it to the CDA.
3. If the CDA approves the CDA 248 they will forward the Property Survey Report (PSR) to AM.
4. AM will forward a disposal letter and the PSR to the AAA C/A.
5. The AAA C/A will follow the instructions on the disposal letter, dispose of the equipment, fill out the PSR and mail it to AM.
6. AM will adjust the status of the equipment to "disposed" and mail the PSR to the CDA.
7. When the CDA does not approve the disposal of the equipment they will notify AM.
8. AM will address the AAA C/A to correct the discrepancy if possible.
9. Once all issues have been resolved, AM will re-submit the CDA 248 or explanation letter to the CDA for approval. (Steps 3 thru 6 will be followed.)

Prior to disposal of equipment with storage capacity or memory, its hard drive must be removed and destroyed. The sanitation records should be maintained in contractor files.

AAA C/A must continue to request permission from WDACS and provide AM with documentation for equipment under \$500 by filling out a separate CDA 248. AM will review it, adjust the inventory data base and keep a copy of it for their records.

The trade-in, transfer, or donation of equipment must not occur without receiving prior approval from WDACS and CDA.

If equipment is to be donated, it can only be donated to a CDA authorized agency on the State of California Department of General Services (DGS) eligible donor list such as: public schools, community colleges, another State Agency or State Correctional Facility.

Do not list "good" equipment and "junk" equipment on the same CDA 248 form.

To locate an e-waste/recycling facility to dispose of equipment whose condition is "broken", "poor", or "junk," click on this link and follow the instructions:

<http://dtsc.ca.gov/>

Point to the tab **SAFEGUARDING COMMUNITIES**.

Select **E-Waste**

Under the **INTRODUCTION** section, on the bottom of the second paragraph:

Select **Find an e-waste handler or recycler in your county.**

Click on **Los Angeles County** on the map

You will see a list to choose from.

#### **EQUIPMENT TRANSFER:**

If an AAA C/A wants to transfer equipment in "good" condition, they must follow the same steps as for the disposals. With the exception that the AAA Program will try to locate an AAA C/A that is willing to use the "good" equipment prior to contacting the CDA.

Upon the CDA's approval, the AAA C/A can take possession of the equipment. AM will update the location change in the inventory data base and continue to track the equipment.

#### **Transfer of AAA Vehicles in "good" condition:**

1. The AAA C/A will complete the CDA 248 and will forward it to AM.
2. AM will notify the AAA Program who will try to locate an AAA C/A who can use the vehicle(s).

3. AM will forward the CDA 248 to the CDA to notify them of the pending transfer.
4. AM will obtain the hard copy of the vehicle's title from the agency in order to commence the vehicle transfer process.
5. In instances where the vehicle was purchased by the County, AM will obtain the hard copy of the title from the Internal Services Department's (ISD) Fleet Services Division.
6. Once AAA Program has confirmed an interested AAA A/C, they will notify AM. AM will notify the CDA of the interested agency.
7. Upon approval by the CDA, AM will contact the agency releasing the vehicle(s) and the agency receiving the vehicle(s) in order to obtain their signatures on the titles.
8. AM will forward the new vehicle titles to the new agency; cc: CMD, CCD, and AAA.
9. AAA Program will notify the new agency to take possession of the vehicle(s). AM will assign the vehicle(s) to the new agency in the inventory data base.

**AAA C/A's are not allowed to auction unwanted equipment or vehicles.**

The CDA will arrange to have vehicles inspected by the DGS Fleet and Asset Management Department to make a determination regarding vehicle disposition. If the Inspector requests the vehicle to be auctioned, it will need to be sent to DGS in Sacramento or Colton at the subrecipient's expense.

In instances where the CDA does not approve of the AAA C/A, the CDA will need to locate an agency to use the closing agency's inventory/vehicle(s). If it is not a WDACS AAA-contracted agency, AM will no longer track the equipment being transferred to the new agency.