



Local Policies – Administration and Governance

Personnel Management and Employment Practices

Effective Date

2/2/2026

Purpose

The purpose of this policy is to define the respective roles and responsibilities of the Northeast Iowa Workforce Development Board (NEIWDB) and its contracted Employer of Record (EOR) in relation to hiring, supervision, evaluation, discipline, and separation of NEIWDB staff. This policy ensures compliance with the Workforce Innovation and Opportunity Act (WIOA), state requirements, and federal regulations.

Authority

This policy is established pursuant to:

- Workforce Innovation and Opportunity Act (WIOA) §107(f)
- 20 CFR Part 679 (Local Governance Provisions)
- 2 CFR 200 (Uniform Guidance)
- The NEIWDB–Employer of Record Service Agreement

NEIWDB contracts with an Employer of Record (EOR) to administer payroll, benefits, personnel administration, and human resources processing.

As of the adoption of this policy, Central Iowa Juvenile Detention Center (CIJDC) serves as the contracted EOR.

If NEIWDB changes its contracted Employer of Record (EOR) in the future, this policy remains in full effect. The Executive Director is authorized to update the name of the EOR within this policy for accuracy, provided the change is limited to the vendor's name and does not alter any roles, responsibilities or governance requirements.

NEIWDB retains all authority over hiring, supervision, performance expectations, discipline, and termination.

Policy

Employment Relationship

1. At-Will Employment

Employment with NEIWDB, administered through the contracted Employer of Record (EOR), is at-will. This means either NEIWDB or the employee may end the employment relationship at any time, with or without cause or notice, consistent with applicable law. Nothing in this policy or any NEIWDB procedure creates a contract or guarantee of employment.



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2. Employer of Record (EOR) Responsibilities

The EOR is responsible for:

- Payroll administration
- Maintaining personnel files
- Benefits administration
- Processing pay, leave, and deductions
- Processing personnel actions initiated by NEIWDB
- Ensuring compliance with employment-related laws

The EOR does not supervise NEIWDB employees or make personnel decisions.

3. NEIWDB Responsibilities

NEIWDB is responsible for:

- Hiring decisions
- Assignment of duties
- Work expectations
- Performance management
- Evaluations
- Corrective action and discipline
- Termination decisions
- Staff oversight and direction

Hiring and Appointment

1. NEIWDB Hiring Authority

NEIWDB retains full authority to:

- Approve staffing structure
- Develop and approve job descriptions
- Conduct recruitment and interviewing
- Select and recommend candidates for hire
- Set salaries and benefits (through the budgeting process)



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- Submit hiring decisions to the EOR for processing

2. Reporting Structure

- The Executive Director reports to the NEIWDB Board Chair and Executive Committee.
- The Associate Director/Equal Opportunity Officer reports to the Executive Director.
- The Compliance Specialist reports to the Executive Director.

3. Pre-Employment Requirements

All candidates selected for hire must complete:

- Background checks
- Employment eligibility verification
- Any EOR-required HR screenings
- Any additional screenings required under state or federal workforce requirements

Employment becomes effective once NEIWDB approves the hire and the EOR completes onboarding.

4. Job Description Approval

Job descriptions and revisions must be approved by the Executive Committee before a position is posted or filled.

5. Nepotism and Eligibility

NEIWDB will not hire or place individuals in positions where they would directly or indirectly supervise, evaluate, or influence employment decisions involving an immediate family member. Employees must disclose any potential conflict prior to hire.

6. Creation or Modification of Staff Positions

NEIWDB must approve the creation of new staff positions, the elimination of positions, and any reclassification of existing positions. Changes to salary ranges or benefit structures must be approved through the annual budgeting process or by separate Board action.

Supervision and Performance Management

1. NEIWDB Supervisory Role

NEIWDB provides the full scope of supervision for all employees, including:

- Daily oversight
- Assignment of duties



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- Scheduling and expectations
- Performance feedback
- Documentation of issues
- Recommendations for discipline or termination

The EOR does not direct or supervise employees.

2. Performance Evaluations

- The Executive Director receives an annual evaluation coordinated by the Board Chair and Executive Committee.
- Other NEIWDB staff receive annual evaluations conducted by the Executive Director.
- Evaluation documents are shared with the EOR for inclusion in the personnel file.

3. Interim Leadership

If the Executive Director position becomes vacant, the Board Chair may appoint an Interim Director or delegate temporary supervisory authority until a permanent hire is made. The Executive Committee will ratify this appointment at its next meeting.

4. Administrative Authority of the Executive Director

The Executive Director is authorized to make routine administrative decisions related to staff work assignments, scheduling, communication, operational needs, training, travel approval, and task prioritization. These actions do not require Board approval unless they involve hiring, discipline, compensation changes, or separation of employment.

Corrective Action and Discipline

1. NEIWDB's Role

NEIWDB determines when corrective action is appropriate, which may include:

- Verbal warnings
- Written warnings
- Performance improvement plans
- Suspension recommendation
- Termination recommendation

2. EOR's Role

The EOR:



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- Ensures documentation meets HR/legal standards
- Processes disciplinary actions initiated by NEIWDB
- Issues required formal HR notifications

The EOR does not decide or recommend discipline.

3. Documentation

NEIWDB must document all performance and conduct issues and forward necessary documents to the EOR for inclusion in the personnel file.

4. Employee Concerns and Grievances

Employees should direct workplace concerns, performance-related questions, or grievances to their immediate supervisor or, if appropriate, to the Executive Director. Matters involving discrimination, harassment, retaliation, or legally protected issues shall follow the Employer of Record's grievance and complaint procedures. NEIWDB will cooperate fully with the EOR in resolving such matters.

Separation of Employment

1. NEIWDB Authority

NEIWDB determines when separation is appropriate.

For the Executive Director, CEO approval may be required according to the NEIWDB–CEO agreement.

2. Separation Process

- a. NEIWDB determines separation action.
- b. NEIWDB notifies the EOR in writing.
- c. The EOR issues final HR documentation and processes the termination.
- d. The employee completes EOR exit requirements and returns all NEIWDB property.

3. Return of Property

Before separation is finalized, the employee must return all NEIWDB equipment, records, and materials.

Conflicts of Interest

NEIWDB staff and Board members must comply with the NEIWDB Conflict of Interest Policy.

Individuals may not participate in personnel decisions where a real, potential, or perceived conflict exists.



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Transparency and Open Meetings Compliance

Hiring, evaluation, and termination decisions requiring Board or CEO approval must occur in properly noticed meetings in accordance with Iowa Open Meetings laws.

Alignment with Employee Handbook

NEIWDB establishes workplace expectations, procedures, and standards of conduct through the NEIWDB Employee Handbook. Employees are required to comply with all provisions of the handbook, including but not limited to remote work requirements, work schedule expectations, professional conduct, technology and equipment use, confidentiality, travel procedures, and timekeeping requirements. The handbook provides operational guidance, while this policy defines governance-level authority.

Work Hours, Schedules, & Remote Work

NEIWDB determines employee work schedules, remote work expectations, onsite work requirements at IowaWORKS Centers or partner locations, and general working conditions. The detailed procedures and requirements for remote work, home office standards, communication expectations, and schedule flexibility are outlined in the Employee Handbook and must be followed by all staff.

Job Duties and Role Assignments

NEIWDB determines job duties, functional responsibilities, reporting relationships, and task assignments for all staff. Employees must perform duties as assigned by NEIWDB leadership. Because workforce system needs, federal and state guidance, and organizational priorities may change, NEIWDB may modify or assign additional duties as necessary to meet operational, programmatic, or compliance requirements.

Job duties and day-to-day expectations are further described in job descriptions and the Employee Handbook; however, these documents are not exhaustive, and employees may be assigned additional responsibilities as needs arise.

Technology, IT Security, and PII

Employees must comply with all NEIWDB expectations for the protection of Personally Identifiable Information (PII), technology use, cybersecurity, equipment safeguarding, and data access. The Employee Handbook provides the operational requirements governing use of devices, passwords, systems, email, remote access, and home office security.

Travel and Reimbursement

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NEIWDB establishes requirements for work-related travel, documentation, pre-approval, and reimbursement. Employees must follow the NEIWDB Travel Policy and related procedures detailed in the Employee Handbook when submitting travel or mileage reimbursements.

Conduct, Professionalism & Representation

Employees must maintain professional behavior and uphold NEIWDB values when interacting with partners, employers, IowaWORKS centers, and the public. Detailed expectations regarding communication, meeting etiquette (virtual and in-person), dress, and representation of the Board are outlined in the Employee Handbook.

Timekeeping & Leave Administration

Employees must comply with all timekeeping, PTO, and payroll submission requirements as established by NEIWDB and the Employer of Record (EOR). The Employee Handbook outlines the procedures for timesheet submission, leave requests, fiscal timesheet reporting (WIOA), and payroll deadlines.

Handbook Updates

The Employee Handbook may be updated as needed to reflect operational changes, administrative procedures, or compliance requirements. When updates occur, employees will be notified. Employees are responsible for reviewing and complying with the most current handbook version.

Records Management and Documentation Responsibilities

NEIWDB staff must maintain all records, files, and documentation in a manner consistent with federal and state law, WIOA requirements, and NEIWDB policies. Because NEIWDB staff operate primarily in a remote environment and collaborate with multiple partners, additional safeguards are required to ensure proper record handling.

1. Personnel Records

Personnel files, payroll records, and benefits documentation are maintained by the Employer of Record (EOR).

NEIWDB shall have access to EOR maintained personnel records upon request for oversight, evaluation, compliance or audit purposes.

NEIWDB maintains only administrative records necessary for:

- Hiring decisions



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- Evaluations
- Disciplinary documentation
- Performance records
- Board-approved personnel actions

All such documents must also be provided to the EOR for inclusion in the official personnel file.

2. Administrative and Program Records

NEIWDB staff must maintain accurate and complete records related to:

- Board administration
- Monitoring activities
- Program oversight and reporting
- Fiscal and procurement documentation
- Committee support and system coordination
- WIOA policies, plans, and agreements

These records are NEIWDB property and must be stored in the approved NEIWDB file system.

3. Electronic Communications and Digital Files

All work-related emails, electronic files, messages, and documents created by staff—regardless of device or location—constitute official NEIWDB records. Staff must:

- Use NEIWDB email and approved platforms for all work-related communication
- Maintain electronic files in the designated file storage system
- Avoid storing documents on personal devices or unapproved cloud systems
- Comply with PII and cybersecurity rules for all electronic documents

4. Records Created During Remote Work

Employees working remotely must ensure that any documents, notes, digital files, or work products created at home are:

- Secured against unauthorized access
- Properly uploaded to NEIWDB's designated storage system
- Destroyed securely if paper-based and no longer needed
- Not stored permanently on personal devices

5. IowaWORKS and Partner-Accessible Data

NEIWDB staff who have access to IowaWORKS.gov or partner systems must follow all state and local data governance rules. Staff must:



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- Safeguard Personally Identifiable Information (PII)
- Access only the information necessary for their role
- Never download or store IowaWORKS data outside approved systems
- Report any suspected breach immediately

6. Board Records vs. Program Records

NEIWDB staff must distinguish between:

- **Board administrative records** — agendas, minutes, policies, contracts, monitoring reports
- **Program-related oversight records** — monitoring documentation, data validation, cost allocation review, performance oversight
- **EOR personnel records** — maintained solely by the Employer of Record

This separation ensures compliance with Open Meetings law, WIOA record retention, and federal Uniform Guidance.

7. Compliance with Record Retention Requirements

Employees must comply with NEIWDB's formal Record Retention Policy and any additional requirements in the WIOA grant, 2 CFR 200.334–338, and partner MOUs.

Failure to maintain, safeguard, or properly store records may result in disciplinary action.

Policy Review

This policy will be reviewed annually and updated as needed to remain compliant with WIOA, Uniform Guidance, and the current Employer of Record Agreement.