NEW RIVER/MOUNT ROGERS WORKFORCE DEVELOPMENT BOARD

CULTIVATING TALENT FOR THE REGION

PROGRAMMATIC POLICIES AND OPERATIONS MANUAL

Effective Date: January 1, 2026

MANUAL PURPOSE, AUTHORITY, AND HIERARCHY STATEMENT

I. Purpose

The Programmatic Policies and Operations Manual establishes standardized procedures governing:

- Eligibility determination
- Participant assessment
- Individual service strategies
- Training and work-based learning
- Supportive services
- Incentives and needs-related payments
- Youth and Young Adult services
- Performance accountability
- Follow-up services
- Case file documentation
- Data validation

This manual ensures compliance with:

- WIOA Titles I and applicable sections
- 20 CFR Parts 679, 680, 681, and 688
- 2 CFR Part 200 (where applicable)

- Virginia Works guidance

II. Relationship to Governance and Financial Manuals

This manual functions as **Tier III** within the Board's governance structure.

It operates under:

- Governance authority established in Tier I
- Fiscal controls established in Tier II

All programmatic activities involving financial commitment must comply with:

Financial Management and Procedures Manual (Tier II).

III. Internal Control Integration

Programmatic approval does not authorize payment.

All participant-related financial actions require:

Programmatic Authorization (Tier III)

Fiscal Authorization (Tier II)

Accounting Execution (Fiscal Agent)

Oversight Review (Executive Director/Board)

This layered structure ensures compliance with 2 CFR §200.303.

IV. Supersession

This manual supersedes all prior standalone programmatic policies effective January 1, 2026.

PART I – PROGRAM GOVERNANCE AND COMPLIANCE FRAMEWORK

Establishes the policy authority, regulatory alignment, and compliance standards governing all workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board. This Part defines required standards for eligibility, service delivery, performance accountability, youth programming, system integration, and internal oversight.

SECTION 1 – Program Governance and Scope

Defines the legal authority of the Workforce Development Board to establish and oversee programmatic policy. Clarifies the relationship between the Consortium Board as legal grant recipient and the Workforce Development Board as policy and oversight authority. Establishes applicability of this Manual across all funding streams and cross-references Governance and Financial Manuals.

SECTION 2 – Eligibility and Enrollment Framework

Establishes uniform standards for eligibility determination, income verification, priority of service, selective service compliance, self-sufficiency determination, exception tracking, and enrollment controls. Prohibits retroactive enrollment and defines documentation requirements necessary to prevent disallowed costs.

SECTION 3 – Individual Service Strategy and Case Management

Defines requirements for objective assessment, development and periodic update of Individual Service Strategies, case note standards, participant file documentation, and internal file review. Establishes documentation standards necessary to support reported services and performance outcomes.

SECTION 4 – Training and Work-Based Learning

Establishes standards for occupational skills training, work experience, on-the-job training, incumbent worker training, employer agreements, and placement verification. Defines documentation, monitoring, and employer oversight requirements aligned with federal and state regulations.

SECTION 5 – Supportive Services and Participant Payments

Defines allowable supportive services, needs related payments, and incentives. Establishes documentation, approval routing, duplication-of-benefits safeguards, and cross-reference to fiscal controls. Ensures participant payments are reasonable, necessary, and fully documented prior to disbursement.

SECTION 6 – Follow-Up and Retention

Establishes structured follow-up requirements, exit determination standards, employment and education verification protocols, and retention support expectations. Aligns follow-up activities with federal performance indicators and reporting requirements.

SECTION 7 – Performance and Data Accountability

Defines measurable skill gains documentation standards, credential verification requirements, placement validation protocols, data entry controls, and internal data validation processes. Establishes safeguards to ensure performance reporting integrity and prevent unsupported outcomes.

SECTION 8 – Privacy and Confidentiality

Establishes standards for protection of personally identifiable information, electronic data security, file security, breach reporting, and compliance with nondiscrimination requirements. Defines access limitations and secure record handling procedures.

SECTION 9 – One-Stop Operator and Service Integration

Defines the structure and oversight of the One-Stop delivery system, including Operator selection, partner coordination, MOU requirements, infrastructure funding alignment, and system integration expectations. Clarifies Board oversight responsibilities.

SECTION 10 – Transfer of Funds (Programmatic Authority)

Defines Board authority and procedures for requesting and approving allowable transfers between funding streams. Establishes documentation requirements, strategic review standards, and fiscal coordination safeguards.

SECTION 11 – Youth Programs

Establishes governance standards for youth and young adult programming, including WIOA Youth and YouthBuild.

11A – Youth and Young Adult Services

Defines eligibility, required program elements, work experience expenditure tracking, youth-specific follow-up, and barrier documentation requirements.

11B – YouthBuild Program Manual

Incorporates the YouthBuild Program Policies and Operations Manual by reference. Establishes that YouthBuild operates under its own detailed operational framework and that YouthBuild-specific requirements govern where stricter than general program policy.

SECTION 1 – PROGRAM GOVERNANCE AND SCOPE

1.1 Purpose

This Programmatic Policies and Operations Manual establishes the governance, authority, oversight structure, and service delivery standards for all workforce programs administered under the jurisdiction of the New River/Mount Rogers Workforce Development Board.

This Manual defines uniform standards for:

- Program eligibility and enrollment
- Case management and service delivery
- Training and work-based learning
- Supportive services and participant payments
- Performance accountability
- Data integrity
- Program monitoring and oversight

This Manual applies to all programs operated or overseen by the Workforce Development Board, regardless of funding source, unless a funding agreement imposes stricter requirements.

Where federal or state law establishes more stringent requirements, the stricter standard shall apply.

1.2 Legal and Governance Structure

The New River/Mount Rogers Workforce Development Area Consortium Board serves as the Chief Local Elected Officials entity and the legal grant recipient for the local workforce development area.

The New River/Mount Rogers Workforce Development Board is appointed pursuant to the Workforce Innovation and Opportunity Act and is charged with establishing policy and exercising oversight of workforce programs within the local area.

In accordance with WIOA and applicable federal and state regulations, the Workforce Development Board is responsible for:

- Establishing local workforce policy

- Overseeing the One-Stop delivery system
- Ensuring program performance accountability
- Ensuring fiscal integrity and internal controls
- Selecting and overseeing the One-Stop Operator
- Monitoring service providers and subrecipients
- Ensuring compliance with federal and state law

This Manual represents official policy adopted and enforced by the Workforce Development Board.

1.3 Applicability

This Manual applies to all workforce development programs administered or overseen by the Workforce Development Board, including but not limited to:

- WIOA Title I Adult
- WIOA Title I Dislocated Worker
- WIOA Title I Youth
- YouthBuild
- State-funded workforce initiatives
- Appalachian Regional Commission workforce projects
- Discretionary federal grants
- Competitive grants
- Any program operating under Board authority

Subrecipients, contractors, partners, and service providers operating under Board oversight are required to comply with this Manual unless otherwise specified in written agreements.

1.4 Relationship to Other Governing Documents

This Programmatic Manual operates in coordination with:

- The Governance and Legal Compliance Manual
- The Financial Management and Procedures Manual

Programmatic policies govern service delivery standards.

All fiscal transactions, procurement actions, payroll, match tracking, cash management, and internal control requirements are governed exclusively by the Financial Management and Procedures Manual.

In the event of conflict regarding fiscal matters, the Financial Management and Procedures Manual shall control.

In the event of conflict regarding governance authority, the Governance and Legal Compliance Manual shall control.

1.5 Regulatory Authority

This Manual is developed in accordance with, and shall be interpreted consistent with:

- Workforce Innovation and Opportunity Act
- 2 CFR Part 200 (Uniform Guidance)
- Applicable federal awarding agency regulations
- YouthBuild regulations (where applicable)
- Jobs for Veterans Act (where applicable)
- 29 CFR Part 38 (Nondiscrimination)
- Virginia Works policy guidance
- Applicable state law

Programs funded through discretionary or competitive awards must comply with all terms and conditions of the specific Notice of Award.

1.6 Internal Control Alignment

All programmatic activities shall be conducted in accordance with internal control standards required under 2 CFR §200.303.

Program staff shall:

- Ensure services are allowable and documented
- Maintain segregation of duties where applicable
- Ensure performance data is supported by documentation
- Prevent retroactive enrollment

- Prevent unsupported payments
- Maintain audit-ready files

Failure to maintain required documentation may result in disallowed costs or performance disallowance.

1.7 One-Stop System Integration

The Workforce Development Board oversees the One-Stop delivery system within the local area.

Programs governed by this Manual shall:

- Coordinate with One-Stop partners
- Ensure co-enrollment when appropriate
- Avoid duplication of services
- Support integrated service delivery
- Align with regional workforce strategy

The One-Stop Operator shall perform coordination functions in accordance with applicable policy and procurement standards.

1.8 Equal Opportunity and Accessibility

All programs administered under this Manual shall operate in compliance with:

- WIOA Section 188
- 29 CFR Part 38
- Title VI of the Civil Rights Act
- Section 504 of the Rehabilitation Act
- Americans with Disabilities Act
- Age Discrimination Act
- Title IX

Programs shall:

- Provide equal opportunity in admission and participation

- Provide reasonable accommodations
- Provide language assistance for limited English proficiency individuals
- Maintain nondiscrimination documentation

Failure to comply may result in corrective action or funding sanctions.

1.9 Subrecipient and Contractor Compliance

Subrecipients and contractors providing program services under Board authority shall:

- Operate in accordance with this Manual
- Maintain documentation sufficient to withstand monitoring and audit
- Submit required reports timely
- Cooperate with monitoring and oversight activities

The Workforce Development Board reserves the right to impose corrective action for noncompliance.

1.10 Monitoring and Enforcement Authority

The Workforce Development Board, through its Executive Director and authorized staff, shall:

- Conduct periodic internal program reviews
- Monitor eligibility determinations
- Validate performance documentation
- Review case files
- Verify data integrity
- Issue corrective action where necessary

Failure to comply with this Manual may result in:

- Technical assistance
- Corrective action
- Special conditions
- Funding modification

- Contract termination

1.11 Policy Review and Amendment

This Manual shall be reviewed annually and updated as necessary to reflect:

- Federal regulatory changes
- Virginia Works guidance updates
- Grant-specific requirements
- Organizational restructuring

Interim updates may be issued when regulatory changes require immediate revision.

1.12 Supervisory Authority Clarification

For purposes of this Manual, supervisory review or approval shall mean review and approval by the Program Manager or formally designated designee assigned oversight responsibility. Delegation of supervisory authority must be documented in writing.

SECTION 2 – ELIGIBILITY, PRIORITY, AND ENROLLMENT FRAMEWORK

2.1 Purpose

This section establishes uniform standards governing eligibility determination, priority of service application, income verification, assessment requirements, and enrollment procedures for all workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board.

The purpose of this section is to:

- Prevent enrollment of ineligible individuals
- Ensure proper documentation prior to service delivery
- Protect against disallowed costs
- Ensure compliance with federal and state regulations
- Maintain consistency across funding streams

Eligibility must be fully verified and documented prior to enrollment unless otherwise expressly permitted by governing regulations.

2.2 General Eligibility Standards

Eligibility requirements vary by funding source. Program staff must determine eligibility based on the governing statute, regulation, Notice of Award, or state guidance applicable to the specific program.

At minimum, eligibility determinations shall:

- Be based on objective and verifiable documentation
- Be fully supported by source documentation
- Be reviewed prior to enrollment
- Be documented in the official case management system
- Be maintained in the participant file

Where multiple funding sources are used, eligibility must be established separately for each funding stream as required.

2.3 Age, Citizenship, and Work Authorization

Where applicable to the funding source, staff must verify:

- Age eligibility
- Authorization to work in the United States
- Compliance with applicable statutory requirements

Acceptable documentation may include:

- Birth certificate
- Government-issued identification
- Passport
- Employment authorization documentation
- Other verifiable official documents

Documentation must be retained in the participant file.

2.4 Income Determination (When Required)

For programs requiring income eligibility:

Income must be determined in accordance with:

- Federal poverty guidelines
- Lower Living Standard Income Level (LLSIL), where applicable
- Program-specific income rules

Income calculations must:

- Identify household size
- Identify income sources
- Identify applicable income period
- Be documented using acceptable verification

Acceptable documentation may include:

- Pay stubs
- Employer statements
- Public assistance documentation

- Unemployment compensation records
- Tax returns
- Self-attestation only where expressly allowed

Income calculation worksheets must be retained in the file.

2.5 Self-Sufficiency Determination (When Applicable)

For programs using self-sufficiency standards:

Self-Sufficiency Wage is defined as:

200 percent of the Federal Poverty Level adjusted for household size, or
The Virginia Non-Metro Lower Living Standard Income Level for the appropriate household size, whichever is higher.

Documentation must include:

- Household size verification
- Income verification
- Wage documentation (if employed)

Self-sufficiency determinations must be documented prior to service authorization.

2.6 Priority of Service (WIOA Adult Program)

When WIOA Adult funds are limited, priority of service shall be applied in accordance with federal and Virginia Works requirements.

Priority shall be given in the following order:

1. Veterans and eligible spouses who are:
   - Recipients of public assistance; or
   - Low-income; or
   - Basic skills deficient.
2. Non-veterans who are:
   - Recipients of public assistance; or
   - Low-income; or

    - Basic skills deficient.
3. Veterans and eligible spouses who do not meet the above criteria.
4. Local priority categories established by the Workforce Development Board.

Veterans priority applies at all priority levels.

Priority determinations must be documented in the participant file and case management system.

2.7 Selective Service Compliance

For programs requiring Selective Service compliance:

Males born on or after January 1, 1960 must be registered with the Selective Service System prior to enrollment, unless exempt.

For males age 26 or older:

- Documentation of registration; or
- Documentation of exemption; or
- Determination of non-knowing and non-willful failure to register

must be completed prior to enrollment.

Failure to properly document Selective Service compliance may result in disallowed costs.

2.8 Assessment Requirements

Prior to enrollment, participants must receive an objective assessment appropriate to the funding source.

Assessment may include:

- Basic skills testing
- Career interest inventories
- Work readiness evaluations
- Barrier identification
- Supportive service needs

Assessment results must inform the Individual Service Strategy.

Assessment documentation must be retained in the participant file.

2.9 Enrollment Procedures

Enrollment shall occur only after:

- All eligibility criteria have been verified
- Required documentation is collected
- Eligibility checklist is completed
- Required supervisory review is completed (if applicable)
- Participant signs required enrollment documentation
- Participant is entered into the official reporting system

The enrollment date is the date on which all requirements are met and recorded.

Services funded by the program may not be provided prior to official enrollment unless expressly allowed by governing regulations.

2.10 Prohibition on Retroactive Enrollment

Retroactive enrollment is strictly prohibited.

Eligibility documentation must exist and be approved on or before the enrollment date.

Post-enrollment documentation used to cure eligibility deficiencies is not permitted.

2.11 Exception Categories (When Applicable)

Where program regulations permit enrollment of individuals under exception categories:

- Exceptions must be documented
- Percentage limits must be tracked
- Approval must be documented prior to enrollment
- Exception usage must be monitored to prevent exceeding regulatory caps

Exception tracking logs shall be maintained and reviewed periodically.

2.12 Eligibility Review and Quality Assurance

Supervisory staff shall conduct periodic review of eligibility determinations to ensure:

- Documentation is complete
- Income calculations are accurate
- Priority is properly applied
- Selective Service compliance is documented
- No retroactive enrollment occurred

Findings shall be documented and corrective action implemented where necessary.

2.13 Documentation Standards

All eligibility documentation must be:

- Legible
- Complete
- Consistent
- Audit-ready
- Retained in accordance with record retention requirements

Incomplete documentation shall prohibit enrollment.

2.14 Monitoring and Enforcement

Failure to comply with eligibility and enrollment standards may result in:

- Disallowed costs
- Required repayment
- Corrective action
- Staff retraining
- Special monitoring conditions

The Workforce Development Board reserves the authority to suspend enrollment authority where repeated noncompliance is identified.

SECTION 3 – CASE MANAGEMENT AND INDIVIDUAL SERVICE STRATEGY FRAMEWORK

3.1 Purpose

This section establishes uniform standards for case management, participant file documentation, Individual Service Strategy development, service tracking, and internal quality assurance across all workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board.

The purpose of this section is to:

- Ensure services are properly documented
- Support performance outcomes with verifiable documentation
- Maintain audit-ready participant files
- Align service delivery with participant goals
- Protect against unsupported costs and performance disallowance

All case management activities must comply with applicable federal regulations, Virginia Works guidance, and internal control requirements.

3.2 Case Management Philosophy

Case management within the local workforce development area shall be:

- Participant-centered
- Goal-oriented
- Data-informed
- Barrier-responsive
- Documented in real time
- Aligned with career pathway development

Case management must demonstrate active engagement and meaningful service coordination, not passive documentation.

3.3 Participant File Requirements

A participant file shall be established for each enrolled individual.

Files may be maintained electronically, physically, or in hybrid format, provided that:

- Documentation is complete and organized
- Access is secure and limited to authorized staff
- Records are retrievable for monitoring and audit
- Documentation supports all reported data

3.4 Required File Components

At minimum, each participant file must contain:

A. Eligibility Documentation

All documents required under Section 2.

B. Enrollment Documentation

- Signed enrollment forms
- Enrollment date confirmation
- Reporting system entry confirmation

C. Assessment Documentation

- Objective assessment results
- Basic skills assessments (if applicable)
- Career interest assessments
- Barrier identification

D. Individual Service Strategy (ISS) or Individual Development Plan (IDP)

E. Service Documentation

- Training attendance
- Work-based learning documentation
- Supportive service documentation
- Incentive documentation (if applicable)

F. Case Notes

- Regular participant contact documentation

- Barrier resolution
- Progress toward goals
- Service coordination

G. Credential Documentation

- Copies of certificates
- Official transcripts
- Licensing verification

H. Placement Documentation

- Employment verification
- Education enrollment verification
- Apprenticeship documentation
- Military documentation (if applicable)

I. Follow-Up Documentation

- Follow-up contact records
- Retention verification
- Wage documentation (if applicable)

Files must be complete and audit-ready at all times.

3.5 Individual Service Strategy (ISS)

An Individual Service Strategy shall be developed after enrollment and based on objective assessment results.

The ISS must:

- Identify career goals
- Identify educational goals
- Identify occupational training pathway
- Identify supportive service needs
- Establish measurable milestones
- Be aligned with labor market demand

The ISS must be reviewed and updated periodically to reflect participant progress and changing circumstances.

Updates must be documented in case notes.

3.6 Case Notes Standards

Case notes must:

- Be entered timely
- Be factual and objective
- Reflect meaningful interaction
- Document services provided
- Document barriers and resolution steps
- Support reported performance outcomes

Case notes must demonstrate active case management, not merely data entry.

Case notes must never contain subjective or discriminatory language.

3.7 Documentation of Services

All services reported in official reporting systems must be supported by documentation in the participant file.

Examples include:

- Attendance sheets
- Instructor verification
- Signed training agreements
- Worksite agreements
- Supportive service approvals
- Payment authorizations

If documentation does not exist, the service may not be reported.

3.8 Work-Based Learning Documentation

For programs involving work experience, on-the-job training, or apprenticeship, the file must include:

- Worksite agreement
- Training outline
- Employer contact information
- Supervisor verification
- Attendance documentation
- Progress evaluations
- Case notes documenting monitoring

Worksite monitoring must be documented at regular intervals.

3.9 Data Entry Alignment

All data entered into the official reporting system must:

- Match file documentation
- Reflect accurate dates
- Reflect accurate service types
- Reflect accurate outcomes

Discrepancies between documentation and system entries must be corrected immediately.

3.10 Quality Assurance and Internal Review

Supervisory staff shall conduct periodic file reviews to ensure:

- Eligibility documentation is complete
- ISS is developed and updated
- Case notes are current
- Services are supported by documentation
- Credentials are verified
- Placement documentation is sufficient

File review findings must be documented.

Corrective action shall be implemented where deficiencies are identified.

3.11 Confidentiality and Protection of Information

Participant files contain personally identifiable information and must be protected in accordance with the Protection of Personal Identifiable Information policy.

Access shall be limited to authorized personnel.

Electronic systems must use role-based access controls.

3.12 Record Retention

Participant files shall be retained in accordance with:

- 2 CFR §200.334
- Virginia Works guidance
- Grant-specific retention requirements

Records must remain accessible for monitoring, audit, or investigation throughout the retention period.

3.13 Conflict of Interest Safeguards

Staff responsible for eligibility determination, supportive service approval, incentive authorization, or performance reporting must comply with conflict-of-interest policies.

No staff member may approve services that present a personal or financial conflict of interest.

3.14 Monitoring and Enforcement

Failure to maintain proper documentation may result in:

- Disallowed costs
- Performance disallowance
- Corrective action
- Staff retraining
- Increased monitoring

Repeated documentation deficiencies may result in suspension of enrollment authority.

SECTION 4 – TRAINING, WORK-BASED LEARNING, AND EMPLOYER SERVICES FRAMEWORK

4.1 Purpose

This section establishes standards governing occupational skills training, work-based learning activities, employer engagement, placement support, and related documentation requirements across all workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board.

The purpose of this section is to:

- Ensure training aligns with labor market demand
- Ensure work-based learning is structured and monitored
- Protect against unsupported employer payments
- Ensure employer agreements are documented
- Support placement and performance accountability
- Maintain compliance with federal and state regulations

All training-related expenditures are governed fiscally by the Financial Management and Procedures Manual.

4.2 Occupational Skills Training

Occupational skills training must:

- Align with in-demand occupations identified through labor market information
- Support attainment of industry-recognized credentials, where applicable
- Be consistent with participant career goals documented in the Individual Service Strategy
- Be delivered by qualified providers

Training may include:

- Classroom instruction
- Credential-based training
- Sector-based training
- Career pathway programs

- Postsecondary education programs
- Registered Apprenticeship

Documentation must include:

- Training provider agreement or approval
- Training plan or curriculum
- Attendance documentation
- Progress documentation
- Credential verification

4.3 Training Provider Selection

Training providers must be:

- Approved under applicable federal or state requirements (e.g., Eligible Training Provider List where required)
- Licensed or accredited where applicable
- In good standing with regulatory authorities

Provider selection must be documented.

Training costs must be reasonable and supported by invoices and payment documentation consistent with fiscal policy.

4.4 Work-Based Learning

Work-based learning may include:

- Work Experience
- On-the-Job Training
- Internships
- Job shadowing
- Apprenticeship
- Transitional employment

Work-based learning must:

- Be structured
- Be tied to participant career goals
- Include supervision
- Include measurable skill development
- Be documented

4.5 Work Experience Standards (Youth and Young Adult Programs)

Where work experience is provided:

- A written worksite agreement must be executed
- Roles and responsibilities must be defined
- Attendance must be documented
- Monitoring must occur at regular intervals
- Employability skills must be evaluated

Worksite documentation must include:

- Worksite agreement
- Supervisor contact information
- Job description
- Time sheets signed after pay period
- Progress evaluations
- Case notes documenting monitoring

Where a required percentage of funds must be spent on work experience, tracking must be documented and periodically reviewed.

4.6 On-the-Job Training (OJT)

On-the-Job Training contracts must:

- Be executed prior to training start date
- Define skills to be learned
- Define training duration

- Define reimbursement rate
- Include wage documentation
- Be supported by employer eligibility verification

OJT reimbursement must:

- Be based on actual wages paid
- Be supported by payroll documentation
- Comply with applicable reimbursement caps
- Follow fiscal controls in the Financial Manual

Employer monitoring must be documented.

4.7 Incumbent Worker Training (IWT)

Incumbent Worker Training must:

- Be designed to upgrade worker skills
- Improve employee retention
- Increase wage progression
- Support employer competitiveness

IWT agreements must:

- Define employer contribution requirements
- Document wage levels
- Document training outcomes
- Be executed prior to training

Employer cost-share documentation must be retained.

4.8 Employer Eligibility and Verification

Prior to executing training agreements, staff must verify:

- Employer legitimacy
- Employer standing with state agencies

- Employer tax identification
- No debarment or suspension status
- Compliance with nondiscrimination requirements

SAM.gov verification must be conducted where applicable.

Verification must be documented.

4.9 Placement and Employment Services

Placement services may include:

- Job matching
- Resume assistance
- Interview preparation
- Direct employer referral
- Apprenticeship placement

Placement must:

- Align with participant career pathway
- Be documented in case notes
- Be verified through acceptable documentation

Acceptable employment verification includes:

- State wage records
- Employer verification
- Pay stubs
- Offer letters
- Supplemental wage documentation where permitted

Self-attestation may only be used when permitted and must be justified in writing.

4.10 Performance Alignment

Training and work-based learning activities must support:

- Measurable Skill Gains
- Credential attainment
- Placement in employment or education
- Wage progression

Performance outcomes must be supported by documentation in the participant file.

4.11 Monitoring and Oversight

Supervisory staff shall periodically review:

- Employer agreements
- OJT contracts
- Worksite agreements
- Incumbent Worker agreements
- Attendance documentation
- Payroll reimbursement documentation
- Placement verification

Monitoring shall ensure:

- Agreements are executed prior to service
- Documentation supports payments
- Training aligns with career goals
- No unsupported employer payments exist

4.12 Conflict of Interest Safeguards

Staff shall not:

- Approve training agreements for employers with whom they have personal financial interest
- Authorize payments without documentation
- Engage in self-dealing

All employer engagement must comply with conflict-of-interest policies.

4.13 Enforcement and Corrective Action

Failure to comply with training and employer service standards may result in:

- Disallowed costs
- Reimbursement recovery
- Contract termination
- Corrective action
- Suspension of employer agreements

The Workforce Development Board reserves the authority to suspend training agreements where noncompliance is identified.

SECTION 5 – SUPPORTIVE SERVICES, NEEDS RELATED PAYMENTS, AND INCENTIVES

5.1 Purpose

This section establishes uniform standards governing the approval, documentation, and oversight of supportive services, needs related payments, and participant incentives across all workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board.

The purpose of this section is to:

- Ensure services are necessary and reasonable
- Ensure costs are allowable under 2 CFR Part 200
- Ensure payments are supported by documentation
- Prevent duplication of benefits
- Protect against fraud, waste, and abuse
- Align programmatic authorization with fiscal controls

All payments and disbursements are governed by the Financial Management and Procedures Manual. Nothing in this section authorizes payment inconsistent with that Manual.

5.2 General Standards for Participant Financial Assistance

Participant financial assistance may only be provided when:

- The individual is officially enrolled in the applicable program
- The need is documented in the Individual Service Strategy or case notes
- The service is necessary to enable participation
- The cost is reasonable and allowable
- Funds are available within program budget
- The service is approved prior to obligation

Participant assistance is not an entitlement and may be limited based on funding availability.

5.3 Supportive Services

Supportive services are services necessary to enable participation in education, training, or employment activities.

Examples may include:

- Transportation assistance
- Childcare
- Required tools or uniforms
- Testing and licensing fees
- Required books and training materials
- Housing-related emergency assistance
- Other services determined necessary for participation

Supportive services must:

- Be directly linked to participation
- Be documented prior to payment
- Not duplicate services available through other resources

Where alternative resources are available, referral should be considered prior to expenditure of program funds.

5.4 Documentation Requirements for Supportive Services

Each supportive service must include:

- Documented statement of need or case note justification
- Description of service provided
- Cost documentation (invoice, bill, quote, etc.)
- Approval by authorized staff
- Proof of payment
- Confirmation of receipt when applicable

Vendor payments should be made directly whenever possible.

Cash payments to participants should be avoided unless expressly permitted and documented.

All documentation must be retained in the participant file and fiscal records.

5.5 Needs Related Payments (Where Applicable)

Needs Related Payments may be provided in programs where authorized by statute or regulation.

Needs Related Payments must:

- Be allowable under the governing funding source
- Be tied to active participation in training
- Be calculated using documented eligibility standards
- Be supported by attendance verification

Eligibility for Needs Related Payments must be documented prior to issuance.

Payment calculations must be retained in the participant file.

5.6 Incentives

Incentives may be provided to participants when permitted by the funding source.

Incentives must:

- Be tied to achievement of specific milestones
- Be aligned with performance goals
- Not be tied to entitlement
- Be consistent across participants
- Be documented and approved prior to payment

Incentives may include recognition for:

- Credential attainment
- Attendance benchmarks
- Academic achievement
- Training completion

Incentives must not be used to induce participation in a manner inconsistent with federal guidance.

5.7 Prohibited Uses

Participant financial assistance may not be used for:

- Non-program-related expenses
- Entertainment
- Fines or penalties
- Non-essential luxury items
- Services not directly linked to participation
- Duplicate benefits

Any questionable expenditure must be reviewed prior to authorization.

5.8 Approval and Segregation of Duties

Supportive services, needs related payments, and incentives must follow layered approval controls:

1. Case manager documents need
2. Program Manager reviews and approves
3. Fiscal staff verify documentation and budget availability
4. Fiscal Agent processes payment

No single individual may authorize, process, and reconcile the same transaction.

All payment processing must comply with segregation-of-duties standards established in the Financial Management and Procedures Manual.

5.9 Limits and Caps

The Workforce Development Board may establish internal limits on:

- Maximum assistance per participant
- Frequency of payments
- Types of allowable services

Such limits must be applied consistently and documented in internal operating procedures.

5.10 Fraud Prevention

Staff shall:

- Verify authenticity of invoices
- Confirm vendor legitimacy when appropriate
- Avoid conflicts of interest
- Report suspected fraud immediately

Suspected fraud must be reported in accordance with organizational fraud reporting policies.

Failure to report suspected fraud may result in disciplinary action.

5.11 Monitoring and Quality Assurance

Supervisory staff shall periodically review:

- Supportive service documentation
- Needs related payment calculations
- Incentive approvals
- Alignment between documentation and payments
- Budget sustainability

Unsupported payments must be corrected promptly.

Repeated documentation deficiencies may result in corrective action.

5.12 Record Retention

All documentation related to participant financial assistance must be retained in accordance with:

- 2 CFR §200.334
- Virginia Works guidance
- Grant-specific requirements

Records must remain available for monitoring and audit.

SECTION 6 – FOLLOW-UP AND RETENTION SERVICES FRAMEWORK

6.1 Purpose

This section establishes uniform standards governing post-exit follow-up services, retention support, employment and education verification, and documentation requirements for all workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board.

The purpose of this section is to:

- Support participant retention in employment or education
- Promote wage progression and career advancement
- Ensure accurate performance reporting
- Maintain compliance with federal accountability standards
- Protect against performance disallowance

Follow-up is a structured service component and not solely an outcome verification activity.

6.2 Applicability

Follow-up services shall be provided in accordance with the requirements of the governing funding source.

Where required by statute or regulation (e.g., WIOA Youth, YouthBuild), follow-up must be provided for a minimum of twelve (12) months after exit.

Where follow-up is optional (e.g., certain Adult or Dislocated Worker programs), services may be provided as appropriate and must be documented if delivered.

Where multiple funding sources apply, the stricter standard shall govern.

6.3 Exit Determination

A participant shall be considered exited in accordance with federal reporting guidance when:

- No services have been provided for the defined no-service period; and
- No future services are scheduled; and
- No documented plan exists to resume services.

The Program Manager, or designee, shall review and confirm exit status prior to entry into the official reporting system.

Reasonable re-engagement efforts must be made prior to confirming exit. These efforts must be documented in case notes.

The exit date must be accurately entered and supported by documentation.

6.4 Purpose of Follow-Up Services

Follow-up services are intended to:

- Support retention in employment
- Support continued enrollment in education or training
- Address workplace challenges
- Assist with career progression
- Provide supportive service referrals when appropriate
- Verify performance outcomes

Follow-up must demonstrate meaningful engagement.

6.5 Types of Follow-Up Services

Follow-up services may include:

- Regular contact via phone, email, text, or in-person meeting
- Employment retention counseling
- Career advancement guidance
- Referral to supportive services
- Connection to community resources
- Assistance resolving workplace or academic barriers
- Verification of employment and wages
- Verification of credential attainment after exit

Follow-up services must be individualized based on participant needs.

6.6 Frequency of Contact

For programs requiring twelve (12) months of follow-up:

- Contact must occur at regular intervals throughout the twelve-month period
- Quarterly documentation is required at minimum for performance verification
- Additional contact may occur based on participant need

For programs where follow-up is optional, frequency shall be determined by program guidelines but must be documented.

All contact attempts must be documented, even if unsuccessful.

6.7 Employment and Education Verification

Performance outcomes during follow-up must be supported by documentation.

Acceptable employment verification may include:

- State wage record data (primary source)
- Employer verification form
- Pay stubs
- Offer letter
- Supplemental wage documentation
- Documented employer contact

Acceptable education verification may include:

- Enrollment confirmation
- Transcript
- Registration documentation
- Institutional verification

Self-attestation may only be used when permitted under federal guidance and must be documented and justified.

6.8 Credential Attainment After Exit

If a credential is earned after exit but within the allowable reporting window:

- Documentation must be obtained
- Entry must be made into the reporting system
- Case notes must reflect the update
- The credential must align with training received

Failure to document credentials properly may result in performance disallowance.

6.9 Loss of Contact

If a participant becomes unresponsive:

- Multiple contact attempts must be made using available contact methods
- Alternate contact information should be utilized if available
- All attempts must be documented

Loss of contact does not eliminate the obligation to attempt follow-up for the required duration.

6.10 Data Entry and Alignment

Follow-up documentation must:

- Match case notes
- Be entered timely into the official reporting system
- Reflect accurate dates
- Reflect accurate employment or education status

Data discrepancies must be corrected immediately.

6.11 Internal Monitoring

Supervisory staff shall conduct periodic review of follow-up documentation to ensure:

- Required follow-up duration is met
- Contacts are documented
- Employment verification is supported
- Wage documentation is accurate

- Reporting system entries align with file documentation

Deficiencies must be documented and corrected.

6.12 Alumni Engagement (Post-Follow-Up)

Upon completion of required follow-up, former participants may be engaged as alumni.

Alumni engagement may include:

- Peer mentoring
- Recruitment events
- Leadership speaking opportunities
- Career networking events
- Community engagement

Alumni engagement activities do not constitute reportable services unless authorized under specific program rules.

6.13 Enforcement and Corrective Action

Failure to properly document follow-up services may result in:

- Performance disallowance
- Monitoring findings
- Corrective action
- Staff retraining
- Increased oversight

Repeated failure to maintain proper follow-up documentation may result in suspension of enrollment authority.

SECTION 7 – PERFORMANCE ACCOUNTABILITY AND DATA INTEGRITY

7.1 Purpose

This section establishes uniform standards governing performance accountability, measurable skill gains, credential attainment, placement verification, data validation, and reporting integrity for all workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board.

The purpose of this section is to:

- Ensure performance outcomes are supported by documentation
- Maintain accuracy of reported data
- Protect against performance disallowance
- Align services with negotiated targets
- Demonstrate internal control over performance reporting

Performance reporting must comply with federal regulations, grant-specific requirements, and Virginia Works guidance.

7.2 Performance Accountability Framework

Programs shall align service delivery with applicable performance indicators, which may include:

- Measurable Skill Gains (MSG)
- Credential Attainment
- Employment in the 2nd Quarter after Exit
- Employment in the 4th Quarter after Exit
- Median Earnings
- Effectiveness in Serving Employers
- Grant-specific performance measures

Where federal or state negotiated targets exist, program operations must align with achievement of those targets.

7.3 Measurable Skill Gains (MSG)

Measurable Skill Gains must be documented in accordance with federal definitions.

Allowable MSG types may include:

- Educational functioning level gain
- Secondary school diploma or equivalent attainment
- Postsecondary transcript progress
- Satisfactory progress toward training milestones
- Skills progression tied to occupational training

Each MSG reported must:

- Occur within the program year being reported
- Be supported by source documentation
- Be entered into the official reporting system timely
- Be verified during internal review

Unsupported MSG entries are prohibited.

7.4 Credential Attainment

Credentials reported must:

- Be industry-recognized or postsecondary-recognized
- Be aligned with the participant's training pathway
- Be supported by official documentation

Acceptable documentation includes:

- Credential certificates
- Official transcripts
- Licensing verification
- State registry confirmation

Credentials that do not meet federal definitions shall not be reported.

Copies of credentials must be retained in the participant file.

7.5 Placement Verification

Placement outcomes must be verified through acceptable documentation.

Primary source:

- State wage record data (where available)

Secondary or supplemental sources:

- Employer verification
- Pay stubs
- Offer letter
- Apprenticeship registration confirmation
- Postsecondary enrollment verification

Self-attestation may only be used when permitted and must include justification.

No placement may be reported without documentation.

7.6 Data Entry Timeliness

All performance data must be entered:

- Within required reporting timelines
- Consistent with case file documentation
- Without backdating
- Without unsupported assumptions

Delayed entry that compromises data accuracy is prohibited.

7.7 Data Validation and Internal Controls

In accordance with 2 CFR §200.303, the Workforce Development Board shall maintain internal controls over performance reporting.

Internal controls shall include:

- Periodic file review
- Documentation verification prior to outcome entry
- Cross-check of system data with source documentation

- Supervisory review of high-impact outcomes
- Removal or correction of unsupported data

Performance data must be audit-ready at all times.

7.8 Data Integrity Standards

Data entered into official reporting systems must:

- Match case file documentation
- Reflect accurate service start and end dates
- Reflect accurate enrollment and exit dates
- Reflect accurate credential types
- Reflect accurate wage information

Data discrepancies must be corrected promptly.

7.9 Global Exclusions (Where Applicable)

Where federal regulations permit global exclusions:

- Exclusions must be documented
- Supporting documentation must be retained
- Duration and justification must be recorded
- Exclusions must comply with applicable reporting rules

Improper use of exclusions is prohibited.

7.10 Staff Training and Accountability

Staff responsible for data entry and reporting shall:

- Receive training on performance definitions
- Receive training on reporting timelines
- Understand documentation standards
- Understand consequences of inaccurate reporting

Submission of knowingly inaccurate data is prohibited and may result in disciplinary action.

7.11 Monitoring and Performance Review

Supervisory staff shall conduct periodic performance reviews that may include:

- Review of MSG documentation
- Credential verification review
- Placement documentation review
- Data system cross-check
- Comparison of actual performance against targets

Findings shall be documented and corrective action implemented when necessary.

7.12 Corrective Action

Failure to comply with performance and data integrity standards may result in:

- Data correction
- Removal of unsupported outcomes
- Corrective action plan
- Staff retraining
- Increased monitoring
- Referral under fraud reporting procedures, if warranted

7.13 Alignment with Financial Controls

Performance outcomes tied to financial expenditures must align with fiscal documentation.

Training expenditures, supportive services, incentives, and employer payments must correspond to documented services and outcomes.

Unsupported services or outcomes may result in disallowed costs.

SECTION 8 – PRIVACY, CONFIDENTIALITY, AND RECORDS PROTECTION

8.1 Purpose

This section establishes uniform standards for the protection, confidentiality, storage, transmission, and destruction of personally identifiable information and participant records for all workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board.

The purpose of this section is to:

- Protect participant privacy
- Safeguard sensitive information
- Prevent unauthorized disclosure
- Maintain compliance with federal and state regulations
- Support audit and monitoring requirements

All staff, contractors, subrecipients, and partners with access to participant information must comply with this section.

8.2 Definition of Personally Identifiable Information

Personally Identifiable Information includes any information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal information.

Examples include:

- Social Security number
- Date of birth
- Driver's license number
- Passport number
- Financial account numbers
- Medical information
- Disability status
- Address and contact information
- Education records

- Wage records

Sensitive information must be handled with the highest level of care.

8.3 Confidentiality Requirements

Participant information shall:

- Be used solely for authorized program purposes
- Not be disclosed without legal authority
- Not be shared with unauthorized individuals
- Be discussed only in private settings
- Be transmitted securely

Access to participant records shall be limited to staff whose job responsibilities require such access.

8.4 Electronic Data Security

Electronic systems containing participant data must:

- Utilize password-protected access
- Employ role-based access controls
- Require secure authentication
- Be maintained on secure networks
- Be protected by current security software

Staff shall not:

- Share login credentials
- Store sensitive information on unsecured devices
- Use public or unsecured Wi-Fi for accessing sensitive data without protection
- Transmit PII through unsecured email systems

Portable storage devices containing PII are strongly discouraged and must be encrypted if used.

8.5 Physical File Security

If physical participant files are maintained:

- Files must be stored in locked cabinets
- Access must be restricted to authorized staff
- Files must not be left unattended in public areas
- Files must not be removed from secure offices without authorization

Workspaces must be secured at the end of each workday.

8.6 Data Transmission

When transmitting participant information:

- Secure file transfer systems should be used whenever possible
- Sensitive information must be encrypted when required
- Fax transmission of PII should be avoided unless secure
- Email containing PII must follow organizational encryption standards

Staff must verify recipient identity prior to transmission.

8.7 Data Sharing and Partner Access

Participant information may be shared with:

- Authorized One-Stop partners
- Subrecipients
- Contractors
- State or federal oversight agencies

Sharing must:

- Be limited to what is necessary
- Be authorized by law or agreement
- Comply with nondisclosure requirements
- Be documented when appropriate

Data-sharing agreements must include confidentiality provisions.

8.8 Breach Response

If a potential breach of confidential information occurs:

- The incident must be reported immediately to the Executive Director
- Steps must be taken to secure the affected information
- An internal review must be initiated
- Virginia Works or the appropriate funding agency must be notified when required
- Corrective action must be implemented

Failure to report suspected breaches may result in disciplinary action.

8.9 Confidential Information and Nondiscrimination

Information related to disability, medical condition, accommodation, or protected status must:

- Be stored separately where required
- Be accessed only by authorized personnel
- Not be used in discriminatory decision-making

All staff must comply with nondiscrimination regulations including 29 CFR Part 38.

8.10 Record Retention

Participant records shall be retained in accordance with:

- 2 CFR §200.334
- Virginia Works guidance
- Grant-specific retention requirements

Records must remain accessible for monitoring, audit, investigation, or litigation throughout the retention period.

8.11 Secure Destruction

Upon expiration of the retention period:

- Paper records must be shredded
- Electronic records must be permanently deleted
- Destruction must prevent reconstruction of sensitive information

Destruction procedures must comply with organizational standards.

8.12 Staff Training

Staff with access to participant information shall:

- Receive training on confidentiality standards
- Receive training on data security
- Understand breach reporting requirements
- Acknowledge responsibility for safeguarding information

Failure to comply with confidentiality standards may result in disciplinary action.

8.13 Monitoring and Enforcement

Supervisory staff shall periodically review:

- File security practices
- Electronic access controls
- Data transmission practices
- Compliance with confidentiality standards

Violations may result in:

- Corrective action
- Disciplinary action
- Reporting under fraud or misconduct procedures

SECTION 9 – ONE-STOP OPERATOR AND SYSTEM INTEGRATION

9.1 Purpose

This section establishes standards governing the One-Stop delivery system, the role and oversight of the One-Stop Operator, system coordination requirements, and integration of workforce services within the New River/Mount Rogers Workforce Development Area.

The purpose of this section is to:

- Ensure compliance with WIOA system requirements
- Clarify the distinction between system coordination and service delivery
- Establish oversight and accountability standards
- Promote integrated service delivery
- Prevent conflicts of interest

9.2 One-Stop Delivery System Overview

The Workforce Development Board oversees a comprehensive One-Stop delivery system designed to provide:

- Access to career services
- Access to training services
- Employer services
- Access to required and additional partner programs
- Integrated referral processes

The system shall promote coordination, co-enrollment where appropriate, and efficient use of resources.

9.3 Authority of the Workforce Development Board

The Workforce Development Board shall:

- Select the One-Stop Operator through a competitive process
- Establish system-level policies
- Oversee system performance

- Monitor compliance with integration requirements
- Approve Memoranda of Understanding with partners
- Ensure infrastructure funding agreements are executed
- Prevent conflicts of interest in system operations

The Board retains oversight authority even when operational functions are delegated.

9.4 Role of the One-Stop Operator

The One-Stop Operator shall:

- Coordinate daily system operations
- Facilitate partner collaboration
- Implement Board-established policies
- Promote integrated service delivery
- Convene partner meetings
- Support continuous improvement

The One-Stop Operator shall not directly provide career services unless permitted under procurement and conflict-of-interest standards.

9.5 Competitive Selection Requirements

The One-Stop Operator must be selected through a competitive procurement process consistent with federal procurement standards.

Selection documentation must include:

- Public notice of solicitation
- Evaluation criteria
- Proposal review documentation
- Conflict-of-interest disclosures
- Contract execution documentation

Procurement standards are governed by the Financial Management and Procedures Manual.

9.6 Memoranda of Understanding and Infrastructure Funding

The Workforce Development Board shall execute Memoranda of Understanding (MOUs) with required and additional One-Stop partners.

MOUs shall:

- Define partner roles and responsibilities
- Establish service coordination protocols
- Define infrastructure funding contributions
- Outline cost allocation methodology

Infrastructure Funding Agreements shall be documented and retained.

Fiscal aspects of infrastructure funding are governed by the Financial Management and Procedures Manual.

9.7 Partner Integration and Co-Enrollment

Programs operating within the One-Stop system shall:

- Coordinate services with required partners
- Avoid duplication of services
- Promote co-enrollment where appropriate
- Support unified intake where feasible

Referrals must be documented in case notes or system records.

9.8 Accessibility and Equal Opportunity

The One-Stop system shall:

- Be physically accessible
- Be programmatically accessible
- Provide reasonable accommodations
- Provide language assistance where required
- Display Equal Opportunity notices

Accessibility compliance must align with nondiscrimination requirements established in the Governance and Legal Compliance Manual.

9.9 Monitoring and Oversight

The Workforce Development Board shall periodically review:

- One-Stop Operator performance
- Partner coordination effectiveness
- Compliance with MOUs
- Accessibility compliance
- Customer service quality
- Employer engagement metrics

Monitoring findings shall be documented and corrective action implemented where necessary.

9.10 Conflict of Interest Safeguards

The One-Stop Operator and partner agencies must comply with conflict-of-interest standards.

The Operator may not:

- Influence procurement decisions in which it has financial interest
- Approve its own funding decisions
- Engage in self-dealing

Conflicts must be disclosed and managed in accordance with governance policies.

9.11 Continuous Improvement

The One-Stop system shall engage in ongoing evaluation and improvement efforts, including:

- Performance analysis
- Customer feedback
- Employer feedback

- System redesign where necessary
- Partner collaboration review

Improvements shall be documented and implemented where feasible.

SECTION 10 – TRANSFER OF FUNDS AND PROGRAM AUTHORITY

10.1 Purpose

This section establishes standards governing the transfer of funds between allowable funding streams and clarifies the authority of the Workforce Development Board to request, approve, and document such transfers.

The purpose of this section is to:

- Ensure compliance with statutory transfer limits
- Maintain transparency in funding allocation decisions
- Align financial decisions with service delivery needs
- Protect against unauthorized fund movement
- Ensure proper documentation and oversight

Fiscal execution of transfers is governed by the Financial Management and Procedures Manual.

10.2 Authority to Transfer Funds

Where permitted by federal or state regulations, the Workforce Development Board may request transfer of funds between eligible funding streams to:

- Address service demand fluctuations
- Support priority populations
- Prevent lapse of funds
- Align funding with regional labor market needs
- Respond to economic conditions

Transfers may only occur when expressly permitted by statute and Virginia Works guidance.

10.3 Transfer Limits

Transfers between WIOA Adult and Dislocated Worker funding streams shall not exceed statutory percentage limits in effect at the time of transfer.

The applicable limit shall be determined based on:

- Federal statute
- Federal regulation
- Virginia Works guidance

The stricter limit shall govern.

10.4 Transfer Approval Process

Prior to transfer:

1. Program Manager shall assess service demand and funding utilization.
2. Finance Manager shall evaluate budget impact and administrative cost implications.
3. Executive Director shall review and approve recommendation.
4. Workforce Development Board shall formally approve the transfer.
5. Required documentation shall be submitted to Virginia Works for approval, when required.

No transfer shall occur without documented Board approval.

10.5 Documentation Requirements

Transfer documentation must include:

- Justification for transfer
- Current expenditure and obligation analysis
- Projected service demand
- Impact on performance targets
- Administrative cap review
- Board meeting minutes reflecting approval
- Virginia Works approval, if required

All documentation must be retained in accordance with record retention requirements.

10.6 Programmatic Impact Review

Prior to approval, the Workforce Development Board shall evaluate:

- Impact on priority populations
- Impact on performance outcomes
- Impact on ongoing training commitments
- Impact on administrative funding
- Risk of service disruption

Transfers must support strategic service delivery, not short-term budget balancing alone.

10.7 Fiscal Execution

Once approved:

- The Finance Manager shall coordinate with the Fiscal Agent.
- Adjustments shall be made in the accounting system.
- Obligation tracking spreadsheets shall be updated.
- Administrative cap calculations shall be recalculated.
- Budget monitoring reports shall reflect the revised allocation.

Fiscal controls governing transfer execution are detailed in the Financial Management and Procedures Manual.

10.8 Monitoring and Oversight

Supervisory staff shall:

- Review post-transfer expenditure trends
- Monitor performance impact
- Ensure transfer does not create over-obligation risk
- Confirm administrative cap compliance

Improper or undocumented transfers may result in corrective action or funding findings.

10.9 Restrictions

Transfers shall not be used to:

- Circumvent performance accountability

- Avoid compliance with priority of service
- Mask program underperformance
- Exceed administrative cost caps
- Support activities not authorized under statute

10.10 Enforcement

Failure to follow transfer procedures may result in:

- Funding disallowance
- Required repayment
- Corrective action
- Increased monitoring
- Limitation of Board authority

SECTION 11 – YOUTH PROGRAMS AND YOUTHBUILD

11.1 Purpose

This section establishes standards governing youth and young adult workforce programming administered or overseen by the New River/Mount Rogers Workforce Development Board, including WIOA Youth services and YouthBuild.

Youth programs shall operate in accordance with:

- Workforce Innovation and Opportunity Act
- YouthBuild statutory and regulatory requirements
- Applicable federal and state guidance
- Grant-specific Notice of Award requirements

Where YouthBuild or other discretionary grants impose stricter requirements, the stricter standard shall apply.

11A – YOUTH AND YOUNG ADULT SERVICES FRAMEWORK

11A.1 Scope

Youth and young adult services may include:

- WIOA Youth (In-School and Out-of-School)
- State-funded youth initiatives
- Discretionary youth grants
- Young adult workforce programs

All youth services must align with career pathway development and labor market demand.

11A.2 Youth Eligibility

Youth eligibility must be determined in accordance with:

- Age requirements
- Income eligibility (where applicable)
- Barrier categories
- School status

- Selective Service requirements (when applicable)

Eligibility must be fully documented prior to enrollment.

Exception categories must be tracked and monitored to ensure percentage limits are not exceeded.

11A.3 Required Youth Program Elements

Where required by WIOA Youth, programs shall make available the fourteen (14) program elements, including but not limited to:

- Tutoring and dropout prevention
- Alternative secondary school services
- Work experience
- Occupational skills training
- Education offered concurrently with workforce preparation
- Leadership development
- Supportive services
- Adult mentoring
- Follow-up services
- Comprehensive guidance and counseling
- Financial literacy
- Entrepreneurial skills training
- Labor market information
- Postsecondary transition activities

Documentation must demonstrate access to required elements.

11A.4 Work Experience Requirements

Where required, a minimum percentage of youth funds must be expended on work experience activities.

Tracking of work experience expenditures must:

- Be documented
- Be monitored periodically
- Align with fiscal reporting

Work experience documentation must comply with Section 4 of this Manual.

11A.5 Follow-Up for Youth

Youth participants must receive at least twelve (12) months of follow-up services after exit, unless stricter requirements apply.

Follow-up must be documented and aligned with Section 6 of this Manual.

11B – YOUTHBUILD PROGRAM OPERATIONS

The YouthBuild Program shall operate in accordance with the YouthBuild Program Policies and Operations Manual adopted by the Workforce Development Board and incorporated herein by reference.

The YouthBuild Manual establishes detailed requirements governing eligibility, mental toughness, stipends, leadership development, construction safety, credential attainment, case management, follow-up, incident reporting, and federal reporting compliance.

In the event of conflict between this Programmatic Manual and the YouthBuild Manual, the YouthBuild Manual shall govern for YouthBuild-funded activities.

11B.1 YouthBuild Program Authority

YouthBuild is a federally funded discretionary program administered under specific statutory and regulatory authority.

YouthBuild operations must comply with:

- YouthBuild authorizing statute
- Applicable federal regulations
- Notice of Award
- DOL guidance
- Grant-specific conditions

Where YouthBuild requirements conflict with general program policy, YouthBuild requirements shall govern.

11B.2 YouthBuild Eligibility

YouthBuild eligibility must include:

- Age requirements
- Low-income status
- Barrier category qualification
- School status verification
- Selective Service compliance (where applicable)

Eligibility documentation must be complete prior to enrollment.

11B.3 Mental Toughness and Orientation

YouthBuild programs may include a structured orientation or “Mental Toughness” phase.

This phase must:

- Be documented
- Include attendance tracking
- Include participant evaluation
- Align with program expectations

Participation standards must be applied consistently.

11B.4 Construction Training and Safety

YouthBuild programs involving construction must:

- Comply with applicable safety standards
- Ensure appropriate supervision
- Provide safety training
- Maintain documentation of certifications

OSHA 30-hour certification may be recognized as an industry credential where applicable.

Safety documentation must be retained.

11B.5 Stipends

YouthBuild stipends must:

- Be tied to participation
- Be supported by attendance documentation
- Follow fiscal controls
- Be documented prior to payment

Stipend calculations must be retained in participant files.

All stipend payments must comply with the Financial Management and Procedures Manual.

11B.6 Leadership Development and Community Service

YouthBuild participants must receive:

- Leadership development opportunities
- Community service engagement
- Civic engagement training

Documentation must reflect participation and outcomes.

11B.7 Case Management and Follow-Up

YouthBuild participants must receive:

- Structured case management
- Documented Individual Service Strategies
- Barrier resolution support
- Twelve (12) months of follow-up

Documentation must align with Sections 3 and 6 of this Manual.

11B.8 Performance Accountability

YouthBuild performance reporting must comply with:

- DOL performance requirements
- Grant-specific outcome measures
- Federal reporting timelines

All performance outcomes must be supported by documentation consistent with Section 7.

11B.9 Incident Reporting

YouthBuild programs must maintain an internal incident reporting protocol for:

- Safety incidents
- Participant misconduct
- Construction site accidents
- Mandatory reporting events

Incidents must be documented and reported in accordance with grant requirements.

11B.10 Partner Oversight

YouthBuild may involve subcontractors or community partners.

Such partners must:

- Operate in accordance with this Manual
- Maintain required documentation
- Comply with safety and eligibility standards
- Submit required reports

Subrecipient oversight must comply with fiscal monitoring standards.

11.12 Monitoring and Enforcement

Youth program operations are subject to:

- Internal monitoring
- Fiscal review

- Federal monitoring
- Performance review

Noncompliance may result in:

- Corrective action
- Special conditions
- Funding adjustments
- Enrollment suspension

PART II – PROGRAM OPERATIONS AND INTERNAL PROCEDURES

SECTION 12 – Eligibility Determination Procedures

Provides step-by-step procedures for determining and documenting participant eligibility across funding streams. Includes required documentation checklists, income calculation standards, self-sufficiency determination procedures, priority of service decision workflow, selective service verification process, exception tracking requirements, supervisory review standards, and enrollment approval routing controls to prevent ineligible enrollments and disallowed costs.

SECTION 13 – Case File Documentation and Review Procedures

Establishes standardized file structure requirements, documentation checklists, case note frequency expectations, Individual Service Strategy update intervals, electronic record management standards, and internal file review protocols. Includes quality assurance procedures, corrective action timelines, and documentation validation processes to ensure audit-ready participant records.

SECTION 14 – Training and Employer Agreement Procedures

Defines operational procedures for executing and monitoring occupational training, work experience, on-the-job training, and incumbent worker training agreements. Includes employer eligibility verification checklist, SAM verification process, contract execution routing, reimbursement documentation standards, monitoring frequency requirements, cost-share calculation procedures, and employer performance oversight protocols.

SECTION 15 – Supportive Services and Payment Procedures

Provides detailed workflow for requesting, reviewing, approving, documenting, and tracking supportive services, needs related payments, and participant incentives. Includes duplication-of-benefits verification, vendor payment versus participant reimbursement standards, approval routing matrix, payment tracking log requirements, and internal control safeguards aligned with fiscal policy.

SECTION 16 – Performance Verification and Data Validation Procedures

Establishes documentation checklists and verification hierarchy for measurable skill gains, credential attainment, placement outcomes, wage verification, exit review, global exclusions, and follow-up tracking. Includes data entry timelines, supervisory validation process, quarterly internal performance review procedures, and corrective action standards to ensure reporting accuracy and integrity.

SECTION 17 – Youth Operational Procedures

Provides detailed operational guidance specific to youth and YouthBuild programming, including youth element tracking, work experience expenditure monitoring, youth exception category tracking, YouthBuild stipend calculation procedures, construction safety documentation standards, incident reporting workflow, leadership development documentation requirements, and alumni engagement tracking processes.

SECTION 12 – ELIGIBILITY DETERMINATION PROCEDURES

12.1 Purpose

This section establishes detailed operational procedures for determining, verifying, documenting, approving, and reviewing participant eligibility across all workforce programs administered or overseen by the Workforce Development Board.

These procedures are designed to:

- Prevent enrollment of ineligible individuals
- Ensure documentation exists prior to enrollment
- Maintain compliance with federal and state regulations
- Protect against disallowed costs
- Ensure uniform application of eligibility standards

Eligibility must be fully documented and approved prior to enrollment.

12.2 Eligibility Determination Workflow

The following steps must occur in order:

Step 1 – Initial Intake
Step 2 – Eligibility Screening
Step 3 – Document Collection and Verification
Step 4 – Income and Priority Determination (if applicable)
Step 5 – Selective Service Verification (if applicable)
Step 6 – Self-Sufficiency Determination (if applicable)
Step 7 – Exception Review (if applicable)
Step 8 – Supervisory Review and Approval
Step 9 – Enrollment Entry in Reporting System

No step may be skipped.

12.3 Step 1 – Initial Intake

Staff shall:

- Conduct preliminary eligibility screening
- Identify potential funding stream(s)

- Provide required program information
- Collect basic demographic information

No services may be authorized at this stage.

12.4 Step 2 – Eligibility Screening

Staff shall verify preliminary qualification based on:

- Age requirements
- Residency (if required)
- Work authorization
- Barrier category (if applicable)
- Income requirement (if applicable)

Screening must be documented in case notes or intake forms.

12.5 Step 3 – Required Documentation Checklist

Prior to enrollment, the following must be collected, as applicable:

Age Verification

- Birth certificate
- Government-issued identification
- Passport

Work Authorization

- Employment authorization document
- I-9 acceptable documentation

Income Verification (if required)

- Pay stubs
- Public assistance documentation
- Unemployment documentation
- Tax return

- Employer statement
- Self-attestation only where permitted

Residency (if required)

- Lease agreement
- Utility bill
- Government correspondence

Barrier Documentation (if applicable)

- School records
- Disability documentation (stored separately)
- Justice-involvement documentation
- Foster care documentation
- Homelessness verification

Selective Service Verification (if applicable)

- Registration confirmation
- Exemption documentation
- Status information letter

Self-Sufficiency Verification (if applicable)

- Household size documentation
- Wage documentation
- Income worksheet

All documentation must be legible and retained in the participant file.

12.6 Step 4 – Income Determination Procedure

When income eligibility is required:

1. Determine household size.
2. Identify income sources for required look-back period.
3. Calculate total gross income.

4. Compare to applicable poverty level or LLSIL.
5. Complete standardized income calculation worksheet.
6. Attach all source documentation.

Income calculation worksheet must be signed and dated by the case manager.

Supervisory review required prior to enrollment.

12.7 Step 5 – Priority of Service Determination

When applicable:

1. Determine veteran status.
2. Determine public assistance status.
3. Determine low-income status.
4. Determine basic skills deficiency (if required).
5. Apply priority order.
6. Document determination in system and file.

If priority applies, documentation must support the category selected.

12.8 Step 6 – Selective Service Verification Procedure

For applicable male participants:

Under age 26:

- Confirm registration prior to enrollment.

Age 26 or older:

- Obtain proof of registration; or
- Obtain status information letter; or
- Complete non-willful determination process where permitted.

Selective Service determination must be documented before enrollment.

12.9 Step 7 – Self-Sufficiency Determination

Where required:

1. Determine household size.
2. Determine current income.
3. Compare income to self-sufficiency standard.
4. Document determination.
5. Attach income verification documents.

Calculation worksheet must be retained.

12.10 Step 8 – Exception Category Tracking

If exception categories are permitted:

- Confirm participant qualifies under exception definition.
- Confirm exception percentage cap has not been exceeded.
- Log participant in exception tracking log.
- Obtain supervisory approval prior to enrollment.

Exception log must be reviewed quarterly.

12.11 Step 9 – Supervisory Review and Enrollment Approval

Prior to enrollment:

- Case manager completes eligibility checklist.
- Supervisor reviews documentation for completeness.
- Supervisor signs eligibility approval form.
- Enrollment is entered into official reporting system.

Enrollment date must be on or after supervisory approval.

Retroactive enrollment is prohibited.

12.12 Date of Eligibility Determination Control

The Eligibility Approval Form must include a clearly documented "Date Eligibility Determined."

The official enrollment date entered into the reporting system must be on or after the documented Date Eligibility Determined.

Eligibility documentation must be finalized and approved prior to enrollment entry. Once supervisory approval is granted, eligibility documentation may not be altered without written supervisory justification and documentation of the reason for modification.

Any discrepancy between eligibility determination date and enrollment date must be documented and reviewed by supervisory staff.

12.13 Prohibition on Retroactive Documentation

Documentation obtained after enrollment may not be used to cure eligibility deficiencies.

If documentation is missing prior to enrollment:

- Enrollment must be delayed until documentation is obtained.

Failure to comply may result in disallowed costs.

12.14 Enrollment Quality Assurance

Supervisory staff shall conduct periodic eligibility audits that include:

- Random file review
- Income recalculation
- Priority validation
- Selective Service validation
- Exception cap review

Findings must be documented.

Corrective action must be implemented for deficiencies.

12.15 Red Flags Requiring Escalation

The following require immediate supervisory review:

- Inconsistent income documentation
- Altered documents
- Conflicting household size information

- Unclear barrier documentation
- Exception cap nearing limit

Suspected fraud must be reported per fraud reporting procedures.

12.16 Internal Control Alignment

Eligibility procedures must align with:

- Segregation of duties standards
- Documentation retention requirements
- Audit readiness expectations
- Financial obligation controls

Eligibility approval precedes financial obligation.

SECTION 13 – CASE FILE DOCUMENTATION AND REVIEW PROCEDURES

13.1 Purpose

This section establishes detailed procedures for participant file structure, documentation standards, case note requirements, Individual Service Strategy updates, internal file review, and corrective action processes.

The purpose of this section is to:

- Ensure all participant files are complete and audit-ready
- Align documentation with reported services and outcomes
- Maintain consistency across programs
- Protect against unsupported services or performance
- Establish internal quality control standards

These procedures apply to all programs unless stricter grant-specific requirements apply.

13.2 File Structure Requirements

Each participant file must be organized using a standardized structure, whether maintained electronically or physically.

Files shall contain the following sections in order:

1. Eligibility Documentation
2. Enrollment Documentation
3. Assessment Documentation
4. Individual Service Strategy (ISS or IDP)
5. Service Documentation
6. Supportive Services Documentation
7. Training and Work-Based Learning Documentation
8. Credential Documentation
9. Placement and Employment Documentation
10. Follow-Up Documentation

11. Correspondence and Additional Notes

Electronic files must follow standardized naming conventions to ensure easy retrieval.

13.3 Individual Service Strategy Procedures

The Individual Service Strategy must:

- Be developed after eligibility determination
- Be based on objective assessment results
- Identify career pathway goals
- Identify training pathway
- Identify supportive service needs
- Include measurable milestones

ISS must be signed and dated where required.

ISS updates must occur:

- When training changes
- When employment status changes
- When barriers change
- At least every 90 days for active participants

Updates must be documented in case notes.

13.4 Case Note Standards

Case notes must be:

- Entered within five (5) business days of contact or activity
- Objective and factual
- Clear and professional
- Free of subjective or discriminatory language
- Linked to participant goals

Case notes must document:

- Type of contact
- Service provided
- Barrier identified
- Action steps taken
- Follow-up required

Case notes must demonstrate active case management, not passive documentation.

13.5 Required Case Note Frequency

Minimum contact standards:

Active Participants:

- At least one documented contact per month

Participants in training:

- At least one documented contact per month
- Additional documentation at training milestones

Participants in work-based learning:

- Monthly monitoring documentation
- Employer contact documentation

Follow-up participants:

- Documentation consistent with Section 6

Supervisors may require more frequent documentation based on participant need.

13.6 Service Documentation Requirements

All reported services must be supported by documentation including:

- Attendance records
- Training enrollment verification
- Worksite agreements
- Employer monitoring forms

- Supportive service approval forms
- Payment documentation

If documentation does not exist, the service may not be reported.

13.7 Documentation Hierarchy and Source Verification Standard

Case notes may support documentation of services and activities but may not substitute for required source documentation.

Services, credentials, measurable skill gains, placements, and supportive services payments must be supported by verifiable source documentation.

Narrative case notes alone are insufficient to support eligibility, service delivery, or performance reporting.

Where source documentation is required, it must be retained in the participant file and aligned with reported data.

13.8 Credential Documentation Standards

For credentials to be reported:

- Copy of certificate must be in file; or
- Official transcript; or
- Licensing verification

Credential documentation must clearly show:

- Participant name
- Credential title
- Date awarded

Unofficial or unverifiable credentials may not be reported.

13.9 Placement Documentation Standards

Employment verification must include:

Primary source:

- State wage record data

Secondary sources (when allowed):

- Pay stub
- Employer verification
- Offer letter
- Apprenticeship documentation

Documentation must confirm:

- Employer name
- Employment start date
- Wage rate

Self-attestation may only be used where permitted and must be justified.

13.10 Electronic File Standards

Electronic files must:

- Be stored in secure systems
- Be protected by role-based access
- Use standardized file naming conventions
- Be backed up appropriately

Files must remain accessible for monitoring and audit.

13.11 Internal File Review Procedure

Supervisory staff shall conduct file reviews:

- Quarterly for active caseloads
- Prior to participant exit
- Prior to major outcome reporting

File review must confirm:

- Eligibility documentation complete
- ISS current

- Case notes timely
- Services supported
- Credentials documented
- Placement verified

Findings must be documented.

13.12 Corrective Action Procedure

If deficiencies are identified:

1. Supervisor documents finding.
2. Case manager is notified in writing.
3. Correction must occur within ten (10) business days.
4. Follow-up review confirms correction.

Repeated deficiencies may result in retraining or disciplinary action.

13.13 Audit Preparation and Readiness

Files must be maintained in a condition that allows:

- Immediate retrieval
- Clear documentation flow
- Logical organization
- Direct support of reported data

Staff shall treat all files as audit-ready at all times.

13.14 Record Retention Alignment

Participant files must be retained consistent with:

- 2 CFR §200.334
- Virginia Works requirements
- Grant-specific requirements

Retention periods begin after grant closeout unless otherwise specified.

SECTION 14 – TRAINING AND EMPLOYER AGREEMENT PROCEDURES

14.1 Purpose

This section establishes detailed procedures for executing, documenting, monitoring, and reimbursing employer-based training activities, including occupational skills training, work experience, on-the-job training, and incumbent worker training.

These procedures ensure:

- Employer eligibility verification
- Proper contract execution
- Compliance with procurement standards
- Proper reimbursement documentation
- Internal monitoring and oversight
- Protection against unsupported employer payments

All fiscal execution must comply with the Financial Management and Procedures Manual.

14.2 Employer Eligibility Verification Procedure

Before executing any employer agreement, staff must:

1. Verify employer legitimacy:
    - Active business registration
    - Valid tax identification number
    - Physical business address
2. Verify employer standing:
    - Not debarred or suspended (SAM verification)
    - No known labor law violations that would prohibit participation
3. Document verification:
    - SAM screenshot retained
    - Employer verification checklist completed
    - Conflict-of-interest disclosure reviewed

No agreement may be executed without documentation of eligibility verification.

Where an employer relationship meets the definition of a subrecipient under 2 CFR §200.331, monitoring shall additionally comply with the Subrecipient Monitoring requirements outlined in the Financial Management and Procedures Manual.

14.3 Occupational Skills Training Procedures

When training is provided through a third-party provider:

1. Confirm provider eligibility (ETPL when required).
2. Confirm alignment with participant ISS.
3. Obtain cost documentation.
4. Verify funds availability.
5. Execute training agreement prior to start date.
6. Enter obligation into tracking system.

Documentation required:

- Training plan
- Cost breakdown
- Attendance tracking
- Progress verification

Training payments must not be made without documentation of attendance.

14.4 Work Experience Procedures

Before work experience begins:

1. Execute written worksite agreement.
2. Define job duties and supervision plan.
3. Confirm wage rate and schedule.
4. Ensure workers' compensation coverage is documented.
5. Document alignment with ISS.

During work experience:

- Collect signed time sheets after each pay period.
- Document employer contact at least monthly.
- Document skill development progress.

Supervisory monitoring must be documented.

14.5 On-the-Job Training (OJT) Procedures

Prior to OJT start:

1. Conduct employer eligibility verification.
2. Develop training outline with defined skills.
3. Establish training duration and reimbursement rate.
4. Execute OJT contract before start date.
5. Enter obligation into tracking system.

Reimbursement procedures:

1. Employer submits payroll documentation.
2. Staff verify:
    - Wages paid
    - Hours worked
    - Reimbursement percentage compliance
3. Case manager confirms training progress.
4. Supervisor reviews and approves.
5. Fiscal processing occurs per Financial Manual.

No reimbursement may occur without payroll documentation.

14.6 Incumbent Worker Training Procedures

Prior to execution:

1. Confirm employer contribution requirements are met.
2. Document incumbent worker wage levels.

3. Confirm training improves retention or wage progression.
4. Execute written agreement prior to training.

Cost-share documentation must include:

- Employer payroll contribution documentation
- Proof of employer-paid training costs
- Calculation worksheet

Employer contribution must be verified prior to reimbursement.

14.7 Employer Monitoring Standards

Monitoring must include:

- Verification of training delivery
- Confirmation of participant attendance
- Confirmation of wage payments
- Verification of skill acquisition
- Documentation of site visit or contact

Minimum monitoring frequency:

- OJT: At least once during training period
- Work Experience: Monthly
- Incumbent Worker: At midpoint or completion

Monitoring must be documented in case notes and retained.

14.8 Placement and Employment Verification Procedure

When participant obtains employment:

1. Collect verification documentation.
2. Confirm employment start date.
3. Confirm wage rate.
4. Document alignment with training.

5. Enter placement into reporting system.

Wage documentation hierarchy:

1. State wage record (primary)
2. Employer verification
3. Pay stub
4. Offer letter
5. Supplemental documentation (when allowed)

Self-attestation may only be used when permitted and must include written justification.

14.9 Employer Payment Internal Controls

No single individual may:

- Execute contract
- Approve reimbursement
- Process payment
- Reconcile payment

Segregation of duties must be maintained consistent with the Financial Manual.

14.10 Contract Modification and Amendment Procedures

If any material term of a training or employer agreement changes, including but not limited to wage rate, reimbursement percentage, training duration, maximum reimbursement amount, or scope of training, a written contract amendment must be executed prior to implementation of the change.

The amendment must:

- Be signed by all required parties
- Be approved by the Program Manager
- Be reviewed for budget availability
- Be reflected in the obligation tracking system

Retroactive amendments are prohibited.

14.11 Red Flags Requiring Escalation

Immediate supervisory review required if:

- Employer refuses documentation
- Payroll documentation appears altered
- Reimbursement request exceeds contract limits
- Training start date precedes contract execution
- Employer fails to provide monitoring access

Suspected fraud must be reported in accordance with fraud reporting procedures.

14.12 Internal Review and Quality Assurance

Supervisory review shall occur:

- Prior to first reimbursement
- At midpoint of contract
- At completion

Quarterly review of employer agreements must include:

- Active contract list
- Total reimbursement paid
- Remaining obligation
- Compliance with contract terms

Findings must be documented.

14.13 Record Retention

Employer agreements and documentation must be retained consistent with:

- 2 CFR §200.334
- Grant-specific requirements

- Organizational retention standards

Records must remain accessible for audit and monitoring.

SECTION 15 – SUPPORTIVE SERVICES AND PAYMENT PROCEDURES

15.1 Purpose

This section establishes detailed operational procedures governing the request, review, approval, documentation, obligation, payment, tracking, and monitoring of supportive services, needs related payments, and participant incentives.

These procedures ensure:

- Payments are necessary and reasonable
- Documentation exists prior to obligation
- Duplication of benefits is avoided
- Segregation of duties is maintained
- Internal controls align with fiscal policy
- Disallowed costs are prevented

All disbursements must comply with the Financial Management and Procedures Manual.

15.2 General Payment Workflow

The following steps must occur in order:

1. Participant request or case manager identification of need
2. Documentation of need in case notes
3. Collection of required supporting documentation
4. Verification of allowability
5. Verification of budget availability
6. Program Manager approval
7. Entry into obligation tracking system
8. Fiscal review
9. Payment processing

10. File documentation and reconciliation

No payment may occur without completion of all required steps.

15.3 Supportive Services Request Procedure

When a supportive service is requested:

1. Case manager documents:
    - Type of service requested
    - Justification
    - Relationship to participation
2. Case manager collects:
    - Invoice, bill, quote, or cost estimate
    - Vendor information
    - Supporting documentation of participation
3. Case manager verifies:
    - Participant is actively enrolled
    - Service is necessary for participation
    - Service is allowable under funding source
4. Case manager completes Supportive Services Approval Form.

15.4 Duplication of Benefits Verification

Prior to approval, staff must:

- Ask participant whether assistance is available from another source
- Document referral attempts (if applicable)
- Confirm service is not being reimbursed by another program

Duplication verification must be documented in the file.

15.5 Approval Routing

Approval process:

1. Case manager recommends approval.
2. Program Manager reviews:
    - Documentation completeness
    - Allowability
    - Budget availability
3. Program Manager signs approval form.
4. Fiscal staff verify documentation and budget alignment.
5. Obligation entered into tracking spreadsheet.
6. Payment submitted to Fiscal Agent.

Segregation of duties must be maintained at all times.

15.6 Vendor Payment vs Participant Reimbursement

Vendor payment is preferred.

If vendor payment is possible:

- Payment shall be made directly to vendor.
- Invoice must be retained.

Participant reimbursement may occur only when:

- Vendor cannot be paid directly; or
- Pre-approved emergency situation exists.

Reimbursement requires:

- Original receipt
- Proof of payment
- Supervisor approval

Cash payments are strongly discouraged and require documented justification.

15.7 Needs Related Payment Procedures (Where Authorized)

When Needs Related Payments are authorized:

1. Confirm statutory eligibility.
2. Verify participant is enrolled in qualifying training.
3. Confirm attendance documentation.
4. Calculate payment based on allowable formula.
5. Complete Needs Related Payment Calculation Worksheet.
6. Obtain Program Manager approval.
7. Submit for fiscal processing.

Calculation worksheets must be retained.

15.8 Incentive Payment Procedures

Incentives must:

- Be tied to documented milestone achievement
- Be consistent across participants
- Be approved prior to payment

Procedure:

1. Case manager verifies milestone completion.
2. Documentation of milestone retained (credential, attendance, etc.).
3. Incentive Approval Form completed.
4. Program Manager approves.
5. Obligation entered.
6. Fiscal processing completed.

Incentives may not be discretionary or arbitrary.

15.9 Payment Tracking and Reconciliation

Supportive service payments must be tracked in:

- Obligation spreadsheet

- Budget monitoring reports
- Participant payment log

Monthly reconciliation must confirm:

- Payment matches approval
- Payment matches invoice
- Payment matches obligation entry
- Budget remains within limits

Discrepancies must be corrected immediately.

15.10 Participant Supportive Service Cap Monitoring

Where supportive service caps exist by funding stream or organizational policy, cumulative participant payments must be tracked in the obligation spreadsheet.

The tracking system must identify when a participant reaches 80 percent of the applicable cap.

Prior to exceeding standard supportive service thresholds, supervisory review and written justification are required.

Payments exceeding established caps without documented approval are prohibited.

15.11 Internal Control Safeguards

No single individual may:

- Authorize payment
- Process payment
- Reconcile payment

Segregation of duties must align with Financial Manual standards.

15.12 Red Flags Requiring Escalation

Immediate supervisory review required if:

- Repeated high-dollar requests

- Altered receipts
- Duplicate invoices
- Participant requesting reimbursement without documentation
- Vendor with suspicious legitimacy

Suspected fraud must be reported per fraud procedures.

15.13 Monitoring and Quality Assurance

Supervisory staff shall conduct:

- Quarterly review of supportive service payments
- Random spot checks of documentation
- Review of participant payment logs
- Verification of duplication-of-benefits documentation

Findings must be documented and corrective action implemented.

15.14 Record Retention

All documentation must be retained consistent with:

- 2 CFR §200.334
- Grant-specific requirements
- Organizational retention standards

Records must be audit-ready.

SECTION 16 – PERFORMANCE VERIFICATION AND DATA VALIDATION PROCEDURES

16.1 Purpose

This section establishes detailed operational procedures for documenting, verifying, validating, reviewing, and reporting performance outcomes across all workforce programs administered or overseen by the Workforce Development Board.

These procedures ensure:

- Measurable Skill Gains are properly documented
- Credentials meet federal definitions
- Employment outcomes are verified
- Wage information is accurate
- Exit dates are correct
- Data entered into reporting systems matches source documentation
- Performance reporting withstands monitoring and audit

All staff are responsible for maintaining reporting integrity.

16.2 Measurable Skill Gain (MSG) Verification Procedure

Before an MSG is entered into the reporting system:

1. Case manager identifies qualifying gain type.
2. Verify gain occurred within the program year.
3. Collect source documentation:
    - Educational functioning level gain documentation
    - Training milestone verification
    - Transcript showing credit completion
    - Documentation of diploma or equivalent
4. Confirm gain meets federal definition.
5. Upload documentation into file.
6. Enter gain into reporting system within required timeframe.

Supervisor review required prior to quarter-end reporting.

MSG may not be reported without documentation.

16.3 Credential Verification Procedure

Before reporting a credential:

1. Confirm credential meets federal definition of recognized credential.
2. Confirm credential aligns with participant training pathway.
3. Obtain:
    - Copy of certificate; or
    - Official transcript; or
    - Licensing documentation; or
    - Registry confirmation.
4. Verify date awarded.
5. Upload to participant file.
6. Enter credential into reporting system.

OSHA 10 is not considered a recognized credential under DOL reporting definitions.

Supervisor review required prior to reporting.

16.4 Employment Verification Procedure

Employment verification hierarchy:

Primary:

- State wage record data

Secondary (when primary not available):

- Employer verification form
- Pay stub
- Offer letter
- Apprenticeship documentation

Procedure:

1. Confirm employment start date.
2. Confirm employer name.
3. Confirm wage rate.
4. Document verification source.
5. Enter placement into reporting system.
6. Retain documentation in file.

Self-attestation may only be used where permitted and must include written justification.

16.5 Wage Verification and Median Earnings Procedure

When wage information is required:

1. Verify wage data through state wage record or documentation.
2. Confirm wage reflects correct quarter.
3. Enter wage data into reporting system accurately.
4. Document source of wage verification.

If supplemental wage information is used:

- Justification must be documented.
- Supervisor approval required.

16.6 Exit Review Procedure

Prior to confirming exit:

1. Confirm no services have been provided during required no-service period.
2. Confirm no future services are scheduled.
3. Review file for completeness.
4. Confirm ISS final status documented.
5. Confirm credential documentation complete (if applicable).
6. Confirm placement documentation collected (if applicable).

7. Document exit review checklist.

Supervisor approval required before final exit entry.

Retroactive exit date adjustment must be documented and approved.

16.7 Global Exclusion Documentation

If global exclusion applies:

1. Confirm participant meets federal exclusion criteria.
2. Obtain required documentation.
3. Document duration and justification.
4. Enter exclusion into reporting system properly.
5. Retain documentation in file.

Improper use of exclusions is prohibited.

16.8 Data Entry Timeline Standards

All reportable events must be entered:

- Within five (5) business days of documentation receipt
- Before quarterly reporting deadlines
- Without backdating or estimation

Failure to enter data timely may impact performance reporting.

16.9 Quarterly Internal Data Validation Review

At least quarterly, supervisory staff shall:

- Randomly select participant files
- Compare reporting system entries to file documentation
- Recalculate income or wages where necessary
- Validate MSG documentation
- Validate credential documentation

- Validate placement documentation

Findings must be documented.

Corrections must be made prior to official report submission.

16.10 Pre-Submission Performance Certification

Prior to submission of official quarterly or annual performance reports, the Program Manager shall conduct a final review of reported outcomes.

This review shall confirm:

- Measurable Skill Gains are supported by documentation
- Credentials meet federal definitions
- Employment outcomes are verified
- Wage data aligns with source documentation
- Exit dates are accurate

Upon completion of review, the Program Manager shall certify that reported data is supported by source documentation.

16.11 Performance Monitoring Dashboard Review

Quarterly review shall include:

- MSG attainment rates
- Credential attainment rates
- 2nd Quarter Employment Rate
- 4th Quarter Employment Rate
- Median earnings
- Youth performance indicators

Performance trends must be analyzed.

If performance is below target:

- Root cause analysis required
- Corrective action plan developed

- Implementation monitored

16.12 Data Integrity and Fraud Safeguards

Staff shall not:

- Report outcomes without documentation
- Backdate services or credentials
- Alter documentation
- Inflate performance numbers

Suspected falsification must be reported under fraud reporting procedures.

Intentional misreporting may result in disciplinary action.

16.13 Corrective Action Procedure

If data validation reveals deficiencies:

1. Document finding.
2. Correct reporting system entry.
3. Notify case manager.
4. Provide retraining if necessary.
5. Conduct follow-up review.

Repeated deficiencies may result in increased oversight.

16.14 Alignment with Fiscal Controls

Performance documentation must align with:

- Training expenditures
- Supportive service expenditures
- Employer reimbursement documentation

Unsupported outcomes may trigger fiscal review.

16.15 Official Reporting System Authority

All official performance reporting shall be derived from the designated state reporting system. Data entered into the reporting system must reconcile to source documentation retained in participant files. Internal spreadsheets or tracking tools may supplement but shall not replace the official reporting system as the authoritative data source.

SECTION 17 – YOUTH OPERATIONAL PROCEDURES

17.1 Purpose

This section establishes detailed operational procedures governing youth and young adult programming, including WIOA Youth and YouthBuild, to ensure compliance with statutory requirements, grant conditions, documentation standards, and performance accountability.

These procedures supplement Section 11 (Youth Programs) and do not replace the YouthBuild Program Manual.

Where YouthBuild grant requirements are stricter, the YouthBuild Manual governs.

17A – WIOA YOUTH OPERATIONAL PROCEDURES

17A.1 Youth Eligibility Verification Procedures

Youth eligibility determination must follow Section 12 procedures with additional verification of:

- In-School or Out-of-School status
- Barrier category documentation
- Low-income status (unless exception category applies)
- Age at enrollment

Barrier documentation must be retained in file and clearly labeled.

17A.2 Youth Exception Category Tracking

When exception categories are permitted:

1. Confirm participant qualifies under allowable exception category.
2. Enter participant into Youth Exception Tracking Log.
3. Confirm exception percentage cap is not exceeded.
4. Obtain supervisory approval prior to enrollment.

Youth Exception Log must be reviewed quarterly by Program Manager.

If exception percentage approaches cap, enrollment must pause until review is completed. The Program Manager shall document quarterly review of Youth Exception percentage utilization and retain documentation of compliance with applicable exception caps.

17A.3 Youth Program Element Tracking

Each enrolled youth must receive access to required program elements.

Procedure:

1. Document program elements provided in case notes.
2. Maintain Youth Element Tracking Log.
3. Verify access to elements during file review.

Failure to document access may result in compliance findings.

17A.4 Youth Work Experience Expenditure Tracking

Where required percentage of youth funds must be spent on work experience:

1. Finance Manager shall maintain work experience expenditure tracking spreadsheet.
2. Program Manager shall review monthly.
3. Quarterly review shall confirm percentage compliance.

If percentage is below required threshold:

- Adjust service strategy immediately.
- Document corrective action.

17A.5 Youth Follow-Up Operational Controls

Follow-up must:

- Occur for at least twelve (12) months after exit
- Include documented quarterly contact
- Include employment or education verification

Follow-Up Tracking Log must be maintained and reviewed monthly.

17B – YOUTHBUILD OPERATIONAL PROCEDURES

17B.1 YouthBuild Stipend Calculation Procedure

Prior to stipend payment:

1. Verify attendance documentation for pay period.
2. Confirm participant remains in good standing.
3. Calculate stipend based on approved rate.
4. Complete Stipend Calculation Worksheet.
5. Obtain Program Manager approval.
6. Submit to fiscal staff for processing.

Stipend payments must align with attendance records.

17B.2 Construction Safety Documentation Controls

For YouthBuild construction activities:

1. Maintain OSHA training documentation.
2. Maintain safety orientation documentation.
3. Document daily supervision.
4. Maintain incident log.
5. Conduct periodic safety review.

OSHA 30 documentation must be retained for credential reporting when applicable.

Prior to placement at any worksite, documentation must confirm appropriate workers' compensation coverage and host site acknowledgment of safety responsibilities.

A signed worksite safety agreement must be retained in the participant file or employer agreement file.

Failure to document worksite safety compliance may result in suspension of youth placement activities.

17B.3 YouthBuild Incident Reporting Workflow

In the event of an incident:

1. Document incident immediately.
2. Notify Program Manager.
3. Notify Executive Director if required.
4. Determine if reporting to DOL is required.
5. Document corrective action taken.
6. Retain incident report in secure file.

Incident reports must align with grant reporting requirements.

17B.4 Leadership Development Documentation

YouthBuild leadership activities must be documented through:

- Attendance logs
- Activity description
- Skill development summary
- Case note entry

Documentation must support grant performance requirements.

17B.5 YouthBuild Credential Documentation

Prior to reporting credentials:

1. Verify credential meets DOL definition.
2. Confirm documentation in file.
3. Enter into reporting system.
4. Confirm alignment with training pathway.

OSHA 10 shall not be reported as a recognized credential.

17B.6 YouthBuild Partner Oversight

Where YouthBuild utilizes subcontractors:

1. Maintain executed agreements.
2. Verify partner documentation standards.
3. Conduct periodic monitoring.
4. Retain monitoring documentation.

Subrecipient oversight must align with fiscal monitoring procedures. This ensures YouthBuild subcontractors are clearly covered.

17B.7 Alumni Engagement Tracking

YouthBuild alumni engagement may include:

- Mentorship
- Recruitment support
- Community presentations

Alumni contact must be documented but does not constitute reportable service unless permitted.

17.2 Youth Internal Monitoring

Quarterly youth program review must include:

- Eligibility verification spot check
- Youth element documentation review
- Work experience percentage compliance
- Stipend calculation verification
- Incident log review
- Performance trend review

Findings must be documented.

Corrective action implemented where necessary.

SECTION 18 – CROSS-MANUAL ALIGNMENT AND SUPERSESSION

This Manual shall be implemented in coordination with the Governance and Legal Compliance Manual and the Financial Management and Procedures Manual.

Where conflicts arise between manuals, the stricter compliance standard shall apply.

This Manual supersedes all prior standalone programmatic policies adopted prior to its effective date.

All staff and program operators are responsible for compliance with this Manual.

Failure to comply with this Manual may result in corrective action, retraining, or disciplinary action consistent with organizational policy.

APPENDIX A – YOUTHBUILD PROGRAM POLICIES AND OPERATIONS MANUAL

Effective Date: January 1, 2026

SECTION 1 – PROGRAM OVERVIEW

Section Overview

This section establishes the statutory authority, program model, purpose, and governance structure of the YouthBuild program operated by the New River/Mount Rogers Workforce Development Board. It defines the program's target population, core components, workforce system coordination, performance accountability framework, and relationship to other governing policies. This section provides the foundational context for all subsequent program operations.

SECTION 2 – ELIGIBILITY & ENROLLMENT

Section Overview

This section establishes the policies and procedures governing participant eligibility determination, documentation standards, enrollment timing, and approval processes. It ensures compliance with federal YouthBuild regulations and protects against enrollment of ineligible individuals. The section defines required documentation, exception tracking, and controls designed to prevent retroactive enrollment.

SECTION 3 – MENTAL TOUGHNESS

Section Overview

This section outlines policies governing pre-enrollment activities, including the Mental Toughness phase. It defines applicant status, distinguishes applicants from enrolled participants, and establishes controls to prevent expenditure of participant funds prior to official enrollment. The section ensures clear separation between recruitment activities and formal program participation.

SECTION 4 – CASE FILES

Section Overview

This section establishes standards for participant case file creation, documentation requirements, record retention, and internal quality assurance. It defines required file components, case note expectations, Individual Service Strategy requirements, and confidentiality protections. The purpose of this section is to ensure all reported services and outcomes are fully supported by source documentation.

SECTION 5 – STIPENDS

Section Overview

This section governs participant stipend eligibility, calculation, documentation, approval, and oversight. It establishes internal controls to ensure stipends are tied to verified participation, processed in accordance with fiscal policy, and supported by documentation. The section reinforces segregation-of-duties requirements and protects against unsupported or improper payments.

SECTION 6 – LEADERSHIP & COMMUNITY SERVICE

Section Overview

This section defines the structured leadership development and community service components required under YouthBuild. It establishes documentation, supervision, safety, and integration standards to ensure these activities are intentional, meaningful, and aligned with participant development goals. The section reinforces service-learning principles and program accountability.

SECTION 7 – OCCUPATIONAL TRAINING & SAFETY

Section Overview

This section establishes policies governing occupational skills training, industry-recognized credential attainment, construction standards, and safety compliance. It ensures training aligns with regional labor market demand, integrates with academic instruction, and is delivered under appropriate supervision and safety protocols. The section defines documentation and oversight expectations for training activities.

SECTION 8 – SUPPORTIVE SERVICES

Section Overview

This section establishes policies governing the identification, approval, documentation, and oversight of supportive services provided to enrolled participants. It ensures services are necessary, reasonable, allowable under federal cost principles, and aligned with participant needs. The section reinforces internal controls and cross-references fiscal governance requirements.

SECTION 9 – PERFORMANCE & CREDENTIAL TRACKING

Section Overview

This section defines policies governing measurable skill gains, credential attainment, placement verification, and performance documentation. It establishes documentation standards, data alignment requirements, and internal validation controls to ensure reported outcomes are accurate, supported, and compliant with federal reporting requirements.

SECTION 10 – FOLLOW-UP

Section Overview

This section establishes policies governing the twelve-month follow-up requirement following participant exit. It defines exit determination procedures, follow-up contact expectations, documentation standards, employment and education verification requirements, and internal monitoring controls to ensure compliance with federal performance accountability standards.

SECTION 11 – DISCIPLINE & GRIEVANCE

Section Overview

This section establishes participant conduct expectations, progressive discipline procedures, dismissal standards, and grievance rights. It ensures disciplinary actions are applied consistently, documented appropriately, and aligned with federal nondiscrimination requirements. The section provides due process protections and outlines grievance escalation procedures.

SECTION 12 – DATA MANAGEMENT & REPORTING

Section Overview

This section governs data entry, reporting accuracy, documentation alignment, system access controls, and internal data validation procedures. It establishes accountability for accurate federal reporting and reinforces quality assurance processes designed to prevent unsupported or inaccurate performance reporting.

SECTION 13 – FISCAL GOVERNANCE AND CROSS-REFERENCE

Section Overview

This section clarifies the relationship between the YouthBuild Program Operations Manual and the NRMRWDB Financial Management and Procedures Manual. It establishes fiscal authority, confirms supremacy of financial policies in fiscal matters, and reinforces compliance with internal control and segregation-of-duties requirements for all YouthBuild-related expenditures.

SECTION 1 – PROGRAM OVERVIEW & PURPOSE

YB1.1 Program Authority

The New River/Mount Rogers Workforce Development Board (NRMRWDB) operates a YouthBuild program under a discretionary grant awarded by the U.S. Department of Labor, Employment and Training Administration (DOL-ETA). The program is authorized under the Workforce Innovation and Opportunity Act (WIOA), Section 171, and governed by 20 CFR Part 688 (YouthBuild Regulations), 2 CFR Part 200 (Uniform Guidance), and applicable federal guidance.

This YouthBuild Program Operations Manual establishes the policies and procedures governing YouthBuild program operations. All fiscal transactions associated with YouthBuild are governed by the NRMRWDB Financial Management and Procedures Manual, effective January 1, 2026.

YB1.2 Program Model

The NRMRWDB YouthBuild program operates as a Construction Plus model serving eligible youth in the New River/Mount Rogers Workforce Development Area.

The program integrates academic instruction, occupational skills training, leadership development, and community service using an Integrated Education and Training (IET) approach. Participants receive structured instructional hours combining classroom education and hands-on skills training aligned with industry-recognized credentials.

Program activities are designed to maintain the required balance of:

- Academic instruction
- Occupational skills training
- Leadership development and community service

The program prepares participants for employment, postsecondary education, Registered Apprenticeship, or military service.

YB1.3 Program Purpose

The purpose of the NRMRWDB YouthBuild program is to:

1. Assist eligible youth in obtaining the education and employment skills necessary to achieve economic self-sufficiency.

2. Provide opportunities for meaningful work experience and community service, including construction or rehabilitation activities benefiting low-income communities.
3. Develop leadership skills, personal responsibility, and civic engagement.
4. Support career pathway development in occupations aligned with regional labor market demand.

YB1.4 Target Population

The YouthBuild program serves individuals who meet federal eligibility requirements, including:

- Youth ages 16 through 24 at the time of enrollment;
- Individuals who have not completed secondary school or its recognized equivalent;
- Individuals who meet low-income criteria or qualify under allowable exception categories;
- Youth facing significant barriers to education and employment.

Specific eligibility criteria and required documentation are detailed in Section 2 of this Manual.

YB1.5 Program Components

The YouthBuild program includes the following core components:

Academic Instruction: Participants receive instruction leading to a secondary school diploma, high school equivalency credential, or measurable academic skill gains.

Occupational Skills Training: Participants receive industry-recognized training aligned with in-demand occupations, including construction and other approved career pathways.

Leadership Development: Participants engage in structured leadership development activities designed to strengthen teamwork, communication, civic responsibility, and workplace readiness.

Community Service: Participants complete community service activities that benefit local communities and reinforce the program's service-learning model.

Supportive Services: Participants may receive supportive services necessary to enable successful participation, consistent with federal cost principles and the NRMRWDB Financial Management and Procedures Manual.

YB1.6 Workforce System Coordination

YouthBuild operates in coordination with the regional workforce development system and collaborates with Virginia Works Centers, education partners, community-based organizations, and employer partners to support participant success.

Co-enrollment and coordination with other workforce programs may occur when appropriate and in compliance with applicable regulations.

YB1.7 Performance Accountability

The YouthBuild program is accountable for achieving federal performance outcomes, including measurable skill gains, credential attainment, and placement in employment, education, apprenticeship, or military service.

Performance data must be accurately documented, supported by source documentation, and entered into designated federal reporting systems in a timely manner.

Performance requirements are further detailed in Section 9, and follow-up requirements are detailed in Section 10 of this Manual.

YB1.8 Relationship to Other Policies

This YouthBuild Program Operations Manual governs programmatic operations specific to YouthBuild.

All fiscal, procurement, payroll, match, and financial oversight activities are governed exclusively by the NRMRWDB Financial Management and Procedures Manual.

In the event of a conflict, federal law and the Financial Management and Procedures Manual shall control fiscal matters.

YB1.9 Policy Review

This Manual shall be reviewed annually and updated as necessary to ensure continued compliance with federal requirements and grant conditions.

YB1.10 Equal Opportunity and Accessibility

The YouthBuild program operates in compliance with WIOA Section 188 and applicable federal nondiscrimination regulations.

The program provides equal opportunity in admission, participation, and treatment without regard to race, color, religion, sex, national origin, age, disability, political affiliation or belief, or any other protected status.

Reasonable accommodations shall be provided to qualified individuals with disabilities to ensure meaningful access to program services.

Language assistance shall be provided to individuals with limited English proficiency, as necessary to ensure equitable access.

YB1.11 Public Communications and Media

All public communications regarding the YouthBuild program, including media inquiries, press releases, and public statements, shall be coordinated through program leadership in accordance with organizational communication policies.

Participants and staff shall not represent official program positions to the media without prior authorization.

Public communications must accurately reflect program activities and comply with federal acknowledgment requirements for discretionary grants.

SECTION 2 – ELIGIBILITY AND ENROLLMENT

YB2.1 Purpose

This section establishes the policies and procedures governing YouthBuild eligibility determination, documentation requirements, and enrollment processes. These procedures ensure compliance with federal YouthBuild regulations and prevent enrollment of ineligible individuals.

Eligibility must be fully verified and documented prior to enrollment.

YB2.2 General Eligibility Requirements

To be eligible for enrollment in the YouthBuild program, an individual must:

1. Be at least 16 years of age and not older than 24 years of age at the time of enrollment.
2. Be a school dropout at the time of enrollment, as defined by federal regulation.
3. Be a member of a low-income family, or meet an allowable exception category under YouthBuild regulations.
4. Be legally authorized to work in the United States, as applicable.
5. If male and age 18 or older, be in compliance with Selective Service registration requirements.

All eligibility criteria must be verified through source documentation prior to enrollment.

YB2.3 Definition of School Dropout

For purposes of YouthBuild eligibility, a school dropout is an individual who:

- Is no longer attending any school and has not received a secondary school diploma or recognized equivalent; or
- Has completed a recognized equivalent but is basic skills deficient and meets applicable regulatory provisions.

Documentation must clearly establish that the individual meets the definition of a school dropout at the time of enrollment.

YB2.4 Low-Income Requirement

An applicant must meet low-income criteria as defined under federal YouthBuild regulations, unless enrolled under an allowable exception category.

Low-income status may be established through documentation including, but not limited to:

- Family income verification;
- Public assistance documentation;
- Supplemental Nutrition Assistance Program (SNAP) benefits;
- Temporary Assistance for Needy Families (TANF);
- Supplemental Security Income (SSI);
- Free or reduced-price lunch documentation;
- Homeless status documentation;
- Foster care documentation;
- Other allowable documentation consistent with federal guidance.

Income calculations must be documented and retained in the participant file.

YB2.5 Exception Category

A limited percentage of participants may be enrolled who do not meet the low-income requirement, consistent with federal YouthBuild regulations.

Individuals enrolled under an exception category must:

- Meet all other YouthBuild eligibility requirements;
- Be documented as qualifying under the exception provision;
- Be tracked to ensure compliance with the maximum allowable percentage.

Exception tracking shall be maintained and reviewed regularly to ensure regulatory compliance.

YB2.6 Age Determination

Age eligibility shall be verified using government-issued documentation, such as:

- Birth certificate;
- Driver’s license or state identification card;

- Passport;
- Other official documentation containing date of birth.

Age must be verified prior to enrollment.

YB2.7 Selective Service

Male applicants age 18 and older must be registered with the Selective Service System, unless exempt.

Selective Service status must be verified and documented prior to enrollment.

YB2.8 Eligibility Documentation Requirements

Eligibility documentation must:

- Be legible and complete;
- Be maintained in the participant file;
- Support each eligibility criterion claimed;
- Be reviewed and approved by designated staff prior to enrollment.

Self-attestation may only be used when specifically allowed under federal guidance and must be properly documented.

Incomplete eligibility documentation prohibits enrollment.

YB2.9 Eligibility Review and Approval

Eligibility determination shall follow this process:

1. Applicant submits required documentation.
2. Program staff reviews documentation for completeness and compliance.
3. Eligibility checklist is completed and signed by designated eligibility staff.
4. Supervisory review is conducted, if required.
5. Final eligibility approval is documented prior to enrollment.

No individual may be enrolled until eligibility has been fully verified and approved.

YB2.10 Enrollment Date

The official enrollment date is the date on which:

- All eligibility criteria have been verified and documented;
- The participant has signed required enrollment forms;
- The participant has been entered into the designated federal reporting system.

Services funded by YouthBuild may not be provided prior to the official enrollment date, except as allowed for recruitment or outreach activities that do not constitute participant services.

YB2.11 Prohibition on Retroactive Enrollment

Retroactive enrollment is strictly prohibited.

Eligibility documentation must exist and be approved on or before the enrollment date. Post-enrollment documentation used to cure eligibility deficiencies is not permitted.

YB2.12 File Maintenance

All eligibility documentation shall be retained in accordance with federal record retention requirements and the NRMRWDB Participant and Financial Records Management Policy.

Files must be available for monitoring and audit review upon request.

YB2.13 Ongoing Compliance

Program staff shall receive training on eligibility determination procedures. Internal monitoring shall include periodic eligibility file review to ensure continued compliance with federal requirements.

SECTION 3 – MENTAL TOUGHNESS/PRE-ENROLLMENT

YB3.1 Purpose

This section establishes policies governing pre-enrollment activities, including the Mental Toughness or Boot Camp phase of the YouthBuild program. These procedures ensure a clear distinction between applicants and enrolled participants and prevent the expenditure of YouthBuild participant funds prior to official enrollment.

YB3.2 Definition of Applicant Status

An applicant is an individual who has expressed interest in the YouthBuild program and is undergoing recruitment, screening, assessment, or Mental Toughness activities but has not yet been determined eligible and formally enrolled.

Applicants are not considered participants and are not eligible to receive YouthBuild-funded participant services.

YB3.3 Purpose of Mental Toughness

The Mental Toughness phase is a structured pre-enrollment process designed to:

- Introduce applicants to program expectations;
- Assess commitment, attendance, and readiness;
- Evaluate academic and work readiness levels;
- Provide orientation to leadership development and program culture;
- Determine suitability for enrollment in YouthBuild.

Participation in Mental Toughness does not constitute enrollment.

YB3.4 Prohibition on Participant Expenditures During Applicant Status

YouthBuild funds designated for participant services may not be expended on individuals during applicant status.

The following are prohibited prior to official enrollment:

- Supportive services;
- Stipends or participant compensation;

- Incentives;
- Training-related payments;
- Any cost that constitutes a direct participant benefit.

YB3.5 Allowable Pre-Enrollment Costs

The following costs may be incurred during the recruitment and Mental Toughness phase, provided they are allowable and properly documented:

- Outreach and recruitment activities;
- Staff time associated with screening and assessment;
- Background checks or drug testing, if required by program policy;
- Assessment tools used to determine eligibility or readiness.

All such costs must comply with federal cost principles and the NRMRWDB Financial Management and Procedures Manual.

YB3.6 Eligibility Determination During Mental Toughness

Eligibility documentation may be collected and reviewed during the Mental Toughness phase. However:

- No applicant may be enrolled until all eligibility documentation is complete and approved in accordance with Section 2;
- Enrollment may not be backdated;
- Applicant participation in Mental Toughness does not guarantee enrollment.

YB3.7 Enrollment Transition

An applicant becomes an enrolled participant only when:

1. All eligibility criteria have been verified and approved;
2. Required enrollment documents have been signed;
3. The individual has been entered into the designated federal reporting system;
4. An official enrollment date has been established.

Only after these steps may participant services funded by YouthBuild be provided.

YB3.8 Documentation Requirements

Mental Toughness activities must be documented, including:

- Attendance records;
- Assessment results;
- Staff observations;
- Applicant progress notes.

Documentation must clearly indicate applicant status and must not reflect participant enrollment prior to the official enrollment date.

YB3.9 Monitoring and Internal Controls

Program staff shall ensure strict separation between applicant and participant records.

Internal monitoring shall include periodic review of:

- Enrollment dates;
- Eligibility documentation timelines;
- Mental Toughness attendance records;
- Participant service start dates.

Any discrepancy between service start dates and enrollment dates must be immediately corrected and reviewed.

YB3.10 Policy Enforcement

Failure to adhere to pre-enrollment and enrollment procedures may result in disallowed costs and corrective action.

All staff involved in recruitment, eligibility determination, and Mental Toughness activities shall receive training on these requirements.

SECTION 4 – CASE FILE AND DOCUMENTATION STANDARDS

YB4.1 Purpose

This section establishes standards for the creation, maintenance, and review of YouthBuild participant case files. Proper documentation ensures compliance with federal regulations, supports performance reporting, and protects against questioned costs or disallowed expenditures.

All case files must be complete, accurate, organized, and audit-ready at all times.

YB4.2 Case File Format

Participant case files may be maintained electronically, in hard copy, or in a hybrid format, provided that:

- All required documentation is maintained;
- Files are secure and protected from unauthorized access;
- Records are readily retrievable for monitoring or audit;
- Electronic systems include appropriate access controls.

Files must be organized in a consistent and logical structure.

YB4.3 Required Case File Components

Each participant file must include, at minimum:

Eligibility Documentation

- Age verification
- School dropout documentation
- Low-income verification or exception documentation
- Selective Service verification (if applicable)
- Eligibility checklist and approval documentation

Enrollment Documentation

- Signed enrollment forms
- Official enrollment date documentation

- Reporting system entry confirmation

Assessments

- Academic assessments
- Career interest assessments
- Basic skills assessments
- Work readiness evaluations

Individual Service Strategy (ISS)

- Documented career pathway plan
- Identified goals and milestones
- Supportive service needs
- Updates reflecting participant progress

Service Documentation

- Academic instruction attendance
- Occupational skills training attendance
- Leadership development activities
- Community service participation
- Supportive services provided

Case Notes

- Regularly documented case management interactions
- Progress updates
- Barriers identified and addressed
- Referrals and outcomes

Credential Documentation

- Copies of earned credentials
- Verification of credential attainment

Placement Documentation

- Employment verification

- Education or training enrollment verification
- Apprenticeship or military placement verification

Follow-Up Documentation

- Follow-up contact records
- Retention verification
- Wage documentation, if applicable

YB4.4 Case Notes Standards

Case notes must:

- Be entered in a timely manner;
- Clearly describe services provided and participant progress;
- Document barriers and corrective actions;
- Support performance outcomes reported;
- Be factual, objective, and professional in tone.

Case notes must demonstrate active case management and meaningful participant engagement.

YB4.5 Documentation of Services

All services provided to participants must be supported by source documentation, including:

- Attendance rosters;
- Sign-in sheets;
- Training completion records;
- Supportive service authorizations;
- Vendor invoices where applicable.

Services reported in federal systems must match documentation contained in the participant file.

YB4.6 Individual Service Strategy (ISS)

An Individual Service Strategy must be developed for each participant after enrollment.

The ISS must:

- Identify academic and career goals;
- Outline occupational training pathways;
- Document supportive service needs;
- Be updated periodically to reflect progress and adjustments.

Updates must be documented in case notes.

YB4.7 Data System Entry

All participant data must be entered accurately and timely into the designated federal reporting system.

Information entered into reporting systems must be supported by documentation in the participant file.

Discrepancies between case file documentation and reported data must be corrected promptly.

YB4.8 File Review and Quality Assurance

Supervisory staff shall conduct periodic case file reviews to ensure:

- Eligibility documentation is complete;
- Enrollment dates are accurate;
- Services are properly documented;
- Case notes are current;
- Performance outcomes are supported by documentation.

Findings from internal file reviews shall be documented, and corrective action shall be implemented as needed.

YB4.9 Confidentiality and Security

Participant files contain sensitive personal information and must be protected in accordance with federal privacy requirements and the NRMRWDB Protection of Personally Identifiable Information Policy.

Access to participant files shall be limited to authorized staff.

YB4.10 Record Retention

Participant case files shall be retained in accordance with federal record retention requirements and the NRMRWDB records management policies.

Files must remain accessible for monitoring, audit, or review throughout the required retention period.

YB4.11 Conflict of Interest

Staff involved in eligibility determination, supportive service authorization, stipend approval, or performance documentation shall avoid real or perceived conflicts of interest and shall comply with organizational conflict-of-interest policies.

SECTION 5 – PARTICIPANT STIPEND POLICY

YB5.1 Purpose

This section establishes the policies and procedures governing YouthBuild participant stipends. Stipends are intended to support participant engagement and offset costs associated with participation. Stipends are not wages and do not establish an employer-employee relationship.

All stipend payments must comply with federal YouthBuild regulations and the NRMRWDB Financial Management and Procedures Manual.

YB5.2 Stipend Eligibility

Participants are eligible to receive stipends only after:

- Official enrollment has occurred in accordance with Section 2;
- Attendance in scheduled program activities has been documented;
- Participation requirements have been met.

Applicants in Mental Toughness or pre-enrollment status are not eligible to receive stipends.

YB5.3 Stipend Rate

The stipend rate shall be established by program leadership and documented in program operating procedures.

The rate must:

- Be applied consistently;
- Be supported by attendance records;
- Not exceed budgeted limitations;
- Be reviewed periodically for compliance and sustainability.

Any change in stipend rate must be documented and approved in accordance with internal controls.

YB5.4 Attendance Requirements

Stipends are contingent upon documented participation in:

- Academic instruction;
- Occupational skills training;
- Leadership development activities;
- Community service activities.

Attendance must be:

- Recorded daily;
- Verified by instructional staff;
- Submitted for review prior to stipend processing.

Stipends shall be calculated based on verified attendance during the applicable pay period.

YB5.5 Pay Periods

Stipends shall be issued according to established program pay periods consistent with internal payroll processing cycles.

Attendance records must correspond directly to the stipend pay period.

YB5.6 Absences and Reductions

Stipends shall be reduced proportionally for:

- Unexcused absences;
- Tardiness exceeding established program policy;
- Early departures without approval.

Excused absences may be permitted for:

- Documented illness;
- Court appearances;
- Medical appointments;
- Other approved circumstances.

All excused and unexcused absences must be documented in the participant file.

YB5.7 Behavioral Expectations

Participants must comply with program policies and codes of conduct.

Serious or repeated violations of program rules may result in:

- Stipend reduction;
- Temporary suspension;
- Dismissal from the program, consistent with Section 12 of this Manual.

Any stipend adjustment due to disciplinary action must be documented.

YB5.8 Documentation Requirements

Each stipend payment must be supported by:

- Attendance records;
- Stipend calculation worksheet or system report;
- Supervisory review and approval;
- Payment authorization documentation.

Stipend records must be retained and reconciled in accordance with the Financial Management and Procedures Manual.

YB5.9 Processing and Approval

Stipend processing shall follow internal control procedures that include:

- Verification of attendance;
- Calculation of stipend amount;
- Program staff approval;
- Fiscal review prior to payment.

No individual may approve their own stipend calculation.

Segregation of duties shall be maintained between attendance verification, approval, and payment processing.

YB5.10 Prohibition on Retroactive Payments

Retroactive stipend payments are prohibited unless:

- A documented administrative error occurred;
- The error is verified and approved;
- The correction is documented in the participant file.

YB5.11 Tax Reporting

Stipends are not wages; however, tax reporting shall be handled in accordance with applicable federal guidance and organizational policy.

Participants shall be informed of stipend status and any applicable reporting requirements.

YB5.12 Monitoring and Oversight

Internal monitoring shall include periodic review of:

- Attendance records;
- Stipend calculations;
- Payment reconciliation;
- Alignment between attendance and reported participation.

Any discrepancies must be investigated and resolved promptly.

SECTION 6 – LEADERSHIP DEVELOPMENT & COMMUNITY SERVICE

YB6.1 Purpose

This section establishes policies governing leadership development and community service activities within the YouthBuild program. Leadership development and service-learning are required components of YouthBuild and are integrated into the overall program model.

These activities are designed to strengthen participant personal growth, civic engagement, teamwork, responsibility, and workplace readiness.

YB6.2 Leadership Development Requirement

Leadership development shall constitute a structured and intentional component of the YouthBuild program.

Leadership development activities must:

- Be planned and documented;
- Support the development of interpersonal and professional skills;
- Reinforce accountability, responsibility, and teamwork;
- Align with participant Individual Service Strategies (ISS).

Leadership development shall represent a designated portion of total program time consistent with YouthBuild program requirements.

YB6.3 Leadership Development Activities

Leadership development may include, but is not limited to:

- Team-building exercises;
- Peer mentoring;
- Conflict resolution training;
- Communication skills workshops;
- Financial literacy instruction;
- Health and wellness education;
- Civic engagement activities;

- Structured reflection sessions;
- Community advocacy initiatives.

Activities must be age-appropriate, structured, and facilitated by qualified staff or partners.

YB6.4 Community Service Requirement

Community service is an integral component of YouthBuild and must be meaningful, supervised, and documented.

Community service activities may include:

- Construction or rehabilitation of affordable housing;
- Neighborhood improvement projects;
- Service projects benefiting local nonprofit organizations;
- Public service initiatives aligned with community needs.

Community service must:

- Provide tangible benefit to the community;
- Be properly supervised;
- Comply with safety standards;
- Be documented through attendance and activity records.

YB6.5 Integration with Program Model

Leadership development and community service shall be integrated with:

- Academic instruction;
- Occupational skills training;
- Career readiness preparation.

These components are not stand-alone activities but are embedded within the YouthBuild experience.

YB6.6 Documentation Requirements

All leadership development and community service activities must be documented through:

- Attendance records;
- Activity descriptions;
- Instructor or supervisor verification;
- Case notes reflecting participant engagement.

Documentation must support hours reported and align with participation records.

YB6.7 Individual Service Strategy Alignment

Leadership development goals shall be incorporated into each participant's Individual Service Strategy.

Case notes should reflect:

- Leadership growth;
- Skill development;
- Areas of improvement;
- Participation in service activities.

YB6.8 Safety and Supervision

All community service and construction-related activities must:

- Be supervised by qualified personnel;
- Comply with safety standards;
- Require appropriate personal protective equipment (PPE) where applicable;
- Include safety orientation prior to participation.

Any incident occurring during leadership or service activities must be documented and reported in accordance with organizational policy.

YB6.9 Monitoring and Quality Assurance

Supervisory staff shall periodically review:

- Leadership activity schedules;
- Attendance documentation;
- Community service logs;
- Alignment between documented hours and reported participation.

Any discrepancies shall be investigated and corrected.

YB6.10 Incident Reporting Protocol

Any accident, injury, safety violation, property damage, or other significant incident occurring during YouthBuild program activities shall be documented and reported promptly.

Incidents requiring documentation include, but are not limited to:

- Participant or staff injury
- Construction site accidents
- Safety violations
- Behavioral incidents involving threats or violence
- Damage to property
- Any event requiring emergency response

The program shall:

- Complete an incident report within one (1) business day;
- Notify program leadership;
- Maintain incident documentation in administrative records;
- Take corrective action as appropriate;
- Report incidents to the funding agency when required by grant conditions.

Incident documentation shall be retained in accordance with record retention policies.

YB6.11 Trauma-Informed Program Approach

The YouthBuild program recognizes that many participants have experienced adverse life events that may impact learning, behavior, and engagement.

Program staff shall implement a trauma-informed approach that:

- Promotes physical and emotional safety;
- Encourages trust and transparency;
- Supports participant empowerment and voice;
- Avoids re-traumatization;
- Provides appropriate referrals to supportive services when needed.

Staff shall receive training to support trauma-informed engagement practices.

SECTION 7 – OCCUPATIONAL AND FOUNDATIONAL TRAINING REQUIREMENTS

YB7.1 Purpose

This section establishes policies governing occupational skills training, credential attainment, and construction-related activities within the YouthBuild program. Occupational training must align with industry demand, support recognized credentials, and comply with all applicable safety and supervision standards.

YB7.2 Occupational Training Model

Occupational skills training shall be delivered as part of the Integrated Education and Training model and must:

- Align with in-demand occupations within the regional labor market;
- Lead to industry-recognized credentials;
- Support participant career pathway development;
- Be integrated with academic instruction and leadership development.

Training pathways may include construction and skilled trades, healthcare, manufacturing, or other approved sectors consistent with grant requirements.

YB7.3 Construction Training Standards

For participants engaged in construction-related training:

- Training must be supervised by qualified instructors or site supervisors;
- Activities must comply with applicable building codes and safety regulations;
- Participants must receive safety orientation prior to engaging in hands-on construction work;
- Personal protective equipment (PPE) must be provided and required as appropriate.

Construction projects must be planned to ensure both educational value and community benefit.

YB7.4 Safety Requirements

Safety is a priority in all occupational training activities.

The program shall:

- Provide OSHA 10 safety training (required safety training and not reported as a credential for performance purposes);
- Maintain written safety procedures;
- Document safety orientations and certifications;
- Monitor compliance with safety standards during all work-based activities.

Any injury or safety incident must be documented and reported in accordance with organizational policy.

YB7.5 Credential Attainment

Occupational training must lead to industry-recognized credentials where possible.

Acceptable credentials include, but are not limited to:

- OSHA 30 certification;
- NCCER credentials;
- HBI PACT certifications;
- Certified Nursing Assistant;
- Manufacturing or other sector-specific credentials aligned with approved training pathways.

Credential attainment must be verified through:

- Official certificates;
- Credential transcripts;
- Provider verification documentation.

Copies of credentials must be maintained in participant case files.

YB7.6 Training Attendance and Documentation

Attendance for occupational skills training must be:

- Recorded daily;
- Verified by instructional staff;

- Retained as supporting documentation.

Training hours reported in federal systems must be supported by documented attendance records.

YB7.7 Work-Based Learning

Work-based learning activities may include:

- Hands-on construction projects;
- Clinical or simulated healthcare experiences, if applicable;
- Employer site visits;
- Structured job shadowing opportunities.

Work-based learning must:

- Be supervised;
- Be documented;
- Comply with safety and labor standards.

YB7.8 Instructor Qualifications

Instructors providing occupational training must possess appropriate credentials, certifications, or relevant industry experience.

Documentation of instructor qualifications shall be maintained in program administrative records.

YB7.9 Alignment with Individual Service Strategy

Occupational training must align with each participant's Individual Service Strategy and identified career goals.

Case notes should reflect:

- Training progress;
- Credential milestones;
- Skill development;
- Barriers encountered and resolved.

YB7.10 Monitoring and Quality Assurance

Supervisory staff shall conduct periodic review of:

- Training schedules;
- Credential tracking logs;
- Attendance documentation;
- Safety compliance records.

Any discrepancies between documented training and reported outcomes must be investigated and corrected.

YB7.11 Partner Agreements and Oversight

When occupational training, academic instruction, or supportive services are delivered through partner organizations or contracted providers, roles and responsibilities shall be defined through written agreements.

The YouthBuild program shall monitor partner performance, documentation, and compliance with applicable federal and program requirements.

SECTION 8 – SUPPORTIVE SERVICES

YB8.1 Purpose

This section establishes policies governing the provision of supportive services to enrolled YouthBuild participants. Supportive services are intended to assist participants in overcoming barriers that may interfere with successful program participation and completion.

All supportive services must be necessary, reasonable, documented, and provided in accordance with federal cost principles and the NRMRWDB Financial Management and Procedures Manual.

All supportive service expenditures are governed by the NRMRWDB Financial Management and Procedures Manual. Nothing in this section authorizes fiscal action inconsistent with that Manual.

YB8.2 Definition

Supportive services are services that enable an enrolled participant to participate in YouthBuild program activities and may include, but are not limited to:

- Transportation assistance;
- Childcare;
- Work-related tools or uniforms;
- Testing or certification fees;
- Required training materials;
- Emergency assistance related to participation;
- Other services determined necessary to support participation.

Supportive services are not entitlements and are provided based on documented need and availability of funds.

YB8.3 Eligibility for Supportive Services

Supportive services may only be provided to individuals who:

- Are officially enrolled in YouthBuild;

- Have an identified need documented in their Individual Service Strategy or case notes;
- Are actively participating in program activities.

Supportive services may not be provided during applicant or pre-enrollment status.

YB8.4 Determination of Need

The need for supportive services must be:

- Identified through assessment or case management;
- Documented in case notes;
- Linked to program participation;
- Approved prior to issuance.

Staff must document how the service directly supports participation or completion.

YB8.5 Allowability and Reasonableness

All supportive services must:

- Be allowable under federal cost principles;
- Be necessary for participation;
- Be reasonable in cost;
- Not duplicate services available through other resources;
- Be within program budget limitations.

If other community resources are available to meet the need, referral to those resources should be considered prior to expenditure of YouthBuild funds.

YB8.6 Documentation Requirements

Each supportive service must be supported by:

- A written request or documented case note;
- Justification for the service;
- Authorization by designated program staff;

- Proof of payment or vendor documentation;
- Confirmation of receipt, where applicable.

Documentation must be retained in the participant file and fiscal records consistent with the Financial Management and Procedures Manual.

YB8.7 Approval Process

Supportive services must follow established internal controls, including:

- Case manager documentation of need;
- Program manager approval;
- Fiscal review and processing consistent with financial policies.

No individual may authorize and process the same supportive service payment.

Segregation of duties must be maintained. All payment processing, obligation tracking, and disbursement of supportive service funds shall comply with the NRMRWDB Financial Management and Procedures Manual, including internal control and segregation-of-duties requirements.

YB8.8 Limits and Frequency

The program may establish internal limits on:

- Maximum dollar amounts;
- Frequency of assistance;
- Types of allowable services.

Such limits must be applied consistently and documented in internal operating procedures.

YB8.9 Emergency Assistance

Emergency supportive services may be provided when:

- An unforeseen circumstance threatens a participant's continued participation;
- The need is documented and verified;
- Approval is obtained in accordance with internal controls.

Emergency assistance must still comply with allowability and documentation standards.

YB8.10 Monitoring and Oversight

Supportive services shall be periodically reviewed to ensure:

- Proper documentation;
- Alignment with identified need;
- Compliance with fiscal policies;
- Budget sustainability.

Any unsupported or unallowable supportive service expenditures must be corrected promptly.

SECTION 9 – PERFORMANCE, MEASURABLE SKILL GAINS & CREDENTIAL TRACKING

YB9.1 Purpose

This section establishes policies governing performance tracking, measurable skill gains, credential attainment, and documentation requirements for YouthBuild participants.

All reported outcomes must be supported by source documentation and entered accurately and timely into designated federal reporting systems.

YB9.2 Performance Accountability

The YouthBuild program is accountable for achieving federal performance outcomes, including:

- Measurable Skill Gains (MSG);
- Credential Attainment;
- Placement in Employment, Education, Apprenticeship, or Military Service;
- Retention during follow-up.

Performance data must be accurate, verifiable, and supported by documentation contained in the participant case file.

YB9.3 Measurable Skill Gains (MSG)

Measurable Skill Gains may include:

- Educational functioning level gains;
- Secondary school diploma or high school equivalency attainment;
- Transcript or report card documentation demonstrating academic progress;
- Satisfactory progress toward established milestones;
- Training milestones completed.

Each reported MSG must be supported by:

- Assessment documentation;
- Official transcripts or grade reports;
- Credential or diploma documentation;

- Instructor verification;
- Other allowable source documentation.

MSG must be documented within the program year in which it is reported.

YB9.4 Credential Attainment

Credentials reported for YouthBuild participants must:

- Be industry-recognized or educational credentials;
- Be aligned with occupational training pathways;
- Be supported by official documentation.

Acceptable documentation may include:

- Certificates;
- Credential transcripts;
- Licensing verification;
- Official award letters.

Copies of credentials must be retained in the participant file.

YB9.5 Placement Documentation

Placement outcomes must be supported by verifiable documentation, which may include:

- Employer verification;
- Pay stubs;
- Offer letters;
- Enrollment documentation from postsecondary institutions;
- Apprenticeship registration confirmation;
- Military enlistment documentation.

Self-attestation shall only be used when permitted under federal guidance and must be properly documented.

YB9.6 Data Entry and Reporting

All performance outcomes must be:

- Entered into the designated federal reporting system in a timely manner;
- Supported by documentation in the case file;
- Reviewed for accuracy prior to submission.

No outcome may be reported without documentation.

YB9.7 Data Quality Assurance

Supervisory staff shall conduct periodic data validation reviews to ensure:

- Documentation supports reported outcomes;
- Dates align with participation records;
- MSG and credential entries are accurate;
- No duplicate or unsupported entries exist.

Discrepancies must be corrected promptly.

YB9.8 Alignment with Case Management

Performance tracking must align with:

- The participant's Individual Service Strategy;
- Case notes documenting progress;
- Training attendance records;
- Credential tracking logs.

Case notes should reflect progress toward performance milestones.

YB9.9 Monitoring and Oversight

Internal monitoring shall include periodic review of:

- MSG documentation;
- Credential files;
- Placement verification;

- Data system entries.

Any unsupported performance outcome must be removed or corrected.

SECTION 10 – FOLLOW-UP SERVICES

YB10.1 Purpose

This section establishes policies governing follow-up services provided to YouthBuild participants after program exit. Follow-up services are required for a minimum of twelve (12) months following exit and are designed to support retention in employment, education, apprenticeship, or military service.

YB10.2 Follow-Up Requirement

All YouthBuild participants who exit the program shall receive follow-up services for twelve (12) months from the official exit date.

Follow-up services must be documented and tracked for the entire follow-up period.

YB10.3 Exit Determination

A participant is considered exited when:

- The participant has not received program services for the required period as defined by federal reporting guidance; and
- No future services are scheduled.

The exit date must be accurately documented in the designated federal reporting system.

YB10.3.1 Exit Determination and Authority

A participant shall be considered exited in accordance with federal reporting guidance when no services have been provided for the defined no-service period and no future services are scheduled.

The Program Manager, or designee, is responsible for reviewing participant status and confirming exit determination prior to entry into the federal reporting system.

Prior to exit, staff shall make reasonable efforts to re-engage the participant and document those efforts in case notes.

The exit date must be documented, supported by case file review, and entered accurately into the designated federal reporting system.

YB10.4 Purpose of Follow-Up

Follow-up services are intended to:

- Support retention in employment or education;
- Provide ongoing guidance and encouragement;
- Assist with resolving workplace or academic challenges;
- Support continued career pathway progression;
- Verify performance outcomes.

Follow-up services are not limited to outcome verification and must include meaningful engagement.

YB10.5 Types of Follow-Up Services

Follow-up services may include:

- Regular check-ins via phone, email, text, or in-person meetings;
- Employment retention counseling;
- Referral to supportive services;
- Career advancement guidance;
- Assistance with postsecondary transition;
- Connection to community resources.

Follow-up services must be appropriate to the participant's needs and circumstances.

YB10.6 Frequency of Contact

Program staff shall make documented follow-up contact with participants on a regular basis throughout the twelve-month follow-up period.

Contact attempts must be documented even when unsuccessful.

The program may establish internal minimum contact frequency standards to ensure consistency.

YB10.7 Documentation Requirements

Each follow-up contact must be documented in case notes and include:

- Date of contact;
- Method of contact;
- Participant status;
- Employment or education update;
- Support provided;
- Any barriers identified.

Documentation must demonstrate active follow-up efforts.

YB10.8 Employment and Education Verification

During follow-up, staff must verify:

- Continued employment;
- Wage progression, if available;
- Continued enrollment in education or training;
- Credential attainment achieved after exit.

Verification must be supported by documentation such as:

- Employer confirmation;
- Pay stubs;
- Enrollment verification;
- Official documentation.

Self-attestation may only be used when permitted under federal guidance and must be documented.

YB10.9 Loss of Contact

If a participant becomes unresponsive:

- Multiple contact attempts must be made using available contact methods;
- Attempts must be documented;
- Alternate contact information should be used if available;

- Efforts must continue throughout the required follow-up period.

Loss of contact does not eliminate the requirement to attempt follow-up.

YB10.10 Data Entry and Reporting

Follow-up information must be entered into the designated federal reporting system in a timely and accurate manner.

Data entered must align with case note documentation and source documentation.

YB10.11 Internal Monitoring

Supervisory staff shall periodically review follow-up documentation to ensure:

- Twelve-month follow-up requirement is met;
- Contacts are documented;
- Employment and education verification is supported;
- Data entry aligns with documentation.

Any deficiencies shall be corrected promptly.

YB10.12 Alumni Engagement

Upon completion of the required follow-up period, former participants may be engaged as YouthBuild alumni.

Alumni engagement activities may include:

- Peer mentoring opportunities;
- Participation in recruitment events;
- Leadership speaking opportunities;
- Continued career advancement support;
- Community engagement activities.

Alumni engagement activities are voluntary and shall not constitute ongoing program participation for reporting purposes.

SECTION 11 – PARTICIPANT DISCIPLINE, DISMISSAL & GRIEVANCE PROCEDURES

YB11.1 Purpose

This section establishes policies governing participant conduct, disciplinary action, dismissal procedures, and grievance rights within the YouthBuild program.

The purpose of these procedures is to ensure fairness, consistency, due process, and compliance with applicable federal requirements.

YB11.2 Code of Conduct

All YouthBuild participants are required to comply with program expectations, which may include:

- Regular attendance and punctuality;
- Active participation in academic and training activities;
- Respectful behavior toward staff and peers;
- Compliance with safety requirements;
- Adherence to workplace standards during training and community service;
- Compliance with substance-free workplace expectations.

Participants shall receive written orientation to program rules and expectations at enrollment.

YB11.3 Progressive Discipline

When appropriate, the program shall use progressive discipline to address behavioral or performance concerns.

Progressive discipline may include:

- Verbal warning;
- Written warning;
- Performance improvement plan;
- Temporary suspension;
- Stipend reduction consistent with Section 5;

- Dismissal from the program.

All disciplinary actions must be documented in case notes.

YB11.4 Immediate Suspension or Dismissal

Serious violations may result in immediate suspension or dismissal, including but not limited to:

- Violence or threats of violence;
- Possession of weapons;
- Serious safety violations;
- Theft or fraud;
- Repeated or egregious misconduct.

The program reserves the right to act immediately when participant or staff safety is at risk.

YB11.5 Documentation Requirements

All disciplinary actions must be documented and include:

- Description of the incident;
- Date and time of occurrence;
- Actions taken;
- Staff involved;
- Participant response;
- Follow-up plan, if applicable.

Documentation must be maintained in the participant's case file.

YB11.6 Dismissal Procedures

If dismissal is determined to be appropriate:

- The decision must be documented;
- The participant must be notified in writing;
- The reason for dismissal must be clearly stated;

- The effective date of dismissal must be documented;
- The participant's exit must be recorded in the federal reporting system in accordance with reporting guidance.

Dismissal decisions must be applied consistently and without discrimination.

YB11.7 Impact on Stipend

Stipend adjustments resulting from disciplinary actions must:

- Be consistent with Section 5 of this Manual;
- Be documented;
- Reflect attendance or behavioral policy violations.

Stipend reductions may not be arbitrary.

YB11.8 Grievance Procedures

Participants have the right to file a grievance if they believe they have been treated unfairly or in violation of program policy.

Grievances must:

- Be submitted in writing within a reasonable timeframe;
- Clearly describe the issue;
- Be reviewed by designated program leadership.

The program shall:

- Conduct a fair review;
- Provide a written response;
- Maintain documentation of the grievance and resolution.

Participants shall be informed of additional grievance rights under applicable workforce system policies.

If a participant is not satisfied with the resolution at the program level, the participant may escalate the grievance in accordance with the applicable workforce system grievance procedures and federal YouthBuild requirements. Information regarding escalation rights shall be provided to the participant in writing.

YB11.9 Nondiscrimination

All disciplinary and dismissal decisions must comply with federal nondiscrimination requirements and organizational Equal Opportunity policies.

No participant may be disciplined or dismissed on the basis of protected status.

11.10 Internal Review

Supervisory staff shall periodically review disciplinary actions to ensure:

- Consistency in application;
- Proper documentation;
- Compliance with policy;
- Absence of discriminatory patterns.

Corrective action shall be taken if inconsistencies are identified.

SECTION 12 – DATA MANAGEMENT & REPORTING CONTROLS

YB12.1 Purpose

This section establishes policies governing data entry, reporting accuracy, documentation alignment, and internal data quality controls for the YouthBuild program.

All data reported to federal systems must be accurate, timely, and supported by source documentation.

YB12.2 Data Integrity Standards

All YouthBuild data must:

- Be accurate and complete;
- Be supported by documentation contained in the participant file;
- Be entered within required reporting timelines;
- Align with federal definitions and reporting guidance.

No information may be reported without documentation.

YB12.3 Data Entry Responsibilities

Designated staff shall be responsible for:

- Entering participant enrollment information;
- Recording services provided;
- Reporting measurable skill gains;
- Recording credential attainment;
- Documenting placement outcomes;
- Updating follow-up information.

Staff entering data must be trained in applicable reporting requirements.

YB12.4 Documentation Alignment

Data entered into federal reporting systems must match:

- Enrollment documentation;
- Case notes;
- Attendance records;
- Credential documentation;
- Employment or education verification.

If discrepancies are identified, corrections must be made promptly.

YB12.5 Timeliness Requirements

Enrollment, services, measurable skill gains, credentials, placements, and follow-up updates must be entered within established reporting timelines.

Delays in data entry may result in inaccurate reporting and are not permitted.

YB12.6 Data Quality Reviews

Supervisory staff shall conduct periodic data validation reviews to ensure:

- Documentation supports reported outcomes;
- Dates are accurate and consistent;
- No duplicate entries exist;
- Exit dates are properly recorded;
- Follow-up is tracked for the full twelve-month period.

Findings from data reviews shall be documented, and corrective action shall be implemented as needed.

YB12.7 Error Correction

When errors are identified:

- The error must be documented;
- Corrections must be made in the reporting system;
- Supporting documentation must be updated if necessary;
- Supervisory staff must verify the correction.

Repeated data errors may require staff retraining.

YB12.8 Access Controls

Access to federal reporting systems shall be limited to authorized personnel.

User access shall be:

- Role-based;
- Reviewed periodically;
- Updated when staff roles change;
- Terminated when staff leave employment.

Passwords and login credentials must be protected.

YB12.9 Confidentiality

All participant data must be handled in accordance with federal privacy requirements and organizational policies regarding protection of personally identifiable information.

Sensitive data must not be shared without proper authorization.

YB12.10 Internal Monitoring

Internal monitoring shall include review of:

- Enrollment accuracy;
- Performance documentation;
- Follow-up reporting;
- Data entry timeliness;
- Credential tracking logs.

Monitoring results shall be documented and retained.

YB12.11 Reporting Accountability

Program leadership is responsible for ensuring that all reports submitted to federal agencies are accurate and supported by documentation.

Submission of inaccurate or unsupported data is strictly prohibited and may result in corrective action.

YB12.13 Annual Review

Data management procedures shall be reviewed annually to ensure alignment with federal reporting guidance and system updates.

SECTION 13 – FISCAL GOVERNANCE AND CROSS-REFERENCE

YB13.1 Fiscal Authority

All fiscal transactions associated with the YouthBuild program are governed exclusively by the NRMRWDB Financial Management and Procedures Manual, effective January 1, 2026.

This includes, but is not limited to:

- Participant stipends;
- Supportive services;
- Procurement;
- Match tracking;
- Subrecipient payments;
- Payroll and personnel costs;
- Obligation tracking;
- Financial reporting and drawdown procedures.

YB13.2 Supremacy of Financial Policies

In the event of any conflict between this YouthBuild Program Operations Manual and the Financial Management and Procedures Manual, the Financial Management and Procedures Manual shall control fiscal matters.

YB13.3 Internal Control Alignment

The YouthBuild program shall comply with all internal control, segregation-of-duties, allowability, and documentation standards established in the Financial Management and Procedures Manual.

No fiscal action may be authorized under this Manual that is inconsistent with federal cost principles or organizational fiscal policy.