

# **CAREERSOURCE ESCAROSA**

## **ADMINISTRATIVE PLAN**

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## **Section I. Introduction**

CareerSource Escarosa (Escarosa), a non-profit corporation, is certified by the State of Florida as the local area workforce board as required by federal legislation to include the Workforce Innovation and Opportunity Act (WIOA) and the Personal Responsibility and Work Opportunities Assistance Act (PRWOAA). In addition, Escarosa has been chartered by the State of Florida under state legislation as the local area workforce board and welfare transition board as required under the Florida Workforce Innovation Act of 2000 (SB 2050). Escarosa is grant recipient, administrative entity and fiscal agent for workforce programs in workforce Region 1, comprised of Escambia and Santa Rosa Counties.

Escarosa oversees the following major services and programmatic activities:

- Wagner Peyser (jointing managed with DEO)
- Veterans programs (jointly managed with DEO)
- Workforce Innovation and Opportunity Act
- Welfare Transition Program
- Unemployment Compensation Information Services
- Supplemental Nutrition Assistance Program
- TAA
- All functions related to the operation of the One-Stop Centers.

## **Section II. Financial Management**

### **INTRODUCTION**

The CareerSource Escarosa (Escarosa) has established a financial system which provides fiscal control and accounting procedures that are in accordance with generally accepted accounting principles (GAAP) and financial management requirements of CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirement for Federal Awards (Uniform Guidance). Internal controls are reviewed and evaluated annually by an independent auditor in accordance with generally accepted audit standards. A detailed description of specific internal controls and accounting procedures is presented on the following pages.

### **TRAVEL POLICIES**

#### **I. PURPOSE:**

This manual contains procedures for authorizing and obtaining reimbursement of travel expenses by employees and other authorized persons of the Local Area Workforce Board (Board). All requests for approval and payment for travel expenses will be accomplished in accordance with Section 112.061, F.S. and these procedures. The requirements

contained within apply to all travel whether paid for with State or Federal funds. In addition, the requirements apply whether paid by reimbursement, contractual agreements, or other methods of payment, including payment to a contractor or volunteer.

## **II. AUTHORITY:**

The authority for this manual is contained in Section 445.007(10), Florida Statutes, which requires local area workforce boards to reimburse standard travel in accordance with rates established in Section 112.061, Florida Statutes, and in compliance with applicable state and federal requirements. Rule 69I-42.007, where applicable, has been relied on in drafting this template in compliance with Section 445.007(10), Florida Statutes.

## **III. DEFINITIONS:**

A. **Authorized person or authorized traveler:** Board employee, board member, or other persons traveling on Board business who are authorized to incur travel expenses in performance of Board duties. This expressly includes consultants and advisers, per Section 112.061(2)(e)2, F.S.

B. **Class A Travel:** Continuous travel of 24 hours or more away from Board headquarters. Overnight absence from Board headquarters must be reasonable and necessary to conduct Board business.

C. **Class B Travel:** Continuous travel of less than 24 hours which involves overnight absence from Board headquarters. The travel day for Class B begins at the same time as the travel period. Overnight absence from official headquarters must be reasonable and necessary to conduct Board business.

D. **Class C Travel:** Travel for short or day trips where the traveler is not away from his or her official headquarters overnight.

**NOTE: CLASS "C" TRAVEL PER DIEM OR SUBSISTENCE ALLOWANCES ARE CURRENTLY NOT TO BE REIMBURSED TO TRAVELERS.** {Source: Section 112.061(15), F.S.}

E. **Complimentary/Gratuitous Transportation:** Transportation which is provided free of charge by another **Board** authorized traveler in a travel status. A traveler shall not be allowed either mileage or transportation expenses if gratuitously transported by another traveler who is entitled to mileage or transportation expense. The traveler should still show how and with whom he/she traveled when requesting reimbursement for other costs incurred during travel.

F. **Conference/Convention:** The coming together of persons with a common interest or interests for the purpose of deliberations, interchange of views, the removal of differences or disputes and discussion of their common problems and interests. The

term also includes similar meetings such as seminars and workshops that are large formal group meetings programmed and supervised to accomplish intensive research, study, discussion and work in some specific field or on a governmental problem or problems.

G. **Headquarters:** The headquarters of an authorized traveler assigned to an office shall be the city or town in which the office is located except that:

- 1) For Board members, the headquarters is the primary address for the Board. {Source: Section 112.061(4), F.S.}
- 2) When any Board employee is stationed in any city or town for a period of over 30 continuous workdays, such city or town shall be the Board headquarters and the employee shall not be allowed per diem or subsistence, as provided in this section, after the period of 30 continuous workdays has elapsed, unless this period of time is extended by the express approval of the board of directors or their designee. {Source: Section 112.061(4), F.S.}
- 3) An authorized traveler may leave his/her assigned post to return home overnight, over a weekend, or during a holiday, but any time lost from his/her regular duties shall be taken as annual leave and authorized in the usual manner. The traveler shall not be reimbursed for travel expenses in excess of the established rate for per diem allowable had the traveler remained at the assigned post. However, when a traveler has been temporarily assigned away from the Board headquarters for an approved period extending beyond 30 days, the traveler shall be entitled to reimbursement for travel expenses at the established rate of one round trip for each 30-day period actually taken to his/her home in addition to pay and allowances otherwise provided. {Source: Section 112.061(4), F.S.}

#### IV. **AUTHORITY TO INCUR TRAVEL EXPENSES:**

**Section 112.061(3)(a), Florida Statutes, states:** *All travel must be authorized and approved by the head of the agency, or his or her designated representative, from whose funds the traveler is paid. The head of the agency shall not authorize or approve such a request unless it is accompanied by a signed statement by the traveler's supervisor stating that such travel is on the official business of the state and also stating the purpose of such travel. (For a Board, the "Head of the Agency" is the board of directors. In compliance with this provision, the board may designate either a board member or a board employee to authorize travel expenses. A board is not a state agency.)*

**Section 112.061(3)(b), Florida Statutes, states:** *Travel expenses of travelers shall be limited to those expenses necessarily incurred by them in the performance of a public purpose authorized by law to be performed by the agency and must be within*



*the limitations prescribed by this section.*

**Section 445.007(10), Florida Statutes, states:** *Preapproved, reasonable and necessary per diem allowances and travel expenses may be reimbursed. Such reimbursement shall be at the standard travel reimbursement rates established by s. 112.061 and shall be in compliance with all applicable federal and state requirements.*

**2 CFR Part 230, Appendix B, Selected Items of Cost, paragraph 51 states:**

*a. General. Travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the non-profit organization. Such costs may be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to the entire trip and not to selected days of the trip, and results in charges consistent with those normally allowed in like circumstances in non-profit organization's non-federally-sponsored activities.*

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- A. An *Authorization to Incur Travel Expense* form must be completed and approved by the board of directors or their designee for ALL travel prior to the beginning date of travel. This includes Travel Advances. {Source: Sections 445.007(10), \_(12), & 112.061(11), F.S.}
- B. Refer to the June, 2010, Board of Director's meeting to confirm who is authorized to approve travel.
- C. The authorization form should include, but not be limited to:
  - 1) Name of each traveler,
  - 2) Purpose of the travel,
  - 3) Estimated, itemized cost to the Board, and
  - 4) Statement of benefits accruing to the Board by virtue of such travel. {Source: Section 112.061(11), F.S.}
- D. Attached to the form should be a copy of the program or agenda of the convention or conference, itemizing the registration fees, and any meals or lodging included in the registration fee. {Source: Section 112.061(11), F.S.}
- E. The form is required to be signed by the traveler and the traveler's supervisor stating that the travel is to be incurred in connection with Board business. {Source: Section 112.061(11), F.S.}
- F. A copy of the completed form shall be included as support for the travel reimbursement voucher. {Source: Section 112.061(11), F.S.}
- G. The Board may pay for travel expenses of candidates for executive or professional positions, where written approval of the board of directors or their designee is obtained. {Source: Section 112.061(3)(d), F.S.}

**V. MEALS AND PER DIEM:**

- A. Reimbursement for meals is only allowable when in authorized Class A or Class B travel status and for those who are approved for reimbursement of those meals, as included in Section IV above. Reimbursement of meals for Class C travel status is not allowed. {Source: Section 112.061, F.S and 445.007(10), F.S.}
- B. Per Section 112.061(6), F.S., the current approved meal allowance rates are as follows:
- Breakfast - \$6.00 (*When travel begins **BEFORE** 6 a.m. and extends **BEYOND** 8 a.m.*)
  - Lunch - \$11.00 (*When travel begins **BEFORE** 12 noon and extends **BEYOND** 2 p.m.*)
  - Dinner - \$19.00 (*When travel begins **BEFORE** 6 p.m. and extends **BEYOND** 8 p.m.*)
- C. In determining the starting or ending time for the travel event, the time of day is important. When returning during work hours, the official work site location should be the return destination, unless otherwise approved by the board or its designee. If returning after or before work hours, the destination, and therefore the point when travel concludes, is the traveler's home. The same considerations apply for determining when travel begins.
- D. When a meal is included in a registration fee, the meal allowance must be deducted from the reimbursement claim, **even if the traveler decides for personal reasons not to eat the meal**. As provided in Attorney General Opinion 081-53, a continental breakfast is considered a meal and must be deducted if included in a registration fee. {Source: Section 112.061(6)(c), F.S.}
- D. In the case where a meal is provided by a hotel or airline to all guests, the traveler will be allowed to claim the meal allowance by law.
- E. Per diem may be used to calculate reimbursement due for days of travel which do not include hotel costs, for example, the final day of a trip. The allowable rate for per diem is currently eighty dollars, as provided for in Section 112.061(6)(a)1, F.S. All claims for per diem and subsistence must be within the limitations set forth in this section of the statutes.
- F. All travelers are allowed the authorized per diem for each day of travel or if actual expenses exceed the allowable per diem, the amount allowed for meals as provided in Section 112.061(6)(b), F.S., plus actual expenses for lodging at a single occupancy rate. Per diem shall be calculated using four six-hour periods (quarters) beginning at midnight for Class A or when travel begins for Class B travel. Travelers may only switch from actual to per diem while on Class A travel on a midnight to midnight

basis. A traveler on Class A or B travel who elects to be reimbursed on a per diem basis is allowed \$20.00 for each quarter from the time of departure until the time of return. {Source: 69I-42.006, F.A.C.}

## VI. TRANSPORTATION:

**Section 112.061(7)(a), Florida Statute, states:** *All travel must be by a usually traveled route. In case a person travels by an indirect route for his or her own convenience, any extra costs shall be borne by the traveler; and reimbursement for expenses shall be based only on such charges as would have been incurred by a usually traveled route.*

**2 CFR Part 230, Appendix B, Selected Items of Cost, paragraph 51 states:**

*c. Commercial air travel.*

*(1) Airfare costs in excess of the customary and standard commercial airfare (coach or equivalent), Federal Government contract airfare (where authorized and available), or the lowest commercial discount airfare are unallowable except when such accommodations would: require circuitous routing; require travel during unreasonable hours; excessively prolong travel; result in additional costs that would offset the transportation savings; or offer accommodations not reasonably adequate for the traveler's medical needs. The non-profit organization must justify and document these conditions on a case-by-case basis in order for the use of first-class airfare to be allowable in such cases.*

*(2) Unless a pattern of avoidance is detected, the Federal Government will generally not question a non-profit organization's determinations that customary standard airfare or other discount airfare is unavailable for specific trips if the non-profit organization can demonstrate either of the following: that such airfare was not available in the specific case; or that it is the non-profit's organization's overall practice to make routine use of such airfare.*

*d. Air travel by other than commercial carrier. Costs of travel by non-profit organization-owned, -leased, or -chartered aircraft include the cost of lease, charter, operation (including personnel costs), maintenance, depreciation, insurance, and other related costs. The portion of such costs that exceeds the cost of allowable commercial air travel, as provided for in subparagraph c., is unallowable.*

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A. Travelers are encouraged to use the most economical means of travel when feasible. The most economical mode of travel is determined by the following conditions:

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- 1) The nature of the business. {Source: Section 112.061(7), F.S.}
- 2) The most efficient and economical means of travel, considering time of the traveler, impact on the productivity of the traveler, cost of transportation, and per diem or subsistence required. {Source: Section 112.061(7), F.S.}
- 3) The number of persons making the trip and the amount of equipment or material to be transported. {Source: Section 112.061(7), F.S.}
- 4) Authorized travelers with a common destination are required to consider and evaluate joint utilization of vehicles. Approval for anything other than joint utilization must be requested in advance via the *Authorization to Incur Travel Expense* form and must include justification.

### B. Airline Travel

- 1) Travel agency surcharges may be reimbursed as long as properly justified and a receipt is provided.
- 2) Penalty for cancellation or exchange of a ticket may be paid by the Board, only if the cause for the cancellation is in the best interest of the Board, or if the cancellation is due to illness of the traveler or illness or death of a member of the traveler's immediate family. Justification should be included with the request for reimbursement. {Source: 69I-42.007(5), F.A.C.}
- 3) Transportation by chartered vehicles (including airplanes, buses, etc.) when traveling on Board business may be authorized when necessary or where it is to the advantage of the Board, provided the cost of such transportation does not exceed the cost of transportation by privately owned vehicle, as allowed under Section 112.061(7)(d), F.S. {Source: Section 112.061(7)(e), F.S.}
- 4) A traveler on a private aircraft shall be reimbursed the actual amount charged and paid for the fare for such transportation up to the cost of a commercial airline ticket for the same flight. The owner or pilot of such aircraft is also entitled to transportation expense for the same flight. {Source: Section 112.061(7)(h)}

### C. Rental Cars

- 1) Rental vehicles should be rented as close to the time of departure as reasonably allowed. Furthermore, rental vehicles should be returned as

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soon as possible upon the traveler's return. Failure to do so may result in a reduction of the reimbursement.

- 2) In areas where a non-airport rental facility exists at a comparable proximity, the non-airport facility should be used in order to avoid airport fees and surcharges.
- 3) The cost of the vehicle should be reasonable and necessary for the number of travelers, the type of travel, and the distance to be traveled. {Not required by Rule or Statue. Recommended Best Practice.}

### D. Board/personal vehicles

- 1) Employees traveling to a common destination are required to consider and evaluate joint utilization of vehicles. Approval for anything other than joint utilization must be requested in advance via the *Authorization to Incur Travel Expense* form and must include justification. {Source: Section 112.061(7), F.S.}
- 2) If travel is complimentary, "COMP" should be entered in the map mileage column of the travel voucher. No reimbursement shall be made for gratuitous transportation. {Source: Section 112.067(7)(h)}
- 3) Use of personal vehicles must be approved in advance via the *Authorization to Incur Travel Expense* form. {Source: Section 112.061(3)(a), 445.007(10)}
- 4) The traveler is entitled to mileage allowance at a fixed rate of 44.5 cents per mile when using a personal vehicle. The reimbursement for expenditures related to the operation, maintenance, and ownership of a vehicle shall not be allowed when privately owned vehicles are used in public business and reimbursement is made via mileage allowance. {Source: Section 112.061(7)(d), F.S.}
- 5) Mileage claimed must be from point of origin to destination based on the official DOT highway map located at the web site below. {Source: Section 112.061(7)(d)3, F.S}  
<http://www2.dot.state.fl.us/CityToCityMileage/viewer.html>
- 6) Flexibility may exist when other cost savings are considered. For example, multiple travelers might carpool to avoid multiple airport parking fees. In this case, the mileage used to pick up other travelers can be claimed. {Source: 69I-42.008(4), F.A.C.}
- 7) Vicinity mileage cannot be claimed while in a rental vehicle, if the cost of that vehicle is reimbursed by the Board. Reimbursement shall be for the cost of mileage or the cost to rent the vehicle, whichever is more

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economical and authorized by the appropriate Board designee. {Source: Section 112.061,(7)(d)1, F.S.}

- 8) An employee may claim mileage from his home to a work location outside his official headquarters provided that travel begins more than one hour before or one hour after the traveler's regular work hours and provided the miles claimed do not exceed the miles actually driven. {Source: 69I-42.008(4), F.A.C.}
- 9) The Board is not responsible for reimbursing parking fines or fines for unlawful driving. {Source: 2 CFR 230, Appendix B, Paragraph 16 (OMB A-122)}

### **VII. LODGING EXPENSES:**

#### **2 CFR Part 230, Appendix B, Selected Items of Cost, paragraph 51 states:**

*b. Lodging and subsistence. Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, shall be considered reasonable and allowable only to the extent such costs do not exceed charges normally allowed by the non-profit organization in its regular operations as a result of the non-profit organization's written travel policy.*

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- A. An **itemized** hotel receipt must be submitted to claim reimbursement (**a credit card receipt is not sufficient**). {Source: 69I-42.006, F.A.C.}
- B. All other reimbursable expenses included on a hotel receipt, such as parking or phone calls, should be properly listed in the incidental column of the travel voucher.
- C. Employees can only be reimbursed at the single occupancy rate. {Source: Section 112.061(6)(a)2, F.S.}
- D. Overnight lodging may not be reimbursed if travel is within 50 miles of headquarters or residence, unless the circumstances necessitating overnight travel are fully explained by the traveler and approved by the agency head. Criteria for approval shall include late night or early morning job responsibilities and excessive travel time because of traffic conditions. {Source: 69I-42.006(7)}

### **VIII. REIMBURSABLE INCIDENTAL EXPENSES:**

The below expenditure types, detailed in 69I-42.010, F.A.C., are required to be accompanied with a receipt, unless otherwise noted. These expenses should be listed in the incidental column of the travel voucher.

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- A. Taxi fares in excess of \$25, on a per fare basis, require a receipt. Amounts less than \$25 do not require a receipt.
- B. Storage, parking fees or tolls in excess of \$25, on a per transaction basis, requires a receipt. Amounts less than \$25 do not require a receipt. Such fees are not allowed on a weekly or monthly basis unless it can be established that such method results in a savings to the Board.
- C. Communication expenses for business-related fax and telephone use can be reimbursed with proper justification. **Personal telephone calls made are not a reimbursable communication expense.**
- D. Actual portage paid shall not exceed \$1 per bag not to exceed \$5 per incident are reimbursable and do not require a receipt. **Portage charges exceeding \$5 per incident will require additional justification. The number of bags must be stated on the travel reimbursement request.**

### **IX. CONFERENCE / CONVENTION TRAVEL:**

- A. Purpose of Conference: Public funds shall not be expended for attendance at conferences or conventions unless:
  - 1) The main purpose of the conference or convention is in connection with the business of the Board and is directly related to the performance of statutory duties and responsibilities of the Board. {Source: Section 112.061(6)(a), F.S. & 69I-42.004(1), F.A.C.}
  - 2) The conference or convention will provide a direct educational or other benefit supporting the duties of the traveler. {Source: 69I-42.004(1), F.A.C.}
  - 3) The duties and responsibilities of the traveler seeking to attend such meeting are compatible with the objective of the particular conference or convention. {Source: 69I-42.004(1), F.A.C.}
- B. No one, whether traveling out of state or in state, shall be reimbursed for any meal or lodging included in a convention or conference registration fee paid by the Board. {Source: Section 112.061(7)(a), F.S.}
- C. The Board may pay the registration fee directly to the conference or convention sponsor or allow the traveler to include the registration fee in the calculation of their travel costs and reimburse the traveler. {Source: 69I-42.004(4), F.A.C.}
- D. Documentation Needed:

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- 1) Travel to a conference or convention must be approved in advance by the board of directors or their designee. Benefits to the Board must be indicated on the authorization. {Source: 69I-42.004(2), F.A.C.}
- 2) The approved *Authorization to Incur Travel Expense* form must be submitted with the travel reimbursement request. {Source: 69I-42.004(2), F.A.C.}
- 3) A copy of the program or agenda of the conference or convention itemizing the registration fees and any meals or lodging included in the registration fee shall be attached to the *Voucher for Reimbursement of Travel Expenses* when submitting for payment. {Source: 69I-42.004(3), F.A.C.}
- 4) If no agenda is available, or if the agenda attached is not clear as to what is included in the registration fee, the traveler will make a statement on the *Voucher for Reimbursement of Travel Expenses* as to the extent of the meals included in the registration fee. The travel reimbursement request must be reduced by the applicable meal allowance. {Source: 69I-42.004(3), F.A.C.}
- 5) Payment in advance of earlier than twenty workdays before the travel period should be accompanied by written justification, such as discounts for earlier payment or earlier payment required for reservation. {Source: 69I-42.004(4), F.A.C.}

### **X. TRAVEL ADVANCES:**

- A. The Board or its designee may make, or authorize the making of, advances to cover anticipated costs of travel to travelers. Such advancements may include the costs of subsistence and travel of any person transported in the care or custody of the traveler in the performance of his or her duties. {Source: 112.061(12), F.S.}
- B. A *Travel Authorization* form is required to be completed and signed by the traveler and the traveler's supervisor.
- C. Travel advances cannot be requested earlier than 7 days before the travel period begins without written justification of circumstances that necessitate an exception to this restriction.
- D. When the advance travel period has ended, the traveler shall properly complete a *Voucher for Reimbursement of Travel Expenses* for the travel period for which he/she received an advance, within 3 working days of the traveler's return to headquarters. A



traveler may not have more than one travel advance outstanding at any time without written justification and approval by the board of directors or their designee.

**XI. REIMBURSEMENT OF TRAVEL EXPENDITURES BY INDIVIDUALS WITH DISABILITIES:**

- A. For individuals covered under the Americans with Disabilities Act (ADA), there are special provisions for travel reimbursement that apply. {Source: 69I-42.012, F.A.C.}
- B. When a physically handicapped traveler incurs travel expenses in excess of those ordinarily authorized pursuant to Section 112.061, F.S., and such excess travel expenses were incurred to permit the safe travel of that handicapped traveler, those excess expenses will be reimbursed by the Board to the extent that the expenses were reasonable and necessary to the safe travel of the individual. All such claims for reimbursement of excess travel expenses shall be submitted in accordance with the requirements of the Americans with Disabilities Act of 1990, 42 U.S.C. 12101 et seq. {Source: 69I-42.012, F.A.C.}
- C. When a payment is requested pursuant to the Americans with Disabilities Act, which would not otherwise be authorized travel reimbursement, the voucher must include a signed statement from the Board chair or his designee certifying that:
- 1) An employee of the Board, an applicant for a position or other covered person has requested a “reasonable accommodation” pursuant to the ADA, to assist him in performing his duties, applying for a position, or other covered activity. {Source: 69I-42.012, F.A.C.}
  - 2) The Board has determined that the individual is a “qualified individual with a disability” as defined in the ADA. {Source: 69I-42.012, F.A.C.}
  - 3) The Board has determined that the payment is for a “reasonable accommodation” pursuant to the ADA, for that employee, applicant or person. {Source: 69I-42.012, F.A.C.}
  - 4) The Board will maintain all records related to this request for seven years and make those records available for review to persons authorized to review such records. {Source: 69I-42.012, F.A.C.}
- D. All vouchers related to providing a “reasonable accommodation” shall contain a file number or other code by which the voucher can be readily traced to the confidential records maintained by the Board pursuant to paragraph (C)(4) above. {Source: 69I-42.012, F.A.C.}

**XII. SUBMISSION AND PAYMENT OF TRAVEL REIMBURSEMENTS:**

- A. **A *Voucher for Reimbursement of Travel Expenses* should be completed in all instances (even if the net amount due the traveler is zero) and maintained in the Accounting office.**
- B. Submit original of all documentation with the *Voucher for Reimbursement of Travel Expenses*. This includes ALL receipts and backup documentation.
- C. The *Voucher for Reimbursement of Travel Expenses* should show both reimbursable expenses to the traveler and expenses already paid by the purchasing card or corporate card and notated in the appropriate areas of the travel voucher.
- D. Copies of all receipts paid with the purchasing card or corporate card must be attached.
- E. The *Voucher for Reimbursement of Travel Expenses* should be submitted within 3 working days of the last day traveled.
- F. A *Voucher for Reimbursement of Travel Expenses* that is only requesting reimbursement for vicinity miles should be completed at least monthly. {Not required by Statute or Rule. Recommended Best Practice.}

#### **TRAVEL - EXECUTIVE DIRECTOR**

Due to the recent actions by the State in requiring all travel of local area workforce boards to comply with State Travel requirements, the Executive Director is requesting Board approval of his/her involvement in the following:

Organizations and events related to improving business recognition, economic development, outreach and recruitment to the business community:

- Economic Development Office of Santa Rosa County (Industry Appreciation Week, etc.)
- Pensacola Bay Area Chamber of Commerce related events (First Friday Breakfast, CEI Advisory Council, Next Generation Learning, Industry Appreciation Week, etc.)
- EDGE - Locklin Vocational Center
- Tours of new businesses/current business expansions
- Meetings with Economic Development Office of Santa Rosa County/Pensacola Chamber for new businesses/business expansions
- Escambia County Enterprise Zone
- City of Pensacola Enterprise Zone
- Involvement with educational partners regarding Career Academies
- Gulf Power Economic Symposium
- Florida's Great Northwest

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Organizations related to increasing services/referrals for the residents Escarosa serves through our various programs:

- Transportation for the Disadvantaged for Escambia
- Transportation for the Disadvantaged for Santa Rosa
- Early Learning Coalition of Escambia (Secretary)
- Early Learning Coalition of Santa Rosa
- Poverty Solution Team – United Way led effort to assist with employment opportunities
- Various activities associated with the military (National Flight Academy, Change of Commands, Military Appreciation Month, etc.)
- Bay Works/United Way (Initiative centered around Cincinnati Works to promote hiring of disadvantaged citizens by the top 125 businesses in our community)
- Various community groups/public educational entities regarding grants related to employment and/or training

Day-to-Day Work related activities:

- Monthly Manager's Meeting
- CareerSource Florida state meetings
- Florida Workforce Development Association (Executive Director's group) meetings
- Various national or regional workforce symposiums
- Various state committee meetings on which Executive Directors are requested to participate
- One Stop Consortium meetings (One Stop Provider format for Escarosa)

The above is not intended to be a complete list, but is provided as a basis for the Director's involvement in activities directly related to the business community and economic development; interactions with community groups to refer/offer services to potential customers of Escarosa, and to insure the smooth operation of programs and services on a day-to-day basis.

### **CREDIT CARDS**

The Executive Director, Chairman of the Board, and/or designated managers of Escarosa are authorized to use any Escarosa credit card for the purposes of conducting business. The following are conditions under which the card(s) may be used:

1. Purchase of airline tickets (including insurance and baggage loss) and cost of rental vehicles when approved by Executive Director.
2. Hotel and facilities charges when used in conjunction with travel, meetings, or other special activities used in conducting the business of Escarosa.
3. Purchase of gasoline for rental cars when on approved business travel.

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4. Other expenditures determined necessary by the Executive Director for the purpose of providing program services, purchases, or other necessary financial transactions.

Appropriate documentation should be provided for all activities with which the corporate charge card is used.

Escarosa does not provide for entertainment or alcoholic beverages in conjunction with expenditures on this card.

Escarosa staff and the Department of Economic Opportunity staff (under direct Escarosa supervision), with approval of the Executive Director, are authorized to use an Escarosa credit card for travel purposes stated in items 1 and 2 above.

### **BUDGETARY PROCESS**

#### **Approval Process**

The Finance Director shall annually submit a detailed budget to the Executive Committee and Board of Directors for review and approval. The proposed budget will include a breakdown by appropriate program cost categories. The Executive Committee will consider, approve, and recommend the proposed budget to the full Board of Directors for review and adoption. Modifications to the budget will be submitted to the Executive Committee and Board of Directors when required due to funding changes and unexpected changes in the programs with the exception of temporary programs that require a budget submitted to DEO along with the request for funds (time requirements would not allow prior Board approval). The budget submitted to DEO will be entered in the Accounting System for comparison to actual expenditures.

#### **Monthly Statement of Revenues and Expenditures**

To ensure that all expenditures are made in accordance with the approved budget, a monthly Revenues and Expenditures report will be maintained. The monthly report will include the following:

- Total amount budgeted
- Expenditures year-to-date
- Remaining budget balance
- Percentage of budget spent

#### **Oversight**

1. Detailed financial statements will be prepared on a monthly basis for analysis by the Executive Director and Finance Director.
2. The most current financial statements will be reviewed by the Executive

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Committee at their meetings.

3. The Executive Committee will present condensed expenditure vs. budget statements to the Escarosa Board for review and approval.
4. Policies and reporting procedures established by the state will be followed.

### **CASH MANAGEMENT AND REPORTING – FEDERAL FUNDS**

It is the policy of Escarosa to utilize advance funds, as allowed under federal law, for the operation of its all programs administered by the Department of Economic Opportunity (DEO), i.e. Workforce Innovation and Opportunity Act (WIOA), Welfare Transition Program (WTP), Wagner Peyser, Unemployment Compensation, Supplemental Nutrition Assistance Program (SNAP) and Veterans Programs. Cash advances will be limited to the minimum amounts needed and shall be timed in accordance with the actual, immediate cash requirements. Program income, rebates, refunds, contract settlements, audit recoveries, and interest earned shall be disbursed prior to requesting additional cash advances.

Cash advances are requested through the State of Florida's One-Stop Management Information System (OSMIS) for all funds that flow through the Department of Economic Opportunity (DEO). Advances are requested weekly (by Thursday or the designated day in holiday weeks) for electronic transfer into Escarosa's bank account by the following Wednesday or Thursday.

Each program's funds will be accounted for separately on a weekly basis in order to monitor cash balances and project the cash advances required for the following week's disbursements.

Projection of the cash advances required will be based on actual invoices due and estimates of participant support services expenditures to be disbursed the day after the receipt of the cash warrant. The Accounts Payable Specialist, Contracts Payable Specialist and the Finance Director will participate in the cash request process with the Finance Director making the final determination of the exact amount to order from each fund. The Finance Director or Accounts Payable Specialist will enter the requests in OSMIS.

All federal funds will be maintained in a financial institution with FDIC coverage and balances exceeding the FDIC coverage will be collaterally secured.

Interest earned will be used as program income for WIOA programs, which include WIOA Adult, Dislocated Worker, Youth and Veterans' Programs. Interest income for all other funding sources including General Revenue funds will be treated as interest payable in the general ledger and refunded to DEO quarterly.

Escarosa will report results of financial operations monthly to DEO via the OSMIS

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system by the 20<sup>th</sup> day following the month end. Expenditures for the reports will come from the accounting system. Expenditures will be reported to each Notice of Funds Available (NFA) in which expenditures were incurred. Expenditures will be applied to program income prior to applying to federal funds. Monthly reconciliations of the general ledger to OSMIS will be prepared by the Finance Director and maintained in a file for audit and monitoring review.

### **BANK RECONCILIATION**

1. The bank statement will be received by the Executive Director and reviewed prior to submitting to the accounting department for preparation of the bank reconciliation. The bank statement packet will be initialed and dated by the Executive Director signifying review.
2. The Bank account is reconciled with accounting records in a timely manner by the Contracts Payable Specialist. The Finance Director reviews and approves the bank reconciliation.
3. Bank reconciliation procedures will include:
  - a. Accounting for check numbers used.
  - b. Investigating checks outstanding for more than 90 days.
  - c. Tracing and reviewing bank transfers.
  - d. Itemizing outstanding checks.
4. All checks listed as outstanding for more than 180 days will be written off by the Finance Director. If the recipient subsequently cashes the check, the expenditure will be re-entered in the Accounting System.

### **CASH RECEIPTS**

Once the cash request has been entered in OSMIS and approved by DEO, the Finance Director will print an OSMIS report showing the cash by NFA to be received from the state. A copy of the report will be given to the Accounts/Contracts Payable Specialist and a copy maintained for the cash receipts journal entry. All program funds are received by means of electronic bank transfer into the Escarosa bank account. The Accounts/Contracts Payable Specialist ascertains that the transfer has occurred and prepares the Cash Receipt Memo. The Finance Director verifies that the appropriate program is credited by signing the daily cash receipt form. The Cash Receipt Memo and the transmittal forms are maintained in the Cash Receipts Log. Miscellaneous cash receipts, such as refunds, are received through the mail. The Executive Secretary (or the Finance Director if Executive Secretary is unavailable) receives the unopened mail each day. She prepares a log of any checks received and then distributes to Accounting. The Accounting Clerk prepares and makes the bank deposit. The deposit is approved by the Finance Director. A Cash Receipt Memo plus deposit receipt and any documents supplied with the remittance is maintained in the Cash Receipts Log.

## **CASH DISBURSEMENTS**

Escarosa has two types of cash disbursements:

- Accounts Payable Disbursements
- Petty Cash Disbursements

Accounts payable disbursements are made weekly on Wednesday or Thursday if cash has been received from the state in which case checks are disbursed as soon as cash is received. If a holiday falls on Thursday the checks will be disbursed on the day prior to the holiday (if cash has been received from the state). Emergency checks may be cut with approval from the Finance Director.

Petty cash disbursements are made as needed and when the fund permits.

### **Accounts Payable Disbursement**

The following types of payments are made through accounts payable:

- Invoices for purchased goods or services
- Recurring monthly expenses
- Lease and rental agreements
- Service Provider invoices
- Participant training and support expenses
- Employee reimbursements

All invoices received through the mail are accumulated by the Accounting Specialist.

Invoices for purchased goods or services are matched with purchase orders, receiving reports, shipping reports and/or any other authorizations required. The Contracts Payable Specialist prepares the check requests (Check Request Form) for these invoices as well as invoices for recurring monthly expenses and lease and rental agreements. General ledger accounts to be charged are determined by the authorization document or the Finance Director.

Employee reimbursements are requested by the employee and approved by his/her supervisor. Supporting documentation such as approved travel advance request or travel expense report must be attached to the request.

Invoices for Service Provider Contracts are forwarded to the Contracts Payable Specialist who audits the invoice for compliance with the contractual agreement and prepares the check request. The audited invoice is forwarded to the Finance Director for approval.

Participant support services and training payments are initiated by the Service Provider Case Managers. A check request that designates the program to be charged and includes authorization documents is prepared by Support Services personnel and forwarded to the

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Accounts Payable and/or Contracts Payable Specialists for review.

All non-support services check requests are submitted to the Finance Director for final review and approval for payment.

The Accounts Payable Specialist processes all approved check requests in the accounting system and prepares computerized checks. Checks are attached to the check requests and backup documentation. The checks are then submitted to the Executive Director or Assistant Director for signature. All checks for \$20,000 or over require a second signature by an authorized Escarosa Board member.

Signed checks are returned to the Contract Payable Specialist for mailing or other distribution. Check copies are attached to supporting documentation and each page of the supporting documentation is stamped "PAID". Checks that are not mailed directly to the recipient must be signed for when distributed.

Blank checks are secured in a locked fireproof cabinet with access limited to the Finance Director, Contracts Payable Specialist and Accounts Payable Specialist.

Checks that must be voided are marked "VOID" and the signature lines are removed. Void checks are voided through the Accounting System. Checks that require a stop payment are written off with a journal entry debiting cash and crediting the expense account originally charged. Voided checks or stop payment checks and backup documentation are maintained for future claims.

### **Petty Cash Fund**

The Board of Directors has authorized a petty cash fund in the amount of \$100. The fund will be maintained by a Petty Cash Custodian and/or alternate appointed by the Finance Director. Petty cash will be distributed upon receipt of an approved petty cash request form with attached receipts for the expenditures. The Custodian must reconcile the petty cash fund and the reconciliation approved by the Finance Director before the fund will be reimbursed. The petty cash fund will be reimbursed through an accounts payable request that will include the approved reconciliation and all petty cash request forms.

## **PERSONNEL AND PAYROLL**

### **Employee Leasing**

The Escarosa Board of Directors has decided to enter into an employee leasing agreement with Landrum Professional, Inc. (Landrum). This agreement creates a dual employment relationship between the CareerSource Escarosa and Landrum. Landrum provides a multitude of services, which includes payroll administration, human resources management, compliance reporting, and employee benefits administration. Escarosa



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retains hiring, firing, supervision, evaluation, promotion, salary determination, and employee benefits determinations.

### **Employee Records**

The Contracts Payable Specialist will maintain a set of employee records for the Escarosa staff. The files are kept in a secure area with limited access. Landrum will maintain the official personnel files on employees, which will include all legally required documentation, i.e. I-9's, W-4's, and employee benefits documentation.

Escarosa's files will contain:

- Name, address, emergency information
- Employment information, i.e. resume (if applicable)
- Job Description
- Employment Data Form
- Payroll Change Notice
- Job titles and wage history

Medical information will be maintained on separate forms, stored separately from all other employee information and treated as confidential medical records.

### **Salary Administration**

Each personnel file will contain an "Employment Data" and "Payroll Change Notice" for each pay increase, promotion, demotion or other change in employment circumstance. This completed form will include the change and the Executive Director's signature. Upon final approval, the Executive Director will forward the form to the Contracts Payable Specialist. Landrum will be notified of the change and a copy filed in the employee's file.

New positions created by Escarosa must be approved by the Board of Directors. The Board will approve the position title, job description and salary range.

### **Payroll Processing**

Payroll will be processed bi-weekly by Landrum. Bi-weekly timesheets are prepared electronically in Landrum's timesheet system by the employee. Once the timesheet is completed the employee will electronically approve the timesheet. Their supervisor will also electronically approve the timesheet. The accounting department will then submit all the timesheets to Landrum for payment.

Landrum will be responsible for making federal payroll tax deposits, preparing quarterly tax information forms (Form 941 and UCT-6), and preparing and submitting W-2 Forms.

### **Annual Leave Requirement**

Staff who works within Escarosa's Accounting Department shall be required to take five consecutive days (one week) of annual leave each fiscal year. This policy may also be applied to other staff that have access to financial records and/or items which are equal to cash access. This determination will be made by the Executive Director upon consultation with the Chief Financial Officer.

## **ACCOUNTING SYSTEM AND FINANCIAL REPORTING**

### **Accounting System**

Escarosa will maintain an accrual accounting system in accordance with generally accepted accounting principles (GAAP). The financial records will contain accurate information pertaining to grant awards and authorizations, obligations, unobligated balances, assets, liabilities, expenditures and income as required by Uniform Guidance 200.302. The system will permit the tracing of all transactions to source documents in order to establish that funds have not be used in violation of the federal regulations, Uniform Guidance and other pertinent policies.

1. The Escarosa's accounting system is based on a chart of accounts that segregates financial information by fund, cost category and expenditure type. The Finance Director will be responsible for maintaining the chart of accounts and must authorize any new account numbers.
2. The books of account include general ledger and accounts payable subsidiary ledger. Sufficient detail will be kept in either the general ledger or subsidiary records to determine to which fund source cash, accounts receivable, accounts payable and deferred revenue relate. Asset and liability accounts will be reconciled monthly to ensure accurate balances.
3. The Finance Director will review and approve entries in the general ledger (through the accounts payable system and journal entries) to ensure that costs are charged against the proper fund and expenditure type.
4. Journal entries that require a write-off of over \$3,000 of revenue, accounts receivable or accounts payable require review and approval by the Finance Committee (with the exception of audit adjustments).
5. A standardized monthly closing procedure and checklist is used to ensure that consistent accounting principles are followed in the recording of financial data.

### **Chart of Accounts Overview**

The chart of accounts is the framework for the general ledger system, and therefore the basis for Escarosa's accounting system. The chart of accounts consists of account titles

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and account numbers assigned to the titles. General ledger accounts are used to accumulate transactions and the impact of these transactions on each asset, liability, net asset, revenue, expense and gain and loss account.

Escarosa's chart of accounts is comprised of six types of accounts:

1. Assets
2. Liabilities
3. Net Assets
4. Revenues
5. Expenses
6. Gains and Losses

Each account number shall be preceded by a three-digit fund code or a two-digit cost pool code and followed by six additional segments denoting various cost categories. The entire general ledger number consists of the following:

Segment 1	Fund/Cost Pool Code
Segment 2	Object Code (Expense type)
Segment 3	Category 1 Code
Segment 4	Category 2 Code
Segment 5	Contract Code
Segment 6	Miscellaneous Code
Segment 7	Grant Code

### **Financial Statements**

The Finance Director will prepare financial statements on a monthly basis. The Finance Director will be responsible for the timely reporting of financial information to the proper funding agency (see Cash Management and Reporting – Federal funds).

An annual independent financial audit will be conducted in accordance with generally accepted government auditing standards (GAGAS) and Uniform Guidance – Subpart F.

### **Bonding**

All personnel who have positions of trust are bonded up to \$300,000.

### **Program Income**

Any income generated by a grant or grant-supported activity or earned only as a result of the grant will be put back into the program from which it was generated. This statement applies to Escarosa and its service providers. Service providers will be monitored annually to ensure that this policy is followed. If program income is returned to Escarosa from service providers, it will be used in the program from which it was generated.

### **Stand-In Costs**

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All allowable costs that are incurred by a federal program and paid by a non-federal source shall be reported as uncharged to the federal program costs. These costs will be included as separate line items in the financial statements presented for audit and reported in the appropriate section of the state reports. These expenses will be treated consistent with cost principles affecting other expenses, including but not limited to, the cost allocation methodology, cost classification methodology, and supporting documentation requirements. These costs will be proposed as Stand-In Costs to substitute for federal costs that have been disallowed as a result of an audit or other review.

### **Discretionary Income**

All non-federal funds shall be assigned discrete account numbers and accounted for separately in the financial statements. Any expenditure to be applied against these revenues shall also be accounted for separately.

## **PURCHASING**

### **Purchasing Policy**

Escarosa will follow the Uniform Guidance 200.316 – 200.326 in the procurement of supplies, equipment, construction, training, and other services.

#### Micro-Purchases:

Procurement by micro-purchases is the acquisition of supplies or services, the aggregate amount of which does not exceed \$3,000 (\$2,000 in the case of acquisitions for construction subject to the Davis-Bacon act). To the extent practicable micro-purchases must be distributed equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the prices are considered to be reasonable.

#### Small Purchases:

Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold (\$150,000). If small purchase procedures are used, written price or rate quotations must be obtained from three qualified sources.

#### Simplified Acquisition Threshold:

Purchases in excess of \$150,000 and/or aggregate units of items or services which annual purchases exceed \$150,000 require either sealed bids or written proposals (see Procurement Section for procedures). Participant support services, i.e. childcare, uniforms, tools, etc. are identified on an individual basis and not considered aggregate units.

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Fixed assets with a value of \$500 or more will require the Executive Director's approval.

Escarosa will prepare a written lease vs. purchase determination for all equipment items, defined as \$5,000 or greater. Annually, during the budgeting process, a determination will be made concerning computer equipment purchases (for equipment under \$5,000). This determination will be documented and kept to support the final decision made.

Factors in the determination will be cost, maintenance cost and turnaround time for repairs, staff time and budget. The analysis will assess the effect of long term leases on future budgets, especially for computer equipment.

Documentation for the process will be maintained.

A purchase order system has been established to maintain internal control over the procurement process. All purchases require a purchase order with the exception of:

1. Purchases costing in total less than \$500.
2. Purchases of services or property that involve a contractual agreement.
3. Recurring expenses such as telephone costs, utilities, insurance, etc.
4. Participant support services such as childcare, books and tools purchases, health support, etc.
5. Staff's travel, conferences and any prepaid items.

### **Purchase Order Procedures**

All purchase orders will be prepared using the accounting system Purchase Order Module.

1. Purchase requisitions indicating items or services required, quantity, and program or account to be charged will be prepared by staff members and approved by their immediate supervisor.
2. Completed purchase requisitions will be submitted to the Contracts Payable Specialist for processing. Every effort to choose the most cost effective vendors taking into account price, quality and, when appropriate, delivery time. Minority vendors and/or recycled products will be used when cost and time permits. Disbarred or suspended vendors as listed in the U.S. General Services Administration Office of Acquisition Policy's "Lists of Parties Excluded from Federal Procurement or Nonprocurement Programs" will not be used.
3. Each purchase order will be assigned a discrete number. A log will be maintained listing the date, the assigned number, and the vendor.

4. The completed purchase order will be submitted to the Finance Director for review and signature. The purchase order will be reviewed to determine if the purchase is for an allowable expense and that funds are available in the appropriate program. In the Finance Director's absence the Executive Director or any Board Director may sign purchase orders. The Executive Director will sign all contracts.
5. Purchased items are received and signed in by the individual or department requesting the items. Receiving reports are forwarded to the Accounting Specialist and retained to file with the request for payment. If there is no vendor receiving report, the Accounting Specialist will send a copy of the purchase order to the requestor for signature to signify receipt of the items.

### **Section III Cost Allocation Plan**

CareerSource Escarosa has an approved Cost Allocation and Resource Sharing Plan which allocates in accordance with the requirements of Generally Accepted Accounting Principles and the Uniform Guidance. The Cost Allocation Plan is a document separate from the Administrative Plan.

### **Section IV. Procurement**

#### **AUTHORITY - PROCUREMENT AND CONTRACTS**

The Escarosa Board of Directors shall authorize any and all contracts with service providers that utilize funds under their auspices. A standing committee of the Escarosa Board (designated by the nature of the contract) shall have the authority to terminate contracts and rate proposals. The Committee will then submit the recommendations to the full Board for final approval and/or action. The Executive Director shall sign contracts and contract modifications for Escarosa.

Escarosa's procurement policies shall reflect Federal, State and local laws and regulations. Procurement Policies shall comply with Uniform Guidance Parts 200.218-323.

#### **CONFLICT OF INTEREST/ETHICAL PROCUREMENT POLICIES**

##### **Board of Directors**

No member of the Board of Directors shall join in discussions related to or cast a vote on the provision of services by that member (or any organization which that member directly represents) or vote on any matter that would provide direct financial benefit to that

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member or those organizations (Section 141(f) of PL 97-300). Contracts awarded to a related party organization must also be submitted to CareerSource Florida for approval.

### **Employee**

It is a breach of ethical standards for an employee to participate directly or indirectly in procurement when:

- The employee or an immediate member of his/her family has a financial interest in the procurement,
- The business/organization in which an employee or any other member of his/her immediate family has a financial interest pertaining to the procurement; or
- Any other person, business, or organization with which an employee or his/her immediate family member is negotiating or has an arrangement concerning prospective employment is involved in the procurement.

Where an employee or his/her immediate family member holds financial interest in blind trust, there will be no conflict of interest, provided that the blind trust has been disclosed to the organization governing procurement ethics.

Whenever the employee discovers or becomes aware of such an actual or potential conflict, he/she should promptly withdraw from the procurement or seek guidance on participation from the group that governs procurement ethics for the agency.

### **Disclosure**

Any employee who has or obtains any benefit from any contract with a business in which he/she has financial interest must report this to the appropriate official or group, except when that interest has been placed in a disclosed blind trust.

### **Gratuities and Kickbacks**

It is a breach of ethical standards for anyone to offer, give, or agree to give any employee or former employee, or for an employee or former employee to accept from another person a gratuity or an offer of employment in connection with any aspect of procurement.

It is a breach of ethical standards for any payment, gratuity, or offer of employment to be made by or on behalf of a subcontractor under a contract to the prime contractor or higher tier subcontractor, or any person associated with these, as an inducement for the award of a subcontract.

### **De Minimus Policy for Acceptance of Gifts**

The Conflict of Interest/Ethics Policy is not intended to prohibit the acceptance of unsolicited modest courtesies, openly given and accepted as part of the usual business amenities, for example, occasional business-related meals or promotional items with a value of less than \$25.

### **Prohibition Against Contingent Fees**

It shall be a breach of ethical standards for anyone to be retained, or to retain anyone, to solicit or secure a contract for a commission, brokerage, or contingent fee or the promise of such payments. This prohibition does not apply to the hiring of bona fide employees of an organization, or to retaining a bona fide commercial selling organization.

### **Confidentiality and Non-disclosure of Proposal Information**

All staff involved in any aspect of the procurement process will not reveal or disclose information to anyone outside of the official group involved in reviewing offers and making contract award decisions.

### **Use of Confidential Information**

It is a breach of ethical standards for any employee or former employee to use confidential information for actual or anticipated personal gain, or for the actual or anticipated personal gain of any other person.

### **Policy for Disciplinary Action for Conflict of Interest Violations**

Officers, employees or agents who violate the conflict of interest/ethics standards will receive disciplinary action as determined by the Executive Committee which may include termination or legal action depending on the severity of the conduct.

## **PROCUREMENT PROCESS**

### **Needs Identification**

1. All procurement for contracts shall be in conjunction with programs and activities described in the Escarosa Five-Year Strategic Plan. Programs and related activities are designed to meet the needs of the area served through Region #1.
2. Results to be achieved may vary, but are within guidelines defined in WIOA/Welfare Transition law. Results may include the following, but are not limited to:
  - Job Placement, as defined in the Five-Year Strategic Placement
  - Job Retention
  - Quality Employment
  - Basic Educational Competencies (to include literacy)



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- Occupational Skills Training
  - High School or GED completions
3. Training, Retraining, and Placement activities are based upon local labor market forecasts in accordance with the Workforce Estimating Conference, needs of local employers, and other local labor market information.
  4. Prospective procurement will be reviewed to avoid unnecessary duplication.

### **Funds Availability**

Items/services which exceed \$150,000 in estimated costs shall be budgeted items approved by the Escarosa Executive Committee and/or the Escarosa Board, or have been approved through budgeted line items.

Items/services to be purchased where the cost estimate exceeds \$3,000, but does not exceed \$150,000, shall be included in budget line items and shall be approved by the Finance Director and the Executive Director.

Items/services to be purchased where the cost estimate exceeds \$500, but does not exceed \$3,000, shall be included in budget line items and shall be approved by the manager and the Finance Director.

Items/services to be purchased where the cost estimate does not exceed \$500, shall be included in budget line items and shall be approved by the a manager or the Finance Director.

### **Timeliness**

Notice of the RFP shall be published in at least one newspaper distributed in Escambia and Santa Rosa Counties at least five (5) working days prior to the date set for receipt of letters of intent to bid and/or the date of the bidders' meeting.

The RFP shall be due no sooner than seven (7) days past the date set for receipt of letters of intent to bid and/or the date of the bidders' meeting.

The bidders' meeting is strictly an information exchange session where technical assistance will be provided and attendance is not mandatory to qualify for submission of proposal(s). Bidders, however, must either submit a letter of intent to bid or attend the bidders' meeting to qualify for submission of proposals.

### **Deadline**

Each RFP will contain a deadline date and time for submissions of proposals. The Escarosa staff will carefully log in the receipt of each proposal, ensuring that proposals are date stamped prior to the proposal deadline. Any proposal received after the deadline

## CAREERSOURCE ESCAROSA ADMINISTRATIVE PLAN

date and time will be rejected and will not be considered further.

### **Format**

Proposals must be presented with the same topic headings and in the same order as set forth in the RFP. Each heading must be addressed with a response or not applicable (n/a) noted, when appropriate. All proposals shall be typed on 8-1/2 x 11" paper and all pages shall be numbered consecutively.

### **Competition/Solicitations**

#### Bid Requirements

1. All services/items where the cost estimate exceeds \$150,000 shall be obtained using a competitive bid system (Request for Proposals). RFPs shall be rated and reviewed by staff, knowledgeable community members, and/or experts in various fields. The ratings and rankings shall be submitted to an Escarosa Board Standing Committee for review and approval. The Committee will then present a recommendation to the Board for final approval.
2. All services/items where the cost estimate is under \$150,000, but at or above \$3,000, will require at least three written quotes. Quotes will be submitted to the Finance Director and Executive Director for approval. All service provider contracts will be submitted to the designated Escarosa Standing Committee and then presented to the final board for approval.
3. All services/items where the cost estimate is \$3,000 or below will follow the Micro-Purchase policy.

#### Sole Source

The competitive bid system shall be utilized as the primary vehicle for soliciting proposals in items 1 and 2 above; however, sole source may be utilized if conditions exist, as listed below:

1. The service is only available from a single source.
2. Emergency conditions exist for the service that will not permit a delay resulting from competitive solicitation.
3. After solicitation of a number of sources, competition is determined inadequate.
4. The awarding agency authorizes noncompetitive proposals.

All sole source awards shall be reviewed by the appropriate Escarosa Board Standing Committee and shall be submitted to the Board for final approval.

**Contents**

Request for Proposals shall include the following areas:

- I. PROPOSAL DEADLINE
- II. GENERAL INFORMATION
  - Purpose of the Request for Proposals (RFP)
  - Background Information
  - Federal and State Legislation
  - General
    - Services Description
    - Cost Categories
    - Procurement
    - Profit
  - Administration of the RFP
    - Financial Capacity of Proposers
    - Contract period
  - Description of Services to be Solicited
  - Performance Outcomes
- III. PROPOSAL SUBMITTAL INSTRUCTIONS
  - Instructions
  - Required Information
- IV. GOVERNING PROVISIONS AND LIMITATIONS
  - Contractor Orientation/Competency
  - Type of Contract
  - Third Party Contracting
  - Disclosure of Proposal Contents
  - Audit Requirements
  - Conflict of Interest
  - Notification of Funding
  - Records Retention
  - Appeals Process
- IV. PROPOSAL FORMAT
  - Response Narrative
  - Staff Qualifications
  - Administrative Capabilities
  - Budget Information
  - Indirect and Direct Administrative Costs
  - Proposal Review Evaluation
  - Required Certifications
  - Proposal Rating Sheet

**Submission**

Proposals may be received by the Executive Director and/or the designated manager

involved with the RFP. Proposals may be opened/reviewed by the Executive Director and/or the designated manager. The Executive Director and/or manager will forward the proposals to the appropriate Rating Review Committee members for review and ratings.

A log will be kept to note time and date of receipt of proposals.

### **Source Selection Procedures**

1. The RFP provides specifications that describe the program activities to be funded and the guidelines to be adhered to by successful bidders.
2. The selection of service providers for each activity will be based upon the proposer's track record of demonstrated effectiveness, ability to meet performance criteria, fiscal accountability, cost effectiveness of the proposal, and any technical applications necessary for program performance.
3. Proposals submitted in response to an RFP will be reviewed by the designated manager for completeness and conformity with the RFP requirements. The manager will also ensure the original proposals were received prior to the RFP deadline.
4. Proposers will be cautioned to carefully review the proposals rating criteria, attached to the RFP, since the criteria described is that which will be used by the committee assigned to evaluate proposals.
5. Reasonableness of cost shall be a determining factor in the proposals. To determine the reasonableness of cost, the following shall be used:
  - a. Facilities/Rental - Local average square footage rates;
  - b. Salaries - Compared to other individuals' salaries within the organization or within the area and to other individuals with comparable level of prior programmatic experience;
  - c. Equipment/Property - Through procurement practices, previous purchases of similar or like equipment or availability/source of supplier;
  - d. Transportation - Will not exceed current transportation payments, but may be of equal or less value; and
  - e. Communications, Utilities, etc. - Based upon time allocations of program.
6. Members of the committee rating the proposals shall be furnished internal monitoring and audit reports regarding previous subcontractors (if available). The rating committee members will utilize the reports when rating new proposals.
7. Proposals in compliance with the RFP will be reviewed and ranked by a designated committee of the Board of Directors. The committee will consist of members appointed by the Chairman and will include the Executive Director and/or appropriate manager.

8. The award will be made to the most responsible offeror(s) whose proposal(s) is/are most advantageous after consideration of price, technical factors, and other desired factors. The chosen contractor must be deemed responsible and possessing the ability to perform successfully under the terms and conditions of the RFP.
9. The proposal must obtain a rating of not less than 70% of the possible score to be considered for funding.
10. The Proposal Summary Evaluation Sheet shall contain the following:
  - a. Average Rating Total;
  - b. Proposed Funding Amount;
  - c. Type of Outcomes;
  - d. Number of Outcomes;
  - e. Past WIOA/WTP Subcontractor (as relates to proposed services);
  - f. Past Performance (if applicable) (as relates to proposed services);
  - g. Monitoring/Audit Findings (as relates to proposed services);
  - h. Reasonableness of Cost; and
  - i. Cost Categories;
  - j. Conflict of Interest Statement.
11. All proposals will be ranked by committee members using a points system defined in the RFP. A simple majority vote of the committee will determine the recommended award (contractor) to the Board of Directors.
12. Under extremely competitive conditions, the committee may require formal presentations by two (2) or more competitors. A second ranking and scoring will take place using the same criteria as identified in the RFP.

### **Contractor Responsibility**

In the event that a bid is received from an agency and/or business with which Escarosa has not contracted services in the past, an on-sight review, if feasible, or documentation will be required which will demonstrate the agency's ability to perform the services required. This may include letters of reference from other agencies who have contracted with the proposer for similar or like services or verbal confirmation of the above. Proposers who have provided services in the past shall be evaluated based upon past performance.

### **Procurement Files**

Escarosa will maintain procurement files sufficient to detail the significant history of procurement. These files will include necessary information to document the rationale for the method of procurement, selection or agreement type, awardees selection or

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rejection, and the basis for the agreement price. Items that will be included in the file to fulfill the above are:

1. Legal Advertisement: Copy of legal ad.
2. Bidders' Meeting Attendees: Sign-in sheets.
3. Bidders' List: Escarosa shall also solicit proposals from all prospective providers who have requested their names to be added to a "bidders' list", which shall be updated once per year. All bidders who have not submitted a proposal within a one-year period or did not renew their intent to bid through written correspondence shall be removed from the bidders' list. Escarosa shall attempt to ensure that current providers on the bidders' list are notified of the RFPs; however, Escarosa assumes no liability for real or prospective losses suffered by potential bidders due to failure to notify via this bidders' list.
4. RFP Instructions: Copy of proposal packages to include rating sheets.
5. RFP Ratings: Rating sheets completed by Escarosa Committee members and as recommended to the Board of Directors.
6. Offeree's Proposals: Submission in response to Escarosa's RFP by potential providers/bidders.
7. Cost/Price Analysis: Documentation to show that contract budget is reasonable.

Procurement files will be retained for five (5) years after the final reports have been submitted to the state.

### **Appeal or Protest**

Grievances/appeals by the proposer shall be made to the Chair of the standing committee of the Escarosa Board of Directors. The appeal must be submitted in writing within five (5) days of notification of intent not to fund. The Committee shall review the appeal and shall respond to the submitting organization in writing within ten (10) working days a recommendation to clarify or resolve the appeal. If the finding of the Committee is not satisfactory to the submitting organization, the issue will be forwarded to Escarosa's Executive Committee for final resolution. The Executive Committee shall issue to the submitting organization the final resolution within ten (10) working days of receipt of the appeal. Legal and technical counsel may be involved in this process. If the grievance is based upon discrimination due to race, sex, religion, age, etc., the grievance procedures included in CareerSource Escarosa, Inc.'s "Grievance/Complaint Hearing/Appeal Procedures".

### **CONTRACTS**

**Contract Type**

All contracts shall be line item, cost-reimbursement contracts or fixed unit priced, performance contracts (FUPPC). Whenever possible, line item, cost-reimbursement contracts will be utilized.

All contracts using WIOA funding with units of government must be cost reimbursement contracts

Fixed unit price, performance contracts will be utilized in accordance with 20 CFR 629.38(e)(2). If a fixed-price agreement with a nonprofit agency results in revenues in excess of actual costs incurred, the excess revenues are considered to be program income.

**Contract Contents May Include the Following:**

- Table of Contents
- Statement of Work, to include services to be provided
- Method and Time of Payment
- Compensation and Time Period
- Public Records Requirement
- Modification Unilaterality
- Equal Opportunity Clause
- Provision against Assignment
- Funding
- Total Amount Allowable
- Type of Contract
- Contract Liabilities and Indemnification
- Insurance
- Termination for Convenience
- Termination for Cause
- Property/Equipment Clause
- Maintenance of Effort
- Conflict of Interest
- Compliance with appropriate regulations
- Accounting Standards
- Audits Right Clause
- Resolution of Complaint
- Maintenance of Records
- Transfer of Records
- Sub-agreements
- Definitions and Acronyms
- Performance Standards
- Disallowed Costs
- Program Income
- Pell Grant Reductions

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Notice and Contact  
Sponsorship  
Procurement of Supplies  
Attachments  
Anti-Lobbying  
Copyrights Clause  
Sectarian Statement  
Clean Air Act  
Energy Policy and Conservation Act  
Patent Rights Clause  
Authorizations for Signature

### Attachments:

Submitted Proposal  
Budget Summary  
American with Disabilities Act Checklist  
Drug Free Workplace  
Public Entity Crimes  
Debarment, Suspension, and Other Matters (\$25,000 or more)  
Anti-Lobbying (\$100,000 or more)  
Equal Access/Equal Opportunity  
Clean Air Act  
Escarosa Grievance Policies and Procedures

### **Contract Numbers**

All contracts will be given a unique contract number using the following convention:

Funding Source – Program Year – Sequential Number

Contracts will be sequentially numbered as issued.

Example: first contract funded by the Workforce Investment and Opportunity Act for Program Year 2016-2017 will be numbered as WIOA-2016-2017-01, the second will be numbered WIOA-2016-2017-02.

### **Contract Administration**

1. Contract payments, documentation required, and how the contractor will be paid are addressed in each individual contract. There is no set policy, as it is individualized based upon the agency and the services to be provided.
2. Contract payments are for completed outcomes or for line-item, cost-reimbursement charges. Advance payments to subcontractors will be allowed under the terms of certain FUPP contracts. Otherwise, advances will not be made.



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3. Contract modifications are allowed if approved by the Escarosa Executive Director. The appropriate staff manager may negotiate modifications; however, approval by the Executive Director is required for implementation of a modification. The Executive Director will sign contract modifications.
4. Escarosa does not allow a prime contractor to subcontract services without prior approval.
5. Escarosa will not extend contracts beyond the first year unless the RFP specifies that three-year proposals are being bid, and interested bidders will need to submit three-year proposals, or unless the RFP states that contracts may be negotiated for extension or modification.
6. Service providers' performance, as required in their contracts, will be reported to the Board of Directors quarterly through the appropriate committee. The service provider's performance will be reviewed prior to renewal of the contract for the second and third year. Service providers with unacceptable performance will not have their contract renewed.

### **Contract and Agency Disputes**

Appeals by the contractor will be made directly to the Executive Director. The contractor must submit a written grievance stating the issues of concern to the Executive Director within ten (10) working days. The Executive Director will attempt to resolve and/or clarify any concerns. If a satisfactory agreement is not reached within ten (10) working days, the issue will be forwarded to the Escarosa Executive Committee. The Executive Committee will make a final decision regarding the issue within ten (10) working days. Legal counsel may be involved in this process. Additional actions will be referred to the Director, Department of Economic Opportunity (DEO).

### **Contract Files**

Active contract files should include contracts, invoices and back-up documentation, revenues expended and received, correspondence, modifications, monitoring reports, progress reports, and equipment/property purchases, if applicable.

Escarosa will retain records for five years, or per appropriate federal and state requirements, for all contracts. If litigation or an audit question is pending, records will be retained until legal or audit questions are resolved. Contractors must retain original documentation, as specified above, regarding expenditures and revenue.

### **Contract Closeout**

The attached "Contract Closeout Guide" will be used to close out each contract after its term expires. The form will be signed and maintained in the contract file with a copy sent to the contractor.

Action to be Taken After Receipt of Notice of Termination:

After receipt of the notice of termination, the contractor shall cancel outstanding commitments covering the procurement or rental of materials, supplies, equipment, and miscellaneous items and shall exercise all reasonable diligence to accomplish the cancellation or diversion of outstanding commitments covering personal services that extend beyond the date of such termination, to the extent that they relate to the performance of any work terminated by the notice. With respect to such canceled commitments, the contractor agrees to:

1. Settle all outstanding liabilities and claims arising out of such cancellation of commitments or ratify all such settlements; and
2. Assign to Escarosa in the manner, at the time and to the extent directed by Escarosa, all of the rights, titles, and interest of the contractor under the orders and subcontracts so terminated. Escarosa shall have the right, at its discretion, to settle or pay any or all claims arising out of the termination of such orders and subcontractors.

Payment:

For cost reimbursement agreements, payments will be made for expenditures incurred up to the date that termination notification has been received. The Escarosa must receive the final request for cost reimbursement within thirty (30) days after the termination of the Agreement.

**Forms**

1. Certification Regarding A Drug-free Workplace
2. Certification Regarding Debarment, Suspension, and Other Matters
3. Anti-lobbying Statement
4. Sworn Statements of Public Entity Crimes
5. Equal Access/Equal Opportunity
6. Clean Air Act
7. Contract Closeout Guide

**Section V. Property Management**

**PROPERTY MANAGEMENT POLICY**

Escarosa's property management policy and procedures conform to Uniform Guidance Part 200.313.

All tangible personal property with a value of \$5,000 or greater is capitalized as an asset, inventoried and tagged with a unique Escarosa property number. Tangible personal

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property is defined as non-expendable property with a life expectancy of one year or more. This policy does not pertain to participant training materials that are purchased for the participant to retain permanently.

Tangible property with a value of \$500 to \$4,999 is inventoried and tagged with a unique Escarosa property number. These items have a value to Escarosa and are maintained with the same internal control procedures as capitalized property. This property will be maintained in a separate database and files.

The Finance Director is responsible for maintaining property records and internal control over property.

Staff will notify the Finance Director and/or Contracts Payable Specialist immediately of any changes in the status of property, i.e., moves, sales, scrapping, obsolescence, damaged or missing equipment.

All sales and disposal of property will be in accordance with Uniform Guidance Part 200.313 and at the direction of the Executive Committee.

Property purchased with federal funds shall be used in the program for which it was acquired as long as needed. When no longer needed in the original federal program, the property will be used in connection with other federal programs.

### **PROPERTY MANAGEMENT PROCEDURES**

1. Upon receipt of the personal property as defined above, a Property Record Form will be filled out and a property number assigned. A copy of the accounts payable packet, which should include a check copy, invoice and purchase order, should be attached to the Property Record Form. If physically possible a label stating the property number and "Property of the Workforce Escarosa, Inc." will be attached to the item.
2. The Property Record Form will contain, when applicable:
  - a. Property number.
  - b. Description of item or items,
    - A. Class (e.g. desks) and type (e.g. typewriter desk),
    - B. Number of units,
    - C. Name, make, or manufacturer,
    - D. Year and/or model.
  - c. Identification:
    - A. Manufacturer's serial number, vehicle identification, number, title certificate number, etc.
  - d. Cost of Property and Date Acquired
    - A. Surplus property, donations, and similar acquisitions should be recorded at

- their value at the time of acquisition rather than at the cost to the governmental unit.
  - B. For current acquisitions show purchase order number, check number, date, and cost and from whom acquired.
  - C. Show both unit cost and total cost if items are under group control.
  - e. Physical location.
  - f. Custodian's delegate.
  - g. Date of last physical inventory and condition.
  - h. Disposition
    - A. Show method of disposition: sold, traded, scrapped or transferred.
    - B. Give full particulars as to date, amounts, who sold to, authority, etc.
    - C. Funding source and/or account charged.
  - i. Any additional information desired by the custodian.
3. A physical inventory of the above-defined property will be taken annually. This physical inventory will be reconciled with property records.
  4. All pertinent data regarding property records are incorporated the Fixed Assets Module of the accounting system for permanent record keeping and well as files with supporting documentation.

## **Section VI. Records Management and Confidentiality**

Escarosa has processes and procedures in place to manage, retain and properly dispose of program and financial records, to include insuring the confidentiality of client personal information.

### **RECORDS MANAGEMENT**

#### **Client Records**

Client files are maintained by the service provider delivering services for one year after the client has been terminated or until all follow-up services are completed. The files are then transferred to the designated Escarosa Programs staff individual (by program) for proper storage and safekeeping. Files that have been transferred to Escarosa are archived in locked storage units. Access to units is limited to the designated staff, which retrieves records necessary for monitors and auditors. Client records will be retained for a period of five (5) years, after the final expenditures report for the fiscal year has been submitted to the state as required by the State of Florida policy or until all audits are complete and findings on all claims have been finally resolved, whichever is the longer period of time. Files will be shredded at the archive site in the presence of designated staff.

#### **Financial Records**

Financial records consist of vendor files that include a copy of checks and appropriate

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backup, payroll records, journal entries, the books of account, financial statements and cash management reporting records. All financial records for the current and prior fiscal year are maintained at the administrative offices. All other financial records are maintained in a secured archive area. The Accounting Staff will maintain archived financial records.

Financial records will be retained for a period of five (5) years after the final expenditures report has been submitted to the state with the following exceptions:

- If any litigation, claim, or audit is started before the expiration of the 5-year period, the records shall be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.
- Records for real property and equipment acquired with Federal funds shall be retained for 5 years after final disposition of the property.

### **Property Records**

Property records are maintained at the administrative offices. The Finance Director maintains a computer database of the inventory.

Property records will be retained for a period of five (5) years after final disposition of the property.

### **CONFIDENTIALITY**

While in custody of the service providers the client files are kept in a secure location with access limited to “need to know” personnel, auditors and monitors. Clients do not have access to their files. DEO’s Guidance Paper, AWI FG 04-044, concerning data sharing will be followed when sharing of client information between staff and agencies is necessary. Escarosa staff members, service provider and partner staff members must submit annually a “Non-Disclosure and Confidentiality Certification between RWB and Contractors/Subcontractors” form.

### **Medical Records**

Medical, Supplemental Security Income (SSI) and disability-related information on applicants/participants are stored in a manner that ensures confidentiality, and must be used only for the purposes of record keeping, reporting and determining eligibility. WIA and TANF applicants/participants may be deferred from program activities and have medical information supporting their temporary medical deferral. TANF applicants that apply for SSI may also have medical documentation.

Escarosa has established the following procedures to comply with the Health Insurance Portability and Accountability Act (HIPAA) and place controls on the access of the medical information that participants/applicants share with program staff.

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1. All medical, SSI, disability, and medical case note information are maintained on separate forms/sheets, stored separately from all other information about a particular individual and treated as a confidential medical record. Therefore, participants/applicants with medical, disability, or SSI information have two separate records/files; one program record and one medical record. All case notes, doctor forms, letters, etc. pertaining to medical information, disability, SSI are kept in the individual's medical record.
2. Medical records are kept in a separate location from program records.
3. Access to disability-related or medical information is limited to:
  - a. Case managers (custodian of the file) of the individual.
  - b. Supervisors and managers may be informed regarding restrictions on the work or duties of a participant and regarding necessary accommodations.
  - c. First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment or evacuation.
  - d. USDOL, DEO, DEO contracted monitors, and Escarosa staff/monitors responsible for program compliance issues will be provided information on request. Participant release forms must be signed by the participants and maintained with their medical record. This release form will state that the participant is aware and agrees to the release of their medical information.
4. Any request for participant medical information from a source not listed above, or in cases where the file custodian is not sure of a specific request for information, he/she will report the request to his/her manager. The manager will coordinate with the Executive Director/Assistant Director concerning release of the information.
5. Staff having access to medical information receives HIPPA training to insure comprehension and compliance with the law.
6. Managers are responsible for the following:
  - a. Ensure that all appropriate staff receives HIPPA training. This training may count toward staff's 15 hours required One-Stop credential training.
  - b. Ensure that new staff members receive HIPPA training within 60 days of hire.
  - c. Ensure that all HIPPA procedures are followed.
  - d. Ensure that participant medical records are maintained as required by the above procedures.
  - e. Ensure that all medical records/files have a participant's signed release form as a part of their medical record.

### **Demographic Data**

Demographic data (race/ethnicity, sex, age, and disability status) for applicants, registrants, eligible applicants/registrants, participants, terminated participants and employees, employees, and applicants for employment are stored in a manner that ensures confidentiality. The data is maintained in secure files, with access available to authorized personnel only. The data is used only for the purposes of record keeping and reporting; determining eligibility, where appropriate, for WIOA financially assisted programs or activities; determining the extent to which the Escarosa is operating its WIOA financially assisted program or activity in a nondiscriminatory manner; or other used authorized by law. The data is used for statistical purposes only and is not used in a manner which reveals the identity of the individual.

### **Subpoena or Public Records Request**

In the event there is a subpoena or public records request for confidential information, Escarosa will follow the guidance in AWI FG 02-033. Escarosa will not release any confidential information unless specifically authorized by law. Any subpoena or public records request submitted to an Escarosa staff member or service provider will be forwarded to the Executive Director who will coordinate release of the information with DEO's general counsel. If necessary, Escarosa will contact legal representative. A public records request for non-client Escarosa records must be submitted to the Executive Director who will coordinate release of the records. If necessary, Escarosa will contact legal representation before release of the information.

## **Section VII. Grievance Procedures**

The following Grievance Policy is disseminated to each Escarosa staff member, service provider staff member and program participant through a form that the individual signs acknowledging notice of the policy. The forms signed by staff members (Escarosa and service providers) are maintained by Escarosa and the forms signed by program participants are maintained in their client files.

### **GRIEVANCE POLICY**

Workforce Investment and Opportunity Act (WIOA), Trade Adjustment Act (TAA), Welfare Transition (WT/TANF) and Wagner-Peyser (WP) Program participants and other interested parties (e.g., contractors, One-Stop partners, One-Stop operators, and employers affected by decision or actions of the local workforce system have a right to file grievances/complaints with the local Regional Workforce Board. The grievance/complaint should be filed with CareerSource Escarosa, in accordance with the below listed procedures. In the event you submit a grievance/complaint not under the authority of CareerSource Escarosa, CareerSource Escarosa will notify you within 5

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working days from the receipt of the grievance/complaint of the relevant agency responsible for the grievance/complaint.

### **Sexual Harassment Policy**

An individual or entity desiring a copy of the CareerSource Escarosa Sexual Harassment Policy should write or call CareerSource Escarosa, 3670-2A North "L" Street, Pensacola, FL 32505; telephone number (850) 473-0939.

### **Criminal Fraud and Abuse**

The procedures for reporting such incidents and instructions for completing the incident reporting form can be found at the following web site: [http://www.floridajobs.org/forms/inspec\\_gen/complaint\\_assessment.doc](http://www.floridajobs.org/forms/inspec_gen/complaint_assessment.doc). The form should be completed and mailed to: USDOL Office of Inspector General, Office of Investigations, Room S5514, 200 Constitution Avenue NW, Washington, D.C. 20210 or to USDOL South East Regional Inspector General for Investigations, Office of Investigations, Sam Nunn Atlanta Federal Center, 61 Forsyth Street, SW, Suite 6T1, Atlanta, Georgia 30303. Reports or complaints alleging fraud and abuse may also be reported through the USDOL Hotline at 1-800-347-3756.

### **Reporting Discrimination Complaints**

To receive forms and procedures for filing discrimination complaints call DEO at (850) 488-7228 ext 1330, 1340, 1338 or visit the following website: <http://www.floridajobs.org/civilrights/docs/Complaint%20form.docx>

You may file a discrimination complaint directly with the CareerSource Escarosa EO Officer, Mrs. Janay Sims, 3670-2A North "L" Street, Pensacola, FL 32505, (850) 473-0939. A **WIOA/TAA** complaint file with the U.S. Department of Labor, Civil Rights Center Discrimination Complaints 200 Constitution Ave., NW, Room N-4123 Washington, D.C. 20210 **and** a copy mailed to DEO, Office for Civil Rights, MSC 150, 107 East Madison Street, Tallahassee, FL 32399-4129; **and** with the EEOC Tampa Area Office 501 East Polk Street, Suite 100, Tampa, FL 33602 (813) 228-2310 or TTY (813) 228-2003. A **WT** complaint file with U. S. Department of Health and Human Services, Office of Civil Rights, Inspector General, Sam Nunn Atlanta Federal Center, 61 Forsyth Street, SW, Suite 3B70, Atlanta, GA 30303 **and** a copy mailed to DEO, Office for Civil Rights, MSC 150, 107 East Madison Street, Tallahassee, FL 32399-4129; **and** with the EEOC Tampa Area Office 501 East Polk Street, Suite 100, Tampa, FL 33602 (813) 228-2310 or TTY (813) 228-2003. You may file electronically at the following address [civil.rights@deo.myflorida.com](mailto:civil.rights@deo.myflorida.com) A **WP** complaint may be filed directly with a local-office EO Officer or with the U.S. Department of Labor, Civil Rights Center Discrimination Complaints 200 Constitution Ave., NM, Room N-4123 Washington, D.C. 20210. If the person filing the complaint is sight or speech impaired, they should call the Florida Relay System at 1-800-955-8771 (TTY) or 1-800-955-8770 for voice assistance.



### **Filing a Grievance/Complaint and Request for Hearing/Appeal with CareerSource Escarosa**

An **WIOA/TAA/WT** individual or entity, adversely affected by an CareerSource Escarosa action, to include but not limited to: displacement of employee; denial or termination as a **WIOA** training provider; denial of eligibility as a **WIOA OJT** or customized training provider; participant sanctioned for using controlled substances; termination of program eligibility or sanctioning for non-compliance with work activities, may submit a Grievance/Complaint or hearing request. Submissions should be concise and clearly written or typed; state the facts, laws, procedures, etc. that the grievant/complainant believes to be relevant for review; and must include a legible address where official notices may be mailed to the grievant/complainant; include the words **REQUEST FOR A HEARING** at the top of the first page in capital letters; and specifically state the type of violation and nature of the action that is the subject of the grievance. The grievance shall be no longer than five pages (exhibits and attachments are not included in the five-page limit) and submitted to CareerSource Escarosa, Executive Director, 3670-2A North "L" Street, Pensacola, FL 32505. If possible CareerSource Escarosa will attempt to resolve the grievance/complaint informally. If the matter cannot be resolved informally, CareerSource Escarosa must establish a hearing date, complete the hearing and issue a decision within a 60-calendar day time frame from the date the grievance/complaint was filed. When the matter is not resolved informally, you will be notified by certified mail return receipt at least 15 calendar days prior to the hearing. The written hearing notice will include: hearing procedures, date, time, and place of the hearing; pertinent sections of the **WIOA, WT**, and any federal regulations involved. Affected parties may be represented at the hearing by an attorney or other representative, and may present witnesses or documentary evidence at the hearing. The parties will receive a written decision of the hearing within **30 calendar days** after the hearing by certified mail return receipt requested. Individuals alleging a labor standards violation may submit the grievance/complaint to binding arbitration procedure if the affected parties are covered by a collective bargaining agreement.

**WP** participants may file discrimination complaints against the Florida Department of Economic Opportunity (DEO) or its employees or complaints alleging discrimination by an employer. Special handling procedures are required for complaints filed by Migrant and Seasonal Farm Workers (MSFW). CareerSource Escarosa shall attempt to resolve the MSFW complaint. If the MSFW complaints cannot be resolved within five working days of receipt of complaint by CareerSource Escarosa, the complaint form and copies of all documents in the complaint file are forwarded to the Florida Department of Economic Opportunity (DEO), Monitor Advocate Office, MSC 150, 107 East Madison St, Tallahassee, FL 32399-4133. Attention: Senior Monitor Advocate.

\*Note: Individuals with a disability needing special accommodations shall call CareerSource Escarosa at (850) 473-0939 or fax at (850) 473-0935 at least five working days prior to the hearing and state what special accommodation requirements are needed in order to participate in the hearing.

## **Right to Appeal**

An individual, or entity, adversely affected by CareerSource Escarosa actions or decisions can file an appeal with the State WIOA/TAA Administrative entity. An appeal may be made to the federal level (USDOL) if the state has not conducted a hearing or made a decision regarding the grievance/complaint **within the mandated 60-calendar day timeframe**, or if either party is dissatisfied with the state hearing decision. If the DEO Administrative Entity in conjunction with State Board staff determines that a grievance/complaint filed at the State level should have been decided at the local level, then the grievance/complaint may be remanded back to CareerSource Escarosa.

## **Filing a Grievance/Complaint and Request for Hearing/Appeal at the State Level**

Because of the many types of grievances/complaints and level of hearing/appeals allowed under WIOA/TAA/WT regulations, DEO staff working in conjunction with the State Board staff will be responsible for reviewing and determining the appropriate processing of requests/appeals filed at the State level. The following procedures should be followed when filing a grievance/complaint and/or requesting a hearing/appeal regarding a CareerSource Escarosa decision. The request and/or grievance /complaint for a hearing appeal should be clearly identified at top of the first page, i.e., REQUEST FOR HEARING. The written hearing request should not exceed five pages (not including attachments) and should state the facts, procedures, etc. that the grievant/complainant believes to be relevant for review and, if applicable, shall include any written decision made by CareerSource Escarosa and an address where official notices may be mailed to the grievant/complainant. The request shall be sent by certified mail return receipt to DEO, Office of General Counsel, MSC 150, 107 East Madison Street, Tallahassee, FL, 32399-4128. The grievant/complainant and CareerSource Escarosa will be contacted at least 5 working days of receipt of the complaint to attempt an informal resolution. If informal methods do not resolve the issue, then a hearing will be scheduled. The complainant/ grievant will be notified of the specific procedures for the hearing and will receive a decision within 60 calendar days from receipt.

## **State and Federal Level Appeal Process**

If DEO has not reached a decision on the appeal of a local decision or the grievant disagrees with the decision, the grievant/complainant can file an appeal to USDOL no later than 60 calendar days of receipt of the decision being appealed. That request is submitted by certified mail, return receipt to Secretary USDOL, Attention: ASET, Washington, D.C. 20210. A copy of the appeal must be simultaneously provided to DEO (address above). Actions that may not be appealed to USDOL include: sanctions applied at the local level for using a controlled substance; sanction for non-compliance with work activities; or denial of eligibility as a WIOA/TAA training provider. WP states that non-ES related complaints (employment, discrimination, health and safety, etc.) must be forwarded as soon as possible after being received, to DEO, Office of General Counsel, MSC 150, 107 East Madison St, Tallahassee, FL, 32399-4128, or to the appropriate federal agency with a copy of the complaint sent to DEO Office of General Counsel. If

the WP complaint is not resolved within 15 working days, then the complaint and associated file documents are forwarded to the DEO, Office of One-Stop and Program Support, MSC 105,107 East Madison St, Tallahassee FL 32399-4133, Attention: ES Complaint Coordinator.

### **Section VIII.                    Audit Plan**

Escarosa maintains the Audit Plan as a separate document. The Plan conforms to the requirements of Uniform Guidance Subpart F and the “Audit and Audit Resolution Final Guidance AWI FG 05-019” issued August 12, 2005 by DEO. The Audit Plan is submitted annually to the Office of the Inspector General for DEO.

### **Section IX.                    Procedures for Establishment and Collection of a Debt**

ESCAROSA agrees to repay from non-federal funds any amounts accrued due to the misexpenditure of funds due to willful disregard of the federal law, gross negligence, fraud/theft, or failure to observe accepted standards of administration. Escarosa does not have any funding which is not federal, therefore, in those instances where the liability does not arise due to willful disregard of the requirements of federal law, gross negligence, or failure to observe accepted standards of administration, Escarosa will request that the State allow repayment of disallowed costs to be reprogrammed into the same program and title. The reprogramming would take place during the program year the funds were obligated by DEO or the two succeeding program years. This is in accordance with Training and Employment Guidance Letter No. 2-87.

Escarosa will take prompt and aggressive corrective action upon becoming aware of any evidence of a violation of the federal law.

The necessity for debt collection from a service provider or vendor is expected to be a rare occurrence in the program. Should the situation occur, Escarosa will directly attempt to obtain any required repayment amounts from a business or subcontractor. A registered letter will be sent requesting the repayment within 48 work hours of identification. Requested amounts should be paid within 45 days. If this does not occur, appropriate legal sanctions/actions will be imposed.

### **Section X.                    Monitoring Plan**

#### **INTRODUCTION**

The Monitoring Unit will review, monitor and evaluate programmatic activities of Escarosa and its service providers to ensure compliance with applicable rules and statutes such as: Workforce Investment and Opportunity Act (WIOA), the Trade Adjustment

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Assistance program (TAA), the Welfare Transition (WT), and Wagner Peyser (WP), The State and Local Plan, The Administrative Plan, and State Policies.

These procedures have been developed from the WIOA, TAA, WT, and WP Monitoring Technical Assistance Guide and from various monitoring handbooks/documents.

It is the intent of this monitoring function to encourage results and improve the overall management, integrity and quality of the programs and activities under the umbrella of CareerSource Escarosa (Escarosa).

### **MONITORING, OVERSIGHT AND EVALUATION PROCEDURES**

#### **The Monitoring Unit**

The Escarosa Program Monitor(s) is responsible for monitoring, evaluating and reporting on WIOA, TAA, WT and WP Service Provider contracts, special grants and programmatic activities associated with Escarosa. Comprehensive monitoring will ensure effective oversight of program activities, maintenance of program integrity, and constructive evaluation and planning. The Program Monitor(s) reports directly to the Executive Director.

#### **Monitoring Tools**

The monitoring tools have been developed and adapted from the Department of Economic Opportunity (DEO) monitoring tool. As with any monitoring activity, the procedures and tools may need to be updated and revised to meet current federal, state or local requirements on an as needed basis. All of the questions on the monitoring tools must be answered. If a question does not apply "X" will be marked.

In performing the monitoring function, Escarosa may use the following objectives:

1. Compliance Monitoring - the determination that the program activities comply with applicable laws, EFM/OSST regulations and other administrative requirements upon which the release of funds depends and that they maintain program integrity.
2. Performance Monitoring - the determination that the activity is performing the appropriate program service required which may be numerical, i.e., number of participants served, number of participants entered into employment, etc., and defined by such things as the law, the contract, performance standards, and State/Local Plan.
3. Managerial/Program Quality Monitoring - includes an in-depth examination of program activities to ensure that a quality process is in place to meet the employment or training objectives. This is based on certain assumptions about

what constitutes good or quality programs. The monitors review program activities to verify that these attributes are present. Programs may be refined or modified as a result of what is learned about the process being instituted.

### **The Monitoring Process**

The actual data collection procedure may include one or more of the following methods:

1. Record Review - may be used to monitor participant records, financial records, EEO resource personnel or any activity that has a record keeping approach to record specific data. Monitoring tools and checklists are used to effectively review the records.
2. Interviews - are primarily used for gathering information about program quality and performance for managerial monitoring and for general orientation purposes prior to compliance monitoring reviews.
3. Observation - can be made on such activities as how records are organized, non-verbal communications during an interview and verifying such articles as EEO Posters, Mission and Vision Statements.

The flow of the monitoring process will consist of activities such as:

1. Prior to making an on-site visit, a review of relevant background information, identification of data sources, and the location and organization of the activities involved will be completed. The items reviewed will consist, at a minimum, of the service provider's contract, formal monitoring reports or audits, reports submitted by the service provider, relevant laws, regulations, administrative issuances, reports and monitoring instruments related to the monitoring objective.
2. Data collection will fall under the following categories:
  - a. Desk Review - a review of data such as contracts, client folders, EFM/OSST data and reports at the monitor's desk. Transference of the data to various checklists and other monitoring tools may be required.
  - b. On-site Review - an actual visit to the training site to review such components as program activities and outcomes, participant records, childcare referral documents, performance standards to evaluate the success of the program, staff or service provider. The monitor will also observe the client process/training activity, and interview appropriate staff or clients.
  - c. Random Sample - a random sample of participant records will be selected to review for compliance with WIA, TAA, WT, WP, and other programs under Escarosa's authority and the contractual agreement.

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3. Data Analysis - Final conclusions are developed and written from the integration review and evaluation of all of the data that has been accumulated using the above methods. The steps in the data analysis process include:
  - a. Review the monitoring objectives.
  - b. Give the date and a brief description of the monitoring activities, which may include staff points-of-contact within the organization monitored, the data sources, name and titles of interviewees and records.,
  - c. Formulate conclusions for each monitoring objective citing that they were used in the analysis leading to the conclusion.
  - d. Formulate and integrate conclusions of the overall status of the activity and issues that were covered by the monitoring activity.
  - e. Compare the actual performance to the planned levels in terms of outcomes.
  - f. Provide a written report within 20 working days of the completion of the monitoring activity.
4. Technical Assistance may be provided upon request or at the discretion of Escarosa.
5. There will be follow-up monitoring to determine whether appropriate corrective actions were completed.
6. Incident report - All instances of suspected fraud or criminal malfeasance, misapplication of funds and gross mismanagement in the operation of any program must be reported. In the event that an instance of possible fraud, abuse or mismanagement is uncovered during the routine monitoring visit, the Program Monitor will immediately report the incident to the Executive Director so that the appropriate corrective action can be taken such as deobligation of funds and cancellation of contracts that are not in compliance with federal regulations and/or the contracts themselves.
  - a. Fraud or Criminal Malfeasance should be considered broadly as any alleged deliberate action which is apparently limited to indication of bribery, forgery, extortion, embezzlement, theft of participant checks, kickbacks, intentional payments to a contractor with the expectation of receiving services and payments to ghost enrollees.
  - b. Misapplication of funds should be considered as alleged use of funds, assets or property not authorized or provided for in the grant or contract. This category includes, but is not limited to, nepotism, political patronage, use of participants for political activities, ineligible enrollees, conflict of interest, non-reported income from Federal funds, violation of contract procedures, knowingly or unknowingly violating federal/state law, as applicable. Corrective action may include such activities as technical assistance, guidance, deobligation of funds, cancellation of the contract and/or notification of Escarosa legal counsel.

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- c. Gross Mismanagement should be considered as actions or situations arising out of management ineptitude or oversight which leads to major violations of contract provisions and/or which severely hampers accomplishments or achievement of program goals. These include situations which lead to waste of government resources and put into serious jeopardy future support of a particular project. This category includes, but is not limited to, unaudited records, unsupported costs, highly inaccurate fiscal reports and/or program reports, payroll discrepancies, payroll deductions not paid to the Internal Revenue Service and lack of internal control procedures. The corrective action may include technical assistance, guidance deobligation of funds, cancellation of the contract and/or notification of Escarosa legal counsel.
7. A written monitoring report will be completed and submitted to the service providers or the appropriate Escarosa Manager within 20 working days of completion of the formal monitoring activity and may include the following:
    - a. Findings - are systematic in nature and may indicate that the subcontractor is not complying with a specific compliance document.
    - b. Corrective Actions - must be provided for each finding to ensure that the service provider/department is aware of the specific corrections which must be undertaken to bring the contract into compliance.
    - c. Omissions - are not systemic in nature and would be considered as an infrequent occurrence.
    - d. Corrective Action Plan - the service provider/department must provide a written corrective action plan within 20 working days of receipt of the official report noting the completion of the corrective actions.
    - e. Objectivity - to emphasize the objectivity of the monitoring effort, findings and omissions should be corroborated by a specific compliance document.
    - f. Exemplary - areas of superior contract performance work noted during the monitoring review may be cited in the monitoring report.
    - g. Contract Performance - the EFM/OSST systems will provide information in support of the contract work and the service provider official reports.
    - h. Draft Review - the Escarosa Executive Director and Finance Director may review drafts of any monitoring report.
    - i. Distribution - the report will be addressed to the service provider's contract representative/department manager and a copy may be provided to the contract operational staff, the Appropriate Program Committee and the

appropriate Escarosa staff. Documentation will be maintained to support the findings in the monitoring report.

- j. Monitoring Record Retention - all monitoring documents must be retained in accordance with current retention requirements.

## **MONITORING SCHEDULE**

A monitoring schedule will be drafted in July of each year to ensure that an orderly and complete review of Escarosa's activities is accomplished within a timely manner. More frequent monitoring may need to be done on a case by case basis if issues are noted that need additional review. The schedule will be provided to the Executive Director and the affected service provider/department heads by the end of July. The schedule may be revised at the agreement of both parties as long as the review is conducted within the fiscal/programmatic year (e.g., July 1-June 30).

## **MONITORING OF PROCUREMENT PROCESS AND ESCAROSA PROPERTY MANAGEMENT**

### **Bidding Procedures/Process**

The competitive procurement process will be monitored annually by the state's fiscal monitoring team to determine that the required procedures have been followed. Procurement procedures are based on the cost of the purchased item or service. The following areas will be reviewed to determine that:

1. Items/services where the cost exceeds \$150,000:
  - a. The competitive bid (Request for Proposal) process was utilized.
  - b. The bids were rated and submitted to the designated committee for approval.
  - c. Standard criteria as described in the Procurement Policies were used for the rating of the proposals and a majority committee vote recommended the proposal to be presented to the Board for final approval.
  - d. Sole source procurement was kept to a minimum and approved by the Board.
2. A sample of the procurement of items/services with a cost that is from \$3,000 to \$150,000:
  - a. The required bids or quotes were obtained.
  - b. The purchase was approved by the Finance Director or the Executive Director.
  - c. Sole source procurement has been kept to a minimum and is properly documented.
3. A sample of the procurement of items/services with a cost that is up to \$3,000.



- a. Approval by the Finance Director and the appropriate staff manager was obtained.
- b. A purchase order was issued.

## **MONITORING OF SERVICE PROVIDERS/PROGRAMS**

Escarosa monitoring procedures for conducting compliance reviews for service provider contracts operated under grants such as WIOA, TAA, WT, and WP will comply with the requirements of 20 CFR 667.400 through 667.500 and in accordance with Uniform Guidance Subpart F.

### **Service Providers**

Service providers will be monitored at least once during the contract period or annually for multi-year contracts. Circumstances such as new programs, number of past findings, concerns, program performance as compared to planned performance or any other factors determined relevant by Escarosa may warrant more than one monitoring review in a given year.

The monitoring activities will include testing for compliance with the contract, compliance with federal, state and local laws and regulations governing WIOA/WIA/TAA/WP funds, and the quality and quantity of performance under the contract. Data will be gathered as to outcomes, success rates, cost effectiveness and value to the community.

Service providers will be notified in writing 10 working days in advance of the planned dates of the monitoring visit with the exception of follow-up and technical assistance reviews. Each notification letter will include a general list of documents which must be available on-site for review. However, additional documentation may be requested at the time of the visit. If any documentation or information or parts thereof are not made available to the monitor promptly and readily throughout the on-site review, the service provider will be cited accordingly for noncompliance.

In addition to regular on-site monitoring review, Escarosa may conduct follow-up reviews or special or unannounced visits. The service provider may be subject to a follow-up review at the discretion of Escarosa due to their special nature. These reviews may vary from the standard monitoring procedures.

The on-site visits will include, but not necessarily be limited to, the following:

1. A formal entrance interview with the contract representative to give an overview of the monitoring activities, and finalize any logistical arrangements so that documents and records are accessible.

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2. Interviews with staff, participants, instructors and worksite supervisors or employers, as appropriate.
3. Review of participant records and documentation.
4. Review and observation of program activities and services.
5. Visits to training sites and placement worksites.
6. Review of fiscal records (performed by Escarosa Accounting Staff).
7. At the conclusion of the on-site review, an exit interview will be conducted with the contract representatives to discuss concerns of the monitor.

Service providers will be monitored based on the following types of contracts:

### 1. Cost Reimbursement

- a. A separate file should be maintained for each service provider and may include such documentation as:
  - A. a copy of the contract and modifications;
  - B. written communications such as monitoring reports, monitoring tools, corrective action plans, technical assistance visit documents;
  - C. The Accounting Department obtains Audits of service providers as required by the Single Audit Act. Accounting staff are responsible for reviewing the audits and maintaining a copy.
- b. The service provider procurement process, as described in the Procurement/Bidding Process Section, will be monitored for compliance.
- c. The service provider's annual audit (if required) will be reviewed for WIOA/WT/TAA/WP compliance (performed by Accounting Staff).
- d. Monitoring of program activities will be performed as described in the plan.
- e. The Contracts Payable Specialist maintains a schedule of payments made against the contract. Each contract invoice is reviewed for compliance with the contract and WIOA/WT/TAA/WP laws before approval for payment. The service provider is required to attach enough backup documentation to the invoice so that compliance can be reasonably determined. Escarosa's Independent Auditor and the State's Fiscal monitoring team reviews compliance for this section.

### **Technical Assistance**

Technical assistance will be provided upon request from the service provider, upon the recommendation of the Program Monitor, and/or upon the direction of the Executive Director. When the Program Monitor observes that the service provider has a lack of understanding of policies and/or procedures required by WIOA/WT/TAA/WP law, he/she will determine whether technical assistance is required and notify the service provider. Technical assistance may also be required when the corrective action plan submitted by the service provider is inadequate.

### **Deobligation of Funds and Cancellation of Contracts**

In the event that issues cannot be resolved through corrective action and/or technical assistance when the service provider is found non-compliant with WIOA/WT/TAA/WP laws, federal regulations and contractual agreements, the Board of Directors may cancel the contract and deobligate the funds. The following procedure would be followed in such a case:

1. The Program Monitor will suggest a corrective action and provide technical assistance.
2. If the finding is still not resolved, the Program Monitor will notify the Executive Director and the appropriate Escarosa staff.
3. If the finding cannot be resolved through the Executive Director, intervention, and a recommendation will be made to the Board of Directors to cancel the contract and deobligate the funds.
4. With Board approval, the contract will be cancelled and the funds deobligated from that service provider.

### **On-the-Job Training**

Escarosa will use On-the-Job Training (OJT) contracts as appropriate. OJT contracts will be monitored on an individual basis and may include the following:

1. Service provider staff will arrange an actual job site monitoring visit during the OJT period. The monitor will interview the staff, employer/supervisor and if available the participant.
2. Verification that the Career Plan has justified the OJT by documenting the DOT Code, salary, participant barriers, grade level and past work experience.
3. Review the OJT contract and training outline for accuracy and completeness.
4. An OJT monitoring written conclusion (noting any concerns or findings) will be provided to the service provider, the Executive Director, and the Assistant

Director within 20 days of the monitoring visit.

## **MONITORING OF PROGRAM ACTIVITIES**

Program activities will be monitored quarterly or more often as required by utilizing the appropriate matrix/monitoring tool. The areas that will be monitored will include the following:

### **Outreach, Recruitment, and Objective Assessment**

Outreach, recruitment and objective assessment activities will be monitored for:

1. Appropriateness and effectiveness of outreach activities as compared to the success of specific target group enrollments and terminations as reflected on the EFM/OSST listings. Copies of such documentation as newspaper advertisements or other outreach activities may be maintained in a file.
2. Compliance with ADA and EEO requirements in outreach recruitment advertisements and activities.
3. Size of the targeted population applicant pool recruited as compared to the EFM/OSST screen enrollment of these populations.
4. The effectiveness of the objective assessment activity as it relates to identifying targeted populations.

### **Intake and Eligibility**

Monitoring efforts for intake and eligibility may include:

1. A sample of client records from a current service provider EFM listing to show those clients determined eligible since the last monitoring review.
2. A monitoring tool will be used to verify the accuracy of the documentation to determine eligibility as described in the Resource Guide, the WIA Eligibility Documentation TAG and appropriate Division Policies.

### **Case Management System**

The case management system documents the training, placement and supportive service activities for each participant.

1. The Career Plan is the keystone of the case management system and is monitored. It must be reviewed to ensure that the participant is receiving the appropriate mix of training, placement and supportive service activities.

2. The quality of the training process may be identified by positive outcomes, entered employment rates and average placement wages for targeted populations or other criteria described in the contract or described in related policies and procedures.
3. The quality of the supportive service system is identified by the effectiveness and timeliness of the case management system in meeting the supportive service needs of the participant during the training component and, if applicable, during employment or work experience. All supportive services must be in compliance with applicable Escarosa Board policies and procedures, federal laws, regulations and policies, dealing with support services and procurement. The specific services must be described in the Career Plan, and/or the counselor's notes.

### **Community Service Work Experience**

The community service work experience training requirement for WT participants which is provided at a supervised public, private not-for-profit, or for-profit agency will be monitored as follows:

1. A sample of client records will be reviewed annually or more often as appropriate.
2. A monitoring tool will be used to verify the work experience as described in the service provider contract, the WT Handbook, Escarosa Board policies, State WT policies and procedures and any other compliance documents.

### **WIOA Youth Services**

Procedures have been specifically developed to monitor WIOA Youth Services and any other WIOA temporary jobs program due to the unique nature of these programs. Such monitoring activities will include:

### **Organizational Stage**

Monitoring for the youth program should begin early in the program year. The monitors must allow ample time to meet with the Program Coordinator and Career Advisors in order to formulate strategies for coordinating the monitoring activities. The monitors must obtain the following information:

1. The number of Career Advisors and the number of caseloads.
2. The names of the Career Advisors and all contact information including site and office locations.

3. The number of youth to be served.
4. The locations of the academic enrichment classes (AEC) and/or work experience sites.

### **Organizing and Dividing Jobsites**

Prior to the conclusion of the academic enrichment portion of the program each Career Advisor shall provide the monitoring staff with a participant list which should include: participant name, social security number, date of birth, home address, home telephone number, job title, number of hours to work, jobsite, supervisor's name and jobsite telephone number. Specific jobsites will then be assigned to each monitor for visitation.

### **Jobsite Visitation**

1. The monitors will visit each jobsite and interview supervisors and participants to ensure that the program is in compliance with all worksite agreements and all applicable state and federal regulations. Special emphasis will be placed on determining that all Child Labor Laws are followed.
2. A jobsite visitation form must be completed for each visit. This includes all subsequent visits.

### **Corrective Action and Follow-Up**

In the event that a problem with a participant or jobsite should arise, the Career Advisors should be immediately informed. If the Career Advisor is unable to resolve the problem, the Program Coordinator and Program Monitor shall be contacted. A Corrective Action Form will be completed at the time of the problem's discovery and filed in the corrective action binder.

Follow-up of all corrective actions will be completed during the next monitoring visit or, in extreme cases, the following work day. All actions and corrective actions will be noted on the Corrective Action Form.

### **Folder/Record Review**

Program Monitor(s) are responsible for reviewing the participant folders of their assigned caseload. This will be performed several times throughout the year to ensure that all items added during the course of the program are reviewed. The File Folder Checklist will be used to affirm that all items that are required are included in the folder. The Monitor will review a sample of completed folders to test that WIA eligibility requirements are met.

### **Youth Services Monitoring**

The Youth Services monitoring instruments/tools include the review of any basic remediation courses, high school/GED, Jobsite Visitation Forms, and, Corrective Action Forms. The forms may be officially amended as needed. All items and blanks on the form must be completed or marked with an N/A. All monitoring instruments will be completed as soon as possible and stored in the Youth Services binder located in an area determined by the Program Monitor. Completed monitoring instruments are official WIA documents and will be archived and destroyed in accordance with current WIA rules and regulations.

### **MONITORING THE FISCAL ACTIVITIES**

The monitoring of all service providers' fiscal activities is performed by the Accounting Department. The Accounting Department maintains a contract file and payment schedule for each service provider and verifies each invoice submitted against the provisions of the contract. Escarosa requires a level of backup to be submitted with each invoice that will allow determination of validity and allowability of an expense. Escarosa will perform a risk analysis of each service provider taking into account whether a Single Audit was performed and whether the invoice backup was complete and adequate documentation of expenditures. If the service provider does not receive a Single Audit and they are considered high risk based upon documentation, a site visit will be made to review financial procedures and internal control. A report will be submitted for inclusion with the annual monitoring report.

Escarosa's Audit Plan details the requirements and monitoring procedures for service provider audits and their submittal to Escarosa. The Accounting Department performs these monitoring procedures and maintains the files.

### **EMPLOY FLORIDA MARKETPLACE/ONE STOP SERVICE TRACKING**

Verification of the EFM/OSST will be completed on an annual basis or more often as required and will consist of such activities as:

1. Verification that the client data is entered in the system in a timely manner.
2. Testing for accuracy in a sample of enrolled and terminated records.
3. Verifying the maintenance of the master file of the client records.
4. Verifying the accurate compilation of the data to provide statistical reports.

### **REVIEW OF INTERNAL OPERATIONS**

A complete review of the internal administrative operations may be performed at the request of the Executive Director or the Board of Directors. Internal hearings may be

utilized to monitor and research various internal activities.

## **Section XI. Equal Opportunity Procedures**

CareerSource Escarosa maintains a Method of Administration (MOA) plan in a separate document. This plan is updated as required by policy and legal requirements.

## **Section XII. Prior Approval Process**

The Uniform Guidance requires that certain cost items and administrative provisions have approval from the oversight agency prior to expending funds or implementing the administrative provisions. Escarosa will follow AWI Policy #AWI FG 050406 in order to comply with the circular requirements.

1. An annual approval form for as many of the specified cost items as possible will be filed by June 15<sup>th</sup> of each year.
2. A prior approval request form for other individual approval requests will be filed on a case by case basis.
3. The forms will be submitted electronically to [deo.myflorida.com](http://deo.myflorida.com). DEO staff will process the request and email their final decisions to Escarosa.

A copy of the Prior Approval Process and Guidance is included in Appendix E which includes a list of the items required to have prior approval, which items are available for the annual approval form and a copy of the required forms to request approval.

## **Section XIII. Fraud Policy**

### **PRACTICE OF ETHICAL BEHAVIOR**

Unethical actions, or the appearance of unethical actions, are unacceptable under any conditions. The policies and reputation of Escarosa depend to a very large extent on the following considerations.

Each employee must apply her/his own sense of personal ethics, which should extend beyond compliance with applicable laws and regulations in business situations, to govern behavior where no existing regulation provides a guideline. It is each employee's responsibility to apply common sense in business decisions where specific rules do not provide all the answers.

In determining compliance with this standard in specific situations, employees should ask themselves the following questions:



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Is my action legal?  
Is my action ethical?

Does my action comply with Escarosa policy?

Am I sure my action does not appear inappropriate?

Am I sure that I would not be embarrassed or compromised if my action became known within the Organization or publicly?

Am I sure that my action meets my personal code of ethics and behavior?

Would I feel comfortable defending my actions on the 6 o'clock news?

Each employee should be able to answer "yes" to all of these questions before taking action.

The Director, Managers and Supervisors are each responsible for the ethical business behavior of her/his subordinates. Directors, Managers and supervisors must weigh carefully all courses of action suggested in ethical and economic terms and base their final decisions on the guidelines provided by this policy as well as their personal sense of right and wrong.

### **COMPLIANCE WITH LAWS, REGULATIONS AND ORGANIZATION POLICY**

Escarosa does not tolerate the willful violation or circumvention of any Federal, state, local, or foreign law by an employee during the course of that person's employment; nor does Escarosa tolerate the disregard or circumvention of Escarosa policy or engagement in unscrupulous dealings. Employees should not attempt to accomplish by indirect means, through agents or intermediaries, that which is directly forbidden.

Implementation of the provisions of this policy is one of the standards by which the performance of all levels of employees will be measured.

#### **Disciplinary Action**

Failure to comply with the standards contained in this policy will result in disciplinary action that may include termination, referral for criminal prosecution, and reimbursement to Escarosa or to the federal/state government, for any loss or damage resulting from the violation. As with all matters involving disciplinary action, principles of fairness will apply. Any employee charged with a violation of this policy will be afforded an opportunity to explain her/his actions before disciplinary action is taken.

Disciplinary action will be taken:

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1. Against any employee who authorizes or participates directly in actions that are a violation of this policy.
2. Against any employee who has deliberately failed to report a violation or deliberately withheld relevant and material information concerning a violation of this policy.
3. Against any Director, Manager or Supervisor who attempts to retaliate, directly or indirectly, or encourages others to do so, against any employee who reports a violation of this policy.

### **FRAUD POLICY**

#### **Scope**

This policy applies to any fraud or suspected fraud involving employees, officers or directors, as well as members, vendors, consultants, contractors, funding sources and/or any other parties with a business relationship with Escarosa. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship with Escarosa.

#### **Policy**

Management is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Each member of the management team will be familiar with the types of improprieties that might occur within his or her area of responsibility, and be alert for any indication of irregularity.

Any fraud that is detected or suspected must be reported immediately to the Executive Director, Finance Director or, alternatively, to the Chair of the Escarosa Executive/Audit Committee, who coordinates all investigations.

#### **Actions Constituting Fraud**

The terms fraud, defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

1. Any dishonest or fraudulent act
2. Forgery or alteration of any document or account belonging to Escarosa
3. Forgery or alteration of a check, bank draft, or any other financial document
4. Misappropriation of funds, securities, supplies, equipment, or other assets of Escarosa
5. Impropriety in the handling or reporting of money or financial transactions

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6. Disclosing confidential and proprietary information to outside parties
7. Accepting or seeking anything of material value from contractors, vendors, or persons providing goods or services to Escarosa. Exception: gifts less than a nominal \$25 in value.
8. Destruction, removal or inappropriate use of records, furniture, fixtures, and equipment
9. Any similar or related irregularity

If there is a question as to whether an action constitutes fraud, contact the Finance Director or the Chair of the Executive/Audit Committee for guidance.

### **Investigation Responsibilities**

The Executive/Audit Committee has the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. The Executive/Audit Committee may utilize whatever internal and/or external resources it considers necessary in conducting an investigation. If an investigation substantiates that fraudulent activities have occurred, the Executive/Audit Committee will issue reports to appropriate designated personnel and, if appropriate, to the Escarosa Board of Directors.

Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel and senior management, as will final dispositions of the case.

If suspected fraud or other wrongdoing involves programs funded in whole or in part with federal funds, additional responsibilities, such as special reporting and disclosure to the awarding agency, may apply to the organization. It is the policy of Escarosa to fully comply with all additional reporting, disclosure and other requirements pertaining to suspected acts of fraud as described in award documents.

### **Confidentiality**

The Executive/Audit Committee and the Finance Director treat all information received confidentially. Any employee who suspects dishonest or fraudulent activity will notify the Executive Director, Finance Director or the Executive/Audit Committee Chair immediately, and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act (see Reporting Procedures section below).

Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect Escarosa from potential civil liability.

### **Authority for Investigation of Suspected Fraud**

Members of the Escarosa Executive/Audit Committee will have:

Free and unrestricted access to all Escarosa records and premises, whether owned or rented; and the authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who may use or have custody or any such items or facilities when it is within the scope of their investigations.

### **Reporting Procedures**

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

An employee who discovers or suspects fraudulent activity will contact the Executive Director, Finance Director or the Chair of the Executive/Audit Committee immediately. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual(s), his or her attorney or representative(s), or any other inquirer should be directed to the Executive/Audit Committee or legal counsel. No information concerning the status of an investigation will be given out. The proper response to any inquiry is "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation", "the crime", "the fraud", "the forgery", "the misappropriation", or any other specific reference.

The reporting individual should be informed of the following:

1. Do not contact the suspected individual in an effort to determine facts or demand restitution.
2. Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Escarosa legal counsel or the Executive/Audit Committee.

### **Sarbanes-Oxley Act of 2002**

Escarosa will comply with the following requirements of the Sarbanes-Oxley Act of 2002:

It is illegal for any corporate entity to punish whistleblowers or retaliate against any employee who reports suspected cases of fraud or abuse (SOX, Section 1107, Section 1513 of Title 18, USC)

It is a crime to alter, cover up, falsify, or destroy any document that may be relevant to an

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official investigation (SOX, Section 1102, Section 1512 of Title 18, USC).