



ADMINISTRATIVE PLAN

CITRUS LEVY MARION REGIONAL WORKFORCE DEVELOPMENT BOARD, INC. D/B/A CAREER SOURCE CITRUS LEVY MARION

LOCAL AREA 10

**REVISED: MAY 6, 2022
BOARD ADOPTED: JUNE 7, 2022**

CareerSource Citrus Levy Marion is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers listed above may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711. If you need accommodations, please call 352-840-5700, ext. 7878 or e-mail accommodations@careersourceclm.com at least three business days in advance. Additionally, program information may be made available in Spanish upon request. A proud partner of the American Job Center Network.”

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1. Sole Source Form
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Purpose

To establish in clear and detailed written form the plan, procedures, and delegation of duties to be used by CareerSource Citrus Levy Marion for the administrative requirements of the programs and activities administered by CareerSource Citrus Levy Marion.

This administrative plan reflects changes made in the 2 CFR Part 200 also known as the Super Circular. This plan details policy for procurement, monitoring & oversight, cost reasonableness, and fiscal management.

PART 1: DEFINITIONS AND ABBREVIATIONS

Definitions:

"Acquisition cost" means the cost of the asset including the cost to ready the asset for its intended use. Acquisition cost for equipment, for example, means the net invoice price of the equipment including the cost of any modifications, attachments, accessories, or auxiliary apparatus necessary to make it usable for the purpose for which it was purchased.

"Award or Agreement" means a contract, grant, subcontract, sub grant or other type of legal instrument.

"Awardee" means any one of the entities receiving a CareerSource Citrus Levy Marion award (e.g., contractors, grantees).

"Capital Assets & Expenditures" are for tangible or intangible assets used in operations having a useful life of more than one year which are capitalized in accordance with GAAP.

"Commercially Available Off-The-Shelf Training Package" means a training package sold or traded to the general public in the course of normal business operations at prices based on established catalogue or market prices.

"Contract Management" means the process of administering a contract from the initial stages of deciding on the services needed, through the choosing of a provider of services, the negotiation of the actual contract documents, and the monitoring of the service until the contract ends.

"Cost-Reimbursement/Performance Contract" means a type of contract that pays for the actual costs of providing services reflected in a line-item budget that is included in the contract and payments conditional upon satisfactory performance set out in the contract. Cost-Reimbursement/Performance contracts are used when the sub recipient reimburses the provider for actual allowable costs of providing services rather than a predetermined rate per unit of services provided or specific goods.

"Emergency" is any acquisition made without regard to budgeted cost items or amounts when an imminent threat exists that would.

- 1) Affect the life and/or health of the employees, clients, or the public for which the corporation could be held liable.
- 2) Substantially impair the operations or performance of programs of the Corporation; or
- 3) Destroy corporate assets or records.

"Employment and Training Services" or "Services Delivery" means the acquisition of services to be provided to program customers.

"Equipment" means tangible personal property having a useful life of over one year and a per-unit acquisition cost which is equal to or exceeds \$5,000.

"Field Purchase Order" means a document authorizing a provider to deliver merchandise or services, to be rendered at a specified price. Upon acceptance by a provider, a field purchase order becomes a contract.

"Fixed-Price Contracts" means a type of contract that provides for a stated number of units of service, for which payment is made on a price per unit basis so that a determination of total contract price can be made.

"Intangible Goods/Property" shall be considered cost items such as insurance, bonding, and employee benefits.

"Line-Item Budget" means a method of cost presentation that presents the total cost of the proposed services in detailed cost categories such as salaries, benefits, and expenses. It is always used in a cost-reimbursement contract.

"Micro-purchase" means a purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold. Micro-purchase procedures comprise a subset of a non-Federal entity's small purchase procedures. The non-Federal entity uses such procedures in order to expedite the completion of its lowest-dollar small purchase transactions and minimize the associated administrative burden and cost. The micro-purchase threshold is set by the Federal Acquisition Regulation at 48 CFR Subpart 2.1 (Definitions). It is \$10,000 except as otherwise discussed in Subpart 2.1 of that regulation, but this threshold is periodically adjusted for inflation.

"Offerer" means an individual or organization who submits proposals or bids following distribution of a Request for Proposal (RFP) or a Request for Quotes (RFQ), or who otherwise is considered a potential provider during the selection of the goods and services being procured.

"Offerer's List" means a list of potential providers of the contractual services for which CareerSource Citrus Levy Marion may contract.

"Personal Services" are those rendered by an individual or an outside entity on a non-professional temporary, periodic or ongoing basis. Costs of labor and materials are included as specified by agreement. Examples include temporary help, janitorial services, pest control, routine prevention, and maintenance services etc.

"Procurement" means the process, which leads to any award of CareerSource Citrus Levy Marion funds.

"Professional Services" are those rendered by an individual or outside entity on behalf of the Corporation. Examples include legal, auditing, accounting, financial, consulting, etc., services.

"Provider" means an organization or individual providing contractual services in accordance with the terms of a contract.

"Purchase Order" means a document authorizing a provider to deliver merchandise or services, to be rendered at a specified price. Upon acceptance by a provider, a purchase order becomes a contract.

"Qualified Offerer or Responsible Offerer" means a person or organization who has submitted a bid or proposal that conforms in all material respects to the requirements specified in the procurement solicitation, which has the capability in all respects to perform fully the contract requirements, and has the integrity and reliability, which will assure good faith performance.

"Real Property, Land and Improvements" means land, land improvements, structures and appurtenances thereto acquired through purchase, lease, rent or otherwise excluding movable machinery and equipment. NOTE: CareerSource Citrus Levy Marion is prohibited from owning land or buildings. CareerSource Citrus Levy Marion is prohibited from making Leasehold Improvements using CareerSource Citrus Levy Marion funds, without prior approval by DEO.

"Request for Proposal (RFP)," means a bid instrument, which includes a statement of the services sought and all contractual terms and conditions as they apply to the procurement of contractual services. The RFP also contains a description and relative importance of the evaluation criteria, which will be used to evaluate the proposals. Evaluation criteria must include but are not limited to price. The RFP must specify that more than one provider may be selected.

"Request for Quotes (RFQ's)" means the bid instrument used for selecting a provider (or providers) of contractual services when the value is equal to or exceeds small purchase thresholds and the sub recipient intends to enter into a fixed price contract and select the qualified responsible bidder primarily on the basis of price.

"Service Provider" means a public agency, private not-for-profit organization, or private for-profit entity that delivers educational, training, employment, or supportive services to CareerSource Citrus Levy Marion participants.

"Supplies" means all tangible personal property where the acquisition cost is less than \$5,000.

Abbreviations:

CEO	Chief Executive Officer
EVP	Executive Vice President

DF	Director of Finance
DH	Department Head
DO	Director of Operations
R&EA	Research and Executive Assistant
RFQ	Request for Quotes
DEO	Department of Economic Opportunity
RFP	Request for Proposal
CSCLM	CareerSource Citrus Levy Marion
ITN	Invitation to Negotiate
RMLO	

PART 2: Code of Conduct and Ethics

- A. CareerSource Citrus Levy Marion Officers, Members, Employees or Agents shall not solicit nor accept favors or anything of monetary value in excess of \$25.00 from each other or from subrecipients/contractors or potential subrecipients/contractors. Violations of this standard will result in disciplinary actions being taken. Appropriate disciplinary actions will be determined by a specially constituted committee of CareerSource Citrus Levy Marion whose members will be devoid of any conflict of interest related to the party or parties involved.
- B. Any Subrecipient or CareerSource Citrus Levy Marion Officer, Member, Employee or Agent that develops or drafts specifications, requirements, statements of work, invitations for bids, and/or requests for proposals shall be excluded from competing for such procurements. Further, Persons, Organizations, and Employers of such Officers, Members, Employees or Agents shall be excluded from competing for such procurements when a conflict-of-interest situation would be created by such competition.
- C. No CareerSource Citrus Levy Marion Officer, Member, Employee or Agent shall participate in the selection, award, or administration of a contract where, to his knowledge, he or his immediate family, partners, or organizations in which he or his immediate family has a financial interest, or with whom he is negotiating or has any arrangement concerning prospective employment.
- D. No CareerSource Citrus Levy Marion Officer or Member shall discuss or vote on a proposal(s) that is in competition with a proposal submitted by any party with whom the member, or his immediate family, has business, organizational or family ties.
- E. Arm's length relationships will be maintained between subrecipients/contractors and CareerSource Citrus Levy Marion Officers, Members, Employees or Agents in the award and administration of contracts.
- F. Meetings of the CareerSource Citrus Levy Marion, its committees, and between members, will comply with the Florida Government in the Sunshine Act, Florida Statutes, Section 286.011.
- G. CareerSource Citrus Levy Marion Officers, Members and Employees shall maintain on file at the CareerSource Citrus Levy Marion Administrative Office, at all times, a current Conflict of Interest Disclosure Form on which they will certify abidance with the standards of this Code, with a signed copy of this Code of Conduct and Ethics attached.
- H. Upon discovery of an actual or potential conflict of interest, a CareerSource Citrus Levy Marion Officer, Member, Employee or Agent shall promptly file a written statement of disqualification and shall withdraw from further participation in the transaction involved. The Officer, Member, Employee or Agent may apply at the same time to CareerSource Citrus Levy Marion Legal Counsel for an advisory opinion as to what further participation, if any, the Officer, Member, Employee or Agent may have in the transaction.
- I. No Employee shall:
 - 1. Accept any direct or indirect financial benefit from any source other than the CareerSource Citrus Levy Marion as a result of the performance of official duties.

2. Accept any position, whether compensated or uncompensated, which will impair independence of judgment in the exercise of official duties.
3. Accept any position or engage in any business that will require disclosure of information that could provide a competitive advantage to one party over another in procurement matters.
4. Improperly disclose information acquired in the performance of official duties that could result in personal gain or provide a party a competitive advantage over another party in procurement matters.
5. Use or attempt to use official position to secure unwarranted privileges or exemptions personally or on behalf of others or give the appearance of such action.
6. By conduct, give reasonable basis for the impression that any person or organization can improperly influence the performance of official duties.
7. Pursue a course of conduct, which will raise suspicion among citizens, that acts engaged in are in violation of public trust.
8. Pursue a course of conduct, which will give rise to a violation of conflict-of-interest standards.
9. Take part in any prohibited political activities.
10. Take part in any religious or anti-religious activity in the discharge of official responsibilities.
11. Promote or oppose unionization in the discharge of official duties.
12. Participate in any effort to violate any other applicable Federal, State and Local Laws and Regulations.

Violations of any provision of this Code may be cause for immediate dismissal or other disciplinary actions provided for under the CareerSource Citrus Levy Marion's Personnel Rules and Policies.

PART 3: PROCUREMENT POLICIES AND PROCEDURES

A. General Policy - It shall be CareerSource Citrus Levy Marion's general policy that:

1. All procurement transactions will be conducted in a manner that provides for full and open competition, unless it is determined, as provided for herein, that non-competitive, sole source selection or an emergency situation would be the only effective way to provide the goods or services sought.
2. The standards contained in 2 Code of Federal Regulations (CFR) Part 200, known as the "Super Circular" may be relied on in the conduct of procurement activities.
3. Members and staff will avoid personal and organizational conflicts of interest, real or apparent, in procurement matters.
4. Members and staff will conduct themselves in accordance with CareerSource Citrus Levy Marion Code of Conduct and Ethics in procurement matters.
5. All procurement must be properly documented through purchase orders, contracts, leases, petty cash receipts, or other means dependent on the type of procurement being transacted and its objectives.
6. All procurement must be readily identifiable and traceable in the accounting records such that a clear audit trail between benefiting accounts is established.
7. Small, handicapped, minority and female-owned businesses will be utilized to the greatest extent possible when procuring goods and services.
8. A review of proposed procurements will be made to avoid purchase of unnecessary or duplicative items.

B. General Policy on Competition

1. All procurement transactions will be conducted in a manner providing full and open competition consistent with the standards contained in this Policy in order to fulfill the following objectives:
 - a) To assure that prices paid are reasonable.
 - b) To target open access and entry.
 - c) To encourage innovation and quality.
 - d) To support integrity and independence in selection.
2. Some of the situations considered to be restrictive of competition include but are not limited to:

- a) Placing unreasonable requirements on firms in order for them to qualify to do business.
- b) Requiring unnecessary experience and excessive bonding.
- c) Non-competitive pricing practices between firms or affiliated companies.
- d) Noncompetitive contracts to consultants that are on retainer contracts.
- e) Organizational conflicts of interest.
- f) Specifying only "brand name" products instead of allowing "an equal" product to be offered and describing the performance of other relevant requirements of the procurement; and
- g) Any arbitrary action in the procurement process.

C. Need for services/goods defined: When a CareerSource Citrus Levy Marion staff member determines there is need for goods or services, that member will submit a written requisition explaining the nature of the goods or services sought, and, if known, an estimated single item price. A description of the goods or services should provide enough detail for procurement actions to begin. Quotes (per 2c below-Solicitation Requirements) or a Proprietary/Sole Source form if quotes are unattainable need to be attached to the written requisition and must be approved by one of the following authorized positions: CEO or EVP. The authorizing staff member will ensure that the items have been budgeted for and funds are available. Once authorization has been given, the staff member will forward the above to Finance to cut and record a purchase order in the Accounting System.

D. Handicapped, Minority and Female Business Solicitations - CareerSource Citrus Levy Marion is committed to involving handicapped, minority and female owned businesses in its procurement processes. To that extent, it is CareerSource Citrus Levy Marion's policy to solicit quotes, RFP responses or bids from an equal number of handicapped, minority, female, and non-minority firms.

The State of Florida's minority business guide, available in the R&EA's office and, online at:

https://www.dms.myflorida.com/agency_administration/office_of_supplier_diversity_osd/get_certified will be used to determine firms eligible for minority or female solicitation.

In developing its solicitation process, the first solicitation priority with respect to handicapped, minority and female firms shall be those local (within the ~~Region~~ workforce area), and, if the minimum solicitation requirements are not met through this process, then statewide will be used.

E. Procurement Methods and Procedures

1. **Purchases from State Contracts** - CareerSource Citrus Levy Marion is authorized to make necessary purchases from State Contracts as deemed appropriate.

2. **Procurement by micro-purchases.** Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$10,000 (or \$2,000 in the case of acquisitions for construction subject to the Davis-Bacon Act). To the extent practicable, CareerSource CLM will make every effort to distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the price is considered to be reasonable.

3. **Small Purchase Procedures (informal)** - 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 (currently \$250,000). The aggregate item cost is the total cost for the number of identical single items procured. A single item must be able to operate or function without any additional single items. (For instance, a computer keyboard, monitor, and hard disk are not individual single items. They comprise one single item, as does the purchase of multiple computers comprise one single purchase). If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.

4. **Procurement by sealed bids (formal advertising).** Procurement method for securing services, supplies, or other property that is more than the Simplified Acquisition Threshold (currently \$250,000) or for lower amounts as deemed appropriate. Bids are publicly solicited, and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming to all the material terms and conditions of the invitation for bids, is the lowest in price.

a) In order for sealed bidding to be feasible, the following conditions should be present:

- i) A complete, adequate, and realistic specification or purchase description is available.
- ii) Two or more responsible bidders are willing and able to compete effectively for the business; and
- iii) The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally based on price.

b) If sealed bids are used, the following requirements apply:

- i) The invitation for bids will be publicly advertised and bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for opening the bids.

- ii) The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond.
- iii) All bids will be publicly opened at the time and place prescribed in the invitation for bids.
- iv) A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder.
- v) Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and
- vi) Any or all bids may be rejected if there is a sound documented reason.

5. Procurement by competitive proposals.

The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

- a) Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical.
 - i. Advertisements, website notices, and notices to interested parties will be used.
 - ii. The request for proposal or invitation to negotiate documents will include all evaluation criteria and the weight of each.
 - iii. Proposals will be reviewed by staff, following formal evaluation criteria, with the ultimate decision being made by the board.
- b) Proposals must be solicited from an adequate number of qualified sources.
- c) CareerSource CLM will develop a written method for conducting technical evaluations of the proposals received and for selecting recipients.

Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered

6. Procurement by noncompetitive proposals/Sole Source Procurement

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

- a) The item is available only from a single source.
- b) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.
- c) The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or
- d) After solicitation of a number of sources, competition is determined inadequate.
 - i. Purchases under the sole source provision will not be made without completely documenting the reasons for the non-competitive procurement/sole source and approval of the CEO or EVP, prior to procurement action. This will be accomplished using the Certification As To Proprietary and Sole Source Purchases form (See Attachment 1).
 - ii. In providing the above certification one of two elements must be established: (1) only one brand of goods or kind of services will properly fulfill the intended need, or (2) it is obtainable (practically) from only one source.
 - iii. Emergency Purchasing Authority - There may arise from time to time an emergency, which may require action to prevent the disruption of essential services, the resolution of a dangerous situation, or a situation, which arose out of totally unforeseen circumstances. When such an emergency exists, the CEO or EVP is empowered to procure such goods or services, as necessary, to resolve the emergency, without regard to cost. Except that, to the best of his/her ability, the CEO or EVP will attempt, situation permitting, to receive verbal quotes on the procured goods or services.

The CEO or EVP will detail the circumstances of the emergency, the actions taken to procure a solution and the ultimate disposition, in writing, for attachment to the Purchase Order. Such information, on items where more than \$250,000 is spent, will be presented to the Executive Committee at its next scheduled meeting for approval/sanction. The Executive Committee may provide additional guidance to the CEO on this matter.

7. Prior-Approval of Items costing more than \$5,000.

CareerSource Citrus Levy Marion will obtain prior approval to purchase any equipment and other capital expenditure cost items. The Department of Economic Opportunity Prior Approval Request Form will be completed and submitted following the appropriate method of procurement

Solicitation Requirements

<u>Estimated Cost</u>	<u>Type of Inquiry</u>	<u>Minimum # Solicited</u> <u>regular/minority</u>
Micro Purchases up to \$10,000	Determine if Reasonable	N/A

Small Purchases \$10,000-\$250,000	Written quote/Published Price	3/2
\$250,000.01 - above	Formal Written Bids (RFQ/RFP Sealed Bids)	3/3

* NOTE: In the event that there are no Minority Business Contractors from which to receive quotes for the goods or services being procured, remember that **all procurement actions in excess of \$10,000.00 require a minimum of three (3) quotes or bids or a Sole Source/Proprietary Purchase justification on the appropriate form** to finalize the procurement or purchase. If purchasing through State Contract, this will be documented but is considered a competitive purchase as the DEO used a competitive process to determine the most advantageous contractor. Depending on the goods solicited, staff must also inquire whether goods may be leased and obtain applicable bids; and if leasing is an option, a determination must be made as to which action, purchasing or leasing, is more financially advantageous to CareerSource CLM.

8. Solicitation Procedures

- a) Telephone quotes may be used when the services or supplies desired are easily defined. Quotes must include date and vendor. All efforts should be made to contact different contractors rather than relying on repeat quotes from the same contractors.
- b) Published pricing may be used. These published prices may be found on internet sites, store shelves, or catalogs.
- c) Written quotes may be solicited using the written "Request for Quotes" (RFQ) form (See Attachment 2). Written quotes may also be obtained in writing on company letterhead. These quotes are informal in nature and may be received via fax, e-mail, or mail. The form will include the date/time of submittal requirement for the contractor. The Staff Member requesting quotes will complete the form. Written Quotes received on forms from contractors are acceptable as appropriate documentation when a quote to provide goods or services does not require an extensive or technical explanation.
- d) Sealed Bids will be used for any procurement that is formally advertised to secure goods or services where the estimated cost is above the Simplified Acquisition threshold. These bids will be due on a certain time and date, they will be time stamped upon receipt either electronically or via postal service. A time and date will be provided in the solicitation for opening of the bids. Any bids not received by the published date and time will be returned, unopened, to the proposer.

9. **Professional Services Selection** - Professional services are those services such as accounting (RFP), auditing (RFP) and legal services (Legal Notice RFQ only), where the quality of the services cannot be judged by price alone. Such services will be procured using a Request for Proposal Solicitation (RFP) or a Request for Quotes (RFQ), as indicated above. Invitation to Negotiate (ITN) may be used when decisions are not based solely on price, but overall quality of service and proposed value.

- a) RFP Solicitation - A detailed solicitation will be prepared by the appropriate staff person and submitted to the EVP or CEO for review and approval.
- b) The RFP will contain at least the following information:
 - i. A detailed description of the professional services sought, including any time frame requirements, special reporting requirements, or other explicit instructions or requirements.
 - ii. A statement of what specific professional qualifications are required by CareerSource Citrus Levy Marion. These may be experience-based or other special qualification requirements of importance to CareerSource Citrus Levy Marion.
 - iii. A format for the quote of rates, fees or charges associated with the services.
 - iv. Any specific areas that the respondent is required to address that will be the basis for the selection decision.
 - v. The rating criteria that will be used.
 - vi. The date and time responses are due.
- c) Proposal Review Process - All proposals that are received on or before the closing date and time specified in the RFP will be evaluated using the criteria contained in the RFP. All proposals received after that date and time will be returned to the responding party unopened.
- d) The staff member(s) preparing the RFP will review and rate all responses. This rating will be used to reduce the number of responses to a short list of no more than three.
- e) The list of ~~professionals~~-respondents will then be scheduled, at the option of the CEO or the CareerSource Citrus Levy Marion Board, for interviews. It is not required that interviews be given, if in the opinion of the CEO or the CareerSource Citrus Levy Marion Board the rating clearly establishes the most qualified professional to perform the work.

10. Approving Authority - For goods or services of less than \$25,000, the CEO is empowered to approve the selection. For all services in excess of \$25,000, the CareerSource Citrus Levy Marion Executive Committee will be the approving authority. Any contract for audit services will be reviewed and approved by the CareerSource Citrus Levy Marion Executive Committee, regardless of the value of the contract.

11. Contracting for Services - After obtaining approval of goods or services from a specific respondent, staff will enter into negotiations with the respondent. Such negotiations, the original RFP and the respondent's decision, as modified by the negotiations, will form the basis for the contract. In no instance will delivery of any goods or services be authorized to begin prior to the execution of a contract by all parties.

12. Contract Signatures - The CareerSource Citrus Levy Marion Board Chair and the CEO are authorized signatories for contracts. (The CEO is authorized by the CareerSource Citrus Levy Marion Board to sign contracts previously approved by the

Board, and non-financial agreements.) It is however customary that all contracts for amounts over \$250,000 will be signed by the Board Chair.

13. Review and Approval Procedures: Following receipt of the appropriate solicitation responses, informal purchases, as well as all purchase orders and contracts, shall be reviewed and approved as follows:

<u>Amount</u>	<u>Review Level</u>	<u>FPO/PO Approval/ Signature Level</u>
\$9,999.99 & under	DH	CEO, EVP
\$10,000 – \$250,000	DH	CEO, EVP
\$250,000.01 - above	CEO/EVP	Executive Committee/Board

NOTE: The Purchase Order will be used to document approval and must be accompanied by all information pertaining to the solicitation.

14. Procurement of CareerSource Citrus Levy Marion Service Providers- The selection of CareerSource Citrus Levy Marion service providers and training services is similar to but not identical to the professional services process. It uses the same RFP process described above.

- a) Development of the RFP/ITN
 - i. The staff will prepare draft outline(s) of the services or training needs for the Region. These needs will be presented to CareerSource Citrus Levy Marion Board, who review, amend, and approve the services or training needs outline.
 - ii. A complete Cost/Price Estimate must be completed prior to release of the RFP/ITN.
 - iii. Once the outline is approved, the staff will prepare a solicitation package that contains detailed RFP/ITN requirements for the training program(s) specified in the training outline. The full RFP/ITN solicitation will be presented to the Board for review and approval.
 - iv. Once the RFP/ITN is approved, the staff can advertise to solicit responses.
- b) Advertising/Notification of Interested Parties
 - i. If time permits the staff may, advertise for potential providers to establish a list of interested respondents to which an RFP/ITN would be sent. This procedure can be implemented in the same manner as a specific RFP/ITN solicitation. It would establish a list of "eligibles".

- ii. If such a list as mentioned above is not established, CareerSource Citrus Levy Marion will, or, in addition to the above list, CareerSource Citrus Levy Marion may, solicit responses to specific RFPs by advertising those RFPs on the www.CareerSourceCLM.com website and in local area newspapers for one day. Such advertisements will be followed by a period of at least one month (30 calendar days) during which respondents may develop their proposals. This thirty-day period may be waived/decreased by CareerSource Citrus Levy Marion in instances where such a time would cause a lack of services to meet an immediate need. One example of such a situation, but not meant to be limiting or all-inclusive, would be one involving a plant closing or layoff.
- c) Review of Responses
- i. Staff will be assigned by the CEO/EVP to review and rate the proposals in accordance with criteria established in the RFP/ITN. Those individual ratings will be averaged and combined into a Committee report that will be made available to the appropriate CareerSource Citrus Levy Marion Committee for their review and selection of service providers to be recommended to the CareerSource Citrus Levy Marion Board for final approval. A cost price analysis will be part of the staff review.
 - ii. The demonstrated effectiveness of providers will be reviewed in accordance with CareerSource Citrus Levy Marion policy and the RFP/ITN requirements.
- d) Risk Review: CareerSource CLM will review any proposed subrecipient or contractor using a risk-based approach and will consider items such as the following:
- i. Financial Stability.
 - ii. Quality of management systems and ability to meet management standards.
 - iii. History of performance.
 - iv. Reports and findings from audits.
 - v. Registration in SAM (subrecipients)
 - vi. Federal Awardee Performance and Integrity Information System
 - vii. Dun and Bradstreet "Do Not Pay"
- e) A Risk Review will be the first step of the process in an ITN process. The ITN process first establishes the lowest risk respondents prior to continuing with the procurement process.
- f) Approval of Service Provider and Training Services Proposals - All training services proposals, regardless of value, will be reviewed and approved by CareerSource Citrus Levy Marion. Upon approval, staff will be charged with

negotiation of the contract. The RFP/ITN and contract will contain a contractor/subrecipient certification in this regard.

- g) Contract Approval - Staff will negotiate a final contract with the selected provider(s) based upon concerns reported in their review, CareerSource Citrus Levy Marion Board concerns, or other relevant issues. Once an acceptable contract has been negotiated, staff will have the contract executed by the Contractor/subrecipient and then by the CareerSource Citrus Levy Marion Board Chairperson or the CEO/EVP. In no event shall contract services be authorized to begin prior to the execution by both parties of the full contract document.
- h) Failure to Negotiate
 - i. If staff determines that negotiations are at an impasse, they will advise the contractor/subrecipient and schedule an appeal before the Executive Committee. The staff will notify the contractor/subrecipient, in writing, of the impasse and the date of their appeal hearing. Staff will prepare a written report outlining the area(s) where they feel an impasse exists and the reason for the staff position. The contractor/subrecipient will have an opportunity to discuss its position during the appeal hearing.
 - ii. The hearing will be scheduled within ten workdays of the declaration of an impasse. The decision of the Executive Committee is final.

15. Appeal/Protest Procedures

Appeals/Protests may be submitted for Formal Procurement only:

- a) Goods and Services - At the time of Formal Sealed Bid Opening (as advertised in the procurement documents) a tentative determination of the Apparent Low Bidder will be made and tentative selection of the Goods & Services provider(s) will be made. From that date/time of tentative selection of the apparent low bidder (bid opening), any bidder has 72 hours (3 business days) (unless otherwise specified in writing to all contractors at the time of Sealed bid opening) in which to file a written appeal/protest with the CEO.

At the Executive Committee meeting scheduled to review and approve the Staff Recommendations (date, time and location of meeting is included in the Procurement Package), any Appeal(s)/Protest(s) will be heard. The decision of the Executive Committee is final.

- b) CareerSource Citrus Levy Marion Training Services - The CareerSource Citrus Levy Marion Executive Committee meeting, at which staff recommendations are presented, (date, time and location of meeting is included in the RFP/ITN Package) appeals/protests may be submitted for Formal Procurements Only which will result

in the tentative selection of CareerSource Citrus Levy Marion Training Services Provider(s). That meeting date/time will be considered the date/time of official bid opening.

From that date/time, any bidder has 72 hours (three business days) in which to file a written appeal/protest with the CEO. At the scheduled meeting of the CareerSource Citrus Levy Marion Board in which final selection of Service Provider(s) is/are to be made (date, time and location of meeting is included in the RFP Package), the board will hear any appeal(s)/protest(s). The decision made by the CareerSource Citrus Levy Marion Board is final.

16. Documentation of Procurement Actions

- a) All procurement actions will include documentation which will include the request for purchase, all telephone/written quotes received, in writing, from the appropriate number of firms, an emergency or sole source/proprietary purchase approval (if applicable), and a purchase order.

Reports received or other vendor related delivery documents will also be maintained to include a signature of the person receiving the goods or services. Copies of formal bid documents will also be made part of the procurement file. These will be held by the Finance Department.

- c) Contract Files will be maintained by the Assistant Director of Workforce Initiatives and, at a minimum, contain the following: Original Signed Contract, copy of all correspondence concerning the contract to include monitoring reports, copy of all contract modifications, and reference to location of copy of RFP and any RFP supporting documentation.
- d) RFP Procurement Files will be maintained by the Assistant Director of Workforce Initiatives, and at a minimum, will contain the following: Original RFP; Bidder's List; copy RFP distribution letters; copy of Cost/Price Analysis; copy of request for legal notice and copies of actual legal notices when received; original of each RFP proposal received; copies of all correspondence transmitted or received regarding the RFP; and reference to all applicable files filed elsewhere.
- e) Subrecipient and Contractor Determinations will be made on a case-by-case basis. This determination will be documented in writing and will be included in any procurement documentation. (See Attachment 3)

17. Third Party Subcontracts: No third-party subcontracts for provision of services will be allowed, unless specifically approved, in writing, by CareerSource Citrus Levy Marion.

18. Cost/Price Analysis: Cost Reasonableness Standards for Procurement of Employment and Training Services (See Attachment 4).

The Workforce Innovation and Opportunity Act and regulations require that CareerSource Citrus Levy Marion's costs be necessary and reasonable for the proper and efficient administration of grant programs. In accordance with 2 CFR 200.323, a cost or price analysis will be performed in connection with every procurement action, including contract modifications which affect the contract monetarily. Cost and price estimating is the process of determining, in advance, what the reasonable and fair asking price for goods and services should be. All costs will be reviewed for reasonableness.

- a) The method and degree of analysis depends upon the facts surrounding the particular procurement and pricing situation. At a minimum, CareerSource Citrus Levy Marion will perform an independent cost or price estimate before receiving bids or proposals (competitive procurements of a purchase in excess of \$250,000). All procurements, regardless of the dollar amount being spent must include an appropriate analysis of the reasonableness of costs and prices.
- b) CareerSource Citrus Levy Marion will do whatever analysis is appropriate to the particular procurement action. A price analysis alone is allowed under limited circumstances (such as when the reasonableness of price can be established based upon a comparison of catalogue prices or a comparison of prices from an adequate number of suppliers of a commercially available off-the-shelf product.). A price analysis is required whenever a cost analysis is done.
- c) An independent cost and/or price estimate will be performed for every procurement action whose costs exceed (or are expected to exceed) the \$250,000 aggregate threshold for small purchases. This is not required for purchases that fall below the \$250,000 aggregate level for small procurements.
- d) Cost and price estimates must be documented in writing and must be performed by someone who has no financial interest in the outcome of the procurement. CareerSource Citrus Levy Marion staff may use the Certificate of Current Cost Or Pricing Data Form (See Attachment 5) and the Cost/Price Analysis Worksheet Checklist (See Attachment 6) included in this policy to document such cost and/or price estimates having been done.
- e) Price Analysis: Refers to the Total Price without regard to the individual specifics involved in assembling total price.
- f) Cost Analysis: Refers to the Individual Elements that come together to make up the Total Price.

19. Types of Agreements and Usage

Purchase Order - All Goods and Services.

- Purchase order requisition - Training Materials/Supplies and Budgeted Program Expenses \$2,500 limit.
- Formal Contract - CareerSource CLM Service Provider Contracts, Training Services and Professional Services.

20. Contract Closeout: Action to be taken after receipt of notice of termination of a contract (also reference CareerSource CLM local policy, FIN-07, Grant and Contract Closeout Procedures)

After receipt of the notice of termination, the subrecipient 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 subrecipient agrees to:

- a) Settle all outstanding liabilities and claims arising out of such cancellation of commitments or ratify all such settlements; and
- b) Assign to CareerSource Citrus Levy Marion in the manner, at the time and to the extent directed by CareerSource Citrus Levy Marion, all of the rights, titles, and interest of the subrecipients under the orders and contracts so terminated. CareerSource Citrus Levy Marion shall have the right, at its discretion, to settle or pay any or all claims arising out of the termination of such orders and contracts.

21. Payment:

For cost reimbursement agreements (Attachment 14), payments will be made for expenditures incurred up to the date that termination notification has been received. CareerSource Citrus Levy Marion must receive the final request for cost reimbursement within thirty (30) days after the termination of the Contract.

22. Contract Numbers

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

Program Year (PY) – Last two numbers of program year - Sequential Number

Contracts will be sequentially numbered as issued. Example: first cost reimbursement contract entered into by the CareerSource Citrus Levy Marion for Program Year 2020-2021 will be numbered PY20-01; the second would be PY20-02, etc.

23. Contract Administration

- a) Contract payments, documentation required, and how the subrecipient will be paid are addressed in each individual contract. Payments are for completed outcomes or for line

item, cost reimbursement charges. Advance payments to subrecipients may be allowed under the terms of certain contracts. Otherwise, advances will not be made.

- b) Contract modifications are allowed if approved by the CareerSource Citrus Levy Marion Executive Committee and/or Board.
- c) CareerSource Citrus Levy Marion does not allow a prime subrecipient to subcontract services without prior approval.
- d) Instructions to the services RFP calls for a submission from providers based upon a one-year period of performance. Contracts will be renewable for up to three times for a total period of four-years, based upon performance, and will be renegotiated annually. Subrecipients with unacceptable performance may not have their contract renewed.
- e) Financial contracts are renewable for up to four times for a total period of five years, upon performance, and will be renegotiated annually.

PART 4: Cost Reasonableness Standards for Procurement of Employment and Training Services

A cost/price analysis shall be performed on each offer submitted under procurement for employment and training services unless the offer is tuition or catalog based or is the lowest price submitted under the procurement method. All costs will be reviewed for reasonableness.

Price analysis shall be performed when it is possible to compare total price of the offer;

- A. with a similar contract to determine price is fair and reasonable provided that the contract compared with has been determined to be reasonable, or
- B. with competing offers submitted under the same procurement.

Cost analysis shall be performed when competition is not the determinant of cost. Cost analysis is the analysis of each element of cost in the offer. Cost analysis may also be performed under competitive conditions to test reasonableness of all offers submitted. Such analysis may be performed on all cost elements or selected elements.

When cost analysis is used to determine reasonableness of cost, the standards found on the following pages will apply:

<u>Cost Element</u>	<u>Standard</u>
Salaries	Annual salaries generally do not exceed by more than 10% the higher of: 1) CareerSource Citrus Levy Marion salary ranges for comparable positions; or 2) Statewide Region averages for comparable positions; or 3) Salary ranges established by State Institutions for comparable positions.
FICA	Rates established by law for regular FICA and the Medicare tax.
Unemployment	Comp Rates established by law.
Worker's Comp	Rates established by insurer.
Leave Accrual	Proposer's rates if established in written policy using CareerSource Citrus Levy Marion's rates as the reasonableness guide or CareerSource Citrus Levy Marion's rates.
Health/Life/Dental	Rates established by insurer.
Utilities & Phone	Historical experience in the area, utility/phone company estimates, CareerSource Citrus Levy Marion comparative costs.
Equipment Maintenance	Historical experience, maintenance agreement costs, vendor estimates, CareerSource Citrus Levy Marion comparative costs.
Space	Historical experience in the area

Cost Element	Standard
Facility Maintenance	Historical experience, maintenance agreement costs, vendor estimates, CareerSource Citrus Levy Marion comparative costs.
In Region Travel	Maximum Cost Reimbursement Rates
Mileage Rate	Refer to PART 7 of the Administrative Plan.
Total Miles	Refer to PART 7 of the Administrative Plan.
Meals	Refer to PART 7 of the Administrative Plan.
Out of Region Travel	Refer to PART 7 of the Administrative Plan.
Liability & Business Insurance	Insurer rates/premiums
Training Materials & Supplies	Historical experience, contractor quotes based on per participant usage. If contractor is also the offeror, offeror must demonstrate that prices proposed are competitive.
Tuition	Published, catalog rates.
Fees	Published cost reimbursement rates provided fees are not cost plus in nature.
Tools	Contractor quotes.
Equipment	Contractor quotes.
Work Experience Wages	As legally required by CareerSource Citrus Levy Marion.
Tryout Compensation	Employment Federal Minimum Wage or more.
Participant Support Services, Incentive Payments & Insurance	CareerSource Citrus Levy Marion's adopted policies.
CareerSource Citrus Levy Marion Audits	Contractor quotes.

Indirect Administration	Up to 10% dependent on availability of funds. Higher permitted as evidenced in a Negotiated Indirect Cost Rate Agreement (NICRA)
Profit	Up to a maximum of 10%

PART 5: RECORDS MANAGEMENT AND RETENTION PROCEDURES

A. Management Information System

LWDB 10 will participate in the Statewide Management Information Systems (MIS) to facilitate the uniform compilation and analysis of programmatic and financial data on Service Delivery and Subrecipient bases, necessary for reporting, monitoring, and evaluating purposes. MIS data will be entered on a daily or as needed basis to the system as required by each funding source.

Participation in the Statewide Management Information Systems will ensure that the CareerSource Citrus Levy Marion and all subrecipients shall maintain records adequate for the preparation of an Annual Report to the Governor, providing sufficient level of detail to describe activities conducted during the program year, characteristics of participants, and an assessment of the extent to which the activities exceeded or failed to meet relevant performance standards.

B. Reports Generated From MIS

Quarterly programmatic and financial reports, utilizing Statewide MIS as well as in-house information, will be provided to the CareerSource Citrus Levy Marion Full Board. These reports will be used for reporting, monitoring, and evaluating the subrecipients and internal program management within the workforce area, providing guidance and assistance and corrective actions as required.

Statewide MIS will also provide information for reporting activities as required by CareerSource Florida Inc. and the Department of Economic Opportunity (DEO) for the Workforce Innovation and Opportunity Act, the Welfare Transition Program (TANF), Wagner Peyser, Veterans and any other programs managed within LWDB 10.

C. Financial Records Management

CareerSource Citrus Levy Marion Finance Department and Subrecipients (where applicable) maintains detailed financial records related to the provision of services to participants and staff. Financial records consist of contractor files that include a copy of checks and appropriate backup, payroll records, journal entries, the books of account, financial statements, and cash management reporting records. Services for all Adult CareerSource CLM System participants are paid by the Finance Department and all supporting documents are on file in the Finance Department. Services for all Youth participants are paid by the youth subrecipient and supporting documents are on file.

Where applicable, the details for subrecipient expenditures to provide services are maintained in the office of the LWDB's sub recipients. These details are summarized and sent to the CareerSource Citrus Levy Marion Finance Department for reimbursement. The expenses of the subrecipients are accumulated along with CareerSource Citrus Levy Marion data into state and federally required reports. Subrecipient reports are reviewed for compliance with contractual requirements prior to their accumulation into reports. LWDB level and subrecipient level reports are analyzed for compliance with regulatory and policy financial requirements.

Detailed subrecipient accounting records are maintained and retained at the subrecipient level in accordance with contractual requirements related to financial and accounting procedures, records maintenance, and retention requirements. Periodic field monitoring tests of subrecipients' financial and accounting systems are conducted to ensure regulatory, policy, and contractual compliance, and to ensure that expenditures are traceable from source documents through summary reports.

D. Programmatic Participant Records Management

All programmatic participant records, including participant master files, are maintained, and retained by CareerSource Citrus Levy Marion and the respective Service Provider. Records are managed in accordance with the Florida Statutes, Chapter 119, and General Records Schedule GS1-L for Local Government Agencies.

1. Confidentiality

Program participant confidentiality is maintained in accordance with the following policy:

- a) Records will be maintained in a safe, secure, and locked filing system; this includes e-file systems.
- b) 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.
- c) 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/e-file.
- d) Medical records are kept in a separate location from program records.
- e) Access to disability-related or medical information is limited on a need-to-know level.
- f) USDOL, DEO, and CareerSource Citrus Levy Marion 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.
- g) 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 the release of the information with management.
- h) Staff having access to medical information receives HIPPA training to insure comprehension and compliance with the law.
- i) Only persons having a need to consult or handle records will be authorized to access records. Other persons shall not be authorized to access records.
- j) Sign-out procedures will be used for checking records in and out including acknowledgment of responsibility for the records by the person checking them out.
- k) Officials will be restricted to gathering information on participants/applicants to the extent provided for by the disclosure of information statement.
- l) Officials will be allowed access to records as provided for in law, rule or official policy and information contained in records will be disclosed to properly authorized officials.
- m) Records will not be released to unauthorized or unofficial parties pursuant to AWI FG 02-033.

E. Retention of Records

CareerSource Citrus Levy Marion and all subrecipients will retain all records pertinent to the receipt of funds including financial, statistical, property, participant, and supporting documentation as follows:

15. For five (5) years following submission of the final expenditure report for that funding period 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.
16. For five (5) years following final disposition of nonexpendable property.
17. If any litigation, audit, or claim remains unresolved at the expiration of the longest of the hereinabove stated periods, then the records will be retained until all outstanding issues have been resolved.
18. If a subrecipient will not be able to retain the necessary participant and financial records, they shall transfer such records to CareerSource CLM. Such records shall be transmitted for acceptance in an orderly fashion, with documents properly labeled and filed and in an acceptable condition for storage.
19. Additionally, subrecipients will ensure a copy of all documents generated on any participant is included in the Participant File/E-file maintained in the Automated Tracking Linking Archiving System (ATLAS), MIS, including but not limited to: Assessment records, counseling notes, MIS forms, etc.
20. Files that have been forwarded to an archiving/storage agency for retention will be shredded at the archive site at the appropriate time, A record of disposition will be kept on file by the Records Custodian or Records Management Liaison Officer (RMLO).

F. Rights of Inspection/Access

CareerSource CLM may terminate any contracts without advance notice if the subrecipient fails or refuses to permit inspection of its books and records by duly authorized Federal, State and recipient's (CSCLM) representatives, or any person seeking inspection of the subrecipient's records pursuant to the Florida Public Records Law, Chapter 119, Florida Statutes.

CareerSource Citrus Levy Marion and their subrecipients will grant access to and the right to copy any books, accounts, records, correspondence, or other documents pertinent to each Contract that are in their possession, custody or control or their agents, assignees or subrecipients by the duly authorized Federal, State and Grantee representatives. This clause will be inserted into the contracts between CareerSource Citrus Levy Marion (Recipient) and all subrecipients. If the subrecipient has agreements with any other subrecipients, this clause will be inserted in their contracts.

CareerSource CLM will provide the subrecipient with appropriate notice of its intent to gain access to the subrecipient's records, except that CareerSource CLM reserves the right to access subrecipient's records on demand without notice.

G. CareerSource Citrus Levy Marion Records Depository

All contractors, service providers and staff will file a copy of all documents generated on any participant in the Records Depository for inclusion in the Participant's Master e-File, which is

CareerSource CLM's Automated Tracking Linking Archiving System (ATLAS) management information system. All documents include but are not limited to Assessment records, counseling notes, MIS forms, employment plans, financial records, etc.

PART 6: LOCAL MONITORING, OVERSIGHT AND EVALUATION PROCEDURES

Staff responsible for monitoring, oversight, and evaluation of CareerSource Citrus Levy Marion operations and subrecipients will be personnel as follows by function and component.

Function: Fiscal Monitoring
Staff: DF - Subrecipient Reviews

Components: Accounting System, Financial Record keeping and Retention, Internal Controls, Cash Management, Transactions Testing, Property Management, Insurance, Bonding, Cost Allocation, Payroll, Participant Payments Systems, Support Services System, Purchasing, and OJT Reimbursement.

Function: Programmatic Monitoring
Staff: DO – Subrecipient Reviews
- Services provided by CareerSource CLM

Components: Outreach, Recruitment, Intake, Assessment, Eligibility, Participant Selection, Training Activities, Placement and Verification, Staff Qualifications, ADA, EEO and Affirmative Action, Grievances and Complaints, MIS and Participant Reports and Record-keeping.

Function: Evaluation
Staff: DF
DO

Components: Plan and Contractual Performance, Operating Systems, Corrective Action and Follow-up, Coordination.

Function: Internal Procurement Monitoring
Staff: DF
Components: CareerSource Citrus Levy Marion Procurement

Function: Subrecipient Procurement Monitoring
Staff: DF
Components: Subrecipient Procurement, Region and the Region's conflict of interest safeguards or quorums.

Function: Board Composition
Staff: R&EA
Components: Region and the Region's conflict of interest safeguards or quorums and the composition of the Board.

A. MONITORING

1. Monitoring of CareerSource Citrus Levy Marion One Stop Services and any applicable subrecipients will be essentially continuous and on-going with reports produced at a minimum annually, or as needed. Additional reviews will be scheduled as performance dictates. Content of reports will be determined by the sequencing of activities monitored. Generally, monitoring during the first half of the year will be devoted to testing subrecipient's fiscal, operating, and programmatic systems.

Monitoring will generally test discrete fiscal and programmatic transactions for compliance, reasonableness, necessity, and correctness in high-risk prioritized activities. In addition, monitoring will be devoted to validating fiscal and programmatic data, quality aspects of training, effectiveness, along with additional testing in high-risk activities.

2. A written guide covering each function and component is used for monitoring. The guide is divided into component sections. Each component is broken down into discrete activities grouped categorically by those activities testing statutory, regulatory etc. matters and those testing contractual matters. Methodology, frequency, and sequence are delineated for each activity. Predetermined worksheets, checklists etc., are used to further guide testing and organization of results. The monitoring tools furnished by the Department of Economic Opportunity (DEO) will also be used to monitor activities.
3. Monitoring will occur on site or remotely on a regular basis, but not less than once annually. An initial monitoring visit to new subrecipients should be conducted within four months of the start date of the contract or before the end of the contract in cases where the duration of the contract is less than four months, and then annually after that.
4. Monitoring of program participant files will be conducted at least annually and a 10% file sample shall be pulled for each program. However, if there is an extremely large program, a smaller file sample will be derived as long as the total number of files reviewed is not below 2%.
5. Monitoring of Program Activities, which includes outreach, recruitment, intake, assessment, eligibility determination, training, and placement, will initially be performed by a third party monitor competitively procured by the LWDB. The monitoring firm will conduct monitoring as scheduled in the contracted firm's scope of work.
6. Fiscal Monitoring of CareerSource CLM and subrecipients is provided by an independent audit firm and the Department of Economic Opportunity. This monitoring will occur at least annually unless the level of risk dictates a higher level of oversight.
7. Monitoring of functional components will be sequenced and timed so that monitoring data builds on itself between functions for management purposes. All monitoring will be reduced to written reports. Format of reports will be Introduction, Overview of Quality Assurance Results, Findings, Other

Noncompliance Issues, Observations, Notables, and Required Action. Reports will be written by the third-party monitoring firm, coordinating findings and determinations with the Director of Operations and the Executive Vice President and other responsible staff as needed.

8. CareerSource Citrus Levy Marion will make every effort to transmit reports to subrecipients and appropriate staff within 30 working days following the visit for review and comment/response including proposed corrective action when required. Supporting documentation will be maintained in the monitoring files.
9. In the event that monitoring, and oversight activities disclose negative results, a corrective action plan will be recommended. In the first instance, technical assistance will be offered and provided as part of the corrective action. Additional instances of non-compliance will require more comprehensive technical assistance.
10. Corrective action plans must be developed by the subrecipients and CareerSource Citrus Levy Marion staff when programs are found to be out of compliance with the contractual agreement, or any governing regulations. The DF or the Assistant Director of Career Services will follow up to ensure that the corrective actions have been implemented, as stated, in a timely manner. Any corrections made will be reported to the appropriate Director or EVP. The DF or the Director of Operations will evaluate responses and corrective action plans and make a recommendation to the CEO and the EVP. A copy of all monitoring reports ~~with corrective action plans~~ will be brought to the Performance and Monitoring Committee for final review ~~and determination~~.
11. Should a subrecipient not agree with the final determinations made, the CEO will request that a meeting of the CareerSource Citrus Levy Marion's Executive Committee be convened to determine whether cause exists to go, or not go, forward with the final determinations. Any party not agreeing with the committee's decision may appeal using the appeals procedure described in the Debt Collection Section of this document.
12. The DF or the Director of Operations will follow-up on implementation of determination by CSCLM staff or the subrecipient during the next review, or as directed by the CEO and/or the EVP in a special review.

B. FRAUD, WASTE AND ABUSE DURING MONITORING

Should waste, fraud, abuse or other serious noncompliance matters be detected at any point in the monitoring process, it will be reported immediately by the responsible staff person to the CEO, who will take appropriate and immediate action to correct the matter.

C. PERFORMANCE EVALUATION

1. Performance will be evaluated by the Director of Operations as scheduled to ensure compliance with state and federal guidelines.

2. Program evaluation will consist of quarterly compliance reviews on all aspects of program performance. Reports will be forwarded to the CEO/EVP for the preliminary review. Upon completion of the CEO/EVP's review, the report will be placed on CareerSource Citrus Levy Marion's Performance and Monitoring Committee agenda for their review and acceptance and distributed to the appropriate individuals for a corrective action plan. Corrective action will be required in the event that monitoring and oversight activities disclose negative results. The actions may include, but are not limited to, technical assistance and guidance, De-obligation of funds, cancellation of contracts, counseling, or termination of program management staff for internally managed programs, and other steps.
3. Cumulative trends will also be used to develop a performance summary for the Performance and Monitoring Committee and Full Board on a quarterly basis. Quarterly reports to the Full Board based on Quarterly Performance will allow for the following options:
 - Special Reviews
 - Staff Counseling
 - DE obligation
 - Termination Warning Notice
 - Termination of Contract
4. The evaluative monitoring will address analysis of the CareerSource CLM staff or subrecipient's programs in terms of quality, outcomes, success rates, cost effectiveness, and value to the community. This will be accomplished through the compilation of detailed monthly reports, special audits, and reviews.
5. Subrecipients and CareerSource CLM staff must achieve program quality and outcomes that meet the objectives of the funding sources and the CareerSource CLM Board. Corrective action will be required in the event that monitoring and oversight activities disclose negative results, or if the subrecipient or internal management staff is determined to be out of compliance with the contractual agreement or the regulations. The actions may include, but are not limited to:
 - Technical assistance and guidance
 - Staff counseling or termination
 - DE obligation of funds
 - Cancellation of contracts

D. SUBRECIPIENT CONTRACTS (not in compliance)

The procedures for the DE obligation of funds and cancellation of contracts that are not in compliance are specified as follows in the contract with each provider:

1. In accordance with 2 CFR Part 200. 207 and 338, CareerSource Citrus Levy Marion will provide for sanctions and penalties as may be appropriate for any administrative, contractual, or legal remedies in instances where subrecipients violate or breach contract terms.

2. Termination for Breach – CareerSource Citrus Levy Marion may terminate the Contract for any breach of the contract terms, non-performance, or failure to achieve performance goals, upon no less than thirty (30) day notice in writing to Contractor. Waiver of any breach in a provision of the Contract shall not be deemed a waiver of any other or subsequent breach and shall not be construed as a modification of the terms of the Contract.

In the event of termination pursuant to this paragraph, subrecipient shall be compensated only for work satisfactorily completed prior to notification of termination, less any damages incurred because of breach or non-performance. This provision does not limit CareerSource Citrus Levy Marion’s right to remedies at law or in equity.

3. Remedies for Breach – In the event of a breach by subrecipient of any of the terms or conditions of the Contract, CareerSource Citrus Levy Marion may elect one or more of the following remedies:

- a) Requiring a written report of corrective action within a specified time frame.
- b) Withholding payment.
- c) Formal Audit of funds spent to date.
- d) Removal from CareerSource Citrus Levy Marion’ Bidder List.
- e) Disallowing claims, payments, or costs.
- f) DE obligating contract funds.
- g) Legal actions to recoup unspent funds.
- h) Increasing monitoring of program operations.
- i) Suspending or terminating the Contract.
- j) Legal actions as warranted.

E. MISSPENT AND/OR MISUSED FUNDS

Should the subrecipient or its contractor, if any, misspend or misuse Contract funds, the subrecipient, upon such finding and determination shall be held liable for the repayment of such amounts determined to have been misspent or unallowable due to willful disregard of the requirements of the Contract, gross negligence, or failure to observe accepted standards of administration.

Misspent or misused funds shall be explicitly understood by the subrecipient to include expended costs, budgeted or otherwise, which are determined through audit or otherwise to be unreasonable, unnecessary, or disallowed. Repayment of misspent funds shall be from sources other than those provided under the Contract, notwithstanding any other provisions of the Grantee’s Debt Collection Procedure.

F. USE OF ELECTRONIC SIGNATURES

An electronic signature is an online equivalent of a handwritten signature. It electronically identifies and authenticates an individual verifying or signing certain documents. The acceptance of scanned and/or electronic signatures has been approved for use within LWDB 10. Electronic signatures

(which are password protected) are considered originally signed signatures, and as such, may be used on documents processed within CareerSource Citrus Levy Marion.

G. CAREERSOURCE CITRUS LEVY MARION BOARD

CareerSource Citrus Levy Marion's Board membership is internally monitored by the Chief Executive Officer along with the Research and Executive Assistant. Together they advise the Board and Consortium whenever a seat on the Board is vacated. Criteria for filling vacated seats are contained in the Interlocal Agreement. External monitoring of Board membership is conducted annually by the CareerSource Citrus Levy Marion's independent audit firm and the Department of Economic Opportunity.

LWDB conflict of interest will be monitored as follows:

- New members, as well as receiving an orientation as needed, are provided a copy of the CareerSource Citrus Levy Marion's by-Laws, which contain a conflict-of-interest provision.
- At each CareerSource Citrus Levy Marion's committee and board meetings, members will be reminded of the conflict-of-interest provisions at the beginning of the meeting. Conflicts as they are declared will be recorded in the meeting's minutes.

Each new member on appointment and all members annually will be required to file a Disclosure of Potential Conflicts and Certification/Code of Conduct/Ethics Form (ADM-2 policy). Members not completing a conflict-of-interest form will not be allowed to vote on any matters.

H. SELECTION OF CAREERSOURCE CITRUS LEVY MARION STAFF

Procedures governing the selection of CareerSource Citrus Levy Marion staff are specified in CareerSource Citrus Levy Marion Personnel Rules and Policies. Supplemental procedures govern the internal processing of applications etc. inclusive of procedures for acting affirmatively in the recruitment, selection and promotion of qualified minority candidates. All steps of the selection process require documentation, which is maintained on file for review. Separation of functions and required documentation of the process makes it an essentially self-monitoring process. The DF and Human Resources staff internally monitors the process with external monitoring provided by the CareerSource Citrus Levy Marion's independent audit firm.

I. SARBANES-OXLEY ACT OF 2002

CareerSource Citrus Levy Marion's Code of Ethics and Conduct requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities and comply with all applicable laws and regulations. CareerSource Citrus Levy Marion 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 the responsibility of all directors, officers, and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy. No director, officer, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.
- CareerSource Citrus Levy Marion has an open-door policy for employees to share their questions, concerns, suggestions, or complaints with someone who can address them properly. If an employee is not comfortable in sharing this with their supervisor, they can speak with anyone in management who they are comfortable with approaching. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.
- Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.
- It is a crime to alter, cover up, falsify, or destroy any document that may be relevant to an official investigation (SOX, Section 1102, Section 1512 of Title 18, USC).
Note: Also, see CareerSource CLM's policy ADM-18, Whistleblower Policy.

PART 7: FISCAL MANAGEMENT PROCEDURES (Sections I through XVII)

SECTION I - CHART OF ACCOUNTS

PURPOSE

To provide a description of the account code structure.

GENERAL

The Account Code Structure has been designed to provide a means for responsibility reporting on a grant or fund, program, and functional activity basis. It serves as the basic guide for budgeting grant funds, classifying expenditures, and monitoring operational results in relation to a budget. The coding structure provides the flexibility needed to adjust to possible future changes in grants or funds, programs, functional and line-item activity.

PROCEDURE

The Director of Finance will be responsible for the design and maintenance of the chart of accounts including any additions or deletions to the account code structure. A report listing all account code classifications can be accessed through the accounting software program.

ACCOUNT CODE STRUCTURE

The account code structure is demonstrated in the diagram below. The various coding elements are described in the paragraphs that follow:

Grant/Fund Code-----XX
Detailed Account Code-----XXXX
Functional Classification-----XXXXX
Contract/Cost Pool-----XXXXX
County-----XXXXX

Grant/Fund Code: Two digits, which identify the grant or other fund to which, the transactions relate.

Detailed Account Codes: Four digits that identify the specific line-item account.

Functional Classification: Two digits that identify the program activity.

Contract/Cost Pool Classification: Five digits that identify the contract or cost pool.

County Classification: One digit that identifies the county.

Special Code: Up to twelve digits identify grant year or participant.

SECTION II - BOOKS OF ACCOUNT - GENERAL

PURPOSE

To describe the Books of Account and to outline the concepts and procedures observed in their use.

GENERAL

The Books of Account are the vital financial records of CareerSource Citrus Levy Marion. Coupled with adequately documented source data upon which the accounting entries are based, these books constitute a very important part of CareerSource Citrus Levy Marion's organizational framework.

PROCEDURE

The Director of Finance will be responsible for the design and maintenance of all books of account.

Books of Account can be classified into these general categories:

1. Books of Original Entry- Journals into which classified transactions are first recorded are referred to as the books of original entry. The CareerSource Citrus Levy Marion's books of original entry required to conduct the accounting procedures are:
 - a. Cash Receipts Journal - To record all transactions related to the receipt of cash.
 - b. Cash Disbursements Journal- To record all transactions related to the disbursement of cash.
 - c. Payroll Journal- To record all salaries and fringe benefits in the accounting records.
 - d. General Journal- To record the journal vouchers prepared each month.

These journals are sub ledgers, which are part of a complete automated general ledger accounting system. When information is entered into the system through these journals, the system posts the data from each journal transaction to the general ledger and sub ledger accounts.

2. General Ledger- This ledger is the summary record of all financial transactions. The data, which was first entered in the books of original entry, is automatically posted into the General Ledger. The General Ledger contains the control accounts and is the primary source of information for preparation of the financial reports.
3. Subsidiary Account Ledgers- These ledgers contain detailed information in support of the summarized totals found in the various General Ledger control accounts. The following is a list of the subsidiary account ledgers set up for the CareerSource Citrus Levy Marion's accounting system along with a brief description of their content.

CONTROL ACCOUNT

SUBSIDIARY LEDGER

DESCRIPTION

Cash

Bank Reconciliation

A reconciliation of cash balance per the

books and the bank statements with detailed schedules of reconciling items (i.e. outstanding checks, deposits, etc.).

Prepaid Item	Prepaid Items amortizations schedule	A schedule of each prepaid item showing the amount prepaid, the amount amortized each month, and the remaining prepaid (unamortized) balance.
Fixed Assets	Detailed Property records	A file of nonexpendable personal property will be maintained. Periodic checks will be made to the General Ledger.
Payables	Trial Balance	A detailed list of the amounts payable at accounts payable the end of each quarter showing the name of the creditor and the account numbers to which it will be charged and paid.
Payroll Journal	Payroll Master File	These reports include employee earnings report, deductions, check register.

SECTION III - BUDGETS

PURPOSE

To outline the concepts and procedures to be followed in budget procedures from original budget request preparation through final Board approval.

GENERAL

CareerSource Citrus Levy Marion's budget is the financial expression of the plan developed through execution of a detailed planning cycle. It involves the participation of staff personnel, CareerSource Citrus Levy Marion board members, and other interested individuals.

A properly prepared budget, which precisely communicates CareerSource Citrus Levy Marion's plans (in financial terms), is an essential management tool for:

1. Requesting funds
2. Evaluation of proposed programs
3. Approval of funding
4. Operation of programs
5. Evaluation of operational results

PROCEDURE

When preliminary allocations of funding are determined for CareerSource Citrus Levy Marion's fiscal year operations, a budget, which identifies the components within the various cost categories is developed by the Director of Finance and forwarded to the Chief Executive Officer/Executive Vice President.

BUDGET PREPARATION

Budgets will be prepared by the Director of Finance who will be responsible for successful performance of all the budgeted activities. As activities are assigned, the following will occur:

1. The Director of Finance will complete a budget.
2. In preparing the budget, the Director of Finance will be responsible for:
 - a. coordination of budget preparation within the organization.
 - b. preparation of historical data and other special analyses that will assist with the preparation of a meaningful budget.
 - c. itemizing budgets as set forth in the chart of accounts.
 - d. submitting the budget to the Chief Executive Officer/Chief Operating Officer for staff level approval.

BUDGET CONFERENCE REVIEW

The Chief Executive Officer/Executive Vice President will be responsible for reviewing budgets and will:

1. Coordinate a conference review with the Director of Finance and other appropriate management personnel regarding the proposed budgets and design the final draft budget.
2. Review the budgets to assure the reasonableness and consistency with the overall plan.
3. Review all budgeted line items to ensure compliance with the funding source.
4. Present the final budget for the Board's approval.
5. Submit final approved budget to Director of Finance for implementation.

RECORDING BUDGETS/BUDGETARY REPORTING

The Director of Finance will:

1. Implement budgets into the accounting system in order to control expenditures within the authorized limits.
2. Consolidate all budgets and plans in order to prepare required funding source budget forms for funding source approval.
3. Furnish timely reports so that the CareerSource Citrus Levy Marion Board and Chief Executive Officer/Executive Vice President may monitor programs and activities for expenditures versus planned.
4. Maintain a file for all approved budgets.

BUDGET MODIFICATIONS

Minor budget modifications changing budgeted line items within an activity will be prepared by the Director of Finance, who shall:

1. Submit the budget modification with an explanation for the budget change to the Chief Executive Officer/Executive Vice President who shall be authorized to approve line-item budget transfers.
2. Budget modifications needed as a result of changes in total budgeted program activities or changes resulting from actions issued by the funding source will be prepared and the concepts of the budgeting process above will be followed.
3. Section 1 & 2 above are subject to restrictions issued by the funding source.

SECTION IV - CASH RECEIPTS

PURPOSE

To establish the concepts and procedure to be followed in processing cash receipts transactions.

GENERAL

The cash receipts process includes depositing funds received/electronic receipts and recording the transactions.

PROCEDURE

All cash and checks will be immediately opened by the Bookkeeper. The deposit items will be immediately forwarded to the Accountant.

1. The Accountant will prepare the bank deposit slip in duplicate. The deposit slip will include the receipt number, the source, account number, and the amount of each receipt.
2. All checks will be endorsed as follows:
Credit to the Account of Citrus Levy Marion Regional Workforce Development Board, Inc.
3. The Bookkeeper will make the deposit to the bank.
4. All documentation for all receipts with the deposit/electronic receipt will be forwarded to the Accountant in the Cash Receipt Journal.
5. The Accountant will maintain file for deposit/electronic receipt and supporting documentation.

SECTION V - PROGRAM INCOME

PURPOSE

To describe specific procedures to report program income and disbursements thereof on program funds.

GENERAL

Program income is defined as income generated by a program activity or earned as a result of the program. Program Income includes:

1. Income from fees for services performed and hosted conferences.
2. Income from the use or rental of property acquired with program funds.
3. Income from product sales fabricated under the grant.
4. Income from sale of property.
5. Revenue earned under fixed price or reimbursement award that are in excess of actual costs incurred for providing the services; and
6. Interest income earned on advances of program funds. As per Uniform Guidance section 200.305(9) \$500.00 of Interest income may be retained for administration.

Program income shall be expended before program funds and must be expended prior to the submission of the final report for a funding period.

PROCEDURE

Receipt and disbursement of program income will follow the same procedures as program funds.

Program Income will be reported based on funding source requirements. Separate G/L accounts will be used to account for program income revenues.

REPORTING

Program Income will be reported to the appropriate funding source in compliance with the instructions providing by the applicable funding source.

SECTION VI - CASH DISBURSEMENTS

PURPOSE

To establish the concepts and procedures to be followed to process cash disbursement transactions.

GENERAL

The cash disbursements process includes processing invoices for payment, preparing checks, and recording the transactions.

PROCEDURE

The following sequence of activities takes place in processing transactions related to disbursements from the general operating checking account:

1. All original vendor invoices will be immediately forwarded to the Bookkeeper.
2. The Senior Bookkeeper and/or Accounting Clerk will:
 - a) *Match and check all invoices against the authorized purchasing document or contractual agreements ensuring that all terms of the agreements are met.*
 - b) The Accounting Clerk will prepare the accounts payable journal voucher.

CHECK PREPARATION AND PRINTING

1. The Accounting Clerk will enter the invoices for payment into the accounting program from the accounts payable journal voucher.
2. The Senior Bookkeeper will:
 - c) Review the data entry process, computations, GL account distributions, documentations, and sign off on ap batch.
 - d) Accountant post accounts payable batch to the general ledger after the Director of Finance approves for payment.
 - e) Accountant prints accounts payable report.
 - f) Accountant will print the checks in accordance with the accounting software procedure.
 - g) Senior Bookkeeper post checks to the general ledger.
 - h) Senior Bookkeeper will print the Check register and upload to the bank.

ASSEMBLING CHECKS

The Accounting Clerk will:

1. Attach the checks to the supporting documentation.
2. Forward the checks and supporting documentation to the Chief Executive Officer or Executive Vice President for approval.

The Chief Executive Officer or Chief Operating Officer will:

1. Review check request to ensure expenditure is justified.
2. Initial the check copy/journal voucher signifying approval.
3. Sign and return the checks and documentation to the Accounting Clerk.

All checks shall be signed by either the Chief Executive Officer or Executive Vice President.

The Accounting Clerk will:

1. Conduct a final quality review of accounts payable vouchers and signed checks to ensure all checks are properly authorized prior to mailing.
2. Mail check with duplicate invoice or any other payment reference attributable to payment.
3. File duplicate check alphabetically with all supporting documentation. If documentation is not attached to the check duplicate, it will be clearly referenced as to where the documentation can be located.

In **NO** event will a check be:

1. Prepared unless the procedures as outlined in this Plan are followed.
2. Prepared from monthly statements.
3. Used other than in numerical order.
4. Prepared or signed in advance.
5. Made out to cash, bearer, petty cash, etc.
6. Prepared on verbal authorization.

MANUAL CHECKS

1. Manual checks will only be issued under the direction of the Director of Finance and Chief Executive Officer/ Executive Vice President.
2. All manual checks will have supporting documentation and will be prepared using the procedures as outlined in this Plan.

3. When issuing manual checks the Accountant will:
 - a) Type triplicate check with payment information.
 - b) Enter checks into computer system in accordance with the accounting software.
 - c) Follow other instructions for check processing as outlined in this Plan.

VOIDED CHECKS

1. Voided checks will have "VOID" boldly written in ink across the face of the check.
2. The signature portion of the original check will be perforated or cut out.
3. The original will be filed with triplicate and forwarded to Director of Finance for month end to be used in the monthly bank reconciliation.
4. Vendor checks that need to be voided will be entered into the accounting system.
5. Blank checks that need to be voided will be maintained in the voided check file; however, they do not need to be entered into the accounting system.

CUSTOMER DEBIT CARDS

1. The Senior Bookkeeper will review, verify, and process customer support payments.
2. The Senior Bookkeeper will load the debit cards through the Global Cash Card system.
 - a) New customer cards are requested by Career Consultants through Gazelle Purchase Order system.
 - b) Cards are mailed directly to customers. Customer confirms card receipt.
 - c) Funding requests are submitted through Gazelle for approval.
 - d) Once approved, funding is added through the Global Cash Card system.
 - e) Journal entries are made in the accounting system by Senior Bookkeeper
3. The Accounting Clerk will review entries and posting is done.

SECTION VII – REPORTING EXPENDITURES

PURPOSE

To describe the procedures followed in reporting expenditures to state/federal/other funding agencies.

GENERAL

The expenditures reporting process includes gathering expenditures recorded in the Accounting system and reporting them to the state/federal/other funding agencies in accordance with their requirements.

PROCEDURES

At the end of each month, the Director of Finance will allocate costs per CareerSource Citrus Levy Marion's Cost Allocation Plan approved by the State.

Direct and allocated costs are then reported to the funding agencies.

1. Expenditures are reported on an accrual basis.
2. For the state, expenditures are reported by program and functional classifications through their on-line site by the 20th of each month.

SECTION VIII - PAYROLL

PURPOSE

To describe the procedures followed in processing payroll.

GENERAL

The payroll process includes maintaining personnel files, processing payroll, and maintaining leave records.

Maintenance of payroll files involves activity in the following eleven areas:

1. New Hires
2. Termination
3. Status Change
4. Employee Master Information
5. Employee Earnings and Deductions
6. Cumulative Wage and Tax Information
7. Vacation
8. Medical Leave
9. Compensatory Time
10. Federal Taxes and Tax Deposits
11. Unemployment Compensation

PROCEDURES

Personnel Files:

All employees, master file information; necessary for payroll purposes is maintained in the employee's personnel file.

This personnel file is established and maintained on a current basis by the Human Resources Manager. Information required to establish this file and to record changes thereto, originates from the following sources:

1. Application/Resume
2. Form-W4
3. Form-I9/Receipt from E-Verify (kept in a separate file folder)
4. Insurance Enrollment Documents
5. Properly executed and approved authorizations for miscellaneous payroll deductions.
6. Hiring Documents (Background checks kept in a separate folder)
7. Documentation supporting approved employee rate of pay.
8. Acknowledgement of receipt of Employee Benefits and Personnel Rules & Policies handbook.
9. Employee Action Forms: changes to employment, i.e., job title, rate of pay, supervisor, location, status (FT/PT), FLSA class (NE/E)

10. Separation documents
11. Change of address.
12. Change of personal information, i.e., name changes, change of marital status, etc.
13. Performance Evaluations & Awards
14. Education, Training, and certification documents
15. Verifications of Employment
16. Unemployment documents
17. Changes in benefits documentation
18. 403-b Distribution documents
19. Disciplinary/Corrective Action Plans (There are miscellaneous acknowledgments that we keep in the file) Basically, anything we have them sign for.

PAYROLL PREPARATION

Each employee will be responsible for submitting a bi-weekly time sheet, to compute total hours worked each day, to indicate overtime hours, personal leave time, holiday, and to designate the number of hours worked on various grants/programs. Each employee will submit a completed electronic time sheet to his/her supervisor for approval each payroll period.

Each supervisor will approve the electronic time sheet to ensure proper authorization and will ensure that appropriate forms have been completed for any personal leave time.

The Accountant will;

1. Enter the bi-weekly payroll through the payroll service agency by recording the hours from the approved time sheets.
2. Review the payroll register prior to processing report.
3. Submit the payroll.
4. Prepare the journal entry to record payroll from the payroll journal provided by the payroll service agency.
5. Enter the journal entry to the accounting software program.
6. Sort checks and direct deposit stubs and distribute to staff.

The Director of Finance will:

1. Review payroll reports and journal entry for accuracy.
2. Post payroll journal entry to the general ledger.
3. Maintain payroll reports and journal entry file.

EMPLOYEE LEAVE RECORDS

Leave records will be maintained on a bi-weekly basis for each employee. CareerSource Citrus Levy Marion will maintain a funded leave pool to account for accrued leave time in a bank account

separate from operating funds. Accrued leave will be expensed to contracts when earned. The liability and the cash account will be recorded in CareerSource Citrus Levy Marion's general fund.

The Accountant will:

1. Record leave time used, and time earned each pay period.
2. Provide a quarterly report to the Director of Finance.

The Director of Finance will:

1. Record the accrual in the financial statements.
2. Adjust the funded staff leave pool accordingly.

SECTION IX - JOURNAL ENTRIES

PURPOSE

To describe the concepts and procedures followed in preparing and processing journal entries.

GENERAL

In addition to the normal routing transaction, it will be necessary to generate a number of accounting entries internally. These entries (journal entries) are made by the means of journal vouchers.

Such journal entries include non-cash transactions such as, but not necessarily limited to:

1. Payroll
2. Accrued Expenditures/Accounts Payable
3. Amortization of Prepaid Items
4. In-kind Contributions
5. Accounts Receivable
6. Adjusting and Reclassification Entries
7. Monthly, Quarterly, and Year-end closing entries
8. Other Accruals
9. Bank reconciling items
10. Cost allocation entries
11. Accrued leave/leave pool
12. Sub recipient costs applied to contractual advances.

PROCEDURE

The following sequence of activities takes place in preparing and processing journal entries:

The Director of Finance will:

1. Review and post journal entries entered by the Accountant, or the Bookkeeper from source documentation.
2. Attach all necessary documentation to support the journal entry.

SECTION X - BANK RECONCILIATION

PURPOSE

To establish the procedure to be followed in performing the month end bank reconciliation.

GENERAL

The bank reconciliation process includes reconciling the cash balance per the general ledger to the cash balance per the bank statement and recording any necessary adjustments.

PROCEDURE

The following sequence of activities takes place in reconciling bank accounts:

1. Bank statements will be received unopened by the Human Resources Manager/EO Officer to examine for discrepancy/out of the ordinary activities. The bank statements will then be forwarded to the Accountant to prepare the bank reconciliation.
2. For reconciliation purposes, supporting documentation should include bank statement, beginning G/L balance report, ending G/L balance report, canceled checks and any other pertinent information.
3. The bank balance will be in agreement with the balance in the general ledger.
4. The Director of Finance will review and approve the reconciliation.
5. Any necessary journal entry is prepared and recorded and maintained in a bank reconciliation file.
6. Cash journal is printed with the month of reconciliation activity.
7. The Accountant will monitor checks that have been outstanding over 120 days. Based on the research a decision will be made as to whether the check will be reissued or voided. Unclaimed participant payroll checks will be processed in accordance with Florida Statutes Section 717.115, which requires remittance to the State of Florida after one year.

SECTION XI - CASH MANAGEMENT

PURPOSE

To establish the concepts and procedures to be followed to control cash.

GENERAL

A cash control procedure not only strengthens the control of cash, but it also keeps management informed as to the current cash balances available. In addition, it is a useful management aid in planning cash flow.

PROCEDURE

Cash on hand will be minimized between the time elapsing in the receipt of advanced funds and disbursement of those funds. Florida Statutes and Office of Management and Budget (OMB) CFR 2 Part 200 will be followed as it pertains to cash management. Usually, checks and payroll are disbursed bi-weekly. Cash control is achieved through the following steps:

1. Each week the Director of Finance will print the trial balance cash control accounts. The information provided by this report and the addition of outstanding invoices and historical information will enable the Director of Finance to determine from which funding source to request cash advances. Cash advance requests are made in accordance with funding source requirements.
2. Cash disbursements and adjustments will be reported to the state by accessing the state computer system. Disbursements will be reported by grant and a hard copy printed for reference back to the source documents. Cash disbursements are determined from the original books of entry, i.e., cash disbursement journal, payroll journal, and general journal.
3. Each week the Director of Finance will provide a report to the Chief Executive Officer to review cash receipts and disbursements. If the cash on hand allowable amount exceeds the calculated average twice within a program year, CareerSource Citrus Levy Marion can be placed on a cost reimbursement basis for a 12-month period. All cash shall be kept within the amounts allowable.

SECTION XII - SUBRECIPIENT CASH MANAGEMENT

PURPOSE

To establish the concepts and procedures to be followed to control cash advances.

GENERAL

Cash advances will be issued to subrecipients when management considers it appropriate. Generally, the terms of the contract will specify that cash advances may be issued. However, any subrecipient may request cash advances if justifiable circumstances exist. Cash advances are to follow the prescribed requirements of applicable Federal/Florida Statutes and 2 CFR Part 200.

Any contract between CareerSource CLM and a unit of State or local government will be on a cost reimbursement basis only. (683.200 (b)(4))

Upon termination of the contract, amounts paid in excess of actual costs incurred by contractor on advanced program funds will be returned to CareerSource Citrus Levy Marion. Interest income earned from advanced program funds will be either applied towards program expenditures or returned to CareerSource Citrus Levy Marion at the end of each fiscal year.

PROCEDURES

Cash Disbursement

The subrecipient will submit a request for an advance payment to CareerSource Citrus Levy Marion. Advances to subrecipients will follow the same procedures as specified in section VI, the cash disbursement section.

Reporting

The recipient of the advance payment will be required to submit a monthly report of actual expenditures by the fifteenth of the month following the month of service.

The Director of Finance will:

1. Review all request for advances to determine if they are necessary and reasonable.
2. Record the advance as an asset (advance to subrecipient) at the time of disbursement.
3. Review and process the journal entry to record the actual expenditures based on the subrecipient's monthly report.
4. Review all reports to determine if the cash advances are being expended in a reasonable period and if reports are being submitted on a timely basis.
5. If the Director of Finance determines that advances are not being properly requested or reported, the subrecipient will be required to return all excess cash and will be placed on a cost reimbursement basis.

SECTION XIII - PETTY CASH

PURPOSE

To establish the procedures and controls employed in administering petty cash funds.

GENERAL

Petty Cash Funds are authorized by the Chief Executive Officer and issued to the Research and Executive Assistant in those instances where small day-to-day operating funds are deemed necessary.

Petty Cash Funds are established to provide a readily available source of funds for the payment of small, incidental, miscellaneous expenses such as supplies, postage, newspapers, etc. The purpose of such funds is to avoid the need for writing checks for small items to facilitate quick, minor disbursements.

PROCEDURES

Restrictions

The following restrictions are usually observed regarding petty cash funds:

1. The amount to be disbursed per transaction may not exceed \$ 50.00.
2. Only the person to whom the fund has been assigned may have access to the cash.
3. No other monies may be mixed with the petty cash fund.
4. No personal checks are to be cashed from the petty cash fund.
5. No loans or advances are to be made from the petty cash fund.
6. The maximum amount for petty cash is \$100.00.
7. Under no circumstances should the petty cash fund be used to circumvent the established cash disbursements procedure.

Audits

The Accountant will conduct periodic and unannounced audits of petty cash funds. Such audits include the counting of cash and receipts the total of which should equal the maximum of \$100.00.

SECTION XIV - PROPERTY CONTROL

PURPOSE

To describe the concepts and procedures to be followed in recording, reporting, disposing, and physical inventory of tangible personal property.

GENERAL

The system for accounting for tangible personal property maintained by the CareerSource Citrus Levy Marion will be in compliance with 2 CFR 200.313 & 314.

PROCEDURES

Recording and Fixed Assets:

1. Tangible personal property with an acquisition cost exceeding the \$5,000.00 minimum threshold will be capitalized and recorded as a fixed asset.
2. Fixed asset purchases will be recorded as expenditure to the specific program for which it is purchased or allocated to the appropriate programs.
3. Fixed assets will be recorded as an asset in the General Fixed Assets fund and will be offset by a corresponding contra asset account, investment in fixed assets.
4. The Property Custodian, which is the Director of Information Technology (IT), will add the property to the property records and shall maintain the following information, as applicable, on each item: tag number, description, location, property assignee, manufacturer, year or model, serial number, date acquired, cost, source of funding, use, condition, and any other pertinent information including disposition information. This should also include any sale price of the property.
5. The Property Custodian will be responsible for assigning and affixing a property tag to the asset item.
6. Property will be assigned to the individual responsible for its usage (assignee) or locked in designated computer rooms equipped with electronic locks and/or security alarms.

Physical Inventory

1. A physical inventory will be completed once every two years; or, whenever there is a change of property custodian. The Property Custodian will conduct the physical inventory of all equipment, indicating on the listing the condition and location of the equipment and ensure that all equipment is properly marked.
2. The Director of Finance will be immediately notified of all cases of loss, damage, or destruction of equipment; and will make a report to the Chief Executive Officer.
3. The Property Custodian will maintain an up-to-date listing of all equipment.
4. The Director of Finance will reconcile the physical inventory with the prior inventory and the recorded G/L amounts. All discrepancies must be properly explained.

DISPOSALS

The following sequence of activities takes place in processing transactions related to the disposal of tangible personal property.

1. The Property Custodian will inform the Director of Finance of the need to dispose of the tangible property.
2. The Director of Finance will prepare a Notice of Disposal of Non-Expendable Personal Property and forward to the CEO for approval.
3. After the CEO approves disposition of the property, journal entries will be prepared to adjust the control account for the property disposed of. The acquisition cost or value of property being disposed of should be credited to the asset control accounts and debited to the investment in fixed asset offset accounts.
4. The active property control and dollar amount will be reconciled to the appropriate general ledger control account balances, taking into consideration the journal entries prepared for disposed property.
5. Disposal of property that is a fair market value of less than \$5,000 may be sold or otherwise disposed of.
6. Disposal of property that is a per unit fair market value of greater than \$5,000 will be disposed of by:
 - a. Transferring the property to any other workforce area in the state or another partner agency
 - b. Transferring the property to any government entity.
 - c. Donating the property to a private 501c (3) non-profit agency in Citrus, Levy, or Marion County.
 - d. Sale of the property. If the property is determined to be sold. 10% or \$500.00, whichever is less, can be retained to cover costs of selling such property.
7. If the equipment is broken beyond repair or cannot be donated or salvaged, it will be documented as either broken or abandoned. After written approval by the CEO or EVP, it will be taken to the local landfill, recycled, or placed in a commercialized waste disposal bin.

PROPERTY RECORDS

The Director of Finance will maintain a computer database of the property inventory. Property records will be retained for a period of five (5) years after final disposition of the property.

SECTION XV - AUDIT/AUDIT RESOLUTION

PURPOSE

To establish audit and audit resolution responsibilities.

GENERAL

It is the policy of CareerSource Citrus Levy Marion to conduct audits and audit resolution in accordance with applicable Federal/Florida Statutes and OMB Circulars.

PROCEDURE

1. An RFP will be released to secure sealed bid proposals from independent certified public accountants. The formal contract procedures outlined in CareerSource Citrus Levy Marion's purchasing policies shall be adhered to when requesting auditing services. In addition to these procedures the following are some of the criteria accessed:
 - a) Prior experience auditing and/or designing and installing accounting systems.
 - b) Organization size and structure (size will be considered in relation to audits to be performed).
 - c) Qualifications of staff to be assigned to the audits to be performed - Education, position in firm, years, and types of experience.
2. An independent audit will be conducted each fiscal year. Each audit will be conducted in accordance with 2 CFR 200, Generally Accepted Auditing Standards and Governmental Auditing Standards issued by the Comptroller General of the United States and other appropriate audit guides.
3. An exit conference will be held at the conclusion of the fieldwork to discuss the auditor's observations and recommendations.
4. Within 30 days after completion of the audit, CareerSource Citrus Levy Marion will transmit to the Department of Economic Opportunity, 3 copies of the audit report with any corrective action plans.
 - a) The CareerSource Citrus Levy Marion's audit resolution report detailing all corrective actions shall be prepared and submitted to the Department of Economic Opportunity, within 60 days from the receipt of the audit reports.
 - b) In accordance with 2 CFR 200, the State has six months from the issuance of the audit reports to resolve the audit findings. Within the 180 days, a final determination will be issued by the State.
 - c) If CareerSource Citrus Levy Marion disagrees with the final determination issued by the State, CareerSource Citrus Levy Marion will request an audit hearing. The hearing will be requested within 10 calendar days from the receipt of the final determination. The request for a hearing shall be forwarded to the Director of the Department of Economic Opportunity.

A request for a hearing contesting final determination will defer debt collection efforts pending the outcome of the hearing.

SUBRECIPIENT AUDITS

The limit of expenditures from federal funds is \$750,000 per fiscal year to require an audit. All subrecipients are obligated by the terms of the contract to secure an annual independent audit of its operations, which will identify the revenues and expenditures for the services provided pursuant to the contract. These audit reports are to be provided to CareerSource Citrus Levy Marion within one year after the completion of the contract. Subrecipient audits may be either organizational wide or program specific and must comply with 2 CFR 200.

The Director of Finance will:

1. Review the audit reports to determine if there are any audit findings.
2. Request a corrective action plan from the subrecipient if necessary.
3. Prepare a report for the Executive Committee detailing audit findings and the audit resolution/corrective action plan agreed to by the subrecipient.
4. Maintain a file of subrecipient audit reports and any other pertinent information.

DEBT COLLECTION

If a disallowed cost is established with a subrecipient of CareerSource Citrus Levy Marion, the following procedures will apply:

1. **CareerSource Citrus Levy Marion will** notify the subrecipient of the initial determination.
2. **The subrecipient will** have 60 days from receipt of initial determination to resolve any findings.
3. After 60 days **CareerSource Citrus Levy Marion will** issue a final determination and establish a debt if necessary.

If a repayment resolution is not met within 10 days of final determination, the matter will be turned over to the CareerSource Citrus Levy Marion's legal authorities for debt collection.

SECTION XVI – SUBRECIPIENT BACKUP DOCUMENTATION FOR FINANCIAL REPORTING

PURPOSE

To establish the concepts and procedures to be followed governing backup documentation for contract payments.

GENERAL

For costs to be allowable, sufficient documentation must be maintained to ensure that funds have not been spent unlawfully and also for reporting purposes. CareerSource Citrus Levy Marion is responsible for establishing procedures to ensure compliance with documentation requirements. The documentation for all invoices must be maintained on file. The location of the documentation will vary based on past relationships and risk levels with the subrecipient.

DEFINITIONS

Backup documentation - Items that support costs associated with the performance of a contract. Such items may include but are not limited to invoices, purchase orders, requisitions, check copies, payroll registers, time sheets, and subsidiary ledgers.

Primary service provider - Service provider/subrecipient that has contracted directly with the administrative entity.

Secondary service provider - Service provider/subrecipient that has contracted with a primary service provider.

PROCEDURE

LOCATION OF DOCUMENTATION

Documentation in support of invoices will be required to be submitted to the administrative entity in cases where the contract is with a new non-governmental subrecipient for a minimum probationary period of one year. The Chief Executive Officer in conjunction with the Director of Finance and the Director of Operations shall determine if the subrecipient has displayed the administrative capacity to maintain documentation at their location or the extent to which the provider shall continue to submit documentation until such time that another review of their administrative capacity is deemed appropriate.

Documentation in support of invoices will be maintained by the subrecipient in cases where the contract is with an agency with proven administrative capacity. Proven administrative capacity will be determined through a review of prior year audit reports, a risk review, and communication with other administrative entities when applicable.

Agencies considered possessing the capacity to maintain documentation internally will keep the documentation in an auditable manner to facilitate monitoring by CareerSource Citrus Levy Marion.

CareerSource Citrus Levy Marion will conduct annual monitoring of primary service providers who are independently audited. Service providers are contractually required to submit their independent audit reports to CareerSource Citrus Levy Marion. Therefore, CareerSource Citrus Levy Marion will be placing significant reliance on the independent auditors' reports. Agencies not required to have an independent audit will not be deemed to have the administrative capacity to maintain documentation internally and shall submit backup documentation with each reimbursement request.

Primary service providers will follow the same guidance as the administrative entity in determining the location of secondary service provider records.

MINIMUM REQUIRED DOCUMENTATION

Service providers are contractually required to submit periodic (at least quarterly) invoices. Service providers are also required to submit multi-project timesheets to facilitate the allocation of cost when applicable.

SECTION XVII – CREDIT CARD POLICY

Safe custody of cards: Each cardholder has personal possession of his/her credit card and is responsible for it. The CEO has the discretion as to which staff member will possess a Company credit card. These staff positions are CEO, EVP, Operations Director (OD), Director of Finance, Director of Information Technology, Mobile Career Development Representative (MCDR), and Facility Support Specialist (FSS).

- **Lost or damaged cards:** The Director of Finance will be notified. The issuing bank will be contacted immediately to cancel/replace the card.
- **Prohibited transactions:** All transactions are approved by the CEO or EVP prior to purchases being made.
- **Expenditure limits:** Each card will be limited to an established maximum as follows: CEO-\$15,000; Director of IT-\$3,500; EVP -\$5,000, Director of Finance - \$2,000, Director of Operation - \$2,000 and Mobile CDR and FSS-\$1,000.
- **Credit card usage:** Usage is subject to CareerSource Citrus Levy Marion's Procurement Policy and rules set forth in this policy.
- **Documentation supporting transactions:** Receipts with approved credit card authorization form signed by the appropriate parties need to go to the Finance Department as soon as a purchase is made to match with monthly statements.

PART 8: TRAVEL AND BUSINESS MEETING EXPENSES

PURPOSE

To describe the concepts and procedures to be followed in controlling expenses, processing travel, and business meeting expense items.

POLICY

It is the policy of the CareerSource Citrus Levy Marion that costs associated with attendance at meetings, workshops, and conferences (meals, transportation, and lodging) are allowable if such are determined necessary and reasonable and the meeting, workshop, or conference serves a purpose consistent with Workforce funding. It is CareerSource Citrus Levy Marion's responsibility to ensure that program expenditures meet this requirement and adequate documentation is maintained. The Bureau of Compliance Staff will review meeting workshop, and/or conference costs to ensure compliance with this policy. All expenses that fail to comply with this policy will be questioned and subject to disallowance and repayment with Non-Workforce funding. The following expenses are NOT allowed:

- a. Room meal service charges and restaurant charges in excess of approved CareerSource Citrus Levy Marion's meal rates.
- b. Alcoholic beverages.
- c. All other such entertainment costs. (All costs including restaurant/hotel meal or food service charges) for functions whose purpose is social rather than business (such as networking receptions, ancillary tours, outings, etc.) are considered entertainment costs.
- d. Travel, rooms, per diem, and any other costs for persons other than CareerSource Citrus Levy Marion members (or members of a subrecipient's advisory/governing board), CareerSource Citrus Levy Marion staff members, and other persons invited to speak or otherwise directly contribute to the purpose of the meeting.

In order for the CareerSource Citrus Levy Marion to pay per diem, restaurant/hotel meals or food service charges, mileage or other costs for CareerSource Citrus Levy Marion-sponsored conferences, the following conditions must be met:

- a. Advance approval of attending meetings, workshops or conferences must be obtained from the Chief Executive Officer or Executive Vice President.
- b. Any person entitled to reimbursement under CareerSource Citrus Levy Marion travel policies for a meal which has been paid for as part of a restaurant/hotel meal or food service charge must deduct reimbursement for that meal on their Travel Reconciliation Form.

LOCAL TRAVEL

For local travel not involving overnight stays, including business meetings attendance, departures will be logged on Auto Mileage Reports (**Attachment 7**) at the time each trip is taken. Each Auto Mileage Report covers a one-month period and must be turned in to Finance for reimbursement as soon as possible after the end of each month. The traveler must sign, date, and list their job title, and then give it to their Supervisor for review and certification of the report's accuracy **BEFORE** submitting to Finance for reimbursement.

NOTE: Mileage claimed must be from point of origin to destination based on the official DOT highway map and based on actual mileage for local vicinity mileage. If the actual mileage traveled is less than the DOT highway map, the lesser amount of mileage must be claimed.

Traveler may claim mileage from home to a work location outside their official headquarters provided that travel begins more than one hour before or after the traveler's regular work hours and provided the miles claimed do not exceed the miles actually driven.

- a. A Blanket Authorization to Incur Vicinity Mileage Form (**Attachment 8**) must be completed for staff on a yearly basis, approved and signed by the Chief Executive Officer or Executive Vice President. A copy should be maintained in the Finance Department and Staff Personnel File.
- b. A Blanket Authorization to Incur Travel Expenses Form (**Attachment 9**) must be completed for Contractor/Provider Staff on a yearly basis, approved and signed by the Chief Executive Officer or Executive Vice President. A copy should be maintained in the Finance Department and Contract File.

LODGING

Lodging expenses for an employee of the Board and board members, may not exceed the daily limit of \$175 for that of employees of the State of Florida, excluding taxes and fees. An employee of the Board or board member may expend his or her own funds for any lodging expenses over the limit for employees of the State of Florida.

Exceptions:

- a) The Board is participating in a negotiated group rate discount.
- b) The Board obtains and maintains documentation of at least three comparable alternatives demonstrating that such lodging at the required rate is not available.
- c) Other hotels whose rate meets the state requirement are not convenient to conduct business or have safety concerns.

OVERNIGHT TRAVEL

The procedures established by the CareerSource Citrus Levy Marion for overnight travel provide that requests for travel must be approved in advance by the Chief Executive Officer or Executive Vice President. An Authorization to Incur Travel Expenses form (**Attachment 10**) and Advance for Travel Expense Form (**Attachment 11**) must be completed and approved prior to the beginning date of travel. After the trip has been completed, the traveler submits a Travel Reconciliation Form (**Attachment 12**).

All travel advances are recorded as receivables of the CareerSource Citrus Levy Marion until the travel has been completed by the employee and a Travel Reconciliation Form is submitted. Upon submission of a Travel Reconciliation Form, the correct project is charged and any difference between an advance and the actual expense is settled by either the traveler or the CareerSource Citrus Levy Marion.

FORMS PROCEDURES/ROUTING

Authorization to Incur Travel Expense Form:

- a. Traveler completes/signs/dates form stating that the travel is to be incurred in connection with Board business and a description of how it benefits the Board. Attached to the form should be a copy of the program or agenda. Traveler should maintain a copy of the completed form as it must be included as support for the Travel Reconciliation Form.
- b. Supervisor reviews for accurateness, approves/signs form and submits to Workforce Board Administrative Assistant.
- c. Board, Research and Executive Assistant assures accurateness of form and submits to Chief Executive Officer or Executive Vice President for approval/signature.
- d. Approved form is returned to the Board, Research and Executive Assistant for processing of travel arrangements.
- e. Scanned or electronic signatures are acceptable.

Advance for Travel Expense Form:

- a. Board, Research and Executive Assistant completes form.
- b. Traveler signs form
- c. Supervisor approves/signs form.
- d. Form submitted to Finance Department for processing advance.
- e. Scanned or electronic signatures are acceptable.

Travel Reconciliation Form:

- a. Traveler or Board, Research and Executive Assistant completes form. All appropriate backup documentation, receipts and originally signed/approved Travel Authorization Form should be attached to the Travel Reconciliation Form. An electronic signature is also considered an original signature. Hotel receipt should include room charges. Meal receipts are not necessary.
- b. Traveler signs/dates form.
- c. Form submitted to Chief Executive Officer or Executive Vice President for approval/signature.
- d. Form submitted to Finance Department for final processing
- f. Original or electronic signature is needed on this form.

NOTE: For individuals covered under the Americans with Disabilities Act (ADA), there are special provisions for travel reimbursements that apply and may be authorized through the individual's Supervisor.

TRAVEL SPECIFICS

Mileage Reimbursement:

The mileage reimbursement rate will be \$.445 cents per mile.

Meal Reimbursement:

Only allowed where overnight travel is required. In that case the rate shall be as follows:

Breakfast	\$6	Lunch	\$11	Dinner	\$19
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Meal allowance is 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.)

No day travel meal reimbursements are allowed under current law.

On days where overnight travel has occurred, but the day is a travel day, not subject to overnight accommodations, a per diem rate of \$80 can be claimed. That rate is broken out as a reimbursement of \$20 per quarter of the day. If a meal is provided during the conference/event then the quarter reimbursement is reduced by the meal allowance of \$6 for breakfast, \$11 for lunch, or \$19 for dinner.

Quarters of a day are as follows:

Midnight- 6 am / 6am- noon / Noon- 6pm / 6pm- midnight

Reimbursable Incidental Expenses:

- a. Taxi fares in excess of \$25, on a per fare basis, require a receipt. Amounts less than \$25 do not.
- b. Parking fees or tolls in excess of \$25, on a per transaction basis, requires a receipt. Amounts less than \$25 do not.
- c. Tips paid to taxi drivers that do not exceed 15 percent of the taxi fare are reimbursable and do not require a receipt.
- d. Actual amount of tip paid for mandatory valet parking is not to exceed \$1 per occasion are reimbursable and do not require a receipt.

- e. Actual portage paid shall not exceed \$1 per bag not to exceed \$5 per incident are reimbursable and do not require a receipt.

PART 9: REIMBURSEMENT OF INTERVIEW TRAVEL EXPENSE

PURPOSE

To establish financial policy for reimbursement of travel expenses for people asked to travel to interview for top management positions at the CareerSource Citrus Levy Marion.

GENERAL

Candidates that are asked to travel to CareerSource Citrus Levy Marion from outside Marion County, Florida to attend interviews for sr. management positions within the organization may be reimbursed for travel expenses.

PROCEDURE

1. With advance approval of the CareerSource Citrus Levy Marion Executive Committee, candidates for sr. management positions may be reimbursed up to \$300.00 per person per interview.
2. Sr. management positions for the purpose of this policy include Chief Executive Officer and any other positions that may specifically be approved by the Executive Committee at the request of the Chief Executive Officer or the Board Chair.
3. Documentation must be submitted by the candidate for reimbursement.

PART 10: MEMBERSHIPS AND SPONSORSHIPS

PURPOSE

To establish procedures for incurring costs associated with organizational memberships and sponsorships.

PROCEDURES

Memberships

1. All memberships in organizations shall be in the name of CareerSource Citrus Levy Marion.
2. The Chief Executive Officer (CEO) shall be empowered to designate appropriate staff members to represent CareerSource Citrus Levy Marion at board meetings and other events however, policy decisions, legislative matters, and commitments for support and/or funding shall be the decision of the CEO or the Board, in accordance with policy.
3. There shall be only one membership per employee unless additional memberships are approved by the Board.
4. Organizational memberships shall be limited to those whose mission aligns with CareerSource Citrus Levy Marion. These include such organizations as economic development organizations, chambers of commerce, industry associations and associations related to human resources, personnel, or training.
5. Membership in state and national organizations that are supportive of workforce development are also authorized. In such cases, membership shall be organizational, unless approved by the Board.

Sponsorships

1. All sponsorships must support organizations or events that are aligned with the mission of CareerSource Citrus Levy Marion.
2. Event sponsorships of \$100 or under may be approved by the CEO.
3. Such sponsorships are to be documented and the reason that sponsoring an event is supportive of the CareerSource Citrus Levy Marion mission.
4. Sponsorships in excess of \$100 will be documented and presented to the Executive Committee for approval.

The Prior Approval of Membership/Sponsorship form (See **Attachment 13**) must be completed prior to staff participation on behalf of CareerSource Citrus Levy Marion.

PART 11: Discrimination Complaint Procedures and Grievance/Complaint Procedures

Discrimination Complaint Procedures (Also see OPS-58)

CareerSource Citrus Levy Marion does not hear formal discrimination complaints (written and signed) related to discrimination or alleged civil rights violations. If you believe that you have otherwise been discriminated against based on race, color, sex, national origin, religion, age, political affiliation or belief, citizenship or disability and/or your civil rights have been violated, you may choose to follow the steps for informal resolution described in the Grievance/Complaint Procedures set out below and if you are not satisfied with the outcome you may follow the instructions for filing a formal discrimination described below. For an informal resolution, you may directly contact CareerSource Citrus Levy Marion's Equal Opportunity Officer, Iris Pozo, 3003 SW College Road, Ocala, FL 34474, and Phone: 352-873-7939 extension 1286. If you do not wish to try and informally resolve the matter, you may simply follow the guidelines below, which tell you how to file your complaint.

If you have a formal discrimination complaint (must be filed within 180 days of the alleged discrimination), you may file by writing to the Department of Economic Opportunity, Office of Civil Rights, Caldwell Building, MSC 150, 107 East Madison Street, Tallahassee, Florida 32399-4129, (850) 921-3205, Florida Relay (TTY): 711, civil.rights@deo.myflorida.com or be filed directly with the appropriate federal agency listed below. CareerSource CLM's Equal Opportunity Officer (EOO) will assist you in identifying the correct federal agency to direct your discrimination complaint:

Employment Discrimination, WIOA, WP
U.S. Department of Labor
Civil Rights Center
200 Constitution Avenue, NW
Room N-4123
Washington, DC 20210
(202) 693-6500
TTY: (202) 693-6515 FAX: (202) 693-6505

SNAP
U.S. Department of Agriculture
Office of the Hearing Clerk
Room 112, Administration Building
Washington, DC 20250

TANF (WT)
U.S. Department of Health & Human Services
Office for Civil Rights
61 Forsyth Street, SW – Suite 3B70
Atlanta, Georgia 30323
(404) 562-7886
TTY: (404) 331-2867 FAX: (404) 562-7881

The following entities may be contacted regarding employment, health and safety or Florida Law violations/complaints:

Florida Commission on Human Relations

4075 Esplanade Way, Rm. 110
Tallahassee, Florida 32399
(850) 488-7082
1-800-342-8170 (voice and TTY)

Equal Employment Opportunity Commission (EEOC)

Tampa Area Office
501 East Polk Street, Suite 1000
Tampa, FL 33602
(813) 228-2310 or TTY (813) 228-2003

USDOL Occupational Safety and Health Administration (OSHA)

200 Constitution Avenue, NW
Washington, DC 20210

U.S. Equal Employment Opportunity Commission (EEOC)

Employment Complaints
Miami District Office
One Biscayne Tower
Two South Biscayne Blvd., Suite 2700
Miami, FL 33131
(305) 536-4491 or 1-800-669-4000
TTY (305) 536-5721 or 1-800-669-6820

USDOL Office of Inspector General Office of Investigations

200 Constitution, NW
Room S-5014
Washington, DC 200210

Grievance/Complaint Procedures

The Department of Economic Opportunity (DEO) regulations mandates that grievance/complaints and hearing procedures be in place for complaints under the Welfare Transition/Temporary Assistance for Needy Families (WT), Workforce Innovation and Opportunity Act (WIOA), Supplemental Nutrition Assistance Program (SNAP) and Trade Adjustment Assistance Program (TAA), which allege a violation of a participant's rights. As a customer/applicant/participant, you have the right to file a complaint/grievance if you feel you have been adversely affected by a decision or action with any workforce program overseen by the CareerSource Citrus Levy Marion.

Contact:

CareerSource Citrus Levy Marion

3003 SW College Road, Enterprise Center, Suite 205
Ocala, FL 34474

Phone: 352-873-7939 extension 1286

Iris Pozo, Equal Opportunity Officer

The following steps will be followed:

Step I – The opportunity to file a complaint:

The complainant will first meet with the service provider, supervisor, or designated CareerSource designee, explain the problem, and together they shall attempt to resolve the issue informally.

Step II – The opportunity for an informal conference:

If the complaint cannot be resolved at the above level, he/she must file a complaint with the EO Officer and request an informal conference. This request must be in writing. This conference must be held within ten (10) days from the date of receipt of this written request. The complainant and the EO Officer will discuss the allegation and attempt to resolve the issue informally. The findings from this conference will be submitted by the EO Officer to the complainant within ten (10) days following this conference. Included with these findings, will be notification of the claimants' right to request a hearing.

Step III – The opportunity for a hearing:

If the complainant is not satisfied with the results of the of the informal conference, he/she must inform the EO Officer within five (5) days and request a hearing to seek resolution of the issue.

In honor of this request, the CareerSource Citrus Levy Marion shall select an impartial body to hear the complaint. The CareerSource Citrus Levy Marion shall determine the option to be used for constituting an impartial body. Options include but are not limited to a) a hearing officer (to be provided by CareerSource Citrus Levy Marion); or b) a panel chosen by an independent third party satisfactory to all parties; or (c) a panel made up of one member selected by the complainant, one selected by the CareerSource Citrus Levy Marion and one chosen by the first two who would serve as panel chair.

The requested hearing will be held within thirty-five (35) days from the date on which the complaint was filed in writing with the EO Officer. Written notification will be sent out by the CareerSource Citrus Levy Marion, stating the date, time and place of the hearing, and the issue to be heard. The letter will also give the opportunity to resolve or amend the complaint prior to a hearing. All involved parties have the right to be accompanied by an attorney, at their own expense, or other duly authorized representative, the right to present testimony, to bring witnesses and records, and must attend the hearing.

If at any time following the appointment of the hearing officer, and prior to the hearing, the hearing officer is found to have a vested interest in the outcome of the proceedings, any individual involved in the complaint has the right to strike the name of the hearing officer.

The hearing proceedings shall be taped for later transcription purposes.

A written decision from the hearing officer to the complainant(s) and any other interested parties will be sent within sixty (60) days of the filing of the complaint with the EO Officer and will state the reason for the decision and remedies, if appropriate. (Continuances can be made for good cause, pending written approval from the hearing officer). This letter will also inform the complainant of his/her right to proceed to Step IV.

Step IV Appeal to DEO:

Should the complaint remain unresolved to the complainant's satisfaction through the decision in Step III or has not been notified of the resolution by the end of 60 days, the complainant has the right to request an appeal with the Department of Economic Opportunity (DEO). The appeal should be concise (if possible, not to exceed five pages which does not include exhibits and attachments), and shall be sent by certified mail, return receipt, to the Department of Economic Opportunity, Office of General Counsel, Caldwell Building, Suite 150, 107 East Madison Street, Tallahassee, FL 32399-4128.

The appeal request shall state the facts, laws, procedures, etc. that the grievant/complainant believes to be relevant for review. The appeal must be filed with DEO within 30 calendar days of receipt of the CareerSource Citrus Levy Marion's Hearing Officer's decision or within 30 calendar days after the required 60-calendar day timeframe for the CareerSource Citrus Levy Marion to act has elapsed. The request shall include the grievant/complainant's address where official notices will be mailed. DEO may remand the grievance/complaint back to the CareerSource Citrus Levy Marion to hold a hearing or impose other remedies to resolve the grievance/complaint.

DEO shall issue a decision within 60 calendar days of receipt of the appeal request. A grievant/complainant may file an appeal of DEO's decision/final order. The appeal must be filed within 30 calendar days of receipt of the DEO's decision/final order, or after the mandated 60 calendar days has elapsed for the DEO to have issued a decision.

Program Applicants/Participants/Beneficiaries of Services Notification

A notice to all applicants, participants, and beneficiaries of services has been placed in each of our One Stop CareerSource Centers in our region (Citrus, Levy and Marion Counties) in a conspicuous place which provides the name and contact information for the DEO Contact and Equal Opportunity Officer for CareerSource Citrus Levy Marion for a formal discrimination complaint and/or a grievance/complaint.

All program applicants/participants certify by signature that they have received a copy and understand their rights and responsibilities as attached in OPS-58.