

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.