



NEW RIVER/MOUNT ROGERS WORKFORCE DEVELOPMENT AREA CONSORTIUM BOARD

CULTIVATING TALENT FOR THE REGION

SECTION 4 – PARTICIPANT FINANCIAL REQUEST WORKFLOW

(All Programs – Training, Supportive Services, Incentives, Testing, Equipment, childcare, Transportation, Credential Fees, etc.)

4.1 Purpose

This section establishes standardized procedures for reviewing, approving, authorizing, and processing participant-related financial requests to ensure:

- Compliance with 2 CFR Part 200 Subpart E (Cost Principles)
- Proper eligibility verification
- Budget control and over-obligation prevention
- Segregation of duties
- Prevention of fraud, waste, and abuse
- Proper documentation for monitoring and audit

This section applies to all funding streams.

4.2 Definitions

Participant Financial Request – Any request for payment on behalf of or for the benefit of an enrolled participant.

Programmatic Approval – Confirmation that the request aligns with eligibility and the participant's service plan.

Fiscal Authorization – Confirmation that the cost is allowable, within budget, and properly documented.

4.3 Participant Financial Request Categories

This procedure applies to:

- Individual Training Accounts (ITAs)
- Tuition payments

- Testing fees
- Credentialing fees
- Supportive services
- Incentives
- Work-based learning wages (if applicable)
- Tools and uniforms
- Transportation assistance
- childcare assistance
- Other participant-related costs

4.4 Standardized Approval Workflow

All participant financial requests must follow this sequence:

STEP 1 – Case Manager Submission

Case Manager prepares and submits a financial request that includes:

- Participant name and ID
- Funding stream identified
- Service type
- Total requested amount
- Budget category
- Eligibility verification
- Approved IEP/ISS/IDP
- Supporting documentation:
 - Invoice or quote
 - Enrollment documentation
 - Attendance verification (if required)
 - Vendor information
- Case note documenting justification

Incomplete submissions will be returned.

STEP 2 – Program Manager Review (Programmatic Authorization)

The Program Manager reviews for:

- Eligibility verification
- Service plan alignment
- Funding source appropriateness
- Reasonableness of service
- Program budget availability
- Duplication of benefits risk

If approved:

- Program Manager signs or electronically authorizes request.

If denied:

- Written explanation required.

Program Manager approval confirms programmatic appropriateness only.

It does not authorize payment.

STEP 3 – Finance Manager Review (Fiscal Authorization)

The Finance Manager reviews for:

- Allowability under 2 CFR §§200.403–200.405
- Cost reasonableness (2 CFR §200.404)
- Allocability
- Budget availability
- Obligation entry confirmation
- Administrative cap impact
- Proper documentation completeness
- Vendor eligibility (SAM verification if required)

If approved:

- Finance Manager authorizes for fiscal processing.
- Obligation entered or updated in spreadsheet.

If deficiencies:

- Returned for correction.

No request proceeds without Finance Manager authorization.

STEP 4 – Fiscal Agent Processing (Execution Layer)

Upon receipt of authorized request:

Fiscal Agent shall:

- Verify required documentation present.
- Confirm authorization signatures.
- Code expenditure to proper funding source.
- Issue payment within reasonable timeframe.
- Record transaction in general ledger.
- Include in monthly reporting.

Fiscal Agent may not override programmatic or fiscal approval layers.

STEP 5 – Post-Payment Review and Reconciliation

Monthly:

- Accounting Technician reconciles:
 - Obligation spreadsheet
 - General ledger entries
- Finance Manager reviews:
 - Participant spending trends
 - Remaining balances
- Program Manager reviews:
 - Program budget alignment
 - Spending pace

Discrepancies must be resolved within 10 business days.

4.5 Special Controls for High-Risk Categories

4.5.1 Incentives

- Must comply with Incentives Policy.
- Must be tied to documented milestone.
- Must be documented in participant file.

4.5.2 Supportive Services

- Must document need.
- Must confirm service is necessary for participation.
- Must confirm not available through other resources.

4.5.3 Training Payments

- Must verify enrollment.
- Must verify attendance prior to subsequent payments.
- Must verify satisfactory progress if required.

4.5.4 Childcare Assistance

- Must document relationship to participation.
- Must confirm provider information.
- Must confirm period of service.

4.6 Documentation Standards

Each participant financial request must include:

- Program Manager approval
- Finance Manager authorization
- Vendor invoice or equivalent documentation
- Funding source identified
- Budget category identified
- Case note justification

- Obligation tracking reference

Participant files must be audit-ready at all times.

4.7 Prohibited Actions

The following are strictly prohibited:

- Retroactive approval of payments
- Payment without documentation
- Program Manager issuing payment directly
- Finance Manager processing payment directly
- Split transactions to avoid thresholds
- Approving one's own reimbursement
- Charging to incorrect funding stream to resolve deficit

4.8 Monthly Participant Expenditure Review Checklist

Finance Manager must verify monthly:

- ☐ All participant expenditures have documentation
- ☐ Obligation spreadsheet reconciles to ledger
- ☐ Administrative cap within limits
- ☐ No over-obligation exists
- ☐ No duplicate benefits identified
- ☐ All required approvals documented

Checklist completion must be documented.

4.9 Internal Control Statement

This layered approval structure ensures:

Programmatic authorization → Fiscal authorization → Accounting execution → Oversight reconciliation

No single individual controls all aspects of a transaction, consistent with 2 CFR §200.303.