



NEW RIVER/MOUNT ROGERS WORKFORCE DEVELOPMENT AREA CONSORTIUM BOARD

CULTIVATING TALENT FOR THE REGION

APPENDIX B – MASTER POLICY FRAMEWORK

Governance and Policy Structure

New River/Mount Rogers Workforce Development Board

Effective March 30, 2026

I. PURPOSE

The purpose of this Master Policy Framework is to:

- Establish the official policy structure of the New River/Mount Rogers Workforce Development Board.
- Define the relationship between governance policies, fiscal policies, and programmatic policies.
- Eliminate duplication across policy documents.
- Ensure compliance with federal, state, and local requirements.
- Provide a streamlined and organized policy architecture for monitoring and audit purposes.

This framework supersedes any prior informal or fragmented policy organization.

II. POLICY STRUCTURE OVERVIEW

Effective March 30, 2026, the New River/Mount Rogers Workforce Development Area Consortium Board and the New River/Mount Rogers Workforce Development Board policies are organized into three primary governance tiers:

1. **Tier I – Governance and Legal Compliance Policies**
2. **Tier II – Financial Management and Internal Control Policies**
3. **Tier III – Programmatic and Service Delivery Policies**

Each tier serves a distinct function within the organization's compliance and operational framework.

III. TIER I – GOVERNANCE AND LEGAL COMPLIANCE POLICIES

Tier I policies establish Board authority, legal compliance, ethics, civil rights protections, and statutory requirements.

These policies govern the conduct of Board members, staff, contractors, and partners.

A. Governance and Ethics

- Conflict of Interest Policy
- Whistleblower and Fraud Reporting Policy
- One-Stop Operator Policy
- Infrastructure Funding Agreement (IFA)
- Related Governance Resolutions

B. Equal Opportunity and Civil Rights Compliance

- Equal Opportunity and Nondiscrimination Policy
- Non-Discrimination and General Grievance Policy
- Processing Grievances and Complaints Policy
- Protection of Personally Identifiable Information Policy
- Selective Service Registration Policy
- Priority of Service Policy

Tier I policies are not replaced by the Financial Management and Procedures Manual and remain stand-alone governance documents.

IV. TIER II – FINANCIAL MANAGEMENT AND INTERNAL CONTROL POLICIES

Tier II is consolidated under a single comprehensive document:

Financial Management and Procedures Manual

Effective March 30, 2026

This manual governs:

- Internal controls
- Fiscal agent oversight
- Accounting system structure
- Obligation tracking
- Budget monitoring

- Participant financial workflows
- Subrecipient invoice review
- Procurement
- Purchasing card controls
- Payroll and time and effort
- Property and equipment
- Record retention
- Audit and corrective action
- Fraud prevention
- Subrecipient classification
- Match tracking
- Program income
- Cost allocation

The Financial Management and Procedures Manual supersedes prior stand-alone fiscal policies including:

- Cost Allowability
- Procurement Policy
- Match and Leverage
- Subrecipient Monitoring (Fiscal Components)
- Subrecipient vs Contractor Determination
- Transfer of Funds (Fiscal Components)
- Revenue and Receipt policies
- Fiscal Internal Controls documents

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

No separate fiscal policy may conflict with the Manual.

V. TIER III – PROGRAMMATIC AND SERVICE DELIVERY POLICIES

Tier III policies govern eligibility determination, service delivery, case management, performance accountability, and program operations.

These policies reference the Financial Management and Procedures Manual for fiscal transactions.

A. Participant Services and Case Management

- Assessment Policy
- Supportive Services Documentation Policy
- Needs Related Payments Policy
- Follow-Up Services Policy
- Youth and Young Adult Services Policy
- Participant Files and Records Management Policy

B. Training and Employment Models

- On-the-Job Training Policy
- Incumbent Worker Training Policy
- Self-Sufficiency Wage Policy

C. Performance and Accountability

- Credential Attainment Policy
- Placement and Performance Accountability Policy

All programmatic policies must align with:

- Financial Management and Procedures Manual
- Uniform Guidance (2 CFR Part 200)
- Virginia Works guidance
- Applicable federal statutes

VI. POLICY HIERARCHY AND CONFLICT RESOLUTION

In the event of a conflict between policies:

1. Federal law shall control.
2. Uniform Guidance (2 CFR Part 200) shall control for fiscal matters.
3. The Financial Management and Procedures Manual shall control for fiscal processes.
4. Board-adopted governance policies shall control for governance matters.

5. Programmatic policies shall control service delivery matters.

No programmatic policy may authorize a fiscal action inconsistent with the Financial Management and Procedures Manual.

VII. POLICY REVIEW AND MAINTENANCE

All policies shall be reviewed:

- Annually at minimum.
- Upon regulatory change.
- Following audit or monitoring findings.
- When organizational structure changes.

The Executive Director is responsible for:

- Coordinating annual review.
- Recommending revisions.
- Ensuring cross-policy consistency.
- Maintaining the official Policy Index.

The Board shall approve all Tier I and Tier II policy changes.

VIII. ARCHIVING AND SUPERSESSON

Policies consolidated into the Financial Management and Procedures Manual shall:

- Be marked “Superseded Effective March 30, 2026.”
- Be retained for historical reference.
- Not be used for operational guidance.

This Master Policy Framework serves as the official organizational index for all NRMWDACB policies.

IX. INTERNAL CONTROL AND GOVERNANCE ASSURANCE

This streamlined structure:

- Eliminates policy duplication.
- Strengthens internal control layering.

- Clarifies authority and responsibility.
- Improves monitoring readiness.
- Enhances audit defensibility.
- Supports institutional fiscal integrity.

X. EFFECTIVE DATE

This Master Policy Framework is effective March 30, 2026.