

Policy and Procedure

Title:	Segregation of Duties Policy	Number:	OP-20-01
Effective Date:	July 1, 2020	Revisions:	May 13, 2021

Purpose:

The purpose of this policy is to provide guidance in the commitment of the Shenandoah Valley Workforce Development Board (SVWDB) to the highest level of system integrity and the appropriate oversight of the Workforce Innovation and Opportunity Act (WIOA) and the Virginia Career Works Shenandoah Valley (VCW) in order to comply with federal, state, and local laws and regulations. In addition, the purpose of the policy is to document the organizational arrangements to provide clear segregation of duties and responsibilities, and the reporting hierarchy to provide a clear separation between job duties and responsibilities.

References:

1. Workforce Innovation and Opportunity Act (WIOA) of 2014, (Pub. L. 113-128)
2. Title 2 Code of Federal Regulations (CFR) Part 200: "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" (Uniform Guidance)
3. Title 2 CFR § 200.318
4. Title 2 CFR Part 2900: "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" (Department of Labor Exceptions)
5. Title 20 CFR WIOA, "Department of Labor; Final Rule"
6. WIOA Title I, 20 CFR § 679.410, § 679.420, § 679.430 and § 679.370
7. Virginia Workforce Development Board Policy 401-03, Provision of Career Services
8. WIOA Fiscal Agent Agreement between the Shenandoah Valley Chief Elected Officials Consortium and the County of Page, Virginia, and the Shenandoah Valley Workforce Development Board, Inc.

Policy:

It is the Policy of the Shenandoah Valley Workforce Development Board (SVWDB) that WIOA Title I staff assigned in the provision and operation of federal Workforce Innovation and Opportunity Act (WIOA) grant programs minimize organizational conflicts of interest through segregation of duties, supervision, and restrictions on informational access.

Segregation of Duties

The County of Page, Virginia serves as the grant recipient for WIOA Title I funds for the Region and the SVWDB is authorized to serve as the WIOA sub-recipient and fiscal agent, in accordance with the Fiscal Agent Agreement executed by the SVWDB, the County of Page, Virginia and the Chief Elected Officials (CEO) Consortium. The SVWDB Chief Executive Officer has signature/approval authority for all WIOA Title I grants and contracts and is responsible for managing the relationship between the CEO Consortium and the SVWDB, maintaining an adequate staffing structure to carry out their initiatives and directives, applying for grants, developing WIOA Title I policies, submitting financial and other required reports to the Virginia Community College System, and directing all required services. This position oversees and directs staff who perform all duties assigned by the Chief Executive Officer at the direction of the SVWDB in coordination with the CEO Consortium. In that regard, SVWDB staff will provide WIOA Title I Individualized Career and Follow Up Services as part of the One-Stop System under a waiver approved by the Governor of Virginia, as formally requested by the CEO Consortium and SVWDB and will provide WIOA Title I Youth Program Services as part of the One-Stop System under a waiver approved by the CEO Consortium and SVWDB.

Within the SVWDB Organizational Structure (found as Attachment A to this policy), WIOA Title I Program Services are delivered daily by a Program Operations Unit under the supervision of two Workforce Services Directors. The following sections depict each governance group involved in the programmatic, fiscal, and administrative management of these activities.

Program Operations Unit

The Workforce Services Directors are the lead staff of the Program Operations Unit and supervise the dedicated staff that provides WIOA Title I Individualized Career and Follow-up Services and Youth program services. These staff members include the Life and Career Coaches, Job Seeker Coaches, Youth Coaches, and Employer Network Directors. The Workforce Services Directors are responsible for the day-to-day management of the WIOA Title I Adult, Dislocated Worker, and Youth programs. This includes daily management of financial expenditures, technical assistance for the operation of the WIOA Title I programs, and the daily supervision of staff. The Workforce Services Directors are also responsible for the approval of eligibility determinations, approval of financial expenditures related to the delivery of WIOA Title I programs, and day-to-day performance management.

The Workforce Services Directors reports directly to the Chief Executive Officer of the SVWDB who is responsible for ensuring that the Program Operations Unit has the operational and logistical support required for the ongoing delivery of the aforementioned WIOA Services, in an effective and efficient manner.

SVWDB Administrative Staff

The Workforce Services Directors are responsible for the daily supervision of the Coaches and Employer Network Directors and provide daily oversight of the programs and quarterly internal monitoring of the programs. The SVWDB Administrative Staff works with a third party to provide annual program monitoring, which includes the review of documents submitted to the SVWDB Administrative Staff by the Workforce Services Directors, the review of programmatic files for correctness and data validation, and the review of financial expenditures for WIOA Title I services. The SVWDB Administrative Staff under the direction and supervision of the Chief Executive Officer are responsible for obtaining program operations monitoring services.

SVWDB Executive Committee

The SVWDB Executive Committee is responsible for overseeing performance related to the delivery of all One-Stop System operations. The Executive Committee is staffed by the Chief Executive Officer, who will provide reports to the Committee regarding program operations such as program enrollments, services being provided to each of the localities in Local Workforce Development Area (LWDA) 4, activities being provided to participants, and real-time performance related to employment, educational attainment, and wage earnings. The Executive Committee will make recommendations to the SVWDB on modifications to performance and implementing performance improvement plans, if necessary. The Executive Committee will communicate these recommendations to the Chief Executive Officer who will work with the Administrative and the Program Operations Unit staff to report to the SVWDB on such recommendations at the following meeting. All recommendations, reports, and communications from the Executive Committee for the delivery of program services and one stop operations services will be reviewed by the SVWDB Administrative Staff and then reported to the CEO Consortium by the Workforce Services Directors.

SVWDB Finance Committee

The SVWDB Finance Committee has the responsibility of developing the WIOA Title I funds budget, ensuring timely monitoring of funds for accuracy, developing financial controls, preparing financial reports, reviewing fund expenditures, and overseeing external independent audits. The dedicated SVWDB staff lead for the Finance Committee is the Finance Director. The Finance Committee will review on at least a quarterly basis reports showing the budget vs. actual expenditures related to the delivery of Title I

program services, as well as expenditures related to the administration of the SVWDB. The Finance Committee will make recommendations to the SVWDB on budget modifications, if necessary, and/or performance improvement plans, if necessary. The Chair of the Finance Committee, the Treasurer of the SVWDB, will communicate these recommendations to the Chief Executive Officer, the SVWDB Administrative Staff and the Program Operations Unit and will report to the SVWDB on such recommendations at the following meeting. All recommendations, reports, and communications from the Finance Committee related to the delivery of program services will be reviewed by the SVWDB Administrative Staff and then reported to the CEO Consortium by the Workforce Services Directors.

SVWDB Responsibilities

As the SVWDB is the provider of WIOA Title I program services, the responsibility of the SVWDB is to ensure that the performance of the delivery of these services is in line with the goals set by the CEO Consortium, made up of a representative of all sixteen (16) localities in LWDA4, including the region's Grant Recipient. The SVWDB Administrative Staff and the Programs Operations Unit will provide to the SVWDB, at least quarterly, reports to the SVWDB on the performance of the programs, including but not limited to, financial expenditures, program enrollments, monitoring and/or audit results, real-time and final performance goals related to employment, education attainment, and wages earned, and additional administrative tasks as requested. These reports will be reviewed by the SVWDB and then reported to the CEO Consortium by the Workforce Services Directors.

CEO Consortium

The CEO Consortium is the overlying governance body that reviews the performance of the SVWDB as the provider of Title I program services. Through the Workforce Services Directors, the Program Operations Unit will report directly to the CEO Consortium on at least a quarterly basis regarding fiscal expenditures, performance measures, enrollments, and Title I program services and activities. This will include formal reports on budget vs. actual expenditures, including detailed expenditure ledgers, enrollment, and financial performance metrics, and real-time performance management reports as well as any reports from the SVWDB Finance Committee, SVWDB Executive Committee, and/or the SVWDB. The CEO Consortium will provide feedback to the SVWDB Chief Executive Officer on performance, and on at least an annual basis, will review the performance of the SVWDB as the provider of Title I program services. This review will determine the possible continuation of the SVWDB's waiver request to provide Title I program services. The CEO Consortium Chair, as the spokesperson for the CEO, will provide in writing to the SVWDB Chief Executive Officer any recommendations for improvement, or items considered under a performance improvement plan or corrective action plan. The Chief Executive Officer will inform the Workforce Services Directors and Program Operations Unit as to any of the above items.

Relationship of One Stop Operator

The contracted One-Stop Operator is responsible for coordinating service delivery among the leadership of the Region's Workforce System Partners, carrying out performance reporting, and conducting a periodic review of WIOA service delivery activities and related system-wide performance outcomes. The One-Stop Operator will be competitively procured through an RFP Process and reports to the SVWDB.

Revisions:

February 19, 2021

May 15, 2021

Equal Opportunity Employer/Program

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This workforce product was created using 100% of federal U. S. Department of Labor Employment and Training Administration Workforce Innovation and Opportunity Act (WIOA) award of \$1,460,148 (#AA-33260-19-55-A-51) made to Page County on behalf of the Shenandoah Valley Workforce Development Area by the pass-through entity, the Virginia Community College System. No costs of this product were financed by nongovernmental sources. The information contained herein does not necessarily reflect the official position of the U.S. Dept. of Labor.