



BLUE RIDGE REGION

Title: Segregation of Duties Policy	Related Forms: No
Effective Date: 7/1/2020	Revised Date: 6/18/21

Policy:

It is the Policy of the Western Virginia Workforce Development Board (WVWDB) 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, disclosure, and recusal in order to foster public and partner confidence.

The City of Roanoke serves as the grant recipient for WIOA Title I funds for the Region and the Western Virginia Workforce Development Board is authorized to serve as the WIOA Title I fiscal agent, in accordance with an MOU executed by the WVWDB and the Chief Local Elected Officials (CLEO) Consortium and the fiscal agent agreement between the WVWDB and the City of Roanoke. The WVWDB Executive Director has signature/approval authority for all WIOA Title I grants and contracts and is responsible for managing the relationship between the CLEO and the WVWDB, maintaining an adequate staff 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 is ultimately responsible for performing all duties assigned by the WVWDB in coordination with the CLEO. In that regard, WVWDB 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 CLEO and WVWDB.

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

Program Operations Unit

The Program Manager is the lead staff of the Program Operations Unit and supervises the dedicated staff that provide WIOA Title I Individualized Career and Follow-up Services. The Program Director is responsible for the day-to-day management of the WIOA Title I Adult and Dislocated Worker programs, including the delivery of WIOA Title I Individualized Career and Follow-up Services. This includes daily management of financial expenditures, technical assistance for the operation of the WIOA Title I Adult and Dislocated Worker programs, and the daily supervision of staff. The Program Director is also responsible for the approval of eligibility determinations, approval of financial expenditures related to the delivery of WIOA Title I Individualized Career and Follow-up Services, and day-to-day performance management.

The Program Manager reports directly to the Operations Director of the WVWDB 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 Title I Services, in an effective and efficient manner.

WVWDB Administrative Staff

The Operations Director is responsible for the daily supervision of the Program Manager and will provide oversight and monitoring of the programs on an ongoing basis. This oversight and

monitoring will include the review of reports submitted to the WVVWDB Administrative Staff by the Program Manager, the spot check review of programmatic files for correctness and data validation, and the review of financial expenditures for Individualized Career and Follow-up Services prior to approval.

The Operations Director is directly supervised by the Executive Director and is responsible for monitoring the implementation and operation of program functions.

WVVWDB Finance Committee

The WVVWDB Finance Committee has fiscal monitoring responsibility with duties that include accepting, disbursing and managing of WIOA Title I funds, monitoring fiscal accountability, and overseeing external independent audits. The dedicated WVVWDB staff lead for the Finance Committee is the Grant Accountant. 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 Individualized Career and Follow-up Services, as well as expenditures related to the administration of the WVVWDB. The Finance Committee will make recommendations to the WVVWDB on budget modifications, if necessary, and/or performance improvement plans, if necessary. The Chair of the Finance Committee, the Treasurer of the WVVWDB, will communicate these recommendations to the WVVWDB Administrative Staff and the Program Operations Unit and will report to the WVVWDB on such recommendations at the following meeting. All recommendations, reports, and communications from the Finance Committee related to the delivery of Individualized Career and Follow-up Services will be reviewed by the WVVWDB Administrative Staff and then reported to the CLEO Consortium by the Program Director.

WVVWDB Program Oversight Committee

The WVVWDB Program Oversight Committee is responsible for overseeing performance related to the delivery of all One-Stop System operations including WIOA Title I Adult and Dislocated Worker Individualized Career and Follow-up services. The Program Oversight is staffed by the Operations Director, who will provide reports to the Committee on program enrollments, services being provided to each of the localities in Local Workforce Development Area (LWDA) 3, activities being provided to participants, and real-time performance related to employment, educational attainment, and wage earnings. The Program Oversight Committee will make recommendations to the WVVWDB on modifications to performance and implementing performance improvement plans, if necessary. The Chair of the Program Oversight Committee will communicate these recommendations to the WVVWDB Administrative Staff and the Program Operations Unit and will report to the WVVWDB on such recommendations at the following meeting. All recommendations, reports, and communications from the Program Oversight Committee related to the delivery of WIOA Title I Adult and Dislocated Worker Individualized Career and Follow-up Services will be reviewed by the WVVWDB Administrative Staff and then reported to the CLEO Consortium by the Program Director, as well.

WVVWDB Responsibilities

As the WVVWDB is the provider of WIOA Title I Adult and Dislocated Worker Individualized Career and Follow-up Services, the responsibility of the WVVWDB is to ensure that the performance of the delivery of these services is in line with the goals set by the CLEO Consortium, made up of a representative of all eight (8) localities in LWDA3, including the region's Grant Recipient. The WVVWDB will review and provide at least quarterly reports to the WVVWDB Administrative Staff and the Program Operations Unit 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 WVVWDB Administrative Staff and then reported to the CLEO Consortium by the Program Manager, as well.

CLEO Consortium

The CLEO Consortium is the overlying governance body that reviews the performance of the WVVWDB as the provider of WIOA Title I Adult and Dislocated Worker Individualized Career and Follow-up Services under the Adult and Dislocated Worker programs. The Program Operations Unit will report directly to the CLEO Consortium on at least a quarterly basis regarding fiscal expenditures, performance measures, enrollments, and WIOA Title I Adult and Dislocated Worker Individualized Career and Follow-up 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 WVVWDB Finance Committee, WVVWDB Program Oversight Committee and/or the WVVWDB. The CLEO Consortium will provide feedback to the WVVWDB Executive Director on performance, and on at least an annual basis, will review the performance of the WVVWDB as the provider of WIOA Title I Adult and Dislocated Worker Individualized Career and Follow-up services. This review will determine the possible continuation of the WVVWDB's waiver request to provide WIOA Title I Adult and Dislocated Worker Individualized Career and Follow-up Services. The CLEO Consortium Chair, as the spokesperson for the CLEO, will provide in writing to the WVVWDB Executive Director any recommendations for improvement, or items considered under a performance improvement plan or corrective action plan. The Executive Director will inform the Operations Director and Program Operations Unit as to any of the above items.

Relationship of the 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 systemwide performance outcomes. The One-Stop Operator was competitively procured through an RFP Process and reports to the WVVWDB.

Disclosure:

It is the Policy of WVVWDB that WIOA Title I Management and Supervisory staff responsible for the delivery of WIOA Title I Adult and Dislocated Worker Individualized Career and Follow-up Services to One-Stop System customers will do the following:

- Disclose conflicts of interest and recuse themselves from discussions or decisions related to these issues;
- Ensure that disclosures of conflict of interest be documented in WVVWDB meeting proceedings and in approved minutes;
- Contact the WVVWDB Chair with questions regarding possible conflicts of interest.

Recusal/Abstention:

The aforementioned WIOA Title I staff must recuse themselves from involvement in WVVWDB discussions or decisions in which they have a conflict of interest.

Conflict of Interest:

The aforementioned WIOA Title I staff who identifies a possible violation of this Policy must report it to the WVVDB Chair immediately. The WVVDB Chair will recommend a corrective action if a conflict exists or should this Policy be violated.

In addition, the aforementioned WIOA Title 1 staff must annually sign a statement affirming that they:

- Received a signed and dated copy of this Policy and the WVVDB Conflict of Interest Policy;
- Read and understand this Policy and the WVVDB Conflict of Interest Policy;
- Agree to comply with this Policy and the WVVDB Conflict of Interest Policy.

The signed statements will be retained by the Operations Director. The Operations Director will audit this Policy to ensure compliance by reviewing annual statements. If at any time during the year, the information in an annual statement changes materially, the aforementioned WIOA Title I staff must disclose such changes and revise their annual disclosure statements.



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ANNUAL DISCLOSURE AND COMPLIANCE STATEMENT

By My Signature, I acknowledge the following:

- I have read and understand this Policy and the WVVWDB Conflict of Interest Policy.
- I understand that I will be provided with a signed and dated copy of this Policy and the WVVWDB Conflict of Interest Policy.
- I have the opportunity to discuss this Policy and the WVVWDB Conflict of Interest Policy with the WVVWDB Chair.
- I agree to adhere to the standards and requirements set forth in this Policy and the WVVWDB Conflict of Interest Policy.

WIOA Title I Staff Signature

Date

Position Title

By My Signature, I acknowledge that I am available to meet with the above individual upon their request in order to discuss this Policy and/or answer any related questions.

WVVWDB Chair

Date