



NEW RIVER/MOUNT ROGERS WORKFORCE DEVELOPMENT BOARD

CULTIVATING TALENT FOR THE REGION

PART ONE: POLICY CONSOLIDATION AND SUPERSESSION RESOLUTION

Effective January 1, 2026

The New River/Mount Rogers Workforce Development Board hereby adopts the following policy structure effective January 1, 2026:

1. Governance and Legal Compliance Manual
2. Financial Management and Procedures Manual
3. Programmatic Policies and Operations Manual

These manuals collectively replace, consolidate, and supersede all previously adopted standalone governance, fiscal, and programmatic policies, including but not limited to policies related to:

- Conflict of Interest
- Whistleblower and Fraud Reporting
- Equal Opportunity and Nondiscrimination
- Procurement
- Incentives
- Supportive Services
- Incumbent Worker Training
- On-the-Job Training
- Needs Related Payments
- Priority of Service
- Selective Service Registration
- Monitoring and Oversight
- Corrective Action

- Participant Records
- Performance Accountability
- Self-Sufficiency Wage
- Credential Attainment
- Grievance Procedures
- Any other previously adopted standalone fiscal or programmatic policy documents

All such prior policies are repealed effective January 1, 2026, and replaced in full by the adopted manuals.

The Infrastructure Funding Agreement and executed MOUs remain in effect as operational agreements and are not repealed by this resolution.

PART TWO: MASTER POLICY CROSSWALK AND GOVERNANCE MATRIX

TIER I – Governance and Legal Compliance

TIER II – Financial Management and Internal Controls

TIER III – Programmatic Operations

Effective January 1, 2026

TIER I – GOVERNANCE AND LEGAL COMPLIANCE MANUAL

Subject Area	Manual Section	Primary CFR Authority	Responsible Role	Oversight Role
Statutory Authority & Legal Framework	Section 1	WIOA §107, 20 CFR 679	Executive Director	Consortium Board
Board Roles & Delegation	Section 2	WIOA §107(d)	Board Chair	Consortium Board
Conflict of Interest	Section 3	WIOA §107(h); 2 CFR §200.112; §200.318(c)	Executive Director	Executive Committee
Code of Conduct	Section 3	2 CFR §200.303	Executive Director	Board
Whistleblower & Fraud Reporting	Section 4	2 CFR §200.113	Executive Director	Board Chair
Equal Opportunity & Civil Rights	Section 5	WIOA §188; 29 CFR Part 38	EO Officer	Executive Director
Grievance & Complaint Procedures	Section 5 & 4	29 CFR Part 38; WIOA §181(c)	EO Officer	Executive Director
Records Retention & Confidentiality	Section 6	2 CFR §200.334; §200.337	Executive Director	Board
PII Protection	Section 6	2 CFR §200.303; 29 CFR 38	Executive Director	Board
Internal Monitoring Framework	Section 7	2 CFR §200.303	Executive Director	Board

Subject Area	Manual Section	Primary CFR Authority	Responsible Role	Oversight Role
Subrecipient Oversight	Section 8	2 CFR §200.332	Executive Director	Board
Audit & Corrective Action	Section 9	2 CFR Subpart F	Executive Director	Board

TIER II – FINANCIAL MANAGEMENT AND PROCEDURES MANUAL

Subject Area	Section	Primary CFR Authority	Responsible Role	Oversight Role
Financial Management System	Part I	2 CFR §200.302	Finance Manager	Executive Director
Internal Controls	Part I	2 CFR §200.303	Executive Director	Board
Cost Allowability	Part I	2 CFR §§200.403–405	Finance Manager	Executive Director
Cash Management	Section 6	2 CFR §200.305	Fiscal Agent	Finance Manager
Revenue Recognition	Section 6	GAAP; 2 CFR §200.302	Fiscal Agent	Finance Manager
MEDR & CPS Controls	Section 6.14	2 CFR §200.302; §200.303	Fiscal Agent	Executive Director
Procurement Standards	Section 10	2 CFR §§200.317–327	Finance Manager	Executive Director
Micro-Purchase Threshold	Section 10	2 CFR §200.320	Finance Manager	Executive Director
Debarment & Suspension	Section 10	2 CFR Part 180	Finance Manager	Executive Director
Purchasing Cards	Section 8	2 CFR §200.303	Finance Manager	Executive Director
Payroll & Time Distribution	Section 9	2 CFR §200.430	Finance Manager	Executive Director
Equipment & Property	Section 11	2 CFR §200.313	Finance Manager	Executive Director
Match & Cost Share	Section 17	2 CFR §200.306	Accounting Technician	Finance Manager
Subrecipient vs Contractor	Section 15	2 CFR §200.331	Finance Manager	Executive Director

Subject Area	Section	Primary CFR Authority	Responsible Role	Oversight Role
Subrecipient Invoice Review	Section 5	2 CFR §200.332	Finance Manager	Executive Director
Audit & Monitoring Controls	Section 13	2 CFR Subpart F	Finance Manager	Executive Director
Fraud Prevention Controls	Section 14	2 CFR §200.303	Executive Director	Board

TIER III – PROGRAMMATIC POLICIES AND OPERATIONS MANUAL

Subject Area	Section	Primary CFR Authority	Responsible Role	Oversight Role
Eligibility Determination	Section 2 & 12	20 CFR 680; 681; WIOA §134	Program Manager	Executive Director
Priority of Service	Section 2	20 CFR 680.600	Program Manager	Executive Director
Selective Service	Section 2	WIOA §189(h)	Case Manager	Program Manager
Assessment	Section 3	20 CFR 681.420	Case Manager	Program Manager
Individual Service Strategy (ISS/IEP)	Section 3	20 CFR 681.420	Case Manager	Program Manager
Supportive Services	Section 5 & 15	20 CFR 680.900	Case Manager	Program Manager
Needs Related Payments	Section 5	20 CFR 680.930	Program Manager	Executive Director
Incentives	Section 5	20 CFR 681.640	Program Manager	Executive Director
Incumbent Worker Training	Section 4	20 CFR 680.780	Program Manager	Executive Director
On-the-Job Training	Section 4	20 CFR 680.700	Program Manager	Executive Director
Credential Attainment	Section 7	WIOA §116	Program Manager	Executive Director
Performance Accountability	Section 7 & 16	WIOA §116	Program Manager	Executive Director
Follow-Up Services	Section 6	20 CFR 680.150	Case Manager	Program Manager

Subject Area	Section	Primary CFR Authority	Responsible Role	Oversight Role
Youth Services	Section 11A	20 CFR 681	Youth Program Manager	Executive Director
YouthBuild	Section 11B	20 CFR 688	YouthBuild Director	Executive Director
Participant File Documentation	Section 13	2 CFR §200.303	Case Manager	Program Manager
Data Validation	Section 16	TEGL Guidance	Program Manager	Executive Director
One-Stop Integration	Section 9	WIOA §121	Executive Director	Board