NEW RIVER/MOUNT ROGERS WORKFORCE DEVELOPMENT BOARD

CULTIVATING TALENT FOR THE REGION

PROGRAMMATIC POLICIES AND OPERATIONS MANUAL

PART I: GOVERNANCE AND COMPLIANCE

PART II: PROGRAM OPERATIONS AND INTERNAL PROCEDURES

POLICY ADOPTION AND AUTHORITY

Programmatic Policies and Operations Manual

New River/Mount Rogers Workforce Development Board

This Programmatic Policies and Operations Manual establishes the policies and operational procedures governing workforce programs administered by the New River/Mount Rogers Workforce Development Board.

This Manual was developed to ensure consistent program administration, strengthen internal controls, and maintain compliance with applicable federal and state requirements including:

- Workforce Innovation and Opportunity Act (WIOA)
- 20 CFR Parts 679, 680, 681, and 688
- 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards)
- applicable guidance issued by Virginia Works

This Manual consolidates and replaces previously issued standalone programmatic policies of the New River/Mount Rogers Workforce Development Board.

Board Adoption

This Manual is adopted by the New River/Mount Rogers Workforce Development Board and establishes the official policies governing programmatic operations within the New River/Mount Rogers Workforce Development Area.

Upon adoption, this Manual shall serve as the primary reference for program administration by Board staff, program operators, contractors, and partner organizations administering workforce programs under the authority of the Board.

Effective Date

The policies and procedures contained in this Manual are effective March 30, 2026.

Authority for Implementation

The Executive Director of the New River/Mount Rogers Workforce Development Board is authorized to implement the policies contained in this Manual and to issue administrative guidance necessary to support consistent application of these policies.

The Executive Director may make non-substantive administrative updates to maintain alignment with federal or state regulatory guidance. Any substantive policy changes affecting program eligibility, participant services, fiscal controls, or governance structure shall be presented to the Workforce Development Board for approval.

This Manual shall be reviewed periodically and updated as necessary to ensure continued compliance with federal and state workforce requirements. The Workforce Development Board conducts internal monitoring of program activities to ensure compliance with federal and state regulations and to support continuous program improvement.

Certification of Adoption

Adopted by the New River/Mount Rogers Workforce Development Board on March 30, 2026.

Mike Miller, Board Chair
New River/Mount Rogers Workforce Development Board

Jenny Bolte, Executive Director
New River/Mount Rogers Workforce Development Board

DOCUMENT CONTROL

Document Title:
Programmatic Policies and Operations Manual

Organization:
New River/Mount Rogers Workforce Development Board

Effective Date:
March 30, 2026

Adopted By:
New River/Mount Rogers Workforce Development Board

Version Control

Version	Date	Description of Change	Approved By
1.0	March 30, 2026	Initial adoption of consolidated Programmatic Policies and Operations Manual	Workforce Development Board

Future revisions to this Manual will be recorded in this table to maintain a clear record of policy updates and administrative changes.

Responsible Office

The Executive Director of the New River/Mount Rogers Workforce Development Board is responsible for maintaining this Manual and ensuring that it remains consistent with applicable federal and state requirements.

Administrative updates may be issued to maintain alignment with:

- federal regulations
- Virginia Works guidance
- federal grant requirements
- internal operational improvements

Substantive policy revisions shall be presented to the Workforce Development Board for approval.

Distribution

This Manual shall be made available to:

• Board members
• Board staff
• program operators and service providers
• fiscal staff and fiscal agents
• monitoring and oversight entities as requested

The current official version of the Manual shall be maintained by the Workforce Development Board.

Review Cycle

This Manual shall be reviewed periodically and updated as necessary to ensure continued compliance with federal and state workforce requirements.

EXECUTIVE SUMMARY

Programmatic Policies and Operations Manual

New River/Mount Rogers Workforce Development Board
Effective Date: March 30, 2026

Purpose

The New River/Mount Rogers Workforce Development Board has developed a consolidated Programmatic Policies and Operations Manual to establish clear, consistent policies governing workforce programs administered by the Board.

This manual organizes and modernizes the Board's programmatic policies to ensure alignment with federal regulations, state guidance issued by Virginia Works, and local workforce system operational practices.

The manual replaces a number of previously separate policy documents and establishes a comprehensive, structured framework that improves accessibility, consistency, and compliance oversight.

Background

Over time, workforce policies can become fragmented across multiple documents as regulations evolve and programs expand. This manual consolidates those policies into a single structured framework designed to:

- strengthen regulatory compliance
- improve clarity for staff and program operators
- support internal monitoring and quality assurance
- improve accessibility of policies for staff and partners
- ensure alignment with federal and state workforce requirements

The manual reflects current federal requirements including the Workforce Innovation and Opportunity Act (WIOA) and Uniform Guidance (2 CFR Part 200), as well as relevant guidance issued by Virginia Works.

Structure of the Manual

The Programmatic Policies and Operations Manual is organized into two primary parts.

Part I – Programmatic Policy Framework

Part I establishes the governing policies that apply across workforce programs administered by the Board, including:

• governance and oversight
• eligibility and participant documentation
• program service delivery
• supportive services
• performance accountability
• internal monitoring and quality assurance
• equal opportunity and grievance procedures
• fiscal governance cross-references

These sections establish the policy framework that program operators must follow when administering workforce services.

Part II – Operational Procedures

Part II provides operational guidance supporting implementation of the Board's policies. These procedures address topics such as:

• eligibility determination procedures
• case file documentation standards
• employer training agreements
• service authorization and financial obligation controls
• performance verification procedures
• participant exit and follow-up procedures
• youth operational procedures

These procedures support consistent program administration and reinforce internal control requirements.

Relationship to the Financial Management Manual

The Board maintains a separate Financial Management and Procedures Manual governing all fiscal operations, including procurement, financial reporting, cost allowability, and internal fiscal controls.

While the Programmatic Policies and Operations Manual addresses program operations, all fiscal actions must comply with the Financial Management and Procedures Manual.

YouthBuild Program

The Board administers a YouthBuild program funded through the U.S. Department of Labor. YouthBuild-specific requirements are incorporated through **Appendix A**, which supplements this manual and references applicable sections of the primary policy framework.

Implementation

Following Board adoption, the Programmatic Policies and Operations Manual will:

• replace previously issued programmatic policy documents
• serve as the primary reference for program administration
• be maintained and updated by the Executive Director as necessary to reflect changes in federal or state guidance

Non-substantive administrative updates may be made by the Executive Director to maintain regulatory alignment. Substantive policy changes will be presented to the Board for approval.

Requested Board Action

The Board is requested to:

Adopt the Programmatic Policies and Operations Manual effective March 30, 2026.

Adoption of this manual will establish a unified and structured policy framework supporting compliant and effective administration of workforce programs across the New River/Mount Rogers Workforce Development Area.

MANUAL PURPOSE, AUTHORITY, AND POLICY HIERARCHY

I. Purpose

The Programmatic Policies and Operations Manual establishes standardized policies and procedures governing workforce programs administered by the New River/Mount Rogers Workforce Development Board.

The Manual provides operational guidance for program administration, including but not limited to:

- eligibility determination
- participant assessment
- Individual Service Strategy development
- training and work-based learning activities
- supportive services
- incentives and needs-related payments
- youth and young adult services
- performance accountability
- follow-up services
- case file documentation
- data validation and reporting

The Manual ensures program operations comply with applicable federal and state workforce requirements including:

- Workforce Innovation and Opportunity Act (WIOA) Title I
- 20 CFR Parts 679, 680, 681, and 688
- 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards)
- Virginia Works policy guidance and directives

II. Relationship to Governance and Financial Manuals

The Programmatic Policies and Operations Manual functions as Tier III within the Board's governance framework.

The Board maintains a structured policy hierarchy consisting of:

Tier I – Governance and Board Oversight
Policies governing Board governance, organizational structure, and strategic oversight.

Tier II – Financial Management and Fiscal Controls
The **Financial Management and Procedures Manual**, which governs fiscal

administration, procurement, financial reporting, cost allowability, and internal fiscal controls.

Tier III – Programmatic Policies and Operations
This Manual, which establishes programmatic policies and operational procedures governing workforce program administration.

All programmatic activities involving financial commitment must comply with the Financial Management and Procedures Manual (Tier II).

III. Internal Control Integration

Programmatic approval of services does not authorize payment.

All participant-related financial actions require multiple levels of authorization to ensure proper internal controls and compliance with federal requirements.

The Board's internal control structure includes:

Programmatic Authorization (Tier III)
Approval of services based on program eligibility, need, and compliance with program policy.

Fiscal Authorization (Tier II)
Verification of allowability, budget availability, and compliance with fiscal policies.

Accounting Execution
Payment processing and financial recording performed by the fiscal agent in accordance with financial procedures.

Oversight Review
Program and fiscal oversight provided by the Executive Director and the Workforce Development Board.

This layered structure ensures compliance with 2 CFR §200.303 – Internal Controls.

IV. Supersession

This Manual supersedes all previously issued standalone programmatic policies of the New River/Mount Rogers Workforce Development Board effective **March 30, 2026**.

All program operators, staff, and partners administering workforce programs under the authority of the Board must comply with the policies and procedures contained in this Manual.

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PART I

GOVERNANCE AND COMPLIANCE

PART I – GOVERNANCE AND COMPLIANCE

SECTION 1 – PROGRAM GOVERNANCE AND SCOPE

1.1 Purpose

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

This Manual establishes uniform standards governing:

- Program eligibility and enrollment
- Case management and service delivery
- Training and work-based learning activities
- Supportive services and participant financial assistance
- Program performance accountability
- Data integrity and reporting
- Program monitoring and oversight

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

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

1.2 Legal Authority and Governance Structure

The New River/Mount Rogers Workforce Development Area Consortium Board serves as the Chief Local Elected Officials (CLEO) entity and the legal grant recipient for the local workforce development area pursuant to the Workforce Innovation and Opportunity Act (WIOA).

The New River/Mount Rogers Workforce Development Board is appointed in accordance with WIOA and is responsible for establishing workforce development policy and providing oversight of workforce programs operating within the local workforce development area.

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

- Establishing local workforce development policy
- Overseeing the One-Stop delivery system
- Ensuring program performance accountability
- Ensuring fiscal integrity and internal control systems
- Selecting and overseeing the One-Stop Operator
- Monitoring service providers and subrecipients
- Ensuring compliance with federal and state law

This Manual constitutes official programmatic 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 Program
- WIOA Title I Dislocated Worker Program
- WIOA Title I Youth Program
- YouthBuild
- State-funded workforce initiatives
- Appalachian Regional Commission workforce initiatives
- Federal discretionary workforce grants
- Competitive grant-funded workforce programs
- Any workforce program operating under the authority of the Workforce Development Board

Subrecipients, contractors, service providers, and partners operating under Board authority must comply with this Manual unless otherwise specified in written agreements.

1.4 Relationship to Other Governing Documents

This Programmatic Policies and Operations Manual operates in coordination with the following governing documents:

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

This Manual establishes programmatic service delivery standards.

All fiscal transactions, procurement activities, payroll processing, match documentation, cash management, and internal control requirements related to financial management are governed by the Financial Management and Procedures Manual.

In the event of conflict:

- Fiscal matters shall be governed by the Financial Management and Procedures Manual.
- Governance authority shall be governed by the Governance and Legal Compliance Manual.

1.5 Regulatory Framework

This Manual is developed in accordance with and shall be interpreted consistent with the following authorities:

- Workforce Innovation and Opportunity Act (WIOA)
- 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- Applicable federal awarding agency regulations
- YouthBuild regulations where applicable
- Jobs for Veterans Act where applicable
- 29 CFR Part 38 – Nondiscrimination and Equal Opportunity
- Virginia Works policy guidance
- Applicable provisions of state law

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

1.6 Internal Control Standards

All programmatic activities conducted under this Manual shall operate in accordance with internal control requirements established under 2 CFR §200.303.

Program staff shall:

- Ensure services are allowable and properly documented
- Maintain appropriate segregation of duties where applicable
- Ensure participant eligibility determinations are properly documented
- Ensure performance outcomes are supported by verifiable documentation
- Prevent retroactive enrollment practices
- Prevent unsupported or unauthorized participant payments
- Maintain documentation sufficient to support monitoring, audit, and performance verification

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

1.7 One-Stop Delivery System Integration

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

Programs governed by this Manual shall:

• Coordinate with One-Stop partner programs
• Support integrated service delivery
• Encourage co-enrollment when appropriate
• Avoid duplication of services
• Align activities with regional workforce strategy

The One-Stop Operator performs 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 for individuals with disabilities
• Provide language assistance for individuals with limited English proficiency
• Maintain required nondiscrimination documentation

Failure to comply with equal opportunity requirements may result in corrective action or funding sanctions.

1.9 Subrecipient and Contractor Compliance

Subrecipients and contractors providing services under the authority of the Workforce Development Board shall:

• Operate in accordance with this Manual
• Maintain documentation sufficient to withstand monitoring and audit review
• Submit required reports in a timely manner
• Cooperate fully with monitoring and oversight activities

The Workforce Development Board reserves the right to impose corrective action for noncompliance in accordance with applicable federal, state, and local requirements.

1.10 Monitoring and Enforcement Authority

The Workforce Development Board, through its Executive Director and authorized staff, shall conduct oversight activities to ensure compliance with this Manual.

Oversight activities may include:

- Internal program reviews
- Monitoring of eligibility determinations
- Validation of performance documentation
- Participant file reviews
- Data integrity verification

Failure to comply with programmatic policies may result in:

- Technical assistance
- Corrective action plans
- Special grant conditions
- Funding modification
- Contract termination

1.11 Policy Review and Amendment

This Manual shall be reviewed periodically 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 a 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 or state guidance.

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 where required
• 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 the applicable income determination 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 participant 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 (LLSIL) 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 WIOA Section 134€(3)€ and applicable guidance issued by Virginia Works.

Federal priority of service must be applied before local priority categories.

Priority shall be given in the following order:

1. Veterans and eligible spouses who are:

• Recipients of public assistance
• Low-income
• Basic skills deficient

2. Non-veterans who are:

• Recipients of public assistance
• Low-income
• 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.

In establishing local priority categories, the Workforce Development Board may consider regional labor market conditions, barriers to employment, and the need to support participants in obtaining the skills necessary to secure employment that leads to economic self-sufficiency.

Local priority categories are intended to complement federal priority requirements while supporting workforce development strategies that address skill gaps and employer workforce needs within the region.

Determinations regarding whether an individual is considered not self-sufficient for purposes of local priority shall be made in accordance with the Self-Sufficiency Determination policy described in Section 2.5.

2.6.1 Local Priority of Service Categories

In addition to the federal priority categories defined above, the New River/Mount Rogers Workforce Development Board has established the following local priority populations when program funds are limited.

Local priority categories may include individuals who:

- Are determined to be not self-sufficient according to the Workforce Development Board's Self-Sufficiency Determination defined in Section 2.5
- Do not possess a high school diploma or equivalency
- Demonstrate significant skill gaps that prevent them from obtaining or retaining employment that provides self-sufficient wages
- Require occupational skills training to transition into in-demand industries or occupations
- Are unemployed for 27 weeks or longer
- Are justice-involved or returning from incarceration
- Are individuals in recovery from substance use disorder
- Are individuals experiencing homelessness or housing instability
- Are individuals with disabilities
- Reside in areas of concentrated poverty within the workforce development area

Local priority categories are applied only after federally required priority populations have been served.

For purposes of this policy, skill gaps may include individuals who lack the occupational, technical, or foundational skills required to secure employment in in-demand occupations within the local labor market.

Program staff must document the priority category used for enrollment in the participant case file and in the 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, staff must document one of the following prior to enrollment:

- Proof of registration
- Documentation of exemption; or
- A determination that failure to register was **not knowing and willful**

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 development of the Individual Employment Plan (IEP) or Individual Service Strategy (ISS) as applicable.

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 case management and reporting system

Enrollment occurs when the participant receives the first reportable staff-assisted service following eligibility determination.

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 prohibited.

Eligibility must be determined and documented prior to enrollment in accordance with federal regulations and applicable Virginia Works guidance.

Eligibility documentation must exist and be reviewed before the participant is enrolled in the program.

However, when federal or state guidance permits the use of self-certification for specific eligibility elements, enrollment may proceed based on the participant's self-certification while staff make reasonable efforts to obtain third-party documentation.

Examples may include situations where participants temporarily lack access to documentation such as:

- Social Security number verification
- Public assistance verification
- Selective Service registration documentation
- Other documentation permitted under applicable Virginia Works Letters (VWLs)

When self-certification is used:

- The self-certification must be allowable under federal or state guidance
- Staff must document attempts to obtain source documentation
- Source documentation should be obtained and placed in the participant file when reasonably available

Self-certification may not be used when regulations or state guidance require third-party documentation.

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

Documentation methods must comply with federal regulations and applicable Virginia Works Letters, including allowable use of self-certification.

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 and Individual Employment Plan 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 and performance outcomes

3.4 Required File Components

At minimum, each participant file must contain the following components:

A. Eligibility Documentation

All documents required under Section 2 – Eligibility, Priority, and Enrollment Framework.

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 Employment Plan (IEP) or Individual Service Strategy (ISS)

E. Service Documentation

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

F. Case Notes

• Documentation of participant contact
• Barrier identification and resolution
• Progress toward goals
• Service coordination activities

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)

Participant files must remain complete, organized, and audit-ready at all times.

3.5 Individual Employment Plan (IEP) and Individual Service Strategy (ISS)

An Individual Employment Plan (IEP) for Adults and Dislocated Workers or an Individual Service Strategy (ISS) for Youth shall be developed after enrollment and based on objective assessment results.

The IEP/ISS must:

• Identify career goals
• Identify educational goals
• Identify an occupational training pathway where appropriate
• Identify supportive service needs
• Establish measurable milestones
• Be aligned with labor market demand

All services authorized for the participant must align with the goals and activities identified in the IEP or ISS.

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

Updates must be documented in case notes.

3.6 Case Note Standards

Case notes must:

• Be entered in a timely manner following participant interaction
• Be factual and objective
• Reflect meaningful interaction or service coordination
• Document services provided

• Document barriers and steps taken to address those barriers
• Support reported performance outcomes

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

Case notes must never contain subjective, inappropriate, 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 of acceptable documentation include:

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

If supporting 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 activities, participant files must include:

• Worksite agreement
• Training plan or training outline
• Employer contact information
• Supervisor verification
• Attendance documentation
• Participant progress evaluations
• Case notes documenting employer contact and monitoring

Worksite monitoring must occur at reasonable intervals and must be documented in the participant file.

3.9 Data Entry Alignment

All data entered into the official reporting system must:

• Match participant file documentation
• Reflect accurate service dates
• Reflect accurate service types
• Reflect accurate outcomes

Discrepancies between documentation and system entries must be corrected promptly.

3.10 Quality Assurance and Internal Review

Supervisory staff shall conduct periodic file reviews to ensure:

• Eligibility documentation is complete
• IEP or 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 and corrective action 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 applicable confidentiality requirements and the organization's Protection of Personal Identifiable Information policy.

Access shall be limited to authorized personnel.

Electronic systems must utilize 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 applicable 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 SERVICES AND WORK-BASED LEARNING

4.1 Purpose

This section establishes policy governing training services, work-based learning activities, employer-based training, and employment placement services for workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board.

Training and work-based learning services are designed to support participant skill development, career pathway progression, credential attainment, and employment outcomes in occupations that are in demand within the regional labor market.

This section establishes requirements governing:

- Training service authorization
- Work-based learning activities
- Work experience placements
- On-the-job training (OJT)
- Incumbent Worker Training (IWT)
- Employer eligibility and participation
- Placement and employment verification
- Monitoring and oversight of employer-based training activities

Training services must align with applicable provisions of the Workforce Innovation and Opportunity Act (WIOA), federal regulations, Virginia Works guidance, and local workforce development strategies.

4.2 Training Service Authorization

Training services may be authorized for participants when assessment and career planning activities determine that training is necessary for the participant to obtain or retain employment.

Training services must:

- Align with the participant's Individual Employment Plan (IEP), Individual Service Strategy (ISS), or other approved career planning document
- Support employment in in-demand industries or occupations
- Address documented skill gaps identified during assessment
- Be supported by appropriate documentation in the participant record

Training services may include occupational skills training, work-based learning activities, registered apprenticeship participation, incumbent worker training, or other allowable training strategies permitted under applicable program regulations.

Training services may not be authorized until eligibility is verified and enrollment requirements established under Section 2 of this Manual have been satisfied.

4.3 Types of Training Services

Allowable training services may include, but are not limited to:

- Occupational skills training
- Work-based learning activities
- On-the-job training (OJT)
- Registered Apprenticeship participation
- Pre-apprenticeship programs
- Incumbent Worker Training (IWT)
- Customized training where permitted by program regulations
- Industry-recognized credential training programs

Training services must support participant career pathway development and lead to employment, wage progression, credential attainment, or advancement in the workforce.

4.4 Work-Based Learning Overview

Work-Based Learning (WBL) provides participants with opportunities to gain practical work experience, develop occupational skills, and build connections with employers while progressing toward employment in in-demand occupations.

Work-based learning activities serve as a bridge between education, training, and unsubsidized employment and support the development of job-ready workers within the regional workforce.

Work-based learning activities must:

- Occur in a real or simulated workplace environment
- Support development of occupational and employability skills
- Align with the participant’s career pathway or employment goals
- Be documented in the participant’s Individual Service Strategy (ISS) or Individual Employment Plan (IEP)
- Support measurable progress toward employment or career advancement

Work-based learning activities may occur in public sector organizations, private non-profit organizations, or private for-profit businesses and must comply with applicable labor laws, including the Fair Labor Standards Act.

4.5 Work-Based Learning Principles

Work-based learning activities implemented under this Manual must follow these core principles:

Structured Learning

Work-based learning activities must provide structured learning experiences that include clearly defined responsibilities, training objectives, and supervision expectations.

Career Pathway Alignment

Work-based learning must support the participant's career pathway plan and align with identified career interests and skill development needs.

Skill Development

Activities must provide opportunities for participants to develop occupational competencies, employability skills, and workplace behaviors necessary for long-term employment success.

Employer Partnership

Employers participating in work-based learning serve as training partners and must provide supervision, meaningful work assignments, and opportunities for skill development.

Worker Protection

Work-based learning activities must comply with federal and state labor laws and may not:

- Displace currently employed workers
- Replace workers on layoff
- Infringe upon promotional opportunities for existing employees
- Impair existing collective bargaining agreements

Participants must be provided a safe work environment and appropriate supervision.

Documentation and Accountability

All work-based learning activities must be documented and supported by written agreements, monitoring documentation, and participant case records.

4.6 Work Experience (Youth and Young Adult Programs)

Work Experience provides participants with planned and structured learning opportunities in a workplace environment for a limited period of time.

Work experience activities allow participants to:

- Explore career interests
- Develop employability skills
- Build work history
- Gain exposure to workplace expectations

Work experience activities must align with the participant's Individual Service Strategy (ISS) or Individual Employment Plan (IEP).

Work experience placements may occur in:

- Public sector organizations
- Private non-profit organizations
- Private for-profit employers

4.6.1 Types of Work Experience

Work experience activities may include:

- Summer employment opportunities
- Internships
- Job shadowing
- Pre-apprenticeship programs
- Other structured workplace learning opportunities

Activities may be paid or unpaid depending on program design and compliance with applicable labor laws.

4.6.2 Youth Work Experience Requirement

In accordance with WIOA Section 129(c)(4), local workforce areas must expend **at least 20 percent of WIOA Youth program funds on work experience activities.**

Allowable expenditures supporting the work experience requirement may include:

- Participant wages or stipends
- Staff time developing and monitoring work experience placements
- Participant orientation activities
- Employer orientation activities
- Employability skills training related to work experience

- Academic or occupational education components connected to work experience
- Supportive services necessary for participation in work experience activities

Program administrators shall monitor expenditures to ensure compliance with the statutory work experience expenditure requirement.

4.6.3 Academic or Occupational Education Component

Work experience for youth participants must include an academic or occupational education component.

This component may occur:

- Concurrently with the work experience activity
- Prior to the work experience activity
- After completion of the work experience activity

The academic or occupational education component may occur in classroom settings, workshops, training programs, or through structured career counseling activities that reinforce workplace learning.

4.6.4 Worksite Agreements

A written worksite agreement must be executed prior to the start of any work experience activity.

The agreement must identify:

- Responsibilities of the employer, participant, and workforce program representative
- Job duties and learning objectives
- Duration and hours of participation
- Wage or stipend information where applicable
- Supervision expectations
- Timekeeping and attendance requirements

4.7 On-the-Job Training (OJT)

On-the-Job Training (OJT) is a work-based training strategy that provides participants with occupational training while engaged in productive work that leads to long-term unsubsidized employment.

OJT provides employers reimbursement for a portion of the costs associated with training participants while allowing participants to develop occupational skills within a real workplace environment.

OJT activities must align with the participant’s Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

4.7.1 Employer Eligibility

Employers participating in OJT must:

- Operate as legitimate businesses within the local workforce area
- Possess a valid Federal Employer Identification Number (FEIN)
- Maintain workers’ compensation coverage where required
- Provide adequate supervision and training
- Demonstrate the capacity to retain participants following training

OJT may not be used where participation would:

- Displace currently employed workers
- Replace workers on layoff
- Infringe upon promotional opportunities
- Support sectarian or political activities
- Support positions with no expectation of continued employment

4.7.2 OJT Agreements and Training Plans

An OJT agreement must be executed prior to the start of training.

Each OJT agreement must include:

- Employer and participant information
- Job title and description
- Wage rate and work schedule
- Training duration
- Reimbursement rate
- Occupational skills to be learned
- Monitoring and documentation requirements

Training plans must reflect the participant’s skill gaps and the expected competencies to be developed during the training period.

4.7.3 Employer Reimbursement

Employers participating in OJT may receive reimbursement for a portion of the wages paid to participants during the training period.

Reimbursement must:

- Be based on actual wages paid
- Be supported by payroll documentation
- Comply with reimbursement limits established under federal and state guidance
- Follow fiscal procedures established in the Financial Management Manual

4.8 Incumbent Worker Training (IWT)

Incumbent Worker Training provides training opportunities to currently employed workers to upgrade skills, support career advancement, and strengthen the competitiveness of regional employers.

IWT may be used as part of broader workforce strategies supporting sector partnerships, skill development, and economic growth.

IWT funds may not replace training that employers are required to provide as a normal cost of business operations.

4.8.1 Employer Cost Share

Employers receiving Incumbent Worker Training funds must contribute toward the cost of training.

Minimum employer contributions are:

- 10 percent for employers with 50 or fewer employees
- 25 percent for employers with 51 to 100 employees
- 50 percent for employers with more than 100 employees

Employer contributions may include direct payments, wages paid during training, or allowable in-kind contributions.

4.9 Customized Training

Customized Training may be provided to meet the specific skill needs of an employer or group of employers and to ensure that participating individuals acquire the skills necessary for successful employment.

Customized Training is conducted with a commitment by the employer to employ the participant upon successful completion of the training.

Customized Training must comply with 20 CFR 680.760–680.770, applicable policy issued by Virginia Works, and the policies of the New River/Mount Rogers Workforce Development Board.

Customized Training must support employment in occupations that align with regional labor market demand and workforce development priorities.

4.9.1 Eligibility Criteria for Employers and Participants

Customized Training may be approved when the following conditions are met:

• The training is designed to meet the specific requirements of an employer or group of employers.
• The employer commits to employ participants who successfully complete the training.
• The training prepares participants for employment in occupations that meet local labor market demand.
• The training results in employment that provides wages consistent with local labor market standards.
• Participants meet eligibility requirements for the applicable WIOA program under which the training is funded.

Customized Training may also be used to upgrade the skills of existing employees when necessary to retain employment or support business expansion.

4.9.2 Training Purpose and Allowable Activities

Customized Training must be directly related to the needs of the employer and may include training related to:

• Introduction of new technologies
• New production processes or service procedures
• Expansion of business operations
• Upgrading employees to new jobs that require additional skills
• Preventing layoffs by upgrading employee skills

Training must result in the acquisition of skills necessary to perform the job for which the training is provided.

4.9.3 Training Duration and Contract Limitations

Customized Training contracts must be limited to the amount of time required for participants to become proficient in the occupation for which training is provided.

Training duration must be reasonable based on:

• The complexity of the occupation
• Skills required for job performance

• Prior experience of the participant
• Employer training plan

Employers must submit a training plan that includes:

• Training objectives
• Skills to be obtained
• Training duration
• Instruction methods
• Expected employment outcomes

4.9.4 Employer Cost Sharing Requirements

Employers participating in Customized Training are required to pay a portion of the training costs in accordance with **20 CFR 680.760**.

Employer contributions must not be less than:

Employer Size	Minimum Employer Contribution
50 or fewer employees	10%
51–100 employees	25%
More than 100 employees	50%

Employer contributions may include:

• Wages paid to participants during training
• Instructor costs
• Training materials or equipment
• Curriculum development
• Other allowable training-related expenses

Documentation of the employer contribution must be maintained in the training agreement and fiscal records.

4.9.5 Employer Application and Approval Process

Employers seeking Customized Training must submit a request that includes:

• Description of the business and workforce need
• Number of individuals to be trained
• Occupations to be filled
• Proposed training plan and curriculum

- Duration of training
- Employer cost share commitment
- Commitment to employ successful trainees

Requests are reviewed by Workforce Development Board staff to ensure compliance with federal regulations, state policy, and local workforce priorities.

Final approval must be documented prior to execution of the training agreement.

4.9.6 Training Agreements

Customized Training must be documented through a written agreement between the Workforce Development Board and the employer.

The agreement must include:

- Description of the training program
- Number of participants to be trained
- Training duration
- Employer cost share amount
- Payment terms
- Expected employment outcomes
- Monitoring and reporting requirements

No training activities may begin until the agreement has been fully executed.

4.9.7 Relocation and Displacement Prohibition

Customized Training funds may not be used to assist an employer who has relocated employment from another area within the United States and caused job loss at the original location within the previous 120 days.

Employers must certify that participation in the Customized Training program will not result in the displacement of currently employed workers.

4.9.8 Monitoring and Documentation

Customized Training activities must be monitored to ensure compliance with federal regulations, state policy, and Workforce Development Board requirements.

Documentation must include:

- Signed training agreements
- Employer cost share verification

- Participant eligibility documentation
- Training attendance records
- Training completion documentation
- Employment outcomes

Records must be maintained in accordance with applicable federal and state record retention requirements.

4.10 Employer Eligibility Verification

Prior to executing any employer-based training agreement, staff must verify employer eligibility.

Verification must include confirmation of:

- Legitimate business operations
- Federal Employer Identification Number
- Workers' compensation coverage where required
- Compliance with nondiscrimination laws
- Absence of suspension or debarment under federal regulations

Where applicable, verification shall include review of the System for Award Management (SAM.gov).

Verification activities must be documented in program records.

4.11 Placement and Employment Services

Placement services support participants in securing employment aligned with career goals and training outcomes.

Placement services may include:

- Job matching
- Resume development
- Interview preparation
- Employer referrals
- Apprenticeship placement
- Coordination with employer partners

Employment outcomes must be verified using acceptable documentation including:

- State wage records
- Employer verification
- Pay stubs

• Offer letters
• Supplemental wage documentation where permitted

4.12 Performance Alignment

Training and work-based learning activities must support workforce program performance outcomes, including:

• Measurable Skill Gains
• Credential attainment
• Employment placement
• Wage progression and career advancement

Staff must ensure that services reported in official reporting systems are supported by documentation contained in the participant record.

4.13 Monitoring and Oversight

Program managers and supervisory staff shall periodically review employer-based training activities to ensure compliance with program requirements.

Monitoring activities may include review of:

• Employer agreements
• OJT contracts
• Worksite agreements
• Incumbent Worker Training agreements
• Attendance documentation
• Payroll reimbursement documentation
• Employment verification records

Monitoring shall ensure:

• Agreements are executed prior to service delivery
• Documentation supports payments and reimbursements
• Training activities align with participant career goals
• Worksite activities comply with program and labor standards

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

SECTION 5 – ELIGIBLE TRAINING PROVIDER LIST (ETPL)

5.1 Purpose

The Workforce Innovation and Opportunity Act (WIOA) requires states to maintain a list of training providers and training programs that are eligible to receive WIOA Title I training funds through Individual Training Accounts (ITAs). This list is known as the Eligible Training Provider List (ETPL).

The purpose of this policy is to establish the procedures used by the New River/Mount Rogers Workforce Development Board to support the ETPL process, ensure training programs align with regional workforce needs, and ensure compliance with federal and state workforce development requirements.

The ETPL process ensures that workforce development funds support high-quality training programs that prepare individuals for employment in occupations that are in demand within the New River/Mount Rogers Workforce Development Area.

5.2 Authority

This policy is implemented in accordance with:

- Workforce Innovation and Opportunity Act (WIOA), Sections 116 and 122
- 20 CFR 680.400 through 680.530
- 20 CFR Part 38 – Equal Opportunity and Nondiscrimination
- Virginia Board of Workforce Development ETPL policy
- Guidance issued by Virginia Works
- Applicable provisions of state law

Virginia Works maintains and oversees the statewide Eligible Training Provider List through the Virginia Workforce Connection (VaWC) system.

5.3 Policy Statement

Training providers must be included on the Virginia ETPL in order to receive WIOA Title I funding through Individual Training Accounts unless federal regulations permit an exception.

The New River/Mount Rogers Workforce Development Board supports the ETPL process by reviewing training provider information, ensuring training programs align with regional workforce priorities, and promoting access to high-quality training opportunities.

The Board supports participant choice by maintaining a diverse selection of training providers offering programs that lead to recognized credentials and employment in in-demand occupations.

5.4 Roles and Responsibilities

5.4.1 Virginia Works

Virginia Works is responsible for:

- Maintaining the statewide Eligible Training Provider List
- Managing training provider applications through Virginia Workforce Connection
- Evaluating provider eligibility and renewal submissions
- Publishing approved training providers and programs
- Monitoring provider compliance with federal and state requirements
- Removing providers that fail to meet performance or compliance standards

Virginia Works maintains the official ETPL and ensures transparency of provider performance and program cost information.

5.4.2 Local Workforce Development Board Responsibilities

The New River/Mount Rogers Workforce Development Board is responsible for:

- Reviewing training provider information submitted through Virginia Workforce Connection when applicable
- Providing input to Virginia Works regarding training provider eligibility and regional workforce alignment
- Ensuring sufficient training options exist to meet local workforce needs
- Promoting training programs that align with in-demand occupations
- Ensuring ETPL information is accessible through the workforce system
- Recommending removal of providers that fail to meet program requirements or performance standards

The Board also promotes access to training opportunities for individuals with barriers to employment.

5.5 Eligible Training Providers

Eligible training providers may include:

• Postsecondary institutions eligible to receive Title IV federal student aid
• Postsecondary vocational or technical schools
• Registered Apprenticeship programs
• Occupational training providers regulated by state or federal agencies
• Providers delivering integrated education and training programs

Registered Apprenticeship programs may be included on the ETPL in accordance with federal and state policy.

5.6 Training Services Requiring ETPL Inclusion

Training funded through **Individual Training Accounts (ITAs)** must be delivered by providers listed on the ETPL unless an allowable regulatory exception applies.

Examples include:

• Occupational skills training
• Postsecondary credential programs
• Industry-recognized certificate programs
• Career pathway training programs

Training activities exempt from ETPL requirements may include:

• On-the-job training
• Customized training
• Incumbent worker training
• Work experience
• Internships
• Transitional employment

5.7 Training Provider Applications

Training providers seeking to deliver training funded through WIOA must complete the ETPL application process through the **Virginia Workforce Connection system**.

Applications must include information such as:

• Program description
• Delivery method (in-person, online, or hybrid)
• Tuition and fee information
• Credential outcomes
• Completion rates and credential attainment data
• Alignment with in-demand occupations

• Accessibility for individuals with barriers to employment
• Equal Opportunity and nondiscrimination certification

5.8 Public Access to ETPL Information

The New River/Mount Rogers Workforce Development Board ensures public access to training provider information through the workforce system.

Approved training providers and programs are available through:

• The statewide ETPL maintained by Virginia Works
• The Virginia Workforce Connection system
• Workforce partner information resources
• The Board's website

5.9 Record Retention

Documentation related to training provider eligibility, applications, performance information, and related records must be maintained in accordance with federal and state record retention requirements.

Records must be retained for at least three years following the close of the applicable program year or until all audit issues are resolved, whichever is later.

5.10 Monitoring and Compliance

Training providers receiving WIOA-funded training services may be subject to monitoring by Virginia Works and the New River/Mount Rogers Workforce Development Board.

Monitoring activities may include review of:

• Training completion rates
• Credential attainment rates
• Employment outcomes
• Program cost information
• Compliance with nondiscrimination requirements

Providers that fail to meet performance standards or violate program requirements may be subject to corrective action, suspension, or removal from the ETPL.

5.11 Appeals

Training providers may appeal ETPL eligibility decisions or removal actions in accordance with the appeals procedures established by Virginia Works and the Virginia Board of Workforce Development.

Appeals must be submitted in writing within the timeframe established by state policy and must include documentation supporting the basis for the appeal.

SECTION 6 – SUPPORTIVE SERVICES, NEEDS RELATED PAYMENTS, AND INCENTIVES

6.1 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.

6.2 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 the program budget
- The service is approved prior to obligation

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

Only staff authorized by the Workforce Development Board may approve supportive services, incentives, or needs-related payments. Authorization levels and approval procedures must comply with the Financial Management and Procedures Manual.

6.3 Supportive Services

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

Supportive services funded with WIOA resources shall be considered last payer of resort and may only be provided when other public or community resources are unavailable or insufficient to meet the participant's documented need.

Supportive services may include, but are not limited to:

• 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.

6.4 Documentation Requirements for Supportive Services

Staff must document reasonable efforts to determine whether the participant is receiving similar assistance from another federal, state, or community program to prevent duplication of benefits.

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.

6.5 Needs Related Payments (Where Applicable)

Needs Related Payments (NRPs) 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.

6.5.1 Needs-Related Payment Eligibility

Needs Related Payments may be provided to eligible participants who:

• Are enrolled in WIOA Title I Adult or Dislocated Worker programs, where authorized
• Are actively participating in approved training services
• Demonstrate financial need through documented income verification
• Are not receiving unemployment compensation or other wage replacement income sufficient to meet basic needs

Eligibility and continued participation must be verified through training attendance documentation and case management review.

Needs Related Payments may only be provided while the participant is actively engaged in approved training activities.

6.5.2 Needs-Related Payment Calculation

Needs Related Payments shall be calculated on a weekly basis based on verified training participation and documented financial need.

Payments must be prorated based on verified participation and attendance in training activities.

Adult Participants

Weekly payment shall not exceed the equivalent of the participant's weekly unemployment compensation amount if eligible, or $300 per week, whichever is lower.

Dislocated Worker Participants

Weekly payment shall not exceed the participant's most recent unemployment compensation weekly benefit amount.

Where unemployment compensation data is unavailable, the weekly payment shall not exceed $400 per week.

All calculations must be documented using a Needs-Related Payment Calculation Worksheet and retained in the participant file.

6.5.3 Needs-Related Payment Limits

To ensure fiscal sustainability and equitable distribution of resources, the Workforce Development Board establishes the following limits:

Maximum weekly payment:

Adult Participants: $300 per week
Dislocated Worker Participants: $400 per week

Maximum cumulative NRP during a single training enrollment: $5,000

Payments must be prorated based on verified training attendance.

Requests exceeding established limits require written justification and Executive Director approval.

6.6 Incentives

Incentives may be provided to participants when permitted by the funding source and when tied to documented achievements that support progress toward education, training, or employment goals.

Incentives must:

- Be tied to achievement of specific milestones
- Be aligned with program performance goals
- Not be tied to entitlement or guaranteed participation
- Be applied consistently across participants
- Be documented and approved prior to issuance
- Comply with federal and Virginia Works guidance

Examples may include recognition for:

• Credential attainment
• Attendance benchmarks
• Academic achievement
• Completion of training milestones
• Completion of work readiness training
• Successful employment placement

Standard Incentive Amounts

Achievement	**Incentive Amount**
Attendance milestone	$25
Completion of work readiness training	$50
Academic achievement or measurable skill gain	$75
Completion of occupational training	$100
Industry-recognized credential	$100
Employment placement	$150

Maximum cumulative incentive amount per participant: $1,500

Exceptions require Executive Director approval.

6.6.1 Prohibited Incentives

Incentives must directly support engagement in education, training, or employment activities.

The following are not allowable incentives:

• Movie theater tickets
• Concert or sporting event tickets
• Entertainment venue gift cards
• Alcohol or tobacco items
• Lottery-related items
• Cash payments

Gift cards may only be used when tied to allowable purposes such as food, fuel, clothing, or work-related supplies.

6.6.2 Gift Card Internal Controls

When gift cards are used, the following internal controls must be followed.

A Gift Card Distribution Log must include:

- Date of purchase
- Vendor name
- Gift card number or identifier
- Dollar amount
- Participant name and participant ID
- Program milestone associated with the incentive
- Date issued
- Participant signature acknowledging receipt

Gift cards must be stored in a secure locked location with limited access.

Program managers must periodically reconcile gift card inventory.

Fiscal staff must reconcile purchases with distribution logs.

Missing or unused cards must be reported according to internal financial control procedures.

6.7 Out-of-Area Assistance

Out-of-Area Assistance may be provided when necessary to support participant access to employment, training, or services not reasonably available within the local workforce development area.

Assistance may include transportation, lodging, or other reasonable costs necessary to participate in approved activities outside the local area.

All assistance must be documented and approved prior to authorization.

6.7.1 Eligibility Criteria

Participants may qualify when:

- Required training or employment opportunities are unavailable locally
- Participation supports documented employment goals
- The participant meets program eligibility requirements
- Financial need is demonstrated

Requests must be approved by the Program Manager.

6.7.2 Allowable Assistance

Allowable costs may include:

- Mileage reimbursement
- Transportation assistance
- Lodging for overnight travel
- Meals during extended travel
- Other reasonable travel-related costs

All costs must comply with federal cost principles.

6.8 Prohibited Uses

Participant financial assistance may not be used for:

- Non-program related expenses
- Entertainment
- Fines or penalties
- Luxury items
- Services unrelated to participation
- Duplicate benefits

Questionable expenditures must be reviewed prior to authorization.

6.9 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 individual may authorize, process, and reconcile the same transaction.

6.10 Limits and Caps

The Workforce Development Board may establish limits on:

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

Limits must be applied consistently and documented in internal procedures.

6.11 Supportive Service Limits

Maximum supportive service amount per participant: $2,500

Standard limits include:

Transportation assistance
Up to $75 per week

Childcare assistance
Up to $150 per week

Work tools or uniforms
Up to $500

Testing or certification fees
Actual cost up to $1,000

Emergency housing or utility assistance
Up to $750 per incident (maximum two incidents)

Requests exceeding limits require Executive Director approval.

6.12 Fraud Prevention

Staff shall:

• Verify authenticity of invoices
• Confirm vendor legitimacy
• Avoid conflicts of interest
• Report suspected fraud immediately

Failure to report suspected fraud may result in disciplinary action.

6.13 Monitoring and Quality Assurance

Supervisory staff shall periodically review:

• Supportive service documentation
• Needs related payment calculations

• Incentive approvals
• Alignment between documentation and payments

Unsupported payments must be corrected promptly.

6.14 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.

6.15 Food Assistance and Meal Purchases

Food may be provided as a supportive service when necessary to enable participation in workforce development activities.

Food purchases must comply with 2 CFR §200.403–405 and §200.475.

Food purchases are not allowable for routine daily meals unrelated to program participation.

6.15.1 Participant Food Assistance

Food may be provided when:

• Training extends through normal meal periods
• Participants attend program-sponsored workshops
• Food is necessary to support participation

Allowable assistance may include:

• Meal vouchers
• Meals during training events
• Meals during extended program activities

6.15.2 Documentation Requirements

Food purchases must include:

• Documentation of program activity
• Participant sign-in sheets
• Itemized receipts
• Case notes documenting need
• Approval documentation

6.15.3 Staff Meal Purchases

Meals purchased for staff are allowable only when directly associated with approved program activities or travel.

Routine staff meetings or convenience meals are not allowable.

6.16 Duplication of Benefits Verification

Prior to approving supportive services, staff must take reasonable steps to determine whether the participant is receiving comparable assistance from other federal, state, or local programs.

Staff shall document the verification process through case notes, participant self-attestation, or other available documentation.

Supportive services funded through workforce programs may not duplicate assistance available through other programs including, but not limited to:

• Temporary Assistance for Needy Families (TANF)
• Supplemental Nutrition Assistance Program (SNAP)
• Pell Grants or other financial aid for educational costs
• Vocational Rehabilitation services
• Community action or housing assistance programs
• Other publicly funded assistance programs

When alternative resources are available, program staff should make reasonable efforts to coordinate services and refer the participant to those resources before authorizing supportive service expenditures.

Supportive services may be provided when other resources are unavailable, insufficient, or unable to meet the participant’s documented need in a timely manner.

6.17 Participant Financial Assistance Verification

Prior to approving supportive services, needs related payments, or incentives, staff must verify that the participant is actively enrolled and participating in program services.

Verification must include confirmation that:

• The participant is actively engaged in approved program activities
• The requested assistance directly supports participation in training, education, employment services, or job placement activities
• The requested service is consistent with the participant's Individual Service Strategy or Individual Employment Plan

When supportive services are tied to training participation, staff must verify attendance or participation prior to issuing payments when applicable.

6.18 Fiscal Coordination and Budget Oversight

Program staff authorizing supportive services must coordinate with fiscal staff to ensure that expenditures remain within available program funding and comply with budget limitations.

Fiscal staff are responsible for:

• Verifying documentation supporting expenditures
• Confirming that sufficient funds are available prior to payment
• Ensuring expenditures comply with federal cost principles and organizational fiscal procedures

Program managers shall periodically review supportive service expenditures to ensure program funds are used responsibly and remain available to serve eligible participants throughout the program year.

SECTION 7 – FOLLOW-UP AND RETENTION SERVICES

7.1 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.

7.2 Applicability

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

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

Where follow-up services are optional (for example certain WIOA Adult or Dislocated Worker programs), services may be provided as appropriate and must be documented when delivered.

Where multiple funding sources apply, the most restrictive requirement shall apply.

7.3 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 established under federal reporting guidance

• No future services are scheduled
• 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 into the official reporting system and supported by case documentation.

7.4 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 services must demonstrate meaningful engagement with the participant, rather than solely collecting outcome data.

7.5 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 should be individualized based on participant needs and employment or education status.

7.6 Frequency of Contact

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

- Contact should occur periodically throughout the twelve-month follow-up period
- Quarterly documentation is required at minimum for performance verification
- Additional contact may occur based on participant needs

For programs where follow-up services are optional, frequency shall be determined by program guidelines but must be documented when services are provided.

All contact attempts must be documented, even if unsuccessful.

7.7 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 when available)
- Employer verification form
- Pay stubs
- Offer letter or employment contract
- 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 or state guidance and must be documented and justified.

7.7.1 Wage Record Data Usage

State wage record data should be used as the primary source of employment and wage verification whenever available.

When wage record data is unavailable, delayed, or incomplete, supplemental documentation may be used to verify employment outcomes.

Program staff must ensure that wage data used for performance reporting is supported by documentation and entered accurately into the official reporting system.

7.8 Credential Attainment After Exit

If a credential is earned after exit but within the allowable reporting window, the following actions must occur:

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

Failure to properly document credential attainment may result in performance disallowance.

7.9 Loss of Contact

If a participant becomes unresponsive:

- Multiple contact attempts must be made using available contact methods
- Alternate contact information should be used if available
- All attempts must be documented in case notes

Loss of contact does not eliminate the obligation to attempt follow-up during the required follow-up period.

7.10 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 between file documentation and system entries must be corrected promptly.

7.11 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.

7.12 Alumni Engagement (Post-Follow-Up)

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

Alumni engagement activities 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.

7.13 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 8 – PERFORMANCE, DATA REPORTING, AND ACCOUNTABILITY

8.1 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 performance targets
- Demonstrate internal control over performance reporting
- Establish accountability for accurate reporting of program outcomes

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

8.2 Performance Accountability Framework

Programs shall align service delivery with applicable performance indicators established under federal law, grant agreements, or state guidance.

Performance indicators 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.

Program staff must ensure that services provided to participants support measurable progress toward these outcomes.

8.3 Measurable Skill Gains (MSG)

Measurable Skill Gains must be documented in accordance with federal definitions and applicable reporting guidance.

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 in a timely manner
- Be verified during internal review

Unsupported MSG entries are prohibited.

8.4 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 may include:

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

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

Copies of credential documentation must be retained in the participant file.

8.5 Placement Verification

Placement outcomes must be verified through acceptable documentation.

Primary source:

• State wage record data (where available)

Secondary or supplemental sources may include:

• Employer verification forms
• Pay stubs
• Offer letters
• Apprenticeship registration confirmation
• Postsecondary enrollment verification

Self-attestation may only be used when permitted under applicable federal or state guidance and must include written justification.

No placement outcome may be reported without supporting documentation.

8.6 Data Entry Timeliness

All performance data must be entered:

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

Delayed data entry that compromises reporting accuracy is prohibited.

8.7 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 participant 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.

8.8 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 once identified.

8.9 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.

8.10 Staff Training and Accountability

Staff responsible for data entry and performance reporting shall:

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

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

8.11 Monitoring and Performance Review

Supervisory staff shall conduct periodic performance reviews which may include:

- Review of MSG documentation
- Credential verification review
- Placement documentation review
- Cross-check of data systems with participant files
- Comparison of actual performance against negotiated targets

Findings shall be documented and corrective action implemented when necessary.

8.12 Corrective Action

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

- Data correction
- Removal of unsupported outcomes
- Development of a corrective action plan
- Staff retraining
- Increased monitoring
- Referral under fraud reporting procedures, when warranted

8.13 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 participant outcomes.

Unsupported services or outcomes may result in disallowed costs or questioned expenditures during monitoring or audit.

SECTION 9 – PRIVACY, CONFIDENTIALITY, AND RECORDS PROTECTION

9.1 Purpose

This section establishes uniform standards for the protection, confidentiality, storage, transmission, and destruction of personally identifiable information (PII) 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 of participant data
• Ensure compliance with federal and state confidentiality requirements
• Support audit, monitoring, and oversight requirements

These standards are established in accordance with:

• Workforce Innovation and Opportunity Act (WIOA)
• Training and Employment Guidance Letter (TEGL) 39-11 – Safeguarding Personally Identifiable Information
• Virginia Works Letter (VWL) 19-05 Change 1 – Information Security Requirements
• Applicable federal and state privacy and nondiscrimination regulations

All staff, contractors, subrecipients, service providers, and partners with access to participant information must comply with the requirements established in this section.

9.2 Definitions of Personally Identifiable Information

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

Sensitive PII

Sensitive PII includes information that, if disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual.

Examples include:

• Social Security numbers
• Date of birth
• Driver's license or state identification numbers
• Passport numbers
• Financial account information
• Medical or disability information
• Personal identification numbers
• Wage records or tax information

Sensitive PII requires the highest level of protection and must be stored and transmitted using secure methods.

Non-Sensitive PII

Non-Sensitive PII includes information that can identify an individual but generally presents lower risk if disclosed.

Examples include:

• Name
• Address
• Telephone number
• Email address
• Education history
• Employment history

Even non-sensitive PII must be handled in accordance with confidentiality requirements.

9.3 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.

9.4 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 to access sensitive data without approved protection
• Transmit PII through unsecured email systems
• Store Sensitive PII on personal devices or personal email accounts

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

9.5 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.

9.6 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.

Sensitive PII must not be transmitted through unsecured email or unencrypted portable storage devices.

9.6.1 Prohibited Transmission Methods

To reduce risk of unauthorized disclosure, the following transmission methods are prohibited for Sensitive PII unless specifically authorized in writing by the Executive Director and protected by approved encryption controls:

• Sending Sensitive PII through unencrypted email or including Sensitive PII in email subject lines
• Sending Sensitive PII by text message, chat tools, or social media messaging
• Storing or transferring Sensitive PII on unencrypted removable media including USB drives, CDs, DVDs, or external hard drives
• Uploading Sensitive PII to personal cloud storage accounts or non-approved file-sharing platforms

If Sensitive PII must be transmitted electronically, staff must use Board-approved secure methods such as encrypted email, secure portals, or secure file transfer systems.

9.7 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.

9.8 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.

Breaches must be reported and addressed in accordance with TEGL 39-11 and VWL 19-05 Change 1.

9.8.1 Breach Response Procedure

A suspected or confirmed breach includes, but is not limited to:

• Lost or stolen devices
• Misdirected emails containing PII
• Unauthorized system access
• Physical records that are lost, stolen, or accessed by unauthorized individuals

Upon discovery, staff must:

1. Report immediately to the Executive Director or designee.
2. Contain and secure the incident by preventing further disclosure.
3. Preserve evidence including emails, logs, and related records.
4. Document the incident including data involved and actions taken.
5. Notify Virginia Works or funders when required.
6. Implement corrective action to prevent recurrence.

9.9 Confidential Information and Nondiscrimination

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

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

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

9.10 Record Retention

Participant records shall be retained in accordance with:

• 2 CFR §200.333–200.337
• Virginia Works guidance
• Grant-specific retention requirements

All records — financial records, supporting documentation, statistical records, and other records pertinent to a federal award — must be retained for a minimum of three (3) years from the date of submission of the final expenditure report unless a longer period is required.

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

9.11 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.

9.12 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.

9.13 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

9.14 Service Provider Records Retention and Access

(Subrecipients, Contractors, and Partners)

All subrecipients, contractors, service providers, and partners that create, receive, maintain, or have access to records related to programs administered or overseen by the New River/Mount Rogers Workforce Development Board must comply with federal and state record retention and access requirements.

A. Records Covered

Service providers must retain and make available, at a minimum:

- Financial records and accounting records
- Supporting documents and source documentation
- Statistical records and performance documentation
- Participant eligibility, enrollment, service, outcome, and follow-up documentation
- Procurement, contract, and invoicing records
- Any other records necessary to document compliance

B. Minimum Retention Period

Service providers must retain covered records for three (3) years from the date the final expenditure report is submitted unless a longer period is required.

C. Exceptions and Extended Retention

If any audit, monitoring review, investigation, litigation, or other action is initiated before the end of the three-year period, records must be retained until all issues are fully resolved.

D. Collection, Storage, and Transfer Standards

Service providers must maintain records that are:

- Complete, legible, and auditable
- Secure from unauthorized access
- Organized for retrieval
- Backed up when stored electronically
- Transferred securely to the Board when requested

E. Access to Records

Service providers must provide the Workforce Development Board, Virginia Works, and federal oversight entities **timely access to records** for monitoring, audit, inspection, and investigation.

F. Contract Clause Requirement

All service provider agreements must include record retention and access clauses consistent with this Section and the Financial Management and Procedures Manual.

Failure to comply may result in corrective action, repayment, sanctions, or termination of the agreement.

SECTION 10 – ONE-STOP OPERATOR AND SYSTEM INTEGRATION

10.1 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 One-Stop system requirements
- Clarify the distinction between system coordination and service delivery
- Establish oversight and accountability standards
- Promote integrated service delivery
- Prevent conflicts of interest within the workforce system

These requirements are established in accordance with WIOA Section 121, applicable federal regulations, and guidance issued by Virginia Works.

10.2 One-Stop Delivery System Overview

The Workforce Development Board oversees a comprehensive One-Stop delivery system designed to provide coordinated access to workforce services.

The One-Stop system shall provide:

- Access to career services
- Access to training services
- Employer services and business engagement
- Access to required and additional partner programs
- Integrated referral and service coordination processes

The system shall promote service integration, co-enrollment where appropriate, and efficient use of workforce development resources.

10.3 Authority of the Workforce Development Board

The Workforce Development Board shall:

- Select the One-Stop Operator through a competitive procurement process
- Establish system-level policies and operational expectations

- Oversee One-Stop system performance
- Monitor compliance with integration requirements
- Approve Memoranda of Understanding (MOUs) with One-Stop partners
- Ensure Infrastructure Funding Agreements are executed
- Prevent conflicts of interest within system operations

The Workforce Development Board retains system oversight authority even when operational functions are delegated to the One-Stop Operator.

10.4 Role of the One-Stop Operator

The One-Stop Operator is responsible for coordinating the One-Stop delivery system and supporting collaboration among required partners.

The One-Stop Operator shall:

- Coordinate daily system operations
- Facilitate collaboration among One-Stop partners
- Implement Board-established system policies
- Promote integrated service delivery across programs
- Convene partner meetings and coordination activities
- Support continuous improvement of the workforce system

The One-Stop Operator does not manage partner staff or programs unless specifically authorized through contract.

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

10.5 Competitive Selection Requirements

The One-Stop Operator must be selected through a competitive procurement process consistent with federal procurement standards and the Board's procurement policies.

Selection documentation must include:

- Public notice of solicitation
- Defined evaluation criteria
- Proposal review documentation
- Conflict-of-interest disclosures from evaluation panel members
- Contract execution documentation

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

10.6 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
- Document partner participation in the One-Stop system

Infrastructure Funding Agreements must be documented and retained.

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

10.7 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 and referral processes where feasible

Referrals between partners must be documented in case notes or system records when appropriate.

10.8 Accessibility and Equal Opportunity

The One-Stop system shall ensure services are accessible to all individuals.

The system shall:

- Be physically accessible to individuals with disabilities
- Provide programmatic accessibility
- Provide reasonable accommodations when required
- Provide language assistance services when necessary
- Display Equal Opportunity notices and required public information

Accessibility compliance must align with nondiscrimination requirements established under 29 CFR Part 38 and related federal guidance.

10.9 Monitoring and Oversight

The Workforce Development Board shall periodically review:

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

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

10.10 Conflict of Interest Safeguards

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

The One-Stop Operator may not:

- Influence procurement decisions in which it has a financial interest
- Approve funding decisions related to its own organization
- Engage in self-dealing or preferential treatment

Any potential conflicts must be disclosed and managed in accordance with Board governance policies.

10.11 Continuous Improvement

The One-Stop system shall engage in ongoing evaluation and improvement efforts.

Continuous improvement activities may include:

- Performance analysis
- Customer feedback collection
- Employer feedback collection
- Service delivery redesign when necessary
- Partner collaboration review

System improvements shall be documented and implemented where feasible to enhance service delivery and workforce system performance.

SECTION 11 – TRANSFER OF FUNDS AND PROGRAM AUTHORITY

11.1 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.

11.2 Authority to Transfer Funds

Where permitted by federal or state regulations, the Workforce Development Board may request the transfer of funds between eligible funding streams in accordance with WIOA Section 133(b)(4) and applicable guidance issued by Virginia Works.

Transfers may be requested to:

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

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

11.3 Transfer Limits

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

Under current federal law, up to 100 percent of funds may be transferred between the Adult and Dislocated Worker programs unless modified by federal statute or state guidance.

The applicable limit shall be determined based on:

• Federal statute
• Federal regulation
• Guidance issued by Virginia Works

If multiple limits apply, the most restrictive requirement shall govern.

11.4 Transfer Approval Process

Prior to requesting a transfer:

1. The Program Manager shall assess service demand and funding utilization.
2. The Finance Manager shall evaluate budget impact and administrative cost implications.
3. The Executive Director shall review and approve the transfer recommendation.
4. The Workforce Development Board shall review and approve the proposed transfer.
5. Where required, the Chief Local Elected Officials (CLEOs) shall approve the transfer recommendation.
6. Required documentation shall be submitted to Virginia Works for approval, when applicable.

No transfer shall occur without documented approval from the appropriate governing authorities.

11.5 Documentation Requirements

Transfer documentation must include:

• Justification for the transfer
• Current expenditure and obligation analysis
• Projected service demand
• Impact on performance targets
• Administrative cost cap review
• Board meeting minutes reflecting approval
• Chief Local Elected Official approval when required
• Virginia Works approval when applicable

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

11.6 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 levels
- Risk of service disruption

Transfers must support strategic service delivery and program performance, rather than short-term budget balancing alone.

11.7 Fiscal Execution

Once approved:

- The Finance Manager shall coordinate with the Fiscal Agent.
- Adjustments shall be made within the accounting system.
- Obligation tracking records shall be updated.
- Administrative cost 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.

11.8 Monitoring and Oversight

Supervisory staff shall:

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

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

11.9 Restrictions

Transfers shall not be used to:

- Circumvent performance accountability requirements
- Avoid compliance with priority of service

- Mask program underperformance
- Exceed administrative cost caps
- Support activities not authorized under federal statute or regulation

11.10 Enforcement

Failure to follow transfer procedures may result in:

- Funding disallowance
- Required repayment
- Corrective action
- Increased monitoring
- Limitation of Board authority where required by oversight agencies

SECTION 12 – INTERNAL MONITORING AND QUALITY ASSURANCE

12.1 Purpose

This section establishes procedures for monitoring, documenting, reviewing, and ensuring compliance in the administration of workforce programs operated or overseen by the New River/Mount Rogers Workforce Development Board.

These procedures ensure:

- Proper documentation of services and employer-based training activities
- Compliance with federal and state regulations
- Verification of employer eligibility and contract compliance
- Proper reimbursement documentation and fiscal oversight
- Internal monitoring and quality assurance
- Protection against unsupported costs or improper payments

Internal monitoring supports strong internal controls and helps ensure compliance with applicable regulations including WIOA, 2 CFR Part 200 (Uniform Guidance), and Virginia Works guidance.

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

12.2 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.

12.3 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.

Required documentation includes:

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

Training payments must not be made without documentation of attendance.

12.4 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.

12.5 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.

12.6 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.

12.7 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 employer contact

Minimum monitoring frequency:

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

Monitoring must be documented in case notes and retained in the participant or employer file.

12.8 Placement and Employment Verification Procedure

When a 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 the reporting system.

Wage documentation hierarchy:

1. State wage record (primary source)
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.

12.9 Employer Payment Internal Controls

No single individual may:

• Execute a contract
• Approve reimbursement
• Process payment
• Reconcile payment

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

12.10 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
• 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.

12.11 Red Flags Requiring Escalation

Immediate supervisory review is 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.

12.12 Internal Review and Quality Assurance

Supervisory review shall occur:

• Prior to first reimbursement
• At midpoint of contract
• At completion of the training agreement

Quarterly review of employer agreements must include:

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

Findings must be documented and corrective action implemented when necessary.

12.13 Record Retention

Employer agreements and related documentation must be retained consistent with:

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

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

SECTION 13 – YOUTH SERVICES

13.1 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.

13.2 Youth and Young Adult Services Framework

13.2.1 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.

13.2.2 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.

13.2.3 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.

13.2.4 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.

13.2.5 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 7 of this Manual.

13.3 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
- 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.

13.3.1 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.

13.3.2 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.

13.3.3 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.

13.3.4 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.

13.3.5 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.

13.3.6 Leadership Development and Community Service

YouthBuild participants must receive:

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

Documentation must reflect participation and outcomes.

13.3.7 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 7 of this Manual.

13.3.8 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 8.

13.3.9 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.

13.3.10 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.

13.4 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

13.5 Requires Additional Assistance (Eligibility Barrier)

The Workforce Innovation and Opportunity Act (WIOA) identifies “requires additional assistance to complete an educational program or to secure or hold employment” as an allowable barrier to eligibility for youth participants. In accordance with 20 CFR § 681.310(a), the New River/Mount Rogers Workforce Development Board establishes the following local definition and requirements.

A. Definition

A youth shall be considered to "require additional assistance" when the individual demonstrates documented educational, employment, or personal barriers that significantly impede their ability to:

- Complete a secondary or postsecondary educational program; or
- Secure, retain, or advance in employment

Eligibility under this category must be based on objective and documented need and may not be used in the absence of supporting evidence.

B. Allowable Criteria

A youth may qualify under this barrier if one or more of the following conditions are documented:

Educational Barriers

- Grade point average below 2.0
- One or more grade levels behind expected age progression
- History of course failure or credit deficiency
- Documented risk of dropping out as determined by a school official
- Suspension, expulsion, or documented behavioral issues affecting academic progress
- Low standardized test scores or basic skills deficiency not otherwise qualifying under another barrier

Employment Barriers

- Little or no prior work history
- Inconsistent or unsuccessful employment history
- Demonstrated lack of job readiness skills
- Limited exposure to workplace expectations or career pathways
- Chronic unemployment or underemployment

Social, Family, or Personal Barriers

- Lack of stable or supportive home environment
- Living in a non-traditional or unstable household
- Family history of chronic unemployment or public assistance dependency

- Documented behavioral, emotional, or social challenges impacting employability
- Exposure to trauma, substance use, or other adverse life conditions that impede success

C. Documentation Requirements

Eligibility under the “requires additional assistance” category must be supported by appropriate documentation, which may include:

- School records or transcripts
- Case notes from objective assessment
- Employer statements or work history records
- Court, social service, or partner agency documentation
- Self-attestation only when no other documentation is reasonably available and must be justified in the case file

All determinations must be clearly documented in the participant file and aligned with the Individual Service Strategy (ISS).

D. Limitation on Use for In-School Youth (ISY)

In accordance with 20 CFR § 681.310(b):

- No more than five percent (5%) of newly enrolled In-School Youth (ISY) participants in a given program year may be determined eligible solely under the “requires additional assistance” category

Programs must prioritize enrollment of ISY participants who meet other eligibility criteria when feasible.

E. Tracking and Monitoring

The Workforce Development Board and its service providers must:

- Track the number and percentage of ISY participants enrolled under this eligibility category
- Maintain internal controls to ensure compliance with the five percent (5%) limitation
- Monitor usage of this barrier during programmatic and eligibility reviews

- Implement corrective action if thresholds are approached or exceeded

Tracking must be conducted on an ongoing basis throughout the program year.

F. Consistency and Oversight

All determinations under this category must:

- Be applied consistently across participants and service providers
- Be based on objective assessment and documented need
- Be subject to monitoring, review, and validation

Failure to properly define, document, or track this eligibility category may result in findings, disallowed costs, or corrective action.

SECTION 14 – DATA MANAGEMENT AND REPORTING CONTROLS

14.1 Purpose

The New River/Mount Rogers Workforce Development Board requires accurate, timely, and verifiable data reporting to ensure program integrity, support federal performance accountability, and maintain compliance with federal and state reporting requirements.

This section establishes standards governing workforce data management, reporting controls, and internal validation procedures for all workforce programs administered or overseen by the Workforce Development Board.

Data management practices must align with:

- Workforce Innovation and Opportunity Act (WIOA)
- Uniform Guidance (2 CFR Part 200)
- U.S. Department of Labor reporting guidance
- Virginia Works reporting requirements

Data reporting must be supported by documentation standards outlined in Section 3 – Case Management and Participant File Documentation and must support performance reporting requirements described in Section 8 – Performance, Data Reporting, and Accountability.

14.2 Systems of Record

The Workforce Development Board utilizes designated systems of record to document participant services, activities, and outcomes.

Virginia Workforce Connection (VaWC) serves as the official system of record for programs funded under the Workforce Innovation and Opportunity Act (WIOA).

B2B Engage serves as the system of record for programs administered directly by the Workforce Development Board that are not required to utilize VaWC.

All services reported within a system of record must be supported by verifiable documentation maintained within the participant case file in accordance with Section 3 – Case Management and Participant File Documentation.

Data entered into official systems must:

- Accurately reflect services delivered
- Match case file documentation

• Reflect correct service dates and program activities
• Be entered by authorized staff

Access to systems containing participant information must comply with confidentiality and data protection standards outlined in Section 9 – Privacy, Confidentiality, and Records Protection.

14.3 Documentation Requirements

Program operators must maintain documentation sufficient to support:

• Participant eligibility
• Services provided
• Training activities
• Measurable skill gains
• Credential attainment
• Employment outcomes
• Wage verification
• Program exit determinations

Documentation requirements must align with service delivery standards established in:

• Section 3 – Case Management and Participant File Documentation
• Section 4 – Training Services
• Section 6 – Supportive Services
• Section 7 – Follow-Up and Retention Services

Documentation must be maintained in accordance with federal and state record retention requirements and must be readily available for monitoring or audit review.

Documentation must also be sufficient to support reportable data elements required under federal and state reporting frameworks, including those defined within the Workforce Innovation and Opportunity Act Participant Individual Record Layout (PIRL).

Failure to maintain adequate documentation may result in data correction, performance disallowance, or monitoring findings.

14.4 Data Entry Timeliness

Program operators must ensure that participant services and outcomes are entered into the appropriate system of record in a timely manner consistent with state reporting timelines and internal program standards.

Services should be entered as close to the date of service as possible to ensure data accuracy.

Delays in data entry that could impact:

• Performance reporting
• Monitoring reviews
• Grant compliance

are prohibited.

Timely data entry supports performance accountability requirements described in Section 8 – Performance, Data Reporting, and Accountability.

14.5 Data Validation and Internal Review

To ensure reporting accuracy, the Workforce Development Board requires regular data validation procedures.

Data validation activities may include:

• Verification of reported services against case file documentation
• Confirmation of outcome documentation
• Validation of wage records and employment verification
• Review of measurable skill gain documentation
• Cross-check of system data against source documentation

Data validation processes support internal monitoring requirements described in Section 12 – Internal Monitoring and Quality Assurance.

Internal reviews may include both automated system checks and manual file verification.

14.6 Data Integrity Standards

All workforce data must meet the following standards:

• Accurate
• Complete
• Timely
• Verifiable
• Consistent with source documentation

Data entered into official reporting systems must reflect actual services delivered and outcomes achieved.

Submission of knowingly inaccurate data is prohibited.

14.7 Supervisory Oversight

Supervisory staff are responsible for ensuring:

• Data entry accuracy
• Documentation completeness
• Timely correction of identified errors
• Compliance with reporting requirements

Supervisory staff may conduct periodic reviews of participant records and reporting system entries to ensure data accuracy and compliance.

Oversight activities may be incorporated into the monitoring framework described in Section 12 – Internal Monitoring and Quality Assurance.

14.8 Data Correction Procedures

If errors or discrepancies are identified in an official reporting system:

• Corrections must be made promptly
• Case notes should document the correction when appropriate
• Supporting documentation must be retained
• Supervisory staff must review significant corrections affecting performance outcomes

Repeated data inaccuracies may result in additional monitoring, corrective action, or staff retraining.

14.9 Monitoring and Continuous Improvement

Data management practices are subject to periodic review through:

• Internal monitoring
• State monitoring reviews
• Federal oversight

Monitoring procedures must align with Section 12 – Internal Monitoring and Quality Assurance.

Program operators must cooperate fully with monitoring activities and must address any identified findings within required corrective action timelines.

Monitoring results may be used to strengthen reporting procedures, improve documentation practices, and support continuous program improvement.

14.10 Data Certification and Accountability

The Workforce Development Board requires periodic internal review of reported data to ensure accuracy, completeness, and consistency with supporting documentation.

Supervisory staff may conduct periodic certification of program data, which may include:

• Review of reported performance outcomes
• Verification that reported services are supported by documentation
• Confirmation that reported credentials, employment outcomes, and measurable skill gains meet applicable reporting definitions
• Review of data entered into official reporting systems against participant case files

Data certification supports internal control requirements established under 2 CFR §200.303 and reinforces the documentation and monitoring standards outlined in:

• Section 3 – Case Management and Participant File Documentation
• Section 8 – Performance, Data Reporting, and Accountability
• Section 12 – Internal Monitoring and Quality Assurance

Where discrepancies are identified, corrective action must be taken promptly to ensure the integrity of reported data.

SECTION 15 – FISCAL GOVERNANCE AND CROSS-REFERENCE

15.1 Purpose

The New River/Mount Rogers Workforce Development Board maintains separate but coordinated governance structures for programmatic policy and financial management.

This section establishes the relationship between the Programmatic Policies and Operations Manual and the Board's Financial Management Manual to ensure consistent application of fiscal and programmatic requirements.

Programmatic policies govern service delivery, eligibility, case management, training services, and performance accountability, while fiscal policies govern financial management, procurement, and financial compliance.

Both manuals operate together to ensure compliance with federal, state, and grant-specific requirements.

15.2 Relationship to the Financial Management Manual

The Financial Management Manual establishes policies governing fiscal administration of workforce programs, including:

- procurement
- cost allowability
- budget management
- financial reporting
- payment processing
- cost allocation
- asset management
- subrecipient monitoring
- internal fiscal controls

Program operators must comply with all fiscal policies established within the Financial Management Manual when administering workforce programs.

Where fiscal procedures are referenced within this manual, the Financial Management Manual serves as the governing authority.

15.3 Allowability of Costs

All program expenditures must meet federal standards of allowability, reasonableness, necessity, and allocability as defined in:

• Workforce Innovation and Opportunity Act (WIOA)
• Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200)
• Applicable federal and state guidance

Program services, supportive services, training expenditures, and employer reimbursements must be fully documented and supported prior to payment.

Documentation requirements must align with the participant documentation standards outlined in Section 3 – Case Management and Participant File Documentation.

15.4 Coordination of Program and Fiscal Oversight

Programmatic staff and fiscal staff must coordinate to ensure that:

• expenditures align with approved program activities
• participant payments are properly documented
• employer reimbursements meet contractual requirements
• grant funds are used for allowable purposes

Fiscal review procedures may include verification of documentation supporting reported program activities described in:

• Section 4 – Training Services
• Section 6 – Supportive Services
• Section 7 – Follow-Up and Retention Services
• Section 8 – Performance, Data Reporting, and Accountability

15.5 Internal Controls

The Workforce Development Board maintains internal control systems designed to prevent:

• disallowed costs
• improper payments
• unsupported expenditures
• duplication of benefits

Internal controls include both fiscal oversight procedures and programmatic documentation standards.

Internal control requirements must align with Uniform Guidance internal control standards established under 2 CFR §200.303.

Programmatic monitoring procedures described in Section 12 – Internal Monitoring and Quality Assurance support the Board's internal control framework.

15.6 Monitoring and Audit Coordination

Fiscal compliance may be reviewed through:

- internal monitoring
- fiscal monitoring
- state monitoring reviews
- federal oversight
- independent financial audits

Monitoring procedures must align with the oversight framework described in Section 12 – Internal Monitoring and Quality Assurance.

Program operators must cooperate fully with all monitoring activities and must address any identified findings or corrective actions within required timeframes.

SECTION 16 – EQUAL OPPORTUNITY AND NONDISCRIMINATION

16.1 Purpose

The purpose of this section is to establish the Equal Opportunity (EO) and nondiscrimination policy governing all programs and activities administered or overseen by the New River/Mount Rogers Workforce Development Board.

This policy ensures compliance with:

• Workforce Innovation and Opportunity Act (WIOA) Section 188
• 29 CFR Part 38 – Implementation of the Nondiscrimination and Equal Opportunity Provisions of WIOA
• Applicable federal civil rights laws
• Virginia Works policy guidance

The Workforce Development Board is committed to providing equal opportunity in all programs, services, and employment practices.

Auxiliary aids and services are available upon request to individuals with disabilities. Language assistance services are available for individuals with limited English proficiency.

16.2 Definitions

Equal Opportunity (EO)

The principle that individuals must not be excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity funded under WIOA.

Protected Classes

Discrimination is prohibited based on:

• Race
• Color
• Religion
• Sex (including pregnancy, childbirth, gender identity, and sexual orientation)
• National origin (including limited English proficiency)
• Age
• Disability
• Political affiliation or belief
• Citizenship or participation in any WIOA Title I program

16.3 Policy Statement

The New River/Mount Rogers Workforce Development Board prohibits discrimination in all programs, services, and activities funded in whole or in part by federal workforce development funds.

No individual shall be:

- Denied participation in workforce programs
- Denied benefits
- Subjected to discrimination
- Treated differently in service delivery

on the basis of any protected class identified under WIOA Section 188.

Auxiliary aids and services are available upon request to individuals with disabilities.

Language assistance services are available to individuals with limited English proficiency.

16.4 Equal Opportunity Officer

The Workforce Development Board designates an Equal Opportunity Officer responsible for coordinating compliance with WIOA nondiscrimination requirements.

Local EO Officer

Jenny Bolte
Executive Director and Equal Opportunity Officer
New River/Mount Rogers Workforce Development Board
6580 Valley Center Drive, Suite 119
Radford, VA 24141

Phone: (540) 633-6764
Email: Jenny.Bolte@nrmrworks.org

The EO Officer is responsible for:

- Monitoring nondiscrimination compliance
- Coordinating complaint investigations
- Ensuring required notices are distributed
- Ensuring accessibility and language assistance
- Conducting periodic EO reviews of programs and service providers

16.5 Accessibility Requirements

Programs must ensure equal access to services for all individuals.

16.5.1 Physical Accessibility

All program facilities must be accessible to individuals with disabilities consistent with:

- Americans with Disabilities Act (ADA)
- Section 504 of the Rehabilitation Act

16.5.2 Program Accessibility

Programs must provide reasonable accommodations to ensure individuals with disabilities can fully participate in workforce services.

Examples may include:

- Accessible training materials
- Assistive technology
- Alternative testing formats
- Schedule adjustments when necessary

16.5.3 Language Access

Language assistance must be provided to individuals with limited English proficiency (LEP).

Language access may include:

- Interpretation services
- Translated materials
- Bilingual staff when available

Participants must not be required to provide their own interpreter.

16.6 Notice Requirements

The Workforce Development Board and all program operators must provide notice of nondiscrimination rights.

Required notices include:

- "Equal Opportunity is the Law" notice
- Participant nondiscrimination notification
- Complaint filing procedures

These notices must be:

- Posted prominently in program offices
- Included in participant orientation materials
- Provided to participants at enrollment
- Included in participant handbooks when applicable

16.7 Discrimination Complaint Procedures

Individuals who believe they have experienced discrimination under a WIOA Title I program may file a complaint within 180 calendar days of the alleged violation.

Complaints may be filed with:

Local EO Officer

Jenny Bolte
New River/Mount Rogers Workforce Development Board
6580 Valley Center Drive, Suite 119
Radford, VA 24141

Phone: (540) 633-6764
Email: Jenny.Bolte@nrmrworks.org

State EO Officer

Vicki Tanner, MPA
Virginia Works
2221 Edward Holland Drive, Suite 500
Richmond, VA 23230

Phone: (434) 978-8543
Email: vicki.tanner@virginiaworks.gov

U.S. Department of Labor

Civil Rights Center (CRC)
U.S. Department of Labor
200 Constitution Avenue NW
Room N-4123
Washington, DC 20210

Phone: (202) 693-6500
Email: CRCExternalComplaints@dol.gov

16.8 Complaint Investigation Process

When a discrimination complaint is filed locally:

1. The EO Officer will acknowledge receipt of the complaint.
2. The EO Officer will conduct an investigation.
3. The investigation must be completed within 90 calendar days.
4. A written Notice of Final Action will be issued.

If no final action is issued within 90 days, the complainant may file directly with the U.S. Department of Labor Civil Rights Center (CRC).

16.9 Confidentiality and Non-Retaliation

All discrimination complaints will be handled with strict confidentiality consistent with a fair investigation.

Retaliation against any individual who files a complaint or participates in an investigation is strictly prohibited.

16.10 Documentation Requirements

The Workforce Development Board and program operators must maintain documentation demonstrating compliance with nondiscrimination requirements, including:

• EO notices and postings
• Participant notification forms
• Accessibility accommodations provided
• Complaint documentation
• Investigation records

Records must be maintained in accordance with federal record retention requirements and the documentation standards outlined in Section 9 – Privacy, Confidentiality, and Records Protection.

16.11 Monitoring Requirements

The Workforce Development Board will periodically review programs and service providers to ensure compliance with nondiscrimination requirements.

Monitoring activities may include:

• Review of participant files
• Review of complaint logs
• Review of accessibility compliance
• Verification of required EO notices

Monitoring activities must align with the oversight procedures described in Section 12 – Internal Monitoring and Quality Assurance.

Corrective action may be required if deficiencies are identified.

16.12 Equal Opportunity Compliance and Methods of Administration

The New River/Mount Rogers Workforce Development Board maintains procedures designed to ensure compliance with the nondiscrimination and equal opportunity requirements of WIOA Section 188 and 29 CFR Part 38.

The Workforce Development Board maintains internal systems and practices consistent with the Virginia Works Methods of Administration to ensure that:

- Equal opportunity requirements are integrated into all workforce programs and activities
- Staff and service providers receive appropriate training on nondiscrimination requirements
- Required nondiscrimination notices are distributed and publicly posted
- Program operators and service providers comply with accessibility requirements for individuals with disabilities and individuals with limited English proficiency
- Complaints alleging discrimination are processed in accordance with federal regulations
- Monitoring activities include review of equal opportunity compliance

Program operators, contractors, and subrecipients must comply with the nondiscrimination requirements contained in WIOA Section 188 and 29 CFR Part 38 as a condition of receiving workforce development funds.

Failure to comply with nondiscrimination requirements may result in corrective action, funding sanctions, or termination of agreements.

SECTION 17 – GRIEVANCE AND COMPLAINT PROCEDURES

17.1 Purpose

This section establishes procedures for resolving grievances and complaints related to the operation of workforce development programs administered by the New River/Mount Rogers Workforce Development Board.

These procedures are established in accordance with WIOA Section 181 and 20 CFR §683.600.

These procedures apply to complaints related to:

- Program operations
- Service delivery
- Participant treatment
- Contracted service providers
- Violations of WIOA program requirements

Discrimination complaints are addressed separately under Section 16 – Equal Opportunity and Nondiscrimination.

17.2 Definitions

Grievance

A formal complaint alleging a violation of WIOA program requirements, program policy, or dissatisfaction with workforce program services.

Complainant

An individual or entity filing a grievance or complaint.

17.3 Policy

The Workforce Development Board will provide an orderly and fair process for resolving grievances and complaints related to workforce development programs.

Participants, service providers, partners, employers, and other affected parties have the right to file grievances regarding workforce programs administered by the Workforce Development Board.

Complaints must be handled promptly, fairly, and without retaliation.

17.4 Filing a Grievance or Complaint

Grievances must be submitted in writing within 30 calendar days of the alleged violation.

The complaint must include:

- Name and contact information of the complainant
- Date of the alleged violation
- Identification of the respondent
- Description of the allegation
- Requested resolution

Grievances may be filed with:

Jenny Bolte
Executive Director
New River/Mount Rogers Workforce Development Board
6580 Valley Center Drive
Radford, VA 24141

Phone: (540) 633-6764
Email: Jenny.Bolte@nrmrworks.org

17.5 Informal Resolution

The Workforce Development Board may attempt to resolve grievances informally through mediation when appropriate.

Informal resolution may occur prior to formal investigation when both parties agree.

Participation in informal resolution does not waive the complainant's right to pursue formal grievance procedures.

17.6 Investigation and Hearing Procedures

Upon receipt of a grievance or complaint, the Workforce Development Board will:

1. Acknowledge receipt of the complaint within five business days.
2. Conduct an investigation of the allegations.
3. Provide the complainant an opportunity for a hearing if the complaint cannot be resolved informally.

4. Issue a written decision within 60 calendar days of the filing of the complaint.

Hearings may be conducted by the Workforce Development Board or a designated impartial hearing officer.

17.7 Written Resolution

The written decision will include:

• Findings of fact
• Determination regarding the allegation
• Corrective action if applicable
• Information regarding appeal rights

17.8 Appeals

If the complainant is dissatisfied with the local decision, or if no decision is issued within 60 calendar days, the complaint may be appealed to:

Constance Green
Virginia Works – WIOA Title I Administrative Entity
2221 Edward Holland Drive
Richmond, VA 23230

Phone: (434) 978-8538
Email: constance.green@virginiaworks.gov

Appeals must be filed within 30 calendar days of receiving the local decision.

17.9 Confidentiality and Non-Retaliation

All grievances will be handled with confidentiality to the extent possible while allowing for a fair investigation.

Retaliation against individuals who file complaints or participate in investigations is strictly prohibited.

17.10 Documentation Requirements

The Workforce Development Board must maintain documentation of grievance proceedings including:

- Written complaint
- Investigation notes
- Evidence reviewed
- Written decision
- Hearing documentation if applicable
- Appeal documentation if applicable

Documentation must be retained consistent with federal record retention requirements and the documentation standards outlined in Section 9 – Privacy, Confidentiality, and Records Protection.

17.11 Monitoring

The Workforce Development Board will maintain a grievance log and periodically review complaints to identify trends and ensure compliance with federal regulations.

Grievance procedures may be reviewed as part of internal monitoring activities conducted under Section 12 – Internal Monitoring and Quality Assurance.

PART II

PROGRAM OPERATIONS AND INTERNAL PROCEDURES

SECTION 18 – ELIGIBILITY DETERMINATION PROCEDURES

18.1 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.

Eligibility policy standards are established in Section 1 – Participant Eligibility, while this section establishes the operational procedures used to implement those requirements.

18.2 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.

18.3 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.

18.4 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.

18.5 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, complete, and retained in the participant file consistent with Section 3 – Participant File Documentation and Section 9 – Privacy and Records Protection.

18.6 Step 4 – Income Determination Procedure

When income eligibility is required:

1. Determine household size.
2. Identify income sources for the required look-back period.
3. Calculate total gross income.
4. Compare income to the applicable poverty level or LLSIL standard.
5. Complete the standardized income calculation worksheet.
6. Attach all source documentation.

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

Supervisory review is required prior to enrollment.

18.7 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 the reporting system and participant file.

If priority applies, documentation must support the category selected.

Priority of service must be applied consistent with Section 1 – Eligibility and Priority of Service.

18.8 Step 6 – Selective Service Verification Procedure

For applicable male participants:

Under age 26

• Confirm Selective Service 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.

18.9 Step 7 – Self-Sufficiency Determination

Where required:

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

Calculation worksheet must be retained in the participant file.

18.10 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 the exception tracking log
- Obtain supervisory approval prior to enrollment

Exception logs must be reviewed periodically for compliance.

18.11 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 the official reporting system

Enrollment date must be on or after supervisory approval.

Retroactive enrollment is prohibited.

18.12 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.

18.13 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.

18.14 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.

Monitoring activities must align with Section 12 – Internal Monitoring and Quality Assurance.

18.15 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 in accordance with organizational fraud reporting procedures.

18.16 Internal Control Alignment

Eligibility procedures must align with:

• Segregation of duties standards
• Documentation retention requirements

- Audit readiness expectations
- Financial obligation controls

Eligibility approval must occur prior to financial obligation or service authorization.

PART II – PROGRAM OPERATIONS AND INTERNAL PROCEDURES

SECTION 19 – CASE FILE MANAGEMENT AND DOCUMENTATION STANDARDS

19.1 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 outcomes
- Establish internal quality control standards

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

19.2 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.

19.3 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 participant barriers change
- At least every 90 days for active participants

Updates must be documented in case notes.

19.4 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.

19.5 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 – Follow-Up Services

Supervisors may require more frequent documentation based on participant need.

19.6 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.

Documentation standards must align with Section 14 – Data Management and Reporting Controls.

19.7 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.

19.8 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.

19.9 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 include written justification.

19.10 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.

Electronic file management must comply with Section 9 – Privacy and Records Protection.

19.11 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.

Monitoring activities align with Section 12 – Internal Monitoring and Quality Assurance.

19.12 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.

19.13 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 participant files as audit-ready at all times.

19.14 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 20 – EMPLOYER TRAINING AGREEMENTS AND REIMBURSEMENT PROCEDURES

20.1 Purpose

This section establishes operational procedures for executing, documenting, monitoring, and reimbursing employer-based training activities administered or overseen by the New River/Mount Rogers Workforce Development Board.

These procedures apply to employer-based training activities including:

• Occupational Skills Training provided through third-party providers
• Work Experience
• On-the-Job Training (OJT)
• Incumbent Worker Training (IWT)

The purpose of these procedures is to:

• Ensure employer eligibility verification
• Ensure proper execution of training agreements
• Maintain compliance with procurement and contracting standards
• Ensure proper reimbursement documentation
• Provide internal monitoring and oversight of employer agreements
• Protect against unsupported employer payments and disallowed costs

Employer-based training activities must comply with the policy framework established in Section 4 – Training Services.

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

20.2 Employer Eligibility Verification Procedure

Prior to executing any employer training agreement, staff must verify employer eligibility.

Staff must:

1. Verify employer legitimacy, including:
   • Active business registration
   • Valid tax identification number
   • Physical business address

2. Verify employer standing, including:
   • Confirmation that the employer is not debarred or suspended through SAM.gov verification
   • Review for known labor law violations that would prohibit participation
3. Document verification by maintaining:

• SAM verification screenshot
• Completed employer eligibility checklist
• Conflict-of-interest disclosure review when applicable

No employer 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 requirements must additionally comply with the Subrecipient Monitoring provisions contained in the Financial Management and Procedures Manual.

20.3 Occupational Skills Training Procedures

When occupational skills training is provided through a third-party training provider, staff must:

1. Confirm provider eligibility, including ETPL eligibility when required.
2. Confirm training aligns with the participant's Individual Service Strategy (ISS).
3. Obtain training cost documentation.
4. Verify availability of funds prior to authorization.
5. Execute a written training agreement prior to the start date.
6. Enter the financial obligation into the tracking system.

Required documentation must include:

• Training plan
• Cost breakdown
• Enrollment verification
• Attendance documentation
• Progress verification

Training payments may not be made without documentation verifying attendance and participation.

Documentation must be maintained in accordance with Section 19 – Case File Management and Documentation Standards.

20.4 Work Experience Procedures

Before a work experience activity begins, staff must:

1. Execute a written worksite agreement.
2. Define job duties and supervision plan.
3. Confirm wage rate and work schedule.
4. Ensure workers' compensation coverage is documented.
5. Confirm alignment with the participant's Individual Service Strategy.

During work experience, staff must:

• Collect signed timesheets for each pay period
• Maintain documentation of employer contact at least monthly
• Document skill development progress

Supervisory monitoring must be documented.

20.5 On-the-Job Training (OJT) Procedures

Prior to the start of OJT:

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

Reimbursement procedures require:

1. Employer submission of payroll documentation.
2. Staff verification of:

• Wages paid
• Hours worked
• Compliance with approved reimbursement percentage

3. Case manager confirmation of training progress.
4. Supervisory review and approval.
5. Fiscal processing in accordance with the Financial Management Manual.

No reimbursement may occur without verified payroll documentation.

20.6 Incumbent Worker Training Procedures

Prior to execution of an incumbent worker training agreement, staff must:

1. Confirm employer contribution requirements are met.
2. Document incumbent worker wage levels.
3. Confirm training improves retention, advancement, or wage progression.
4. Execute a written training agreement prior to the start of training.

Employer cost-share documentation must include:

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

Employer contributions must be verified prior to reimbursement.

20.7 Employer Monitoring Standards

Monitoring of employer-based training activities must include:

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

Minimum monitoring frequency:

- On-the-Job Training: At least once during the training period
- Work Experience: Monthly
- Incumbent Worker Training: At midpoint or completion

Monitoring activities must be documented in case notes and retained in the participant file consistent with Section 19 – Case File Management and Documentation Standards.

20.8 Placement and Employment Verification Procedure

When a participant obtains employment, staff must:

1. Collect employment verification documentation.

2. Confirm employment start date.
3. Confirm wage rate.
4. Document alignment with training services received.
5. Enter employment outcomes into the reporting system.

Documentation hierarchy for wage verification:

Primary source:

• State wage record data

Secondary sources (when permitted):

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

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

Documentation must comply with Section 14 – Data Management and Reporting Controls.

20.9 Employer Payment Internal Controls

To ensure proper segregation of duties, no single individual may:

• Execute the employer agreement
• Approve reimbursement
• Process payment
• Reconcile payment

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

20.10 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
• 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.

20.11 Red Flags Requiring Escalation

Immediate supervisory review is required when any of the following occur:

- Employer refuses to provide documentation
- Payroll documentation appears altered or inconsistent
- 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 organizational fraud reporting procedures.

20.12 Internal Review and Quality Assurance

Supervisory review of employer agreements must occur:

- Prior to first reimbursement
- At midpoint of the agreement when applicable
- At completion of the training activity

Quarterly internal reviews of employer agreements must include:

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

Findings must be documented and corrective action implemented when necessary.

Monitoring activities must align with Section 12 – Internal Monitoring and Quality Assurance.

20.13 Record Retention

Employer agreements and supporting documentation must be retained consistent with:

- 2 CFR §200.334
- Virginia Works requirements
- Grant-specific requirements
- Organizational record retention standards

Records must remain accessible for audit, monitoring, and review.

SECTION 21 – SUPPORTIVE SERVICES AND PAYMENT PROCEDURES

21.1 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

Supportive services must also comply with the policy framework established in Section 6 – Supportive Services.

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

21.2 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.

21.3 Supportive Services Request Procedure

When a supportive service is requested:

1. Case manager documents:

• Type of service requested
• Justification
• Relationship to program participation

2. Case manager collects:

• Invoice, bill, quote, or cost estimate
• Vendor information
• Supporting documentation demonstrating program participation

3. Case manager verifies:

• Participant is actively enrolled
• Service is necessary to enable participation
• Service is allowable under the applicable funding source

4. Case manager completes the Supportive Services Approval Form.

Documentation must be retained in the participant file consistent with Section 19 – Case File Management and Documentation Standards.

21.4 Duplication of Benefits Verification

Prior to approval, staff must:

• Ask the participant whether assistance is available from another source
• Document referral attempts when applicable
• Confirm the service is not being reimbursed by another program or funding source

Duplication-of-benefits verification must be documented in the participant file.

21.5 Approval Routing

The approval process shall occur as follows:

1. Case manager recommends approval.

2. Program Manager reviews:

• Documentation completeness
• Allowability of the request
• Budget availability

3. Program Manager signs the approval form.
4. Fiscal staff verify documentation and budget alignment.
5. Obligation is entered into the tracking system.
6. Payment request is submitted to the Fiscal Agent.

Segregation of duties must be maintained at all times.

21.6 Vendor Payment vs Participant Reimbursement

Direct vendor payment is the preferred payment method.

When vendor payment is possible:

• Payment shall be made directly to the vendor.
• The vendor invoice must be retained in the participant file.

Participant reimbursement may occur only when:

• Direct vendor payment is not possible; or
• A documented emergency situation has been pre-approved.

Reimbursement requires:

• Original receipt
• Proof of payment
• Supervisory approval

Cash payments are strongly discouraged and require documented justification.

21.7 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 the allowable formula.
5. Complete the Needs Related Payment Calculation Worksheet.

6. Obtain Program Manager approval.
7. Submit documentation for fiscal processing.

Calculation worksheets must be retained in the participant file.

21.8 Incentive Payment Procedures

Incentives must:

• Be tied to documented milestone achievement
• Be applied consistently across participants
• Be approved prior to payment

Procedure:

1. Case manager verifies milestone completion.
2. Supporting documentation of milestone is retained (credential, attendance record, etc.).
3. Incentive Approval Form is completed.
4. Program Manager approves the payment.
5. Obligation is entered into the tracking system.
6. Fiscal processing is completed.

Incentives may not be discretionary or arbitrary.

21.9 Payment Tracking and Reconciliation

Supportive service payments must be tracked through:

• Obligation tracking spreadsheet
• Budget monitoring reports
• Participant payment log

Monthly reconciliation must confirm:

• Payment matches approval documentation
• Payment matches the invoice or receipt
• Payment matches the obligation entry
• Budget remains within allowable limits

Any discrepancies must be corrected immediately.

21.10 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 system.

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

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

Payments exceeding established caps without documented approval are prohibited.

21.11 Internal Control Safeguards

To ensure proper financial oversight, no single individual may:

- Authorize payment
- Process payment
- Reconcile payment

Segregation of duties must align with the internal control standards established in the Financial Management and Procedures Manual.

21.12 Red Flags Requiring Escalation

Immediate supervisory review is required if any of the following occur:

- Repeated high-dollar requests
- Altered receipts
- Duplicate invoices
- Participant requesting reimbursement without documentation
- Vendor legitimacy concerns

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

21.13 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 when necessary.

Monitoring activities must align with Section 12 – Internal Monitoring and Quality Assurance.

21.14 Record Retention

All supportive service documentation must be retained consistent with:

- 2 CFR §200.334
- Virginia Works requirements
- Grant-specific requirements
- Organizational record retention standards

Records must remain accessible and audit-ready for monitoring, audit, or review.

SECTION 22 – SERVICE AUTHORIZATION AND FINANCIAL OBLIGATION CONTROLS

22.1 Purpose

This section establishes procedures governing the authorization, approval, documentation, and financial obligation of participant services prior to the delivery of services or expenditure of funds.

These procedures ensure:

• Services are authorized before delivery
• Funds are obligated before costs are incurred
• Documentation supports all financial commitments
• Program and fiscal controls are aligned
• Segregation of duties is maintained
• Disallowed costs are prevented

Service authorization procedures apply to all participant services, including training, work-based learning activities, supportive services, and employer-based training agreements.

Fiscal execution must comply with the Financial Management and Procedures Manual.

22.2 Service Authorization Requirement

No service may begin and no funds may be expended until the service has been formally authorized.

Authorization must occur prior to:

• Training enrollment
• Work experience placement
• On-the-job training start date
• Incumbent worker training participation
• Supportive service issuance
• Participant incentive payments
• Needs related payments

Services initiated prior to authorization may result in disallowed costs.

22.3 Service Authorization Procedure

Prior to authorizing a participant service, staff must complete the following steps:

1. Confirm participant eligibility has been approved in accordance with Section 18 – Eligibility Determination Procedures.
2. Confirm service aligns with the participant's Individual Service Strategy (ISS) as outlined in Section 19 – Case File Management and Documentation Standards.
3. Verify the service is allowable under the applicable funding source.
4. Obtain required service documentation, which may include:

• Training plan or enrollment documentation
• Employer agreement or training outline
• Supportive service request documentation
• Cost estimate, invoice, or vendor quote

5. Confirm funding availability.
6. Submit service authorization request for supervisory approval.
7. Enter service authorization into the designated tracking or reporting system.

Documentation must be retained in the participant file.

22.4 Financial Obligation Requirement

Financial obligation must occur prior to incurring any program cost.

An obligation represents a formal commitment of funds and must be recorded in the organization's obligation tracking system before:

• Training agreements are executed
• Employer contracts are signed
• Supportive service payments are approved
• Participant incentives are issued
• Needs related payments are calculated

Failure to obligate funds prior to service delivery may result in fiscal findings.

22.5 Obligation Entry Procedure

Once a service is authorized:

1. Program staff confirm the approved cost amount.
2. The obligation is entered into the designated obligation tracking system or spreadsheet, including:

• Participant name or identifier
• Funding stream
• Type of service
• Authorized amount
• Date of authorization
• Expected service period

3. Fiscal staff verify:

• Funding availability
• Proper funding stream assignment
• Compliance with administrative cost limitations where applicable.

4. Obligation entry must occur before services begin.

The obligation record must reconcile with financial reports maintained by fiscal staff.

22.6 Alignment with Reporting Systems

Authorized services must be entered into the designated reporting system consistent with Section 14 – Data Management and Reporting Controls.

When applicable:

• WIOA services must be entered into Virginia Workforce Connection (VaWC).
• Workforce Development Board programs may be tracked within B2B Engage or other approved systems.

Reporting entries must align with:

• Service authorization documentation
• Financial obligation records
• Participant case file documentation.

22.7 Modification of Authorized Services

If a service requires modification (including cost increases, training extensions, or changes in service scope):

1. Case manager documents the reason for modification.
2. Updated documentation must be collected when necessary.
3. Supervisor approval must be obtained prior to implementing the change.
4. Obligation records must be updated to reflect the revised amount.

Retroactive authorization or retroactive cost increases are prohibited.

22.8 Segregation of Duties

To maintain appropriate internal controls:

No single individual may perform all of the following functions:

- Authorize the service
- Obligate the funds
- Approve payment
- Process payment

Segregation of duties must align with internal control procedures established in the Financial Management and Procedures Manual.

22.9 Supervisory Review

Supervisory staff are responsible for ensuring:

- Services are properly authorized
- Funding is obligated prior to service delivery
- Documentation supports authorized services
- Reporting system entries match service authorizations

Supervisory review may occur through:

- Case file review
- Obligation tracking review
- Internal monitoring activities

These reviews must align with Section 12 – Internal Monitoring and Quality Assurance.

22.10 Red Flags Requiring Escalation

Immediate supervisory review is required if any of the following occur:

- Training begins before authorization
- Service cost exceeds authorized amount
- Obligation entry is missing or incomplete
- Documentation supporting authorization is absent
- Vendor or employer agreement executed after service start date

Suspected fraud or misuse of funds must be reported in accordance with organizational fraud reporting procedures.

22.11 Record Retention

All service authorization and financial obligation documentation must be retained in accordance with:

- 2 CFR §200.334
- Virginia Works requirements
- Grant-specific retention requirements
- Organizational record retention policies

Documentation must remain accessible for monitoring, audit, and compliance review.

SECTION 23 – PERFORMANCE VERIFICATION AND DATA VALIDATION PROCEDURES

23.1 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.

23.2 Systems of Record

For WIOA Title I programs, the Virginia Workforce Connection (VaWC) serves as the official system of record for participant enrollment, services, and performance reporting.

For workforce programs administered directly by the New River/Mount Rogers Workforce Development Board that are not required to utilize VaWC, the Board's B2B Engage system serves as the official internal system of record.

Data entered into any reporting system must reconcile with source documentation maintained in participant files in accordance with the documentation standards established in Section 19 – Case File Management and Documentation Standards.

23.3 Measurable Skill Gain (MSG) Verification Procedure

Before a Measurable Skill Gain (MSG) is entered into the reporting system:

1. Case manager identifies the qualifying MSG type.
2. Verify the gain occurred within the program year.

3. Collect source documentation, which may include:

• Educational functioning level gain documentation
• Training milestone verification
• Transcript showing credit completion
• Documentation of diploma or equivalent

4. Confirm the gain meets the federal definition of a Measurable Skill Gain.
5. Upload documentation into the participant file.
6. Enter the gain into the reporting system within the required timeframe.

Supervisory review is required prior to quarter-end reporting.

MSG may not be reported without supporting documentation.

23.4 Credential Verification Procedure

Before reporting a credential:

1. Confirm the credential meets the federal definition of a recognized postsecondary credential.
2. Confirm the credential aligns with the participant's training pathway.
3. Obtain documentation such as:

• Copy of certificate
• Official transcript
• Licensing documentation
• Registry confirmation

4. Verify the credential award date.
5. Upload documentation to the participant file.
6. Enter the credential into the reporting system.

OSHA-10 is not considered a recognized credential under federal performance reporting definitions.

Supervisory review is required prior to reporting.

23.5 Employment Verification Procedure

Employment verification must follow the following documentation hierarchy.

Primary Source

• State wage record data

Secondary Sources (when primary is unavailable)

• 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 the reporting system.
6. Retain documentation in the participant file.

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

23.6 Wage Verification and Median Earnings Procedure

When wage information is required:

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

If supplemental wage documentation is used:

• Justification must be documented.
• Supervisory approval is required.

23.7 Exit Review Procedure

Prior to confirming participant exit:

1. Confirm no services have been provided during the required no-service period.
2. Confirm no future services are scheduled.

3. Review the participant file for completeness.
4. Confirm the final status of the Individual Service Strategy (ISS) is documented.
5. Confirm credential documentation is complete, if applicable.
6. Confirm employment documentation has been collected, if applicable.
7. Complete and document the Exit Review Checklist.

Supervisory approval is required before final exit entry.

Retroactive exit date adjustments must be documented and approved.

23.8 Global Exclusion Documentation

If a global exclusion applies:

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

Improper use of exclusions is prohibited.

23.9 Data Entry Timeline Standards

All reportable events must be entered:

• Within five (5) business days of documentation receipt
• Prior to quarterly reporting deadlines
• Without backdating or estimation

Failure to enter data timely may impact performance reporting accuracy.

23.10 Quarterly Internal Data Validation Review

At least quarterly, supervisory staff shall conduct internal data validation reviews which include:

• Random selection of participant files
• Comparison of reporting system entries to file documentation
• Recalculation of income or wage documentation when necessary

• Validation of MSG documentation
• Validation of credential documentation
• Validation of employment documentation

Findings must be documented.

Corrections must be made prior to official report submission.

23.11 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.

23.12 Performance Monitoring Dashboard Review

Quarterly performance review shall include:

• Measurable Skill Gain attainment rates
• Credential attainment rates
• Second Quarter Employment Rate
• Fourth Quarter Employment Rate
• Median earnings
• Youth performance indicators

Performance trends must be analyzed.

If performance falls below established targets:

• Root cause analysis must be conducted
• Corrective action plans must be developed
• Implementation must be monitored

23.13 Data Integrity and Fraud Safeguards

Staff shall not:

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

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

Intentional misreporting may result in disciplinary action.

23.14 Corrective Action Procedure

If data validation reveals deficiencies:

1. Document the finding.
2. Correct the reporting system entry.
3. Notify the case manager responsible for the record.
4. Provide retraining when necessary.
5. Conduct follow-up review.

Repeated deficiencies may result in increased supervisory oversight.

23.15 Alignment with Fiscal Controls

Performance documentation must align with:

• Training expenditures
• Supportive service expenditures
• Employer reimbursement documentation

Unsupported outcomes may trigger fiscal review.

23.16 Official Reporting System Authority

All official performance reporting shall be derived from the designated state reporting system, the Virginia Workforce Connection (VaWC).

Data entered into the reporting system must reconcile with source documentation retained in participant files.

Internal spreadsheets or tracking tools may supplement internal management processes but shall not replace the official reporting system as the authoritative data source.

23.17 Performance Documentation Hierarchy

To ensure the accuracy and reliability of reported performance outcomes, the Workforce Development Board establishes the following documentation hierarchy for verifying participant outcomes.

Whenever possible, primary source documentation must be used to support reported outcomes. Secondary documentation may be used only when primary documentation is unavailable and must include written justification.

Primary Documentation (Preferred)

- State wage record data
- Official transcripts or registrar records
- Official credential certificates or licensing verification
- Training provider completion documentation
- Employer payroll records

Secondary Documentation (When Primary Is Not Available)

- Employer verification forms
- Pay stubs
- Offer letters
- Apprenticeship registration documentation
- Training provider verification letters

Supplemental Documentation (Limited Use)

- Participant self-attestation
- Case manager notes summarizing participant statements

Supplemental documentation may only be used when:

- Primary and secondary documentation are not reasonably available; and
- Written justification explaining the circumstances is included in the participant file.

Narrative case notes alone may not be used as the sole source of verification for measurable skill gains, credentials, employment outcomes, or wage information.

Supervisory review is required when secondary or supplemental documentation is used to support reportable outcomes.

SECTION 24 – PARTICIPANT EXIT AND FOLLOW-UP PROCEDURES

24.1 Purpose

This section establishes procedures governing participant exit determination, case closure review, and follow-up service requirements for workforce programs administered or overseen by the Workforce Development Board.

These procedures ensure:

- Participant exit is accurately determined
- Follow-up services are provided as required by program regulations
- Employment retention is supported
- Performance outcomes are documented and verified
- Case files remain complete and audit-ready

These procedures apply to all workforce programs unless more restrictive grant requirements apply.

24.2 Definition of Exit

Participant exit occurs when a participant has not received a reportable service for 90 consecutive calendar days and no future services are scheduled.

Exit must be determined in accordance with federal performance reporting requirements.

Participants receiving only follow-up services are considered exited participants for performance reporting purposes.

Exit determinations must align with procedures established in Section 23 – Performance Verification and Data Validation Procedures.

24.3 Exit Determination Procedure

Prior to confirming participant exit, staff must conduct an exit review that includes:

1. Confirming the participant has received no reportable services for 90 consecutive days.
2. Confirming no additional services are scheduled.
3. Reviewing the participant file to confirm:

• Eligibility documentation is complete
• Individual Service Strategy (ISS) reflects final participant status
• Training documentation is complete
• Credential documentation is obtained, if applicable
• Employment documentation is obtained, if applicable

4. Completing an Exit Review Checklist.

5. Obtaining supervisory approval prior to finalizing exit in the reporting system.

Exit documentation must be retained in the participant case file.

24.4 Follow-Up Service Requirement

Follow-up services must be provided to participants after exit in accordance with federal program requirements.

Follow-up services are intended to support:

• Employment retention
• Career advancement
• Credential attainment verification
• Ongoing connection to workforce services

Follow-up services are required for:

• Adult participants receiving certain training services
• Dislocated Worker participants receiving certain training services
• Youth participants

Follow-up services for youth participants must be provided for a minimum of twelve (12) months after exit, unless the participant declines services or cannot be located after documented attempts.

24.5 Types of Follow-Up Services

Follow-up services may include:

• Employment retention support
• Career coaching
• Workplace problem-solving assistance
• Additional referrals to supportive services
• Financial literacy resources
• Educational advancement referrals
• Connection to advanced training opportunities

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

Follow-up services do not extend the participant's program enrollment.

24.6 Follow-Up Contact Standards

Staff must make reasonable efforts to maintain contact with participants during the follow-up period.

Recommended contact methods may include:

- Phone contact
- Email communication
- Text message communication (when appropriate)
- Employer verification
- Wage record verification

At minimum, staff must document periodic follow-up contact attempts consistent with program requirements.

Youth participants must receive ongoing follow-up support during the required twelve-month follow-up period.

24.7 Employment Verification During Follow-Up

When employment is obtained after exit, staff must collect documentation verifying employment consistent with Section 23 – Performance Verification and Data Validation Procedures.

Documentation may include:

Primary source
- State wage record data

Secondary sources
- Employer verification
- Pay stubs
- Offer letters
- Apprenticeship documentation

Employment verification must be retained in the participant file.

24.8 Documentation Requirements

Follow-up services and contact attempts must be documented in participant case notes.

Case notes must include:

• Date of contact or attempted contact
• Method of contact
• Employment status update
• Services or assistance provided
• Referrals made if applicable

Documentation standards must align with Section 19 – Case File Management and Documentation Standards.

24.9 Participants Unable to Be Located

If a participant cannot be contacted during follow-up:

1. Staff must make multiple documented attempts using available contact information.
2. Attempts should include different contact methods when possible.
3. If the participant remains unreachable, case notes must document:

• Dates of contact attempts
• Methods used
• Outcome of attempts

Participants who cannot be located may still be included in performance reporting based on wage record data when available.

24.10 Performance Alignment

Follow-up activities support federal performance indicators including:

• Second Quarter Employment Rate
• Fourth Quarter Employment Rate
• Median Earnings
• Credential Attainment Rate

Accurate documentation during follow-up helps ensure performance outcomes are properly verified and reported.

Follow-up procedures must align with Section 23 – Performance Verification and Data Validation Procedures.

24.11 Supervisory Review

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

• Contact attempts are documented
• Employment verification procedures are followed
• Performance documentation aligns with case file records

Findings may be addressed through corrective action or staff retraining when necessary.

Monitoring activities must align with Section 12 – Internal Monitoring and Quality Assurance.

24.12 Record Retention

Follow-up documentation must be retained in accordance with:

• 2 CFR §200.334
• Virginia Works requirements
• Grant-specific retention requirements
• Organizational record retention policies

Records must remain accessible for monitoring, audit, and compliance review.

SECTION 25 – YOUTH OPERATIONAL PROCEDURES

25.1 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 Program Manual shall govern.

25A – WIOA YOUTH OPERATIONAL PROCEDURES

25A.1 Youth Eligibility Verification Procedures

Youth eligibility determination must comply with Section 18 – Eligibility Determination Procedures, with additional verification of youth-specific eligibility criteria including:

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

Barrier documentation must be retained in the participant file and clearly labeled.

25A.2 Youth Exception Category Tracking

When exception categories are permitted:

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

The Youth Exception Log must be reviewed quarterly by the Program Manager.

If the exception percentage approaches the allowable cap:

• Enrollment must pause until review is completed.
• The Program Manager shall document the quarterly review of Youth Exception percentage utilization and retain documentation demonstrating compliance with applicable caps.

25A.3 Youth Program Element Tracking

Each enrolled youth must receive access to the required WIOA youth program elements.

Procedure:

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

Failure to document access to required elements may result in compliance findings.

25A.4 Youth Work Experience Expenditure Tracking

Where federal requirements mandate that a percentage of youth funds be spent on work experience:

1. The Finance Manager shall maintain a Work Experience Expenditure Tracking Spreadsheet.
2. The Program Manager shall review expenditures monthly.
3. Quarterly review shall confirm compliance with the required expenditure percentage.

If the required threshold is not being met:

• Service strategy must be adjusted immediately.
• Corrective action must be documented.

25A.5 Youth Follow-Up Operational Controls

Youth follow-up services must:

• Occur for at least twelve (12) months after exit
• Include documented periodic contact with the participant
• Include verification of employment, education, or training status when applicable

Follow-up services must be documented consistent with Section 24 – Participant Exit and Follow-Up Procedures.

A Follow-Up Tracking Log must be maintained and reviewed periodically to ensure follow-up requirements are met.

25B – YOUTHBUILD OPERATIONAL PROCEDURES

25B.1 YouthBuild Stipend Calculation Procedure

Prior to stipend payment:

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

Stipend payments must align with attendance records.

25B.2 Construction Safety Documentation Controls

For YouthBuild construction activities:

1. Maintain OSHA training documentation.
2. Maintain safety orientation documentation.
3. Document daily supervision of participants.
4. Maintain an incident log.
5. Conduct periodic safety reviews.

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

Prior to placement at any worksite, documentation must confirm:

• Appropriate workers' compensation coverage
• 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.

25B.3 YouthBuild Incident Reporting Workflow

In the event of a participant or worksite incident:

1. Document the incident immediately.
2. Notify the Program Manager.
3. Notify the Executive Director when required.
4. Determine whether reporting to the U.S. Department of Labor is required.
5. Document corrective action taken.
6. Retain the incident report in a secure file.

Incident reports must align with applicable grant reporting requirements.

25B.4 Leadership Development Documentation

YouthBuild leadership activities must be documented through:

- Attendance logs
- Description of leadership activities
- Summary of leadership or civic engagement skills developed
- Case note documentation

Documentation must support YouthBuild grant performance requirements.

25B.5 YouthBuild Credential Documentation

Prior to reporting credentials:

1. Verify the credential meets the federal definition of a recognized credential.
2. Confirm supporting documentation is retained in the participant file.
3. Enter the credential into the reporting system.
4. Confirm the credential aligns with the participant's training pathway.

OSHA-10 shall **not** be reported as a recognized credential under federal performance reporting definitions.

25B.6 YouthBuild Partner Oversight

Where YouthBuild utilizes subcontractors or training partners:

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

Subrecipient oversight must align with applicable fiscal monitoring procedures.

25B.7 Alumni Engagement Tracking

YouthBuild alumni engagement activities may include:

- Mentorship
- Recruitment support
- Community presentations

Alumni contact must be documented but does not constitute a reportable program service unless specifically permitted by program rules.

25.2 Youth Internal Monitoring

Quarterly youth program review must include:

- Eligibility verification spot checks
- Youth program element documentation review
- Work experience expenditure compliance
- Stipend calculation verification
- Incident log review
- Youth performance trend review

Findings must be documented and corrective action implemented where necessary.

Monitoring activities must align with Section 12 – Internal Monitoring and Quality Assurance.

SECTION 26 – EMERGENCY AND ESCALATION RESPONSE POLICY

26.1 Purpose

This policy establishes procedures for responding to emergency situations, including incidents involving irate, disruptive, or potentially unsafe behavior by participants, customers, staff, or visitors. The purpose is to ensure the safety of all individuals, promote consistent response practices, and provide clear guidance when de-escalation is unsuccessful.

26.2 Scope

This policy applies to all Workforce Development Board staff, contractors, partners, and program operators in all service locations, including Virginia Career Works centers, training sites, and community-based service environments.

26.3 Definitions

Escalated Situation:
Any interaction in which an individual exhibits heightened emotional distress, agitation, or disruptive behavior that interferes with normal operations.

Emergency Situation:
Any situation involving immediate risk of harm to individuals, including but not limited to threats of violence, physical aggression, medical emergencies, or unsafe conditions.

De-escalation:
Actions taken to reduce tension and stabilize a situation through calm communication, active listening, and non-confrontational behavior.

26.4 General Policy Statement

The Workforce Development Board is committed to maintaining a safe and respectful environment for staff, participants, and the public. Staff are expected to attempt appropriate de-escalation when safe to do so. However, staff safety takes priority over service delivery, and no staff member is expected to remain in or manage a situation that poses a risk to personal safety.

26.5 Response to Escalated or Irate Individuals

When encountering an irate or escalating individual, staff shall:

1. Remain calm and use a respectful, non-confrontational tone.
2. Listen actively and allow the individual to express concerns without interruption.
3. Set clear and appropriate boundaries for behavior.
4. Avoid arguing, threatening language, or physical contact.
5. Maintain appropriate physical distance and position themselves near an exit when possible.
6. Seek assistance from a supervisor or colleague when needed.

If the situation stabilizes, staff may proceed with service delivery or refer the individual through appropriate grievance or complaint procedures.

26.6 When De-escalation is Unsuccessful

If the individual continues to escalate or refuses to comply with behavioral expectations, staff shall:

1. Disengage from the interaction in a calm and professional manner.
2. Inform the individual that services cannot continue due to behavior.
3. Remove themselves and others from the immediate area if necessary.
4. Notify a supervisor or designated leadership staff immediately.
5. Avoid further engagement that may escalate the situation.

26.7 Emergency Response Procedures

Staff shall treat the situation as an emergency and take immediate action if any of the following occur:

- Threats of harm to self or others
- Physical aggression or attempted assault
- Possession of a weapon or implied weapon

- Severe disruption posing a safety risk
- Medical emergency or collapse
- Any situation where staff feel unsafe

In such cases, staff shall:

1. Call 911 or local emergency services immediately.
2. Follow site-specific emergency procedures (evacuation, lockdown, etc.) if applicable.
3. Notify supervisory staff as soon as it is safe to do so.
4. Do not attempt to physically intervene unless trained and authorized.

26.8 Removal from Premises

When behavior poses a disruption or safety concern:

- Staff may request that the individual leave the premises.
- If the individual refuses, law enforcement may be contacted.
- Access to services may be suspended in accordance with applicable program policies, including participant conduct and grievance procedures.

26.9 Staff Safety and Authority

- Staff are not required to tolerate threatening, abusive, or unsafe behavior.
- Staff have the authority to discontinue services when safety is at risk.
- Supervisors are responsible for supporting staff and assuming control of escalated situations when present.

26.10 Incident Documentation and Reporting

Following any escalated or emergency situation:

1. Staff shall document the incident in accordance with established incident reporting procedures.
2. Documentation must include:
    - Description of the incident
    - Date, time, and location

    - Individuals involved
    - Actions taken
    - Outcome and any follow-up actions
3. The incident shall be reported to the Program Manager and Executive Director as required.
4. Documentation must be retained in accordance with record retention and reporting requirements.

This policy shall align with all applicable incident reporting requirements outlined in program-specific procedures, including YouthBuild and other federally funded programs.

26.11 Training Requirements

All staff shall receive training on:

- De-escalation techniques
- Workplace safety awareness
- Emergency response procedures

Training shall be documented and provided periodically to ensure staff preparedness.

26.12 Policy Alignment

This policy shall be implemented in coordination with:

- Participant conduct and disciplinary procedures
- Grievance and complaint procedures
- Incident reporting protocols
- Applicable Virginia Works guidance

Where conflicts arise, the stricter safety requirement shall apply.

SECTION 27 – CROSS-MANUAL ALIGNMENT AND SUPERSESSION

27.1 Purpose

This section establishes the relationship between the Programmatic Policies and Operations Manual, the Governance and Legal Compliance Manual, and the Financial Management and Procedures Manual adopted by the New River/Mount Rogers Workforce Development Board.

These manuals collectively establish the policies, procedures, and internal control framework governing the administration of workforce development programs and activities.

The purpose of this section is to ensure that:

- Programmatic policies operate in alignment with fiscal and governance requirements
- Staff and program operators understand which policies apply to specific activities
- Conflicts between policy sources are resolved using consistent compliance standards
- All workforce activities remain compliant with federal, state, and local requirements

27.2 Relationship Between Organizational Manuals

The Workforce Development Board maintains three primary policy manuals:

Governance and Legal Compliance Manual
Establishes policies governing:

- Board governance and structure
- Conflict of interest and ethics standards
- Board membership and responsibilities
- Oversight of workforce programs
- Legal compliance requirements

Financial Management and Procedures Manual
Establishes policies governing:

- Procurement and contracting
- Cost allowability
- Financial reporting
- Budget management
- Internal fiscal controls
- Subrecipient monitoring

• Asset management
• Payment processing

Programmatic Policies and Operations Manual (this Manual)
Establishes policies governing:

• Workforce program operations
• Participant eligibility and enrollment procedures
• Case management and documentation standards
• Employer training agreements and work-based learning
• Supportive services and participant payments
• Data reporting and performance verification
• Participant exit and follow-up procedures
• Youth and YouthBuild program operations

These manuals must be applied together to ensure full compliance with applicable regulations.

27.3 Resolution of Policy Conflicts

If conflicts arise between manuals or policy provisions, the following hierarchy shall apply:

1. Federal statutes and regulations (including WIOA and 2 CFR Part 200)
2. Federal grant requirements
3. Virginia Works policies and guidance
4. Organizational policy manuals

Where provisions differ between organizational manuals, the stricter compliance requirement shall apply.

Staff must seek supervisory guidance if policy interpretation is unclear.

27.4 Authority and Responsibility

The Workforce Development Board is responsible for adopting and maintaining organizational policies that govern workforce program administration.

The Executive Director is responsible for:

• Implementing policies adopted by the Board
• Ensuring staff and service providers comply with adopted policies
• Updating procedures when federal or state guidance changes
• Ensuring training is provided on applicable policies

Program operators, contractors, and subrecipients must comply with this Manual as a condition of receiving workforce development funds.

27.5 Supersession of Prior Policies

This Manual supersedes all previously issued standalone programmatic policies, guidance documents, and operational procedures adopted prior to the effective date of this Manual, unless explicitly retained or incorporated into this document.

Where older policies conflict with this Manual, the provisions of this Manual shall govern.

27.6 Compliance and Enforcement

All staff, program operators, contractors, and service providers administering workforce development programs must comply with the policies and procedures contained in this Manual.

Failure to comply with these policies may result in:

- Corrective action
- Required staff retraining
- Increased monitoring
- Contract modification or termination
- Disciplinary action consistent with organizational policies

Compliance with these policies is necessary to ensure proper stewardship of federal and state workforce development funds.

APPENDIX A – YOUTHBUILD PROGRAM POLICIES AND OPERATIONS SUPPLEMENT

Effective Date: January 1, 2026

A.1 Purpose and Authority

This Appendix establishes YouthBuild-specific program requirements for activities administered by the New River/Mount Rogers Workforce Development Board under a U.S. Department of Labor YouthBuild award.

This Appendix supplements the Programmatic Policies and Operations Manual and the Financial Management and Procedures Manual. Topics already governed in those manuals are incorporated by reference and are not repeated here except where YouthBuild imposes a stricter or different requirement.

YouthBuild is authorized under WIOA Section 171 and governed by 20 CFR Part 688, applicable grant terms and conditions, DOL guidance, and the Notice of Award. YouthBuild is recognized in regulation as a pre-apprenticeship program, and current DOL funding guidance continues to frame YouthBuild as a pre-apprenticeship model that prepares participants for quality jobs and Registered Apprenticeship pathways.

Where this Appendix conflicts with the general Programmatic Manual, the stricter YouthBuild requirement shall govern for YouthBuild-funded activities. Where a fiscal issue is involved, the Financial Management and Procedures Manual governs.

A.2 Program Model and Required YouthBuild Components

The YouthBuild program shall operate as a structured education and occupational training program serving eligible youth and young adults through a model that integrates:

- academic instruction
- occupational skills training
- leadership development
- service to the community
- supportive services
- follow-up services

YouthBuild regulations define the program as providing disadvantaged youth opportunities for employment, education, leadership development, service to the community, and training through rehabilitation or construction activities and other approved occupational pathways.

To the extent these topics are already addressed in the main manual, the following sections apply:

• Eligibility and enrollment: Sections 13, 18
• Case files and documentation: Sections 3, 19
• Training services and work-based learning: Sections 4, 20
• Supportive services and payments: Sections 6, 21
• Performance and data reporting: Sections 8, 14, 23
• Exit and follow-up: Sections 7, 24
• Equal Opportunity and grievances: Sections 16 and 17

A.3 YouthBuild Participant Eligibility Standards

For YouthBuild-funded participation, eligibility must satisfy YouthBuild-specific rules in addition to any local intake and documentation procedures.

An individual is eligible for YouthBuild if the individual is:

• at least age 16 and not more than age 24 on the date of enrollment;
• a school dropout, including an individual who dropped out and later reenrolled, as allowed by regulation; and
• within one or more allowable qualifying categories under YouthBuild, including low-income family status, foster care, offender status, disability, child of a currently or formerly incarcerated parent, or migrant youth.

YouthBuild-specific eligibility documentation shall be maintained using the procedures in Section 18 – Eligibility Determination Procedures and Section 19 – Case File Management and Documentation Standards.

Where allowed by regulation, exception or alternative eligibility pathways must be documented and tracked in a manner sufficient to demonstrate compliance with YouthBuild requirements.

Work authorization verification, where applicable to ETA grant participation, must comply with current DOL guidance.

A.4 Pre-Enrollment and Mental Toughness

YouthBuild applicants may participate in a structured pre-enrollment or “Mental Toughness” phase before official enrollment, provided that applicant status remains clearly distinct from participant status.

During applicant status:

• no official participant enrollment may be recorded;
• no participant stipend may be paid;
• no participant supportive service may be charged as an enrolled participant cost unless specifically allowable and documented under applicable grant guidance;
• staff must maintain clear separation between applicant documentation and enrolled participant files.

This Appendix incorporates by reference Section 18 – Eligibility Determination Procedures, Section 19 – Case File Management and Documentation Standards, and Section 22 – Service Authorization and Financial Obligation Controls for operational controls relating to enrollment timing, documentation, and pre-obligation requirements.

A.5 YouthBuild Work Sites, Construction Activities, and Safety

Where YouthBuild includes construction or rehabilitation activities, work sites and projects must comply with YouthBuild regulations, grant requirements, and DOL guidance on qualifying work sites and minimum construction activity standards. DOL's continuing guidance specifically addresses acceptable YouthBuild construction work sites and clarifies the role of hands-on occupational training.

For YouthBuild construction and other occupational training work sites, the program must maintain:

• documented work site approval;
• work site safety expectations and supervision requirements;
• required safety orientation records;
• documentation of participant safety training;
• incident documentation and escalation procedures;
• host site acknowledgment of responsibilities where applicable.

YouthBuild-specific work-site safety requirements supplement, and do not replace:

• Section 4 – Training Services
• Section 20 – Employer Training Agreements and Reimbursement Procedures
• Section 25 – Youth Operational Procedures

If OSHA-related training is provided, credential reporting must follow federal performance definitions and the documentation hierarchy in **Section 23**. DOL guidance and YouthBuild performance materials make clear that not every safety training completion is reportable as a recognized credential.

A.6 YouthBuild Stipends

YouthBuild stipends must be governed by YouthBuild-specific participation rules and the Board's fiscal controls.

Stipends may be paid only when:

- the individual is officially enrolled;
- participation for the applicable period is documented;
- the payment is supported by attendance or participation documentation;
- the payment is approved and processed in accordance with fiscal controls.

YouthBuild stipends are subject to:

- Section 21 – Supportive Services and Payment Procedures, where applicable to payment controls;
- Section 22 – Service Authorization and Financial Obligation Controls;
- Section 25 – Youth Operational Procedures; and
- the Financial Management and Procedures Manual.

A.7 Leadership Development and Community Service

YouthBuild must include leadership development and service to the community as core program elements. YouthBuild regulations identify leadership development and community service as part of the program model and program goals.

For YouthBuild-funded activities, the program shall maintain documentation sufficient to show:

- participant participation in leadership development;
- community service activity descriptions;
- attendance or participation logs;
- supervision where applicable;
- alignment with participant development goals.

These requirements supplement Section 13 – Youth Services and Section 25 – Youth Operational Procedures.

A.8 YouthBuild Performance and Federal Reporting

YouthBuild performance accountability is governed by YouthBuild regulations and DOL performance guidance. DOL has published program-specific performance accountability guidance for YouthBuild under 20 CFR 688.400.

All YouthBuild performance outcomes must be:

- supported by source documentation;
- entered into the designated official reporting system;
- validated against case file documentation;
- consistent with applicable federal definitions.

YouthBuild performance verification shall follow:

- Section 8 – Performance, Data Reporting, and Accountability
- Section 14 – Data Management and Reporting Controls
- Section 23 – Performance Verification and Data Validation Procedures

Where YouthBuild reporting requirements are more specific than general WIOA procedures, YouthBuild requirements govern.

A.9 YouthBuild Follow-Up

YouthBuild participants must receive follow-up services after exit in accordance with federal YouthBuild requirements and applicable DOL guidance. DOL performance materials for YouthBuild specifically address post-exit performance accountability and follow-up.

YouthBuild follow-up operations shall follow:

- Section 7 – Follow-Up and Retention Services
- Section 24 – Participant Exit and Follow-Up Procedures
- Section 25 – Youth Operational Procedures

Where YouthBuild requires stricter or more specific follow-up procedures, YouthBuild requirements shall govern.

A.10 YouthBuild as a One-Stop Partner

Where the grantee operates a YouthBuild program in the local area, YouthBuild is a required partner in the local one-stop delivery system under **20 CFR 688.380** and is subject to applicable one-stop partner requirements.

Accordingly, YouthBuild system coordination shall also align with Section 10 – One-Stop Operator and System Integration.

A.11 Equal Opportunity, Complaints, and Discipline

YouthBuild participants are protected by the same nondiscrimination and grievance frameworks that apply to the Board's other workforce programs, except where YouthBuild-specific grant procedures add additional requirements.

The following sections are incorporated by reference:

• Section 16 – Equal Opportunity and Nondiscrimination
• Section 17 – Grievance and Complaint Procedures
• Section 25 – Youth Operational Procedures for youth-specific discipline and grievance operational controls

A.12 Fiscal Governance and Manual Hierarchy

All YouthBuild fiscal actions, including but not limited to stipends, procurement, subawards, payroll, match, supportive services, and payment processing, are governed by the Financial Management and Procedures Manual.

Where a YouthBuild partner or contractor relationship constitutes a subrecipient relationship, oversight must comply with the Board's subrecipient monitoring framework and Uniform Guidance requirements. Uniform Guidance establishes subrecipient distinctions and monitoring obligations at 2 CFR 200.331.

This Appendix is incorporated into the Board's overall manual structure and must be read together with:

• the Programmatic Policies and Operations Manual;
• the Financial Management and Procedures Manual; and
• any current YouthBuild Notice of Award and grant conditions.

A.13 Review and Maintenance

This Appendix shall be reviewed and updated as necessary to reflect changes in:

• federal YouthBuild regulations;
• DOL guidance;
• Notice of Award conditions;
• local program design.