



**Request for Approval**

**America's Job Center of California<sup>SM</sup>**

**Operator**

**Local Workforce Development Board**  
**Golden Sierra Workforce Development Board**

**Local Workforce Development Area**  
**Golden Sierra Job Training Agency**

*The EDD is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.*



## Request for Approval

### America's Job Center of California Operator

#### Type of Procurement

1. What type of procurement was used by the Local Board or administrative entity?  
 Competitive                       Noncompetitive
2. If Noncompetitive, did the Local Board or administrative entity offer an open, competitive procurement prior to Noncompetitive?  
 Yes                       No
3. If Noncompetitive, identify the reason(s) for using this procurement method:  
 The AJCC Operator services are only available from a single source.  
 A public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.  
 After solicitation of a number of sources, competition was determined inadequate.

#### Documentation Requirements for Competitive Procurement

Please provide responses to the following items on a separate document.

1. A description of the AJCC Operator. **N/A**
  - a. Will the Local Board or administrative entity be the only AJCC Operator or act as a member of a consortium? If part of a consortium, include a list of the other consortium members.
  - b. Is there more than one comprehensive AJCC in the Local Area? If so, will the Local Board or administrative entity act as the operator for all of them? If not, list which ones the Local Board will act as operator for and who will be the operator for the others.
2. Documentation of local internal controls, conflict of interest, and firewalls policies adhered to during the AJCC Operator procurement process. **N/A**
3. Documentation of the procurement process, including but not limited to, preparation of the request for proposal, public notices, receipt of bids/letter of intent, public bid/proposal meetings, evaluation, comparison, protest letters, and award notice/contract. In addition, provide a timeline that includes the date and staff name, organization, and title involved in each step of the selection process. **N/A**
4. Copy of the Local Board's or administrative entity's bid/proposal. **N/A**
5. A written description of the following operational topics. **N/A**
  - a. Specify the role(s) of the Local Board or administrative entity as the AJCC Operator(s) (i.e., coordinating service providers, primary provider of services, and coordinating

activities throughout the AJCC system). If the Local Board or administrative entity is part of a consortium, provide each assigned role and the related responsibilities for each entity in the consortium.

- b. How does this structure demonstrate the Local Board's or administrative entity's ability to successfully operate the AJCC system while also providing leadership and accountability for the entire Local Area and AJCC system?
- c. How will this structure deliver the highest performance outcomes for the Local Area?

### **Documentation Requirements for Noncompetitive Procurement**

Please provide responses to the following items on a separate document.

1. A justification for whichever exemption mentioned above the Local Board or administrative entity feels they fall under in order to use Noncompetitive. **See Exhibit A**
2. A description of the AJCC Operator. **See Exhibit A**
  - a. Will the Local Board or administrative entity be the sole AJCC Operator or act as a member of a consortium? If part of a consortium, include a list of the other consortium members.
  - b. Is there more than one comprehensive AJCC in the Local Area? If so, will the Local Board or administrative entity act as the operator for all of them? If not, list which ones the Local Board or administrative entity will act as operator and who will be the operator for the others.
3. An analysis of market conditions and other factors that lead to the determination for utilizing Noncompetitive. **See Exhibit A**
4. Copies of internal controls, conflict of interest, and firewall policies. **See Exhibit B**
5. Provide a written description of the following operational topics:
  - a. Specify the role(s) of the Local Board or administrative entity as the AJCC Operator(s) (i.e., coordinating service providers, primary provider of services, and coordinating activities throughout the AJCC system). If the Local Board or administrative entity is part of a consortium, provide each assigned role and the related responsibilities for each entity in the consortium. **See Exhibit A**
  - b. How does this structure demonstrate the Local Board's or administrative entity's ability to successfully operate the AJCC system while also providing leadership for the entire Local Area and AJCC system? **See Exhibit A**
  - c. How will this structure deliver accountability and the highest performance outcomes for the Local Area? **See Exhibit A**

6. Evidence that the request for approval of the Local Board or administrative entity to be an AJCC Operator through Noncompetitive was made available to the public for at least 30 days. Submit copies of comments received. **See Exhibit C**
7. Views expressed by the local WIOA mandatory AJCC partner programs. Submit copies of any letters of support, disagreement, or other views received. **See Exhibit D**
8. Attach documentation (signed and dated letter) that the members of the Local Board and other relevant parties (e.g., Board of Supervisors) reviewed the information provided in the application and approved its contents in a public meeting. **See Exhibit E**

## Signature Page

By signing below, the local CEO and Local Board chair request approval from the Governor to be designated as an AJCC Operator. Each party certifies that this application submission was reviewed and demonstrates that the Local Board met all the requirements to be designated as the AJCC Operator of the Local Area under WIOA law and regulations.

### Instructions

The Local Board chair and local CEO must sign and date this form. Include the original signatures with the request.

#### Local Workforce Development Board Chair

---

Signature

---

Rick Larkey

Name

---

Chair

Title

---

Date

#### Local Chief Elected Official

---

Signature

---

Lori Parlin

Name

---

Chair

Title

---

Date

**Golden Sierra Workforce Development Board  
Request for Approval - America's Job Center of California Operator**

Documentation Requirements for Noncompetitive Procurement

**1. A justification for whichever exemption mentioned above the Local Board or administrative entity feels they fall under in order to use Noncompetitive.**

The Workforce Development Board (WDB) issued a Request for Proposals (RFP) on May 29, 2024 to competitively procure an America's Job Center of California (AJCC) Operator. The WDB received one response from the incumbent contractor by the July 3, 2024 deadline. The WDB extended the submission deadline and conducted additional outreach to potential bidders. The WDB received a second response, but the proposed costs were significantly higher than the stated budget. After rating these responses, the WDB concluded there was inadequate competition in the local market.

**2a. Will the Local Board or administrative entity be the sole AJCC Operator or act as a member of a consortium? If part of a consortium, include a list of the other consortium members.**

The WDB will be the sole AJCC Operator. The WDB will not act as a member of a consortium for purposes of this activity.

**2b. Is there more than one comprehensive AJCC in the Local Area? If so, will the Local Board or administrative entity act as the operator for all of them? If not, list which ones the Local Board or administrative entity will act as operator and who will be the operator for the others.**

There is one comprehensive AJCC within the Local Area. The WDB will be the sole AJCC Operator for the sole location.

**3. An analysis of market conditions and other factors that lead to the determination for utilizing Noncompetitive.**

Despite conducting extensive outreach and extending the submission deadline, the WDB received only two responses to the RFP - one from the incumbent contractor and another with proposed costs far exceeding the stated budget. After rating these responses, the WDB concluded there was inadequate competition in the local market.

The WDB views the competitive procurement process as an essential tool to safeguard public resources. In ideal market conditions, the WDB expects to attract multiple bidders and receive a full range of responses. The procurement efforts that took place in 2021 yielded multiple proposals from qualified bidders, enabling a thorough evaluation of alternatives.

However, in 2024, market conditions have shifted. Rising operational costs, wage pressure, workforce shortages, and increased compliance requirements seem to have discouraged potential bidders from participating in the process. Due to the lack of viable alternatives, the WDB determined there is no longer adequate competition in the local market to justify contracting with an external service provider.

The WDB is seeking state approval to serve as the AJCC Operator for the next four years. By assuming this role internally, the WDB can reduce costs, eliminate duplicative efforts, and improve services.

**4. Copies of internal controls, conflict of interest, and firewall policies.**

See *Exhibit B* for copies of local policies and a chart depicting the firewall.

**5a. Specify the role(s) of the Local Board or administrative entity as the AJCC Operator(s) (i.e., coordinating service providers, primary provider of services, and coordinating activities throughout the AJCC system). If the Local Board or administrative entity is part of a consortium, provide each assigned role and the related responsibilities for each entity in the consortium.**

As the AJCC Operator, the WDB will oversee service delivery coordination by delegating certain tasks to Golden Sierra Job Training Agency (GSJTA), the administrative entity for the Golden Sierra WDB.

**AJCC Operator Roles and Responsibilities:**

- Coordinate the service delivery of required AJCC partners and service providers.
- Provide policy recommendations to encourage alignment and increase the provision of services to individuals with barriers to employment.
- To the extent possible, eliminate duplication and promote resource sharing.
- Develop effective partnerships with all valued stakeholders.
- Ensure the implementation of partner responsibilities and contributions agreed upon in the Memorandum of Understanding (MOU).
- Serve as a liaison between the AJCC system partners to address operational issues.
- Deliver reports on operations, performance, and continuous improvement efforts.
- Convene regular partner meetings.
- Coordinate the cross-training of partner staff.
- Evaluate the interagency referral process with a focus on customer satisfaction.
- Evaluate and make recommendations on the physical and programmatic accessibility of the comprehensive AJCC.
- Lead the development of a shared methodology for measuring and tracking the success of the AJCC partners and service providers.
- Adhere to all applicable federal and state guidance.

**5b. How does this structure demonstrate the Local Board's or administrative entity's ability to successfully operate the AJCC system while also providing leadership for the entire Local Area and AJCC system?**

GSJTA was founded by a Joint Powers Agreement (JPA) in 1983. Over its 40 year history, the agency has made significant investments in the community and has long standing relationships with businesses, partners, board members, and job seekers. From 1983 to 2017, GSJTA successfully coordinated service delivery as part of its regular operations. As such, the agency is well suited to assume the roles and responsibilities outlined above so the WDB can focus on strategic planning and oversight activities.

This structure ensures the WDB can accept the designation of AJCC Operator without compromising its broader leadership role. It also reinforces the board's commitment to transparency, accountability, and continuous improvement across all levels of the workforce development system.

**5c. How will this structure deliver accountability and the highest performance outcomes for the Local Area?**

The proposed structure maintains a clear separation of duties and includes robust oversight. The WDB will maintain its commitment to excellence by setting clear performance expectations and regularly monitoring progress. The request to serve as the AJCC Operator will have no impact on the board's

ability to meet or exceed negotiated performance goals. In fact, by assuming the role internally, the WDB will have more resources to identify and promote promising practices.

**6. Evidence that the request for approval of the Local Board or administrative entity to be an AJCC Operator through Noncompetitive was made available to the public for at least 30 days. Submit copies of comments received.**

See *Exhibit C* (pending - to be included in final application).

**7. Views expressed by the local WIOA mandatory AJCC partner programs. Submit copies of any letters of support, disagreement, or other views received.**

See *Exhibit D* (pending - to be included in final application).

**8. Attach documentation (signed and dated letter) that the members of the Local Board and other relevant parties (e.g., Board of Supervisors) reviewed the information provided in the application and approved its contents in a public meeting.**

See *Exhibit E* (pending - to be included in final application).



To: All Golden Sierra Staff and Subrecipients
Subject: Internal Controls
Effective Date: July 1, 2024
Revision Number:

### Purpose

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance") issued by the Office of Management and Budget (OMB) includes specific requirements for internal controls to ensure that non-federal entities, such as recipients of federal funds, comply with applicable laws and regulations and manage their federal awards responsibly.

The purpose of this policy is to establish a framework for internal controls to ensure the proper use of funds and reduce the risk of fraud, waste, or abuse.

### Local Policy

#### *Segregation of Duties*

To reduce the risk of error or fraud, responsibilities shall be divided so that no single employee has control over all aspects of any significant financial transaction. The following key duties shall be separated:

- Authorization of transactions
- Payroll approval
- Recording of transactions
- Custody of assets

#### *Authorization and Approval*

All transactions must be properly authorized by management prior to being executed. Key procedures include:

- Pre-approval of purchase orders, expense reports, and payment requests
- Verification of supplier invoices before payment
- Multi-level approval for participant payroll disbursements

#### *Documentation and Record Retention*

Adequate documentation shall be maintained for all financial transactions to provide an audit trail and support management decisions. Key procedures include:

- Retention of invoices, contracts, and receipts
- Timely recording of transactions in the accounting system
- Maintaining records in accordance with legal and regulatory requirements

#### *Reconciliation of Accounts*

To ensure the accuracy of financial records, accounts shall be regularly reviewed. All discrepancies shall be investigated and resolved. Regular reconciliation includes monthly, quarterly, and annual reviews of the following items:

- Expenditure Reports (CalJOBS)
- Schedule of Expenditures of Federal Awards (SEFA)
- Credit card statement

### *Physical Controls*

Assets such as cash, equipment, and inventory shall be physically safeguarded to minimize the risk of loss or theft. Controls include:

- Secured storage for cash, checks, credit cards, equipment, and assets
- Restricted access to sensitive areas and data (physical and digital)
- Annual inventory reviews and comparison to agency records

### *Financial Reporting*

Golden Sierra shall ensure the accurate and timely preparation of financial reports. Procedures include:

- Regular review of financial statements by management
- Analysis of variances between budgeted and actual performance
- Preparation of annual financial statements for external reporting
- Internal audits performed by an independent party
- External audits by certified auditors
- Ongoing review and updating of policies as necessary

### *Employee Training*

Employees responsible for financial transactions shall receive regular and ongoing training on internal controls, company policies, and ethical standards to ensure compliance and reduce errors.

### *Reporting Violations*

Local policy provides employees a clear mechanism for reporting suspected fraud, waste, abuse or other criminal activity without fear of retaliation. See "Incident Reporting Instructions for Fraud, Waste, and Abuse" policy.

### References

WIOA (Public Law 113-128)

2 CFR Part 200 (Uniform Guidance)

2 CFR Part 2900 (DOL Exceptions)

TEGL No. 02-16, Revised ETA-9130

WSD19-05

Placer County Accounting Policies and Procedures Manual

**BYLAWS OF THE GOVERNING BODY  
OF THE  
GOLDEN SIERRA JOB TRAINING AGENCY**

**ARTICLE I  
Name and Principal Office**

Section 1. GOVERNING BODY ESTABLISHED. Pursuant to the provisions of the Joint Exercise of Powers Agreement for Golden Sierra Job Training Agency, as amended (the "Joint Powers Agreement"), there is hereby established the Golden Sierra Job Training Agency Governing Body, hereinafter called the "Governing Body."

Section 2. PRINCIPAL OFFICE. The principal office of the Governing Body shall be that of the Golden Sierra Job Training Agency Administrative Office, 1919 Grass Valley Highway, Suite 100, Auburn, CA 95603.

**ARTICLE II  
Duties and Authority**

Section 1. DUTIES. The duties of this Governing Body are those prescribed by the Joint Powers Agreement, as amended, forming Golden Sierra Job Training Agency ("Agency").

Section 2. AUTHORITY. The Governing Body is the unit of authority within the Agency. The Governing Body shall act only by ordinance, resolution or motion. The primary responsibility of the Governing Body is the formulation and evaluation of policy. Routine matters concerning the operational aspects of the Agency are to be delegated to professional staff members of the Agency. No individual Member (as defined in Article III below) shall represent the Agency's policy unless said policy has been determined by the Governing Body.

**ARTICLE III  
Governing Body Members**

Section 1. COMPOSITION. The Governing Body shall have three (3) members ("Member"), as follows:

- (a) One member of the Board of Supervisors of Alpine County.
- (b) One member of the Board of Supervisors of El Dorado County.
- (c) One member of the Board of Supervisors of Placer County.

Section 2. ALTERNATES. Each Member shall have at least one alternate ("Alternate"). Each Alternate shall have authority to attend, participate, and vote at any

Treasurer and Auditor-Controller cannot vacate, be removed from or resign the office in the same manner as the officers.

## **ARTICLE VII EXECUTIVE DIRECTOR**

The Executive Director shall be the chief operating officer of the Agency and responsible for the day-to-day management and operation of the Agency. In addition to the duties set forth in the Joint Powers Agreement, as amended, the Executive Director shall perform such other duties as may be imposed by the Governing Body. The Executive Director shall be responsible for the hiring, firing, promoting and disciplining of the Agency employees. However, the Executive Director shall not have any such responsibility with respect to non-employees of the Agency, including, the Treasurer, the Auditor-Controller, legal counsel, consultants and other professional staff retained directly by the Governing Body.

## **ARTICLE VIII MISCELLANEOUS**

Section 1. **CONFLICT OF INTEREST.** Conflict of interest situations by Governing Body Members shall be regulated by State law and the Agency's currently adopted local conflict of interest code.

Section 2. **FISCAL YEAR.** Unless and until changed by resolution of the Governing Body, the fiscal year is as set forth in the Joint Powers Agreement, as amended.

Section 3. **ANNUAL ORGANIZATION MEETING.** The Governing Body shall hold an annual organization meeting at its regular meeting in December. At this meeting, the Governing Body will elect a Chairperson and Vice Chairperson from among its Members.

Section 4. **ANNUAL REPORT AND ANNUAL AUDIT.** An annual report and annual audit shall be prepared and distributed in accordance with the Joint Powers Agreement, as amended, and Section 6505 of the California Government Code. In addition to information required by law, such report shall contain a balance sheet as of the end of the most recently completed fiscal year, an income statement, and statement of changes in the financial position for such fiscal year.

Section 5. **INSPECTION OF AGENCY RECORDS.** All books and records of the Agency shall be open to inspection by the Members in accordance with the Joint Powers Agreement, as amended. Inspection may be made in person or by an authorized representative of the Member. The right of inspection includes the right to copy and make extracts.

Section 6. **CHECKS AND WARRANTS.** All checks and warrants for the payment of money, notes or other evidences of indebtedness issued in the name of and

**GOLDEN SIERRA WORKFORCE DEVELOPMENT BOARD**  
**BYLAWS AS AMENDED APRIL 4, 2018**

These Bylaws are hereby created by the Golden Sierra Workforce Development Board (formerly referred to as “Workforce Investment Board” or “WIB”) and the Governing Body of the Golden Sierra Job Training Agency (“Governing Body”).

**RECITALS**

- A. The Counties of Alpine, El Dorado, and Placer have created the Golden Sierra Job Training Agency, herein referred to as “Golden Sierra,” a joint powers agreement, to administer workforce development programs within their boundaries.
- B. The Governing Body consists of three members, i.e., one chief elected official from each of the Boards of Supervisors of Alpine, El Dorado, and Placer Counties.
- C. The State of California, pursuant to the Workforce Innovation and Opportunity Act of 2014, 29 U.S.C. § 3101 *et seq.* (which supersedes the Workforce Investment Act of 1998, 29 U.S.C. § 2801 *et seq.*), hereinafter called the “Act,” has designated the Golden Sierra Job Training Agency as a “Workforce Development Area” (formerly a “Workforce Investment Area”) for the system building and delivery of workforce development programs at the local level, and provides funding thereto.
- D. The State and Federal rules and regulations promulgated pursuant to the Act provide for program activities and require that the Governing Body establish the Workforce Development Board, to be as follows:

**ARTICLE I**  
**NAME**

The name of this body shall be the Golden Sierra Workforce Development Board, hereinafter referred to as the “WDB.”

**ARTICLE II**  
**PURPOSE AND FUNCTION**

2.1. The purpose of the WDB, in partnership with the Governing Body, shall be to establish and oversee the workforce development system for the Counties of Alpine, El Dorado, and Placer.

2.2. Vision: A fully integrated workforce system that capitalizes on the expertise of industry and workforce partners to continuously meet the needs of business, and facilitate pathways to success for students, workers and job seekers.

2.3. Mission: The Golden Sierra Workforce Board convenes industry leaders and key partners to identify workforce initiatives, create innovative solutions, and measure the success of systems' ability to meet industry and workforce needs.

The function of the Executive Committee shall be to coordinate the establishment and content of WDB agendas, proposals, communications to and from the Governing Body, review and make recommendations on workforce board membership to the Governing Body, and other supportive activities and functions as may be directed by the WDB or the Governing Body.

The Executive Committee may exercise the powers of the full WDB when timely action is necessary to ensure the best interest of the WDB, its program and services.

All Executive Committee actions shall be reported to the WDB at its next meeting.

## **ARTICLE VII STAFFING AND SUPPORT OF WDB**

7.1. The Governing Body shall be asked to provide, from funds made available under the Act, Golden Sierra support staff and necessary office and material support for the WDB.

7.2. Golden Sierra support staff assigned to WDB responsibilities shall coordinate WDB activities with the WDB Chairperson. Notwithstanding the foregoing, such staff shall remain Golden Sierra employees at all times.

7.3. The Governing Body and WDB will maintain the consolidated office and material support necessary for both to properly discharge their responsibilities under the Act.

7.4. Authority for any decision to hire, evaluate, or discharge any staff assigned to the WDB shall rest with the Governing Body.

7.5. The WDB shall not directly operate programs.

## **ARTICLE VIII CONFLICT OF INTEREST**

8.1. A WDB and/or committee member shall recuse him or herself from making, participating in making, or in any way attempting to use his or her official position to influence a decision of any matter which would financially benefit such member or his/her immediate family member or any organization such member represents. Such member must declare his or her conflicts for the official record.

8.2. WDB members shall avoid organizational conflict of interest, and they and their personnel, employees, or agents shall avoid personal conflict of interest or appearance of conflict of interest in awarding financial assistance, and in the conduct of procurement activities involving funds under the Act.

8.3. Members of the WDB shall comply with the California Political Reform Act of 1979 (commencing with Section 87300 of Chapter 7, Title IX, of the California Government Code) and any other conflicts of interest or financial disclosure requirements which the State may require.

**GOLDEN SIERRA JOB TRAINING AGENCY**

**Employee Handbook**

**Revised June 6, 2018**

3. The Governing Body may waive this rule with an acceptable showing of unusual or exceptional circumstances when this rule would otherwise prohibit the promotion, transfer, or demotion of a regular employee. To be considered by the Governing Body, such action must be initiated by the appointing authority or the employee and recommended by the appointing authority. The foregoing waiver process must be completed prior to certification from an eligible list, approval of transfer, or approval of a voluntary demotion of an employee into a situation that would cause nepotism, as defined by this rule.
4. An exception to this nepotism rule shall be in the case of a voluntary transfer or demotion due to a layoff. However, every effort should be made to avoid creating a supervisor-subordinate relationship as a result of the transfer or demotion.

## **2021 CONFLICT OF INTEREST**

Situations of actual or potential conflict of interest are to be avoided by all employees. Personal or romantic involvement with a competitor, supplier, or subordinate employee of Golden Sierra, which impairs an employee's ability to exercise good judgment on behalf of Golden Sierra, creates an actual or potential conflict of interest. Supervisor-subordinate romantic or personal relationships can also lead to supervisory problems, claims of sexual harassment, and morale problems.

An employee involved in any of the types of relationships or situations described in this policy should immediately and fully disclose the relevant circumstances to his or her immediate supervisor, or any other appropriate supervisor, for a determination as to whether a potential or actual conflict exists. If an actual or potential conflict exists, Golden Sierra may take whatever corrective action appears appropriate according to the circumstances. Failure to disclose facts that constitute or may constitute an actual or potential conflict of interest may result in disciplinary action.

## **2022 REDUCTION IN FORCE**

Golden Sierra is a publicly funded agency. Layoffs may occur because of a reduction in grant funds or because of a lack of work.

A. Layoff Plan. When Golden Sierra determines there is a need to layoff Local 39 represented employees, the Union will be given a written notice prior to issuing layoff notices to employees and the layoffs will be conducted in conformity with the parties' MOU.

B. Seniority Lists. When Golden Sierra provides Local 39 with a notice of layoff, Golden Sierra will provide the Union seniority lists for the impacted classifications which will include classification and employer seniority. Concurrently, these lists will also be posted in the impacted departments.

### Golden Sierra Workforce Development Board AJCC Operator Firewall

