



NINETEEN TRIBAL NATIONS WORKFORCE INVESTMENT BOARD (NTNWIB) Sanction Policy

IMPLEMENTATION: This policy, NTN_POL_005 rescinds and supersedes the NTNWIB Fiscal Sanction Policy approved May 13, 2012.

BACKGROUND: The WIA Contract contains a sanction clause for failure to meet performance measures. Since the Nineteen Tribal Nations Workforce Investment Area (NTNWIA) is a consortium of Tribes, and it is the responsibility of the NTNWIB to provide oversight and ensure that WIA funds are spent and utilized in the best manner possible, a separate NTNWIB Sanction Policy is needed.

POLICY: Adult and youth allocations are two (2) separate funding streams; therefore, the sanction policy will be applicable to performance for the individual allocation. Exceeding a measure means achievement of over 100% of the goal, and meeting a measure means achieving at least 80% of the goal.

The intent of this policy is to reallocate funds from under-performing Tribes to Tribes that meet the performance goals.

Reallocation of funds will be on a program year basis, and will be based on final performance achievements for two (2) years prior.

PROCEDURES:

- Ten (10) points will be awarded for each measure that is exceeded
- Eight (8) points will be awarded for each measure that is met
- No points will be awarded for a failed measure
- The allocation for any entity/Tribe not achieving 80% of the goal will be reduced by 5% of the allocation received for the previous program year
- The total amount of allocation reductions will be divided equally between the entities/Tribes that meet or exceed all measures by category (adult and youth)
- The 5% reduction in an allocation will continue each year an entity/Tribe does not meet 80% of the goal
- To implement this Sanction Policy, any reductions in the PY12/FY13 allocations will be based on PY10/FY11 performance achievements