

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.