



WORKFORCE DEVELOPMENT BOARD

Supporting the Development and Retention of a World Class Workforce

Jeffrey S. Swartz, Executive Director

Carl A. Donato Jr., Chair

**Camden County Workforce Development Board,
One-Stop Operator, and Fiscal Agent Firewall Policy**

Purpose

This Firewall Policy establishes clear lines of authority, accountability, and operational independence among the Camden County One-Stop Career Center (“One-Stop”), Camden County as the Fiscal Agent and One-Stop Operator, and the Camden County Workforce Development Board (“WDB”), a 501(c)(3) organization.

The purpose of this policy is to ensure compliance with the Workforce Innovation and Opportunity Act (WIOA) and related regulations by maintaining **adequate separation of duties** between oversight, operations, and fiscal responsibilities pertaining to management of cash receipts and financial reporting.

The provisions of this policy reflect the structure of the existing One-Stop Operator arrangement. Should a new entity be awarded the One-Stop Operator role in the future, the Workforce Development Board will review and amend this policy accordingly.

Background

Under WIOA:

- The **WDB** provides strategic direction, policy guidance, and oversight for workforce development activities.
- The **One-Stop Operator**, Camden County, who is awarded a contract through an RFP process, by the WDB, manages the daily operations of the One-Stop Career Center system.
- The **Fiscal Agent**, Camden County, provides fiscal management of WIOA funds on behalf of the WDB.

Because Camden County serves as both **Fiscal Agent** and **One-Stop Operator**, and the WDB is a separate 501(c)(3) entity, strict internal controls and documentation procedures are required to avoid conflicts of interest and ensure accountability.



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Policy Statement

Camden County and the Camden County Workforce Development Board shall maintain a **firewall** ensuring that:

1. **The WDB performs independent oversight** and policy functions separate from the County's operational and fiscal management. The WDB is responsible for the local workforce area funding budget and allocation of funds.
2. **The County (as Fiscal Agent and Operator)** will not influence, control, or interfere with the WDB's strategic or oversight decisions.
3. **All fiscal transactions** between the WDB and the County are transparent, documented, and subject to audit.

Roles and Responsibilities

1. Workforce Development Board (WDB)

- Provides strategic planning, policy direction, and performance oversight for workforce programs in Camden County.
- Reviews and approves workforce plans, performance reports, and budget allocations.
- Evaluates the effectiveness of the One-Stop delivery system.
- Refrains from direct management or operational control of daily One-Stop activities.
- Submits fiscal reimbursement requests to the County through the fiscal agent.
- Maintains documentation of expenditures and justifications for review by the Fiscal Agent.
- Performs an annual fiscal audit of the One-Stop to ensure compliance with WIOA regulations regarding subrecipients.
- The Executive Director and/or the Chief Financial Officer of the WDB shall review and document the review and approval of monthly IGX/SAGE reporting prior to State submission.



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2. Camden County (Fiscal Agent)

- Manages and disburses WIOA and related funds in accordance with federal and state regulations.
- Maintains accounting records, audit trails, and financial reports for all WIOA funding streams.
- Designates staff from the County Fiscal department to receive and initiate the process for the review of the WDB request for reimbursement voucher package.
- Ensures that fiscal review functions are conducted by staff who do not have programmatic or oversight roles within the WDB.
- Shall designate a representative who does not report to the One-Stop Local Area Operations Director to input monthly expenditure information into IGX/SAGE.
- Provides the WDB with quarterly fiscal reports providing data similar to budget to actual information for transparency regarding emerging imbalances or funding shortages prior to year end.

3. Camden County One-Stop Operator

- Coordinates day-to-day operations and service delivery across One-Stop partner programs.
- Ensures compliance with service standards and performance metrics set by the WDB.
- Reports operational data and outcomes to the WDB but does not participate in oversight or fiscal decision-making related to WDB reimbursements or budget approvals.

Conflict of Interest and Separation Controls

To maintain the integrity of oversight and fiscal operations:

1. **No individual** shall perform both fiscal agent duties and WDB oversight functions.
2. **Individuals employed by Camden County** in either the Fiscal Agent or One-Stop Operator capacity must not engage in WDB oversight functions, such as governance decisions, monitoring efforts, or evaluation procedures.



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3. **WDB staff and Board members** shall approve and authorize fiscal disbursements in relation to their authority being limited to policy and performance oversight.
4. **All reimbursements** requested by the WDB must be:
 - Supported by approved budgets.
 - Reviewed by the County Fiscal Office for compliance.
 - Processed and paid through the County's established financial system.
5. **Annual reviews** of this firewall structure will be submitted to the Office of Internal Audit to ensure compliance and adequacy of separation.

Documentation and Transparency

- Written documentation of all transactions, communications, and decisions involving the WDB and Camden County will be maintained for audit purposes.
- Meeting minutes, fiscal reports, and monitoring results shall be publicly available in accordance with the Open Public Meetings Act and WIOA transparency requirements.

Policy Review and Updates

This Firewall Policy shall be reviewed annually by the WDB Executive Committee with a copy sent to the Fiscal Agent to ensure continued compliance with WIOA and USDOL regulations.

Effective Date

This policy is effective as of **December 17, 2025** and remains in effect until amended by the Camden County Workforce Development Board.