

# **Monroe County/Rochester Workforce Development Board**

## **Comprehensive Gun Violence Prevention Program Policy**

**DATE:** August 13, 2021  
**REVISED:** November 7, 2023  
**SUBJECT:** Gun Violence Prevention Program

### **I. Purpose**

In July 2021, the Governor announced the availability of state funds to establish workforce development programming for youth in various cities impacted by gun violence. This document contains a comprehensive local policy governing the use of that funding in Rochester, Monroe County.

### **II. Service Providers**

There will be two types of eligible service providers for this program.

- A. **Currently Selected Navigator Agencies.** Organizations currently selected to provide Workforce Innovation and Opportunity Act (WIOA) Youth navigator services (including RochesterWorks, Inc.) will be invited to submit proposals to fund additional navigators to serve program participants. Proposals will be evaluated based on 1) past performance achieving enrollment goals, 2) past performance on the WIOA primary indicators of performance, 3) past performance on programmatic monitoring reviews, 4) past performance achieving spending goals, 5) past performance on fiscal monitoring reviews, and 6) a sufficient level of detail in the proposal to recruit and serve eligible Gun Violence Prevention (GVP) program participants, including numbers, outreach plan, service locations, and description of services provided. A committee of RochesterWorks, Inc. staff will evaluate proposals.
- B. **Qualified Community Service Providers.** RochesterWorks Inc. (RWI) will issue a Request for Qualifications to compile a list of Qualified Community Service Providers (QCSPs). QCSPs must
- Be a non-profit with 501(c)(3) status *or a unit of local government*
  - Pass a pre-award responsibility review *(not required for a unit of local government)*
  - Agree to RochesterWorks' programmatic and fiscal monitoring requirements

Community Service Providers may apply to provide outreach & recruitment services, workforce preparation services, or both. Community Service Providers who apply to provide outreach & recruitment services must

- Submit an outreach and assessment plan detailing outreach and assessment strategies, proposed numbers served by targeted ZIP code, and staffing
- Preference will be given to outreach plans submitted by or that describe partnerships with gun violence interveners and other anti-gun violence advocacy organizations

- We will be looking for innovative, community-based strategies to engage a hard-to-reach population

Community Service Providers who apply to provide workforce preparation services must

- Identify one or more confirmed employment and training partners, which may include an Institute of Higher Education; a local school district; a proprietary training provider certified or licensed by NYSED's Bureau of Proprietary School Supervision; a unit of local government; a labor organization; an association representing private businesses, including a local chamber of commerce; a sponsor of registered apprenticeships; and/or an individual employer.
- Submit a service plan detailing proposed workforce preparation services, training services, a detailed list of supportive services, a list of partners to which referrals will be made for supportive and wraparound services, and stipends to be offered, as well as proposed numbers served by targeted ZIP code, physical locations where services will be provided (which may be secured through partnerships with libraries, recreation centers, or other community spaces), and staffing.
- We will be looking for innovative, community-based strategies that lead to successful outcomes for a population with multiple barriers to obtaining and retaining employment.

A committee of RWI staff will evaluate the qualifications submitted by community service providers for eligibility, maximum number of participants served, proposed employment, training, and supportive services, including any stipends or incentives, and timeframe of services. Once approved, a Qualified Community Service Provider (QCSP) will be placed on the Qualified Community Service Provider list. They will be reimbursed with milestone payments based on documentation of services and costs.

### **III. Eligible Participants.**

- The Program will serve unemployed, under-employed and out-of-school youth between age 18 and 24 in areas of cities impacted by gun violence.
- The Program will not serve youth enrolled in college; and
- At least 75% of program participants must reside within the following priority zip codes provided by New York State Department of Labor (NYSDOL): 14605, 14606, 14608, 14609, 14611, 14613, 14615, 14619, 14621.

**IV. Paid Work Experience.** Also known as transitional jobs under WIOA. Paid work experience placements of up to five (5) weeks in duration may be provided by *QCSPs* to eligible participants enrolled in the GVP program at private non-profit, for-profit, or public employer worksites, subject to the following guidelines.

- A. Placements may not be made at any employer worksite with known violations of federal, state, or local laws or regulations implemented to protect the safety or rights of workers.
- B. Placements may not be made with staffing agencies. This program has its own contracted work experience payrolling agency(ies).

- C. A worksite agreement must be approved by RWI prior to the start of any paid work experience.
- D. Service providers must use RochesterWorks' contracted work experience payrolling provider(s) as the employer of record.
- E. The intent of the paid work experience is to 1) allow the participant time to develop and demonstrate the skills needed to qualify for unsubsidized employment at the employer worksite and 2) give the employer time to evaluate the development and suitability of the participant. Therefore, work experience placements should be in jobs for which the employer intends to hire a qualified applicant. If the worksite employer is willing to consider the participant for unsubsidized employment without a work experience tryout period, then a paid work experience would not be appropriate. Paid work experiences may end in either an on-the-job training placement or an unsubsidized employment placement.
- F. If a Qualified Community Service Provider (QCSP) employs a youth participant as an outreach worker in the GVP program, the worker may be paid with work experience funds for up to five (5) weeks.
- G. Paid work experiences must be included on a participant's Individual Service Strategy (ISS) document.
- H. Participants engaging in paid work experience must be paid at the same rate as other employees hired to perform similar tasks at the same worksite. It is preferred that participants be placed in paid work experiences that pay at least \$15 per hour. Participants must be paid at least the minimum wage and must not work more than 40 hours in any week. Due to a limited budget, RWI may not be able to approve worksite agreements with a wage higher than \$18 per hour, or if such agreements are approved, they may need to be approved for less than the five-week maximum duration.
- I. RWI will reimburse paid work experience wages plus the agreed upon markup to the contracted work experience payrolling agency(ies).
- J. *Navigator Agencies may leverage WIOA funds for paid work experiences for participants that they co-enroll in the WIOA Youth program, according to local WIOA Youth policies.* RWI may, at its discretion, use GVP funds for Navigator Agency participants, depending on the availability of funds.

**V. Stipends.** Eligible Service Providers may pay stipends to eligible participants enrolled in the GVP program while participating in program services, subject to the following guidelines.

- A. A Service Provider's stipend plan must be approved by RWI before any stipends will be paid.
- B. Stipends are time-based payments, paid upon the completion of specific program activities. Stipends may not be paid for employment activities. The activities and associated stipends must be included on the participant's ISS document.
- C. Upon completion of an activity, a QCSP may invoice RWI for either a direct payment to the participant or a reimbursement to the service provider. All payments made by RWI will be in the form of a check.
- D. Upon completion of an activity, a Navigator Agency may include the cost of any stipends paid in its monthly invoice to RWI. *The cost of stipends will be part of the Navigator Agency's contracted program budget.*

- E. GVP participants co-enrolled in the Empire State Development-funded ROC SEEDS program may be paid a stipend of \$54 for each day in attendance in classroom training for up to 15 days of classroom training. A day of attendance is defined as a minimum of two hours of participation in classroom training. Stipends will be paid directly to participants by RWI.

**VI. Incentives.** Eligible Service Providers may pay incentives to eligible participants enrolled in the GVP program, upon achieving specific goals, subject to the following guidelines.

- A. A Service Provider's incentive plan must be approved by RWI before any incentives will be paid.
- B. Incentives are milestone-based payments, paid upon the achievement of specific program goals. The milestones and associated incentives must be included on the participant's ISS document.
- C. Upon achievement of a milestone, a QCSP may invoice RWI for either a direct payment to the participant or a reimbursement to the service provider. All payments made by RWI will be in the form of a check.
- D. Upon achievement of a milestone, a Navigator Agency may include the cost of any incentives paid in its monthly invoice to RWI, *as part of its contracted program budget. Alternatively, a Navigator Agency may leverage WIOA funds for incentives for participants that they co-enroll in the WIOA Youth program, according to local WIOA Youth policies.* RWI may, at its discretion, use GVP funds for Navigator Agency participants, depending on the availability of funds.

**VII. On-the Job Training (OJT).** On-the-Job Training (OJT) is training by an employer that is provided to a paid participant while engaged in productive work in a job that—(A) provides knowledge or skills essential to the full and adequate performance of the job; (B) is made available through a program that provides reimbursement to the employer of a percentage of the wage rate of the participant for the extraordinary costs of providing the training and additional supervision related to the training; and (C) is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate. The GVP OJT policy conforms to our local WIOA OJT policy, with the following exceptions.

- A. Provided that transportation is available to the participant, worksites are not limited to Monroe County.
- B. Employers who have relocated to Monroe County, and whose relocation has resulted in a loss of employment at the original location in the last 120 days may be eligible.
- C. Participants do not need to be assessed for eligibility by a RWI staff. Assessment may be conducted by GVP service provider staff. The OJT must be included on the participant's ISS document.
- D. For participants without significant prior work experience, it is not necessary to administer the JobZone Skills Survey. The skill gap may be determined by an informal assessment.
- E. OJTs may be approved for training leading to part-time employment.
- F. The base reimbursement rate for a GVP OJT is 75%.
- G. OJTs will be reimbursed by RWI using GVP funds.

**VIII. Classroom and Customized Training.** There are three types of classroom training that may be funded: standalone occupational skills training, customized training, and skills training integrated with education and/or career services. The training service must be included on the participant's ISS.

**A. Standalone Occupational Skills Training.** *For Navigator Agencies, the cost of standalone occupational skills training may be included in its monthly invoice to RWI, as part of its contracted program budget. Alternatively, a Navigator Agency may leverage WIOA funds for Youth ITAs for participants that they co-enroll in the WIOA Youth program, according to local WIOA Youth policies. RWI may, at its discretion, use GVP funds for Navigator Agency participants, depending on the availability of funds. For Qualified Community Service Providers (QCSPs), the policy for standalone occupational skills training conforms to WIOA Policy 104, with the following exceptions.*

1. Rather than priority for demand occupations, priority consideration for training programs will be given to programs that are aligned with jobs with current openings in the commuting area. Training not leading to a recognized post-secondary credential is approvable.
2. The maximum funding amount is \$9,000 for any occupation. For participants who are co-enrolled in the WIOA Youth program, a combination of GVP and WIOA funding may be used, depending on the availability of funds.
3. Training that leads primarily to commission-based jobs and/or self-employment, prerequisite courses, parking fees, and physical exams may be funded.
4. Application fees and registration fees may be paid as a supportive service.
5. Training programs may be paid retroactive to a request for training funds but may not be paid retroactive to a participant's GVP enrollment date. No training will be paid with a start date prior to the participant's GVP enrollment date.
6. The need for training is assumed for all eligible, enrolled GVP participants. It is not necessary to document a need for training.
7. The one-time grant rule does not apply to GVP participants.
8. GVP training is not subject to WIOA Policy 101, Priority of Service.
9. Traditional college students may be funded.
10. All training costs must be accrued by the program end date, currently 7/31/2022. GVP funds may cover the first part of a training program (including a bachelor's degree program) if the participant will have other resources to complete the program.
11. High school equivalency classes are encouraged but not required for participants without a high school diploma or equivalent.
12. Required textbooks, materials (or supplies), and uniforms may be covered regardless of household income level.
13. Service Providers will submit to RWI the participant's ISS, along with a completed request for funds document, to be provided by RWI. Once approved, RWI will send a training voucher to the training provider.

**B. Customized Training.** Customized training is training—(A) that is designed to meet the specific requirements of an employer (including a group of employers); (B) that is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and for which the employer pays an agreed-upon portion of the cost of training. Customized training may include some elements of occupational skills training integrated with education and/or career services. Customized training costs will be paid by RWI when part of an approved training plan submitted by a Qualified Community Service Provider (QCSP). Navigator agencies will not be eligible to provide customized training paid by the GVP program.

1. Any staff costs, supplies, or operational costs incurred by a QCSP for provision of education or career services will be paid from their milestone payments, provided that such costs are reasonable and necessary to enable the participant to participate in program services and/or to achieve program outcomes.
2. If a QCSP pays tuition or fees to a training partner, the service provider may invoice RWI for reimbursement of the training costs.
3. If a partner employer pays tuition or fees to a training partner, the employer may invoice RWI for reimbursement of the training costs, less the agreed-upon employer match.
4. A partner training provider may invoice RWI for payment of tuition or fees at the end of the training provider's refund period.
5. All requests for payment or reimbursement must be accompanied by documentation of services provided and employer match.

**C. Occupational Skills Training Integrated With Education and/or Career Services.**

Qualified Community Service Providers (QCSPs) may propose a program of services including training in a specific occupation(s) integrated with basic skills education, job readiness training, soft skills training, digital literacy training, and/or other types of employment preparation education. Costs for occupational skills training integrated with education and/or career services will be paid by RWI when part of an approved training plan submitted by a QCSP. Navigator agencies will not be eligible to provide integrated training and education/career services paid by the GVP program.

1. Any staff costs, supplies, or operational costs incurred by a QCSP for provision of education or career services will be paid from their milestone payments, provided that such costs are reasonable and necessary to enable the participant to participate in program services and/or to achieve program outcomes.
2. If a QCSP pays tuition or fees to a training partner, the service provider may invoice RWI for reimbursement of the training costs.
3. A partner training provider may invoice RWI for payment of tuition or fees at the end of the training provider's refund period.
4. All requests for payment or reimbursement must be accompanied by documentation of services provided.

- D. On a case-by-case basis, RWI may be able to reimburse a participant directly for a training cost that they have already paid with their own funds. We would need documentation of the payment. All payments made by RWI will be in the form of a check.

**IX. Supportive Services and Other Participant Needs.** *For Navigator Agencies, the cost of supportive services may be included in its monthly invoice to RWI, as part of its contracted program budget. Alternatively, a Navigator Agency may leverage WIOA funds for supportive services for participants that they co-enroll in the WIOA Youth program, according to local WIOA Youth policies. RWI may, at its discretion, use GVP funds for Navigator Agency participants, depending on the availability of funds. Participants served by a Qualified Community Service Provider (QCSP), or Navigator Agency at the discretion of RWI, may receive supportive services and other participant needs, subject to the following guidelines.*

- A. A QCSP's supportive services plan must be approved by RWI before any supportive services or other participant needs costs will be paid.
- B. All supportive services must be included on the participant's ISS document. Costs must be reasonable and necessary to enable the participant to participate in program services and/or to achieve program outcomes. Any supportive services that can be paid with another funding source will not be allowed.
- C. Many needs that can be covered by GVP supportive services will continue to exist beyond the program service period. Supportive services should be accompanied by case management and financial counseling to help participants address needs and barriers on a long-term basis.
- D. On a case-by-case basis, RWI may be able to reimburse a participant directly for a supportive service need that they have already paid with their own funds. We would need documentation of both the need and the payment. All payments made by RWI will be in the form of a check.
- E. **Transportation Supportive Services.** Qualified Community Service Providers (QCSPs) may issue transportation supportive services, including but not limited to bus passes, gas cards, and fares for ridesharing services when needed to participate in program services. Service providers may invoice RWI for reimbursement of transportation services paid on behalf of an eligible, enrolled participant. Alternatively, RWI may purchase a supply of 31-day unlimited bus passes and \$25 gas cards to issue to QCSPs as needed.

**F. Child and Dependent Care.** QCSPs may pay child and dependent care expenses, including the cost of transportation to and from a child or dependent care facility, for a participant or the participant's household, if not covered by another funding source and if needed to participate in program services. Service providers may invoice RWI for reimbursement of child and dependent care services paid out on behalf of an eligible, enrolled participant. Alternatively, RWI may pay a licensed child care facility directly, when invoiced. Child and dependent care expenses can quickly become very expensive. Service providers should make every effort to coordinate with other programs or funding sources to cover these costs. Costs above \$2,000 for any individual participant must be approved by RWI as an exception.

**G. Mobile Phones and Computing Devices.** Qualified Community Service Providers (QCSPs) may purchase mobile phones or computing devices and issue them to participants as a supportive service, subject to the following terms.

1. In each case, the ISS must include a clear connection between the device being issued and why the participant needs it for training services and/or to secure and retain employment. The ISS must document the long-term need for the item, which may include, but is not limited to, 1) training longer than six (6) months, 2) participation in On-the-Job Training (OJT), 3) participation in paid work experience, and/or 4) activities leading to securing and/or retaining unsubsidized employment that are anticipated to last longer than six (6) months.
2. The cost of mobile phones or computing devices must be reasonable and at the lowest cost necessary to achieve their purpose. Mobile phones or computing devices with a cost of \$1,000 or more (including any shipping, taxes, fees, or extras) will not be allowed. Service Providers may invoice RWI for reimbursement of mobile phones or computing devices purchased. Alternatively, if it would pose a financial hardship for the Service Provider to pay this cost and wait for reimbursement, then RWI can pay a vendor directly. Complete documentation of costs, along with a copy of the participant's ISS, and a signed participant attestation affirming that they do not already own the requested electronic devices, or that they only possess old inadequate electronic devices and do not have sufficient personal funds to purchase these items, will be required for any payment.
3. Electronic devices must be provided to participants at the start of training and services for the purpose of providing the participant with access or additional assistance during the training or related to the services, and not at the end of the training or services as a completion award or a way to boost spending.



4. The QCSP must assign an inventory control number to the device and store it in a safe place until it is issued to the participant. The QCSP must retain a signed receipt/agreement from the participant acknowledging the participant's responsibility to properly safeguard the device and return it to the QCSP and/or RWI in the event that the participant drops out of the program. If the participant drops out of the program before either completing all scheduled program services or retaining unsubsidized employment for one month, the QCSP must make and document three attempts to recover the device from the participant. If returned, the QCSP may issue the device to another participant. Once a participant has completed all scheduled program services and/or retained unsubsidized employment for one month, neither RWI nor the service provider will be required to maintain any record or control over the mobile phone and/or computing device issued to them. At the end of the program period, any mobile phones or computing devices purchased with program funds and not yet issued to participants will become the property of RWI.

**H. Other Supportive Services Costs.** Other supportive services costs may be paid by a Qualified Community Service Provider (QCSP) and reimbursed by RWI upon submission of an invoice with adequate documentation of need and cost. Alternatively, if it would pose a financial hardship for the Service Provider to pay this cost and wait for reimbursement, then RWI can pay a vendor directly. Other supportive services may include, but are not limited to, the costs on the following list.

1. Interview/Work Clothing, Uniforms, and Required Safety Equipment
2. Hygiene Kits
3. Exam and Licensing Fees
4. Fees to obtain or restore a driver's license or other identification documents
5. Assistance With Housing, which may include, but is not limited to, mortgage payments, rent, security deposits, furniture, and/or appliances, subject to maximum amounts approved in the QCSP's supportive services plan
6. Reasonable Accommodations for Individuals With Disabilities
7. Health Care (including substance abuse treatment and recovery) Costs for services provided by a licensed or certified health care professional
8. Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes
9. Legal Aid Services
10. Food while participating in program services (alcoholic beverages are not an allowable cost)
11. Internet, mobile phone, or data access
12. Family stabilization costs
13. Emergency Needs

**I. Other Needs.** Other needs may be paid by Qualified Community Service Providers (QCSPs) from their milestone payments, provided that such costs are reasonable and necessary to enable the participant to participate in program services and/or to achieve program outcomes.

## **X. Documentation of Program Services and Costs.**

- A. **Participant Records.** Service providers are required to maintain individual participant records documenting 1) participant eligibility, 2) results of any assessments, 3) the ISS, 4) any services provided, and 5) any costs associated with those services.
- B. **Protection of Participant Data.** All service providers must comply with New York State Workforce Development System Technical Advisory #18-5 (July 6, 2018). Service providers are responsible for ensuring that all participant data are securely stored and transmitted. RWI will provide technical assistance to ensure that service providers have both the knowledge and the resources to comply with this requirement.
- C. **Data Entry.** NYSDOL requires that services provided to program participants be recorded and tracked in OSOS. QCSPs will be required to provide sufficient data on program participants and the services they need to either NYSDOL or RWI within 5 business days of the date of enrollment and/or service provision. Navigator agencies will enter these data directly into OSOS following the instructions in the Gun Violence Prevention (GVP) Local Initiative OSOS Guide. *For participants co-enrolled in the WIOA Youth Program, the Navigator Agency will also follow all NYSDOL advisories and guidance that apply to WIOA Youth program participants.*
- D. **Weekly Updates.** Service providers are required to provide to RWI weekly summary reports of the number of participants receiving outreach and/or program services; number and names of participants scheduled to start customized training, along with start and end dates, partner training provider name, and costs; number and names of participants who have started customized training, along with start dates; number and names of participants scheduled to start occupational skills training integrated with education and/or career services, along with start and end dates, partner training provider name, and costs; and number and names of participants who have started occupational skills training integrated with education and/or career services, along with start dates.
- E. **Documentation Needed for Payments to Navigator Agencies.** Navigator agencies will submit monthly invoices following the same policies and procedures under which WIOA Youth Navigator invoices are paid.

**F. Documentation Needed for Milestone Payments to Qualified Community Service Providers.** Qualified Community Service Providers (QCSPs) will receive milestone payments of \$500 for each participant referred to and completing a full week (5 days) of workforce preparation services (including training services); \$1,000 for each participant completing four full weeks (20 days, excluding holidays) of workforce preparation services; and \$2,000 for each participant placed and retained for one month in unsubsidized employment, *an OJT, and/or a paid work experience*. Total milestone payments may not exceed the maximum amount approved in the QCSP's service plan. If multiple service providers claim the same participant for an outreach milestone, RWI will make the final determination on how the milestone is paid. Other milestones may only be paid to the service provider who has enrolled the participant. Only one service provider may enroll a participant. When multiple service providers recruit a participant, the participant may make the choice of service provider. When submitting an invoice for a milestone payment, community service providers must include the following documentation.

1. Participant Name
2. OSOS ID
3. Description of milestone achieved
4. Date milestone achieved
5. Documentation of attendance in workforce preparation or training services (if applicable)
6. Name of employer (if applicable)
7. Job title (if applicable)
8. Hourly wage and hours per week (if applicable)
9. Documentation of all staff, supplies, or other operational costs covered by the milestone payment, accompanied by an attestation that these costs are not being paid by any other funding source

**G. Documentation Needed for Other Payments.** All other payments should include the following documentation, in addition to specific documentation listed in the other sections of this policy document.

1. Participant Name
2. OSOS ID
3. Description of the cost.
4. Documentation of prior participation or attendance
5. Justification of the need and reasonableness of the cost
6. Documentation of the cost and/or payment, accompanied by an attestation that these costs are not being paid by any other funding source

**H. Approval of Payments.** All invoices or reimbursements must be approved, after a review of back-up documentation, by a RWI manager or director. The signature indicates the manager or director is aware of the purchase and is approving it for payment. The manager or director is responsible for ensuring that goods and/or services are received at the location associated with the cost and determining whether the cost is reasonable.

## **I. Tracking Training Obligations and Accruals (Including Paid Work Experience).**

1. **Paid Work Experience.** A designated RWI staff member will track obligations and accruals. Costs for a paid work experience will be obligated at the time the worksite agreement is approved. They will be accrued at the end of each scheduled week of paid work experience. Unpaid obligations will be deobligated after the last day of participation in the paid work experience.
2. **On-the-Job Training (OJT).** A designated RWI staff member will track obligations and accruals. Costs for an OJT will be obligated at the time the OJT contract is executed. They will be accrued at the end of each scheduled week of work. Unpaid obligations will be deobligated after the last day of participation in the OJT.
3. **Standalone Occupational Skills Training.** A designated RWI staff member will track obligations and accruals. Costs for a standalone occupational skills course will be obligated at the time the training voucher is sent to the training provider. They will be accrued at the end of the training provider's refund period, or incrementally, as they become due under a graduated refund policy. Unpaid obligations will be deobligated after the last day of participation in an occupational skills course.
4. **Customized Training.** A designated RWI staff member will track obligations and accruals. Costs paid to a partner training provider, whether directly or by reimbursement to the Qualified Community Service Provider (QCSP) or partner employer, will be obligated as soon as included in the future training starts section of the weekly update report submitted by the QCSP to RWI. They will be accrued at the end of the training provider's refund period, or incrementally, as they become due under a graduated refund policy. Unpaid obligations will be deobligated after the last day of participation in the training provider portion of the customized training.
5. **Occupational Skills Training Integrated With Education and/or Career Services.** A designated RWI staff member will track obligations and accruals. Costs paid to a partner training provider, whether directly or by reimbursement to the Qualified Community Service Provider (QCSP), will be obligated as soon as included in the future training starts section of the weekly update report submitted by the QCSP to RWI. They will be accrued at the end of the training provider's refund period, or incrementally, as they become due under a graduated refund policy. Unpaid obligations will be deobligated after the last day of participation in the training provider portion of the integrated training.

**XI. Monitoring of Service Provider and Participant Records.** Navigator agencies will be monitored according to the regular schedule of WIOA Youth program and fiscal monitoring. Qualified Community Service Providers (QCSPs) will be required to retain fiscal (including procurement) and participant records for three years following the closeout of the GVP program. Between the start of the program and the end of the document retention period, they must make records available to RWI and/or NYSDOL staff upon request, either in person, or electronically, using secure encryption and file transmission technology. RWI will monitor QCSPs according to the following schedule.

**A. Programmatic Monitoring.**

1. Monthly desk reviews of program participant data, eligibility, and services provided
2. Quarterly review of a sample of participant files
3. Semi-annual site visits at a time that program services are being provided
4. Ad-hoc monitoring as needed if a potential risk or compliance issue is identified

**B. Fiscal Monitoring**

1. QCSPs must submit a copy of their procurement policy and procedures to RWI at the time that their service plan is approved. Service Providers that do not have a procurement policy and procedures must adhere to the RWI procurement policy and procedures.
2. Desk review of all invoices submitted for payment to monitor for need, reasonableness, and allowability of costs, as well as to ensure that costs are not being paid by another funding source. If there is any question on the reasonableness of a cost, RWI staff will request a copy of the procurement file. If a cost is disallowed, RWI will provide technical assistance to the Service Provider.
3. Quarterly monitoring of inventory and control records of any mobile phones or computing devices purchased by the QCSP.
4. Ad-hoc monitoring as needed if a potential risk or compliance issue is identified.

**XII. Waivers and Exceptions.** This program has been designed to allow maximum flexibility to try new approaches to serving a population that has been underserved by previous workforce development efforts. RWI has the authority to make exceptions to this policy in cases where a documented need is justified. Such exceptions will be applied evenly among service providers and participants.

**XIII. Effective Date.** This policy is effective immediately upon approval by the Executive Committee of the Workforce Development Board.

**XIV. Revision.** RWI has the authority to make technical revisions to this policy. Technical revisions may be made to better align this policy with federal or state laws, statutes, regulations, or policy guidance; to better align this policy with other local policies; to respond to changes in the program budget that impact this policy; or to revise references to source documents cited in this policy. Any revision to this policy that could have a substantial impact on participants must be approved by the Workforce Development Board. The Executive Director has the authority to temporarily approve policy changes until the next Workforce Development Board meeting.

**XV. Questions.** Questions on this policy may be directed to Lee Koslow, Technical Assistance and Training Manager, RochesterWorks Inc., (585) 258-3500, x-3516 or [Lkoslow@rochesterworks.org](mailto:Lkoslow@rochesterworks.org).

**Date Revisions Temporarily Approved by Executive Director:** November 7, 2023

**Date Approved by the Executive Committee:** November 21, 2023

**Date Approved by Workforce Development Board:** December 19, 2023