



CRATER REGION

Crater Regional Workforce Development Board

<u>Title:</u> Internal Controls Policy	<u>Policy #:</u> 2022-007
<u>Effective Date:</u> April 11, 2022	<u>Revision Date:</u>

**Purpose**

The Internal Controls Process provides a consistent and systematic format to ensure that individuals meet the required eligibility under the Title I Adult and Dislocated Worker Programs and related participation requirements, established under WIOA and by the various technical guidance documents provided by the VCCS to the Local Workforce Development Areas. Internal control framework also exists for fiscal/financial processes. Specific federal guidance can be referenced through 2 CFR 200.303.

**Policy**

I. Program Internal Controls

Title 1 Program Enrollment Review Process

Upon application completion & submission of required documents to enroll, the case manager verifies/completes the enrollment process utilizing VWL 15-02 to ensure the eligibility determination for adult and dislocated worker participants is properly documented.

The file is then routed to the Programs Coordinator. Enrollment information and documentation is once again reviewed for compliance and to ensure that all required pieces are present to support WIOA participation. If approved, the Programs Coordinator will sign and date to signify approval for enrollment into the Title I Adult and/or Dislocated Worker program.

The file is approved and routed back to the Case Manager for additional data entry into the State’s system of record, the Virginia Workforce Connection(VAWC) . If not approved, the file is returned to the assigned Case Manager with specific instructions for resolution.

The Programs Coordinator also reviews submitted files for completeness and compliance and to determine Veteran’s Priority of Service, Adult Priority of Service, and other Priority of Service Category participants, in accordance with VWL #18-04, as applicable and shares information of note with the Executive Director. The Executive Director is responsible for tracking and oversight of implementation of any/all Priority of Service requirements.

Ongoing Case Management

The contents of the file, inclusive of activity codes and dates are entered and managed in the VaWC by the Case Manager unless an administrative change or items that require a higher level of access are needed.

The Case Manager provides ongoing case management, file maintenance and post-employment follow-up, as applicable.

### File Monitoring

#### *Desk Review*

The Programs Coordinator will pull caseload reports every month through the VaWC. The Programs Coordinator will also perform a random review of the electronic files to review the following:

- Regular Customer Contact/Engagement
- Updated Case Notes
- Allowable Activity Extensions
- Training Progress
- VaWC Activity Entry

If the Programs Coordinator requires clarity or additional assistance with any concerns, findings, questions, etc. those will be brought to the Executive Director upon completion of Desk Reviews.

#### *Quarterly File Monitoring*

Case Managers are scheduled to sit with the Programs Coordinator at least once per quarter for a physical file monitoring review. The file is reviewed for the following:

- Updated/Appropriate Case Notes
- IEP Updates
- Training Documentation Updates
- Credentials
- Vouchers
- Allowable Activity Extensions
- Measurable Skills Gains

The Programs Coordinator will report concerns or findings in regards to the aforementioned review items to the Executive Director upon completion of Desk Reviews. If it is determined that staff require additional training or technical assistance for areas of concern, trainings shall be scheduled and conducted within 30 days of the completed quarterly monitoring.

#### *Annual File Monitoring*

The CRWDB will conduct an annual file monitoring once per program year for active and exited participants. This will include a review of eligibility, performance, file documentation, data validation, and service delivery. A formal final report will be compiled and delivered to the Chief Elected Officials for review and will also be retained in case of request by any outside monitoring entities.

#### *Ad-Hoc Monitoring*

In addition to the items listed under the aforementioned monitoring activities, the Executive Director will review to ensure completion of the following, on an as-needed basis:

- Employment Verifications in accordance with established guidelines
- Follow-up services noted in VaWC and Case Note
- Any possible outstanding invoices, voucher to be issued, de-obligations
- Credentials & Measurable Skills Gains in file and VaWC
- Any active employment that may have been missed at exit

## *File Monitoring Documentation*

The results of file monitoring are recorded via both formal and informal documentation. The CRWDB will be sure to maintain proof of required monitorings for submission to the VCCS or Department of Labor as needed. Such proof will include all monitoring communication, working papers, written reports, and corrective action. If instances of noncompliance are identified through monitoring, prompt action is required per 2 CFR 200.303.

## II. Fiscal Internal Controls

### Invoice Review

The WIOA Title I invoice process is the first account and record of accounts payable for all allowable expenditures set forth under 2 CFR 200.328 and 2 CFR 200.329. This includes (but is not limited to) individual training account (ITA) vouchers, supportive services, non-ITA trainings such Work Experience or On the Job training, customized training, incumbent worker training.

When invoices are received, all relevant details are entered into a OneDrive shared invoicing spreadsheet.

If an invoice is received by a case manager, they will then compile backup documentation including a formal requisition for payment. The requisition packet is then submitted to the Programs Coordinator who reviews the invoice and documentation. If all requirements are met and verification is satisfactory, the requisition packet is then submitted to the finance staff for entry in the QuickBooks system. A case note is entered into the VaWC system recording invoice information by the Case Manager.

If an invoice is received by the Programs Coordinator or other Board administrative staff, they will then compile backup documentation including a formal requisition for payment. The requisition packet is then submitted to the Executive Director, who reviews the invoice and documentation. If all requirements are met and verification is satisfactory, the requisition packet is then submitted to the finance staff for entry in the QuickBooks system. A case note is entered into the VaWC system recording invoice information by the Programs Coordinator or other Board administrative staff.

Prior to submission to the finance staff, the appropriate line item and funding stream associated with the expenditure must be indicated on the requisition form to ensure charges are allocated accurately.

After the invoice is entered into Quickbooks for payment (by finance staff) but prior to payment completion (whether online or via check), the Executive Director will review for high level accuracy and allowability and will provide final approval to the finance staff. The finance staff then reviews for accuracy and enters applicable information into the financial system of record. The finance staff will cut checks or remit payment as needed. Once checks are prepared and approved, invoices and checks are forwarded to the Executive Director for final review, approval and signature for processing for payment. The Executive Director has primary signatory authorization with the CRWDB Treasurer/Secretary is an authorized alternative signatory per the CRWDB Bylaws. A copy of the invoice(s) is maintained in the participant file, as part of the Internal Controls Process. Records of invoices received, and

checks paid will be made available to the CRWDB upon request at any time. The Service Delivery Unit will provide a list of expenditures to the CLEO on at least a quarterly basis for performance and fiscal responsibility monitoring over the Board as the provider of WIOA Title I Adult and Dislocated Worker Individualized Career and Follow-Up Services.

Note: Vendors or training providers have been notified that individualized invoices should be submitted to the CRWDB to ensure both the protection of PII and to ensure that QuickBooks can accurately reflect funding stream expenditures.

#### Tracking of Obligations

Funding obligations are recorded on a shared OneDrive spreadsheet available to all Case Managers and Board administrative staff. The Programs Coordinator & Executive Director will review the obligations on at least a monthly basis to ensure that invoices are paid in a timely manner and that funding is managed appropriately. The Monthly Expenditure Detail Report (MEDR) should be used as a mechanism to cross-reference obligations and to track the progress of meeting 80% obligation of the program year funding.

The Programs Coordinator, along with the finance staff communicates any anomalies, missing invoices, or questions to vendors directly. All de-obligations are recorded in the shared spreadsheet and in a case note in the VaWC. Additionally, any obligation changes will be recorded on the MEDR accordingly.

Administrative questions or items that require additional oversight/investigation are directed to the Executive Director.