WSW Executive Board Meeting  
Zoom Conference Call  
February 24, 2021 4:00 – 5:30 pm

AGENDA

3:30  Welcome  
Paige Spratt – Chair

3:35  Consent Agenda  
Paige Spratt – Chair
  • Approval of Executive Board Minutes
  • Approval of Contract Memo
  • Approval of Policy Memo

3:40  Finance  
Renny Christopher – Finance Chair
  Barri Blair – CFO
  • 990 Form
  • Quarterly Reports
  • Treasurers Memo

3:55  Governance  
A.D. Simmons – Governance Co-Chair
  Ralph Clark – Governance Co-Chair
  • Dr. Karin Edward’s Nomination Packet

4:05  CEO Report  
Kevin Perkey – CEO
  • Strategic Plan
  • WTECB Memo – Local Plan Approval
  • ISY Memo for SummerWorks
  • BFET Overview
  • Draft Agenda for March WSW Board Meeting

4:55  Open Discussion / Other Items  
Paige Spratt – Chair

5:00  Adjourn

NOTES
WSW Joint Finance Committee & Executive Board Meeting Minutes
January 27, 2021
3:30 p.m.
Zoom Conference Call, WSW

Executive Board & Finance Committee Members Present: Chair Paige Spratt, Kelley Foy, John Vanderkin, Ralph Clark, Renny Christophe, A.D. Simmons, and Councilor Karen Bowerman.

Staff Members Present: CEO Kevin Perkey, CFO Barri Horner, and Traci Williams.

Guests Present: Cora Kenworthy and Jeremy Fogelquist from Johnson, Stone & Pagano, P.S.

WELCOME
Chair Paige Spratt opened the meeting at 3:36 p.m. and welcomed everyone in attendance. All Executive Board, Finance Committee, and staff introduced themselves due to this being Councilor Bowerman’s first meeting.

AUDIT:
Cora Kenworthy and Jeremy Fogelquist of Johnson, Stone & Pagano, P.S. (JSP) joined the meeting to present the findings from their recent fiscal audit of WSW held last November. Chief Financial Officer Barri Horner provided additional information to the members.

Ms. Kenworthy and Mr. Fogelquist reported that JSP performed the Uniform Guidance Single Audit, which focuses on compliance related to the use of federal funds. A clean audit resulted, with no negative findings with the design and/or performance of WSW’s fiscal procedures.

Ms. Kenworthy and Mr. Fogelquist reported that WSW’s financial statement audit, as a whole is an unmodified, clean opinion; the internal controls for financial statements and the internal controls and compliance for the federal awards were all clean and unmodified, qualifying the organization as a low-risk auditee. Questions were invited and addressed by Ms. Kenworthy and Ms. Horner.

John Vanderkin moved to approve the audit draft report as presented and forward to the full board at the upcoming March Board meeting, second by Paige Spratt. Motion carried from the Finance Committee.

Mr. Perkey acknowledged the great fiscal work of Barri Horner, Kathy Ashley, Denise Elliott, and Linda Czech in this process.

CONSENT AGENDA
Having reached quorum, Chair Spratt entertained a motion to approve the Consent Agenda, consisting of the Executive Board minutes held on November 18, 2020, Contract Memo, Policy Memo; containing
the WSW Supportive Services Policy #3005 and WSW Trade Act and Dislocated Worker Co-Enrollment Policy #3036.

John Vanderkin moved to approve the Consent Agenda as presented, second by Ralph Clark. Motion carried.

CEO REPORT
Mr. Perkey updated the Executive Board on WSW’s strategic planning process, with a March final adoption of the Strategic Plan. A draft of the new Strategic Plan will go to the Executive Board at the upcoming February meeting. Mr. Perkey also informed the Executive Board that yesterday was Narek Daniyelyan’s last day working at WSW and that WSW is close to hiring the two new positions of Program Manager and Program Coordinator in early February. Mr. Perkey also mentioned that today was Suzi Levine’s last day at ESD before she leaves to start her new position with the Biden/Harris Administration, more news to follow. He also mentioned the WSW Governance Committee is actively recruiting for the six open seats on the board and Mr. Perkey has had 1:1 discussions with three of the candidates. Questions were answered by Mr. Perkey.

ADJOURNMENT
With nothing further for the good of the order, Chair Spratt adjourned the meeting at 4:37 p.m.
CONTRACT MEMO

DATE: FEBRUARY 17, 2021
TO: KEVIN PERKEY
    WSW EXECUTIVE BOARD MEMBERS
FROM: AMY GIMLIN, WSW CHIEF OPERATING OFFICER
RE: CONTRACT UPDATE (JANUARY 2021 – FEBRUARY 2021)

WSW modified the following contracts:

- Equus Workforce Solutions Thrive contract modified to increase budget by $16,814, revise statement of work and performance, and BFET terms added. Total contract $480,727.
- Strategies 360 contract modified to extend the end date to December 31, 2021 and increase budget by $10,000. Total contract $20,000.
- Equus Workforce Solutions One Stop Operator contract modified to increase budget by $505,400 for a total contract $1,323,553.

Board approval required:

- Lower Columbia College contract to initiate a System Liaison position to bridge the gap between quality employment and college students in Cowlitz County, total contract not to exceed $100,000.
POLICY MEMO

DATE: FEBRUARY 19, 2021
TO: KEVIN PERKEY
    WSW EXECUTIVE BOARD MEMBERS
FROM: AMY GIMLIN, WSW CHIEF OPERATING OFFICER
RE: POLICY UPDATES

WSW Employee Handbook

This is a revision to the original handbook put into place January 2020. During our recent ESD monitoring, there were a few points of clarification needed to either show our actual process or allow for changes. We added our ability to provide fringe benefits in the way of an internet allowance. Also, need recommendations for language around employee bonuses, performance-based raises under compensation.

Based on the approval process, this policy approval falls under **Tier 2 Executive Board** and Full Board notification.

**Tier 2 – Intermediate**

*Definition:* Intermediate revisions consist of minor tweaks to language to improve functionality for service providers. The modification could be a change requested by the service provider. These revisions require Executive Board approval and Full Board notification.

WSW Monitoring Policy #2003

This is a revision to the original policy. Revisions were made to the timeline to show a more appropriate timeframe and addition of the allowability to conduct a remote review.

Based on the approval process, this policy approval falls under **Tier 2 Executive Board** and Full Board notification.

**Tier 2 – Intermediate**

*Definition:* Intermediate revisions consist of minor tweaks to language to improve functionality for service providers. The modification could be a change requested by the service provider. These revisions require Executive Board approval and Full Board notification.
WSW Eligibility Guidelines and Documentation Requirements #3028 and Eligibility Handbook

This is a revision based on a requirement from DOL and ESD. The policy and corresponding handbook are revised to update the data validation requirements and link to the new TEGLs (Training and Employment Guidance Letter). Added a performance metric for Priority of Service directed by DOL in TEGL 7-20. The state has not issued additional guidance or measurements regarding Priority of Service this handbook shows what DOL is requiring.

Based on the approval process, this policy approval falls under Tier 1 Executive Board and Full Board notification.

Tier 1 – Minimum

**Definition:** Minimum revisions consist of grammar, spelling, branding changes, State or Federal mandated adjustments, or a new State or Federal mandated policy with no local revisions. These revisions would not require Executive or Full Board approval but would be included in a notification memo.
This Handbook supersedes all previous employee manuals, employer memos, and/or handbooks issued previously regarding subjects covered by this Handbook.
Welcome to Workforce Southwest Washington!

We are pleased that you are part of our team at WSW. Whether you have just joined our staff or have been here for a while, we consider all our employees to be our most valuable resource. We value the talents and abilities of our employees and seek to foster an open, cooperative, and dynamic environment in which employees and Workforce Southwest Washington alike can thrive. Without you, we could not accomplish what we do every day.

We hope you will find your work here to be both challenging and rewarding and that you take pride in being a part of Workforce Southwest Washington. To facilitate the success of our employees, this Employee Handbook is designed to answer questions frequently asked by employees and acquaint employees to WSW and its culture, mission, and expectations. We refer to our company as WSW, and this title will be reflected throughout this handbook.

Our mission is investing in human potential, driving the growth and development of our Southwest Washington economy. We envision a region where the opportunity for prosperity and growth exists for all.

Workforce Southwest Washington (WSW) considers diversity, equity, and inclusion to be one of our core values. We are committed to providing and promoting a diverse and inclusive environment for all, giving each person the opportunity to succeed professionally. By doing so, we thrive as a company through diversity and the unique qualities and life experiences our employees bring to the workplace. WSW considers equal opportunity and non-discrimination to be fundamental to the mission and objectives of the organization. All staff hired at WSW are encouraged to embrace, continually support, and enhance social equity within our organization and in our community.

Our goal at WSW is to invest in creating a vibrant and thriving Southwest WA where all work is valued and dignified. As an employee, you are very important to achieving this goal because, no matter what position you hold in our Company at WSW, your work directly influences our external partners’ experiences. We look forward to your contributions to our shared success.

Sincerely,

Kevin Perkey
Chief Executive Officer
### TABLE OF CONTENTS

**ABOUT THIS HANDBOOK**

- MAKING WSW A GREAT PLACE TO WORK .......................................................... 3
- INTERNAL COMMUNICATIONS & CONFLICT RESOLUTION .......................... 4
- BOARD ENGAGEMENT ....................................................................................... 4
- EQUAL EMPLOYMENT OPPORTUNITY POLICY ............................................ 5
- ANTI-DISCRIMINATION/ANTI-HARASSMENT POLICY ................................. 5
- WHISTLEBLOWER POLICY ................................................................................ 7
- LOBBYING ........................................................................................................ 8
- RESTRICTIONS ON POLITICAL ACTIVITY .................................................... 8
- REASONABLE ACCOMMODATIONS ................................................................. 8
- COMPLAINT & INVESTIGATION PROCEDURES ............................................ 9

**NAVIGATING OUR WORKPLACE**

- KNOWING YOUR EMPLOYEE STATUS & CLASSIFICATION ....................... 11
- WORK SCHEDULES ......................................................................................... 11
- OFF-SITE WORK ............................................................................................ 12
- ATTENDANCE & PUNCTUALITY ..................................................................... 12
- MEAL & BREAK PERIODS ................................................................................ 14
- TIMEKEEPING ................................................................................................ 14
- DRESS & APPEARANCE .................................................................................. 15
- CONFIDENTIALITY/NON-DISCLOSURE ......................................................... 15
- CONFLICT OF INTEREST ................................................................................ 16
- TOBACCO-FREE/SMOKE-FREE ENVIRONMENT ............................................ 16
- DRUG & ALCOHOL POLICY ............................................................................ 16
- USE OF PERSONAL VEHICLES FOR WORK ............................................... 19
- SOCIAL NETWORKING & MEDIA ................................................................... 19

**USING COMPANY TECHNOLOGY & PROPERTY**

- ELECTRONIC DEVICES, COMMUNICATIONS & NETWORK SYSTEMS .......... 21
- COMPANY MOBILE PHONES .......................................................................... 21
- OTHER COMPANY PROPERTY ........................................................................ 22

**WORKPLACE SAFETY**

- MAINTAINING A SAFE WORK ENVIRONMENT ............................................. 24
- PET POLICY ................................................................................................... 24
- REPORTING INJURIES OR ILLNESS ............................................................... 24
- BUILDING SECURITY ....................................................................................... 24
- VISITORS IN THE WORKPLACE ...................................................................... 24
- WORKPLACE VIOLENCE .................................................................................. 25

**PERFORMANCE EXPECTATIONS & PAY**

- EMPLOYEE PERFORMANCE MANAGEMENT .............................................. 26
- STANDARDS FOR WORKPLACE CONDUCT .................................................. 26
- PERFORMANCE IMPROVEMENT/DISCIPLINARY ACTION ......................... 27
- COMPENSATION PRACTICES ......................................................................... 28
- PAYDAYS ....................................................................................................... 28

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EMPLOYEE HANDBOOK

<table>
<thead>
<tr>
<th>Topic</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>OVERTIME</td>
<td>28</td>
</tr>
<tr>
<td>TRAVEL TIME</td>
<td>28</td>
</tr>
<tr>
<td>ADDITIONAL COMPANY POLICIES</td>
<td>30</td>
</tr>
<tr>
<td>PERSONAL INFORMATION &amp; EMPLOYMENT REFERENCES</td>
<td>30</td>
</tr>
<tr>
<td>EMPLOYEE FILES</td>
<td>30</td>
</tr>
<tr>
<td>IMMIGRATION LAW COMPLIANCE</td>
<td>30</td>
</tr>
<tr>
<td>SOLICITATION &amp; DISTRIBUTION OF LITERATURE</td>
<td>31</td>
</tr>
<tr>
<td>OUTSIDE EMPLOYMENT</td>
<td>31</td>
</tr>
<tr>
<td>EMPLOYMENT OF RELATIVES</td>
<td>31</td>
</tr>
<tr>
<td>DATING POLICY</td>
<td>31</td>
</tr>
<tr>
<td>GIFTS &amp; ENTERTAINMENT</td>
<td>32</td>
</tr>
<tr>
<td>WORK-RELATED EXPENSES</td>
<td>32</td>
</tr>
<tr>
<td>PUBLIC RELATIONS &amp; THE MEDIA</td>
<td>32</td>
</tr>
<tr>
<td>IF YOU SHOULD LEAVE US</td>
<td>33</td>
</tr>
<tr>
<td>EMPLOYEE BENEFITS</td>
<td>35</td>
</tr>
<tr>
<td>HEALTH BENEFITS</td>
<td>35</td>
</tr>
<tr>
<td>TIME OFF BENEFITS</td>
<td>35</td>
</tr>
<tr>
<td>LEAVES OF ABSENCE</td>
<td>39</td>
</tr>
</tbody>
</table>

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WSW strives to provide a positive work environment that fosters collaboration, teamwork and continuously achieving solid business results. It is important to us that you are actively engaged in your work here, feel a part of our team and are able to use your skills to contribute to our success. To help you achieve this, we have designed this Handbook to acquaint you with WSW and provide you with information about working conditions, benefits, and policies affecting your employment.

The pages of this Handbook set out our basic people management philosophies and values.

WSW is continuously growing and changing. New challenges and opportunities will require new and/or modified policies and programs. In light of that, we reserve the right to interpret, change, suspend or cancel, with or without notice, all or any part of our policies, procedures and benefits at any time. As we make changes to policies, procedures and benefits, we will make every effort to notify you. Changes will be effective on the dates determined by WSW, and after those dates, all previous related policies will no longer be effective. Policies in this Handbook will not be interpreted to limit an employee’s right to discuss terms and conditions of employment with other employees and to otherwise engage in activities that are protected by the National Labor Relations Act.

This Handbook is intended to summarize for you many of our employment guidelines; however, neither this Handbook, nor any other company document, should be regarded as an employment contract. Like many employers, WSW is an “at-will” employer. Simply stated, this means that just as you entered into employment with WSW voluntarily, you may resign at any time for any reason or no reason. Similarly, WSW is free to conclude its relationship with any employee at any time for any reason or no reason, with or without prior notice.

No individual manager has the authority to change company policies at any time. Additionally, only authorized representatives of our Company may enter into an agreement for employment for a specified period of time. You should not rely on any document or statement that is contrary to the “at-will” nature of our work environment, unless it is in writing and signed by an authorized representative.

If you have questions about any of the contents of this Handbook, or about other aspects of your employment with WSW, we encourage you to bring them to the attention of your manager or the Chief Operating Officer.
MAKING WSW A GREAT PLACE TO WORK

WSW is committed to promoting and maintaining an environment in which all employees, external employees, partners, vendors and visitors are treated with respect and dignity. To achieve this, we strive to create a work environment that promotes inclusiveness, integrity, teamwork, and ongoing communication and support. The following policies are designed to encourage just that.

Internal Communications & Conflict Resolution

Communication between employees and managers and among employees is critical to our success as a company and promotes a positive and healthy work environment. All employees should be aware of new and changing policies and procedures, as well as company successes, goals, and activities. We also want to hear your ideas, suggestions, personal goals and problems as they affect your work. The responsibility for maintaining open lines of communication belongs to all employees, regardless of their position, and we encourage and expect employees to take this responsibility seriously.

How We Communicate with Employees

WSW strives to maintain open channels of communication at all times. To support this goal, we use company e-mail and staff meetings to impart important information. We expect and encourage you to regularly check your company e-mail and attend staff meetings to ensure you are receiving up-to-date information about company events, policies, and expectations.

Sharing Your Thoughts

WSW is interested in your constructive ideas and suggestions for improving our operations. Additionally, a continuous flow of open communication between employees and their managers is essential to maintaining a good work environment and continuous improvement. For these reasons, we urge you to talk to your manager about your job-related ideas, recommendations, concerns and other issues that are important to you.

Resolving Workplace Conflict

WSW recognizes it is inevitable that from time-to-time employees will experience legitimate disagreements and conflicts in our workplace. When these misunderstandings or conflicts happen, we encourage you to try to resolve the problem with those directly involved through open and candid discussions, conducted in a respectful manner. Working directly with those involved often leads to the simplest, quickest and most satisfactory solution.

Similarly, if you are approached by another employee about a concern, please listen to him or her, be open minded rather than defensive, and focus on finding a resolution to the issue. By exploring issues in a professional and constructive fashion, it should be possible to find an appropriate way to resolve any problem.

If you are uncomfortable going directly to those involved, or you have done so but the issue remains unresolved, your manager can assist you with identifying and carrying out other methods for addressing the situation. If your complaint or concern involves your manager, or if after talking with your manager you feel the need for additional discussion, we encourage you to speak with the Chief Executive Officer or Chief Operating Officer.

Because external employee relations are extremely important, if the conflict you are experiencing involves a sensitive issue with an external employee, you should discuss the situation with your manager. Together you will determine the best course of action for addressing the situation. This includes letting your manager know about any significant concerns an external employee brings to your attention.
Board Engagement

The primary role of the Board of Directors is one of fiduciary responsibility, organizational oversight, and monitoring of the Executive Director.

Direct engagement with board members related to specific projects is encouraged however must be coordinated with the Chief Executive Officer. Additionally, if you have a human resources related issue that is not being adequately addressed by the Chief Executive Officer, you may reach out directly to the Board Chair.

Equal Employment Opportunity Policy

WSW is an Equal Opportunity Employer, providing equal employment and advancement opportunities to all individuals. We recruit, hire and promote into all job levels the most qualified applicants without regard to race, color, national origin, religion, sex (including pregnancy, childbirth and related medical conditions), age, disability, genetic information, citizenship status, veteran status, gender identity/expression, sexual orientation, and marital or family status, political affiliation or activities, military service, domestic violence victim status, arrest/conviction record, obesity or any other status protected under applicable federal, state and local laws. WSW’s commitment to providing equal employment opportunities extends to all aspects of employment, including job assignment, compensation, discipline and access to benefits and training.

Affirmative Action

WSW is a federal contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended ("Section 4212") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). In accordance with these laws, and other similar laws and Executive Orders, it is WSW’s policy to take affirmative action to ensure qualified minority group individuals, females, disabled veterans, recently separated veterans, Armed Forces service medal veterans, other protected veterans and disabled persons are introduced into our workforce and considered for promotional opportunities.

As part of our affirmative action policy, we also prohibit employees and applicants from being subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in:

- filing a complaint;
- assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503, Section 4212, or any other Federal, state or local law requiring equal opportunity for disabled persons or covered veterans;
- opposing any act or practice made unlawful by Section 503 or Section 4212 and their implementing regulations, or any other Federal, state or local law requiring equal opportunity for disabled persons or covered veterans; or
- exercising any other right protected by Section 503 or Section 4212 or their implementing regulations.

This is explained in further detail under the Our Complaint and Investigation policy below, which applies to all issues related to reasonable accommodations.

Anti-Discrimination/Anti-Harassment Policy

WSW also is committed to providing a work environment that is free of discrimination and harassment. WSW management is primarily responsible for seeing that our equal employment opportunity and anti-discrimination/anti-harassment policies are implemented, but all employees share our responsibility for assuring that these policies are followed.
Neither discrimination in violation of our Equal Employment Opportunities policy, nor harassment of any kind, for any reason, will be tolerated. This includes harassing conduct by vendors, external employees, partners, and other non-employees that you may encounter while carrying out your work duties, and harassing conduct that occurs off-premises or off-hours.

Harassment is verbal, physical and visual conduct that creates an intimidating, hostile or offensive work environment, or may otherwise unreasonably interfere with an employee’s work performance. Harassment becomes illegal when it is based on a protected characteristic, such as race, color, national origin, religion, sex (including pregnancy, childbirth and related medical conditions), age, disability, genetic information, citizenship status, veteran status, gender identity/expression, sexual orientation, and marital or family status, political affiliation or activities, military service, domestic violence victim status, arrest/conviction record, obesity or any other status protected under applicable federal, state and local laws.

Types of Harassment

SEXUAL HARASSMENT includes many forms of offensive behavior and it does not matter if the harasser is the same sex or a different sex than the person being harassed. Conduct is considered unlawful sexual harassment when:

- submission to such conduct is made either explicitly or implicitly a term or condition of employment;
- submission or rejection of the conduct is used as a basis for making employment decisions;
- the conduct unreasonably interferes or is intended to interfere with work performance; or
- the conduct creates or is intended to create an intimidating, hostile or offensive work environment.

Depending on the circumstances, sexual harassment can include: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendos; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; displaying or circulating sexually suggestive objects or pictures (including through e-mail); and other physical, verbal or visual conduct of a sexual nature.

OTHER TYPES OF HARASSMENT include verbal or physical conduct or visuals that denigrate or show hostility or aversion toward an individual. Such conduct is illegal when it is because of a protected characteristic and it:

- unreasonably interferes or is intended to interfere with work performance;
- creates or is intended to create an intimidating, hostile, or offensive work environment; or
- otherwise adversely affects an individual’s employment opportunities.

Reporting Discrimination or Harassment

Preventing harassment is everyone's responsibility. If you have questions or concerns about discrimination or harassment in our workplace, you are encouraged to discuss them with your manager or the Chief Operating Officer. If you believe you have been subjected to discrimination or harassment, or know of another employee who has, you must report it immediately. Employees can raise concerns without fear of retaliation, and you will not be disciplined or suffer retaliation of any kind for reporting a legitimate good-faith complaint of discrimination or harassment, or honestly assisting in the investigation of such a complaint. Our Complaint and Investigation policy below applies to all issues related to discrimination or harassment.

Managers and supervisors are required to report any complaint that they receive, or any harassment that they observe to the Chief Operating Officer. In addition to being subject to discipline if they engaged in harassing conduct themselves, supervisors and managers will be subject to discipline, up to and including termination, for
failing to report suspected harassment or otherwise knowingly allowing harassment to continue. Supervisors and managers will also be subject to discipline for engaging in any retaliation.

Whistleblower Policy

All employees of WSW are expected and encouraged to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of WSW, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. To this end, WSW is committed to operating in furtherance of its tax-exempt purposes and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its board members, officers, employees, or volunteers.

Reporting Illegal and/or Dishonest Activity

Employees are encouraged to report any activity, policy or practice that he or she believes may be illegal or dishonest and that involves WSW. If you have a reasonable belief that an employee or WSW has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, you are expected to immediately report such information to your manager or the Chief Operating Officer. If you do not feel comfortable reporting the information to your manager or the Chief Operating Officer, you may report the information to the Chief Executive Officer. Please note that WSW recognizes you may need to disclose trade secrets in conjunction with some of this activity and in certain circumstances employees will not be disciplined for doing so. See our Confidentiality/Non-Disclosure policy for more details on this.

You are not responsible for investigating any suspicious activity or for determining fault or corrective measures. WSW has assigned specific management officials to carry out these activities.

Preventing Retaliation

You will not be subject to discipline or retaliation of any kind for reporting a concern to a manager, the Chief Operating Officer, the Chief Executive Officer or to a federal, state or local agency what you believe in good faith to be a violation of the law; or because you participate in good faith in any investigation or proceeding, or exercise your rights under any state or federal laws or regulations to pursue a claim or take legal action to protect your rights. Additionally, we expect that WSW employees will not engage in any type of harassing conduct or retaliate in any way against a fellow employee who reports a concern or participated in these activities. If you have reported a concern or participated in a related activity and feel that you are being retaliated against for having done so, you must notify the Chief Operating Officer so we can address the situation appropriately.

The Investigation Process

Upon learning of illegal or dishonest conduct or retaliation, a manager, the Chief Operating Officer and/or the Chief Executive Officer must promptly take steps to ensure the appropriate company representative(s) is advised of the issue. This is to ensure that potentially harmful, unlawful or otherwise improper conduct is corrected immediately.

Employee complaints will be investigated promptly, and appropriate steps will be taken to resolve valid concerns and protect reporting employees from retaliation. All WSW employees are expected and encouraged to cooperate with any requests for an interview, to provide documents or other evidence, and to participate in any aspect of an investigation. During an investigation, WSW will maintain confidentiality to the degree possible, consistent with the Company’s need to thoroughly investigate the incident and issue appropriate disciplinary action.
Employees found to be engaging in illegal or dishonest conduct or retaliatory behavior will be subject to disciplinary action, up to and including employment separation. Similarly, employees who intentionally file a false report of wrongdoing will be subject to discipline up to and including employment separation.

**Lobbying**

Generally, no employee will be given tasks that involve lobbying; that is, seeking to influence legislation. There are important federal laws regarding tax-exempt non-profit organizations engaging in such activities. While the law does not prohibit the activity, it sets strict and limiting standards for undertaking and reporting on the activity with which WSW employees must fully comply.

In general, no organization may qualify for section 501(c)(3) status if a substantial part of its activities is attempting to influence “legislation” (commonly known as lobbying). A 501(c)(3) organization may engage in some lobbying, but too much lobbying activity risks loss of tax-exempt status. “Legislation” includes action by Congress, any state legislature, any local council, or similar governing body, with respect to acts, bills, resolutions, or similar items (such as legislative confirmation of appointive office), or by the public in referendum, ballot initiative, constitutional amendment, or similar procedure. It does not include actions by executive, judicial, or administrative bodies.

An organization will be regarded as attempting to influence legislation if it contacts, or urges the public to contact, members or employees of a legislative body for the purpose of proposing, supporting, or opposing legislation, or if the organization advocates the adoption or rejection of legislation.

Organizations may, however, involve themselves in issues of public policy without the activity being considered as lobbying. For example, organizations may conduct educational meetings, prepare and distribute educational materials, or otherwise consider public policy issues in an educational manner without jeopardizing their tax-exempt status.

**Restrictions on Political Activity**

Candidacy for political party office, including that of committee member or convention delegate, is not prohibited, even where such office is voted on in a partisan election. However, in compliance with the Hatch Act and OEO Instruction 6907-1, the following rules shall apply to all employees. No employee shall:

- Use his/her official authority or influence for the purpose of interfering with or affecting the result of an election;
- Directly or indirectly coerce, attempt to coerce, or advise a state or local officer to pay, lend, or contribute anything of value to a party, committee, organization, agency, or person for political purposes; or
- Be a candidate for public elective office in a partisan election.

**Reasonable Accommodations**

WSW provides reasonable accommodations related to disabilities, religious observances or for victims of domestic violence, sexual assault or stalking. If you require an accommodation, we encourage you to talk with your manager or Chief Operating Officer. We will make every effort to provide reasonable accommodations, taking into account your needs, safety concerns and the likely burden on our operations.

If you are denied an accommodation and feel that the denial is unwarranted, or if you believe you are experiencing retaliation because you requested an accommodation, notify your manager or the Chief Operating Officer immediately. Employees can request accommodations and raise concerns related to them without fear of
retribution. This is explained in further detail under our Complaint and Investigation policy below, which applies to all issues related to reasonable accommodations.

**Reasonable Accommodation for Disability**

WSW provides individuals with disabilities with reasonable accommodations for the known physical or mental limitations of an otherwise qualified applicant or employee, unless it creates undue hardship to WSW. Individuals who may qualify for consideration as disabled include applicants or employees who have or are regarded as having a physical or mental impairment or have a record of such impairment.

Inquiries about reasonable accommodations will be kept confidential to the extent possible. Once we learn of your need for an accommodation, we will work with you to identify possible reasonable accommodations to help you perform the essential functions of your job.

**Reasonable Accommodation for Pregnancy**

WSW provides reasonable accommodations to pregnant employees, including frequent, longer, or flexible restroom breaks, allowances to eat and drink while working, means/opportunity to sit more frequently and assistance with lifting any object. Additional accommodations may be available depending on specific circumstances.

**Reasonable Accommodation for Religious Reasons**

WSW provides reasonable accommodations for religious practices or needs of employees. Religious practice or need is broadly defined and includes moral or ethical beliefs as to what is right and wrong that are sincerely held by an employee with a strength of traditional religious views. Reasonable accommodations may include allowing employees to wear religious clothing or to take paid or unpaid time off to engage in an employee’s religious observance or practice, such as a holy day.

**Complaint & Investigation Procedures**

At WSW, we take employee concerns and complaints seriously. We want to hear from our employees about important employment-related issues and concerns, such as potential discrimination, harassment, retaliation and safety concerns. We encourage you to bring these issues to the attention of your manager or the Chief Operating Officer. If you feel your concern is not being appropriately addressed, you may contact the Chief Executive Officer.

**Preventing Retaliation**

Employees can raise legitimate good-faith complaints and honestly assist the investigation of any such complaints without fear of discipline or retaliation of any kind. Additionally, we expect that WSW employees will not engage in any type of harassing conduct or retaliate in any way against a fellow employee who reports a concern. If you have reported a concern and feel that you are being retaliated against for having done so, you must notify your manager or the Chief Operating Officer so we can address the situation appropriately.

**The Investigation Process**

Any employee in a supervisory role who becomes aware of possible discrimination, harassment, retaliation, or other important employment issues must promptly take steps to ensure the appropriate company representative(s) is advised of the issue. This is to ensure that potentially harmful, unlawful or otherwise improper conduct is corrected immediately. Every effort will be made to provide confidentiality; however, even when an employee shares information but asks for no action to be taken, a manager must seek additional information from the appropriate company representative(s) before agreeing not to take action.
Employee complaints will be investigated promptly, and appropriate steps will be taken to resolve valid concerns and protect reporting employees from retaliation. All WSW employees are expected and encouraged to cooperate with any requests for an interview, to provide documents or other evidence, and to participate in any aspect of an investigation. During an investigation, WSW will maintain confidentiality to the degree possible, consistent with the Company’s need to thoroughly investigate the incident and issue appropriate disciplinary action.

Employees found to be engaging in unlawful discrimination, harassment, retaliation, illegal or dishonest conduct or other violations of company policy will be subject to disciplinary action, up to and including employment separation. Similarly, employees who intentionally file a false report of wrongdoing will be subject to discipline up to and including employment separation.
NAVIGATING OUR WORKPLACE

Knowing Your Employee Status & Classification

It is important to understand the status of your employment when it comes to topics such as wage and hour laws, eligibility for benefits, and, in general, communications we may send to our employees.

Exempt and Non-Exempt Status

All employees are designated as either exempt or non-exempt. If you are not sure which category you fall into, please talk to your manager.

**EXEMPT** employees work a professional workweek and are not eligible for overtime pay under applicable federal and state laws. A professional workweek is considered working the hours needed to carry out assigned job duties, regardless of whether this requires more or less than 40 hours a week. Some exempt positions may require overnight travel, weekend or evening hours, a work-at-home component or other variations to schedules.

**NON-EXEMPT** employees typically are paid an hourly wage, are normally assigned a regular work shift of no more than 40 hours per week and receive overtime pay at the rate of one and one-half times their regular rate of pay for hours worked in excess of 40 hours per week, unless otherwise required by law. Non-exempt employees must report all time they work on a daily basis. Some non-exempt positions may also require overnight travel, weekend or evening hours, or other variations to schedules.

Employee Classification

Employees also are classified as regular full-time, regular part-time, temporary, or some other official employee classification. If you are not sure which category you fall into, please talk to your manager.

Regular Full-Time & Regular Part-Time Employees

Regular full-time and regular part-time employees are exempt or non-exempt employees who are regularly scheduled to work and may be eligible for certain employee benefits as outlined in benefit plan documents.

Regular employees who work an average of 35 or more hours per week are regular full-time employees. Regular employees who work an average of less than 35 hours per week are regular part-time employees.

Temporary, Seasonal, Intern, & On-Call Employees

Temporary, seasonal, intern and on-call employees are exempt or non-exempt employees hired by WSW to work only on an interim basis. These employees usually are not eligible for certain benefits for which regular full-time or regular part-time employees may be eligible. Temporary, seasonal, intern and on-call employees retain their status until they are notified of a change. Employment beyond any initially projected period does not imply in any way a change in at-will employment status.

Independent Contractors/Staffing Firm Employees

Independent contractors or workers employed by contract staffing firms generally are engaged to cover a variety of project-based assignments, and they are not considered employees of WSW. Such contract-based work does not create eligibility for benefits to which a WSW employee may be entitled.
Work Schedules

WSW is open for business from 8:00 a.m. to 5:00 p.m., Monday through Friday; however, our work from time to time may be conducted outside of normal business hours. Employees should coordinate with their manager to determine their work schedule and required availability.

To support a collaborative work environment, WSW has established Core Working Hours of 9:00 a.m. to 4 p.m. Employees may adjust their schedules, with approval from their manager, earlier or later to accommodate their preferences, provided they are working during the Core Working Hours with the exception of normal and reasonable meal and break periods.

Please keep in mind that workloads, staffing needs and operational efficiency may require temporary or permanent adjustments to your work schedule, including releasing you from work before your scheduled shift end time, or requiring you to work beyond your scheduled shift end time.

Off-Site Work

Employees may be eligible to work off-site under certain conditions, on either a temporary or ongoing basis. Employees must obtain approval to work off site from their manager and Chief Executive Officer, and each request to do so will be evaluated on a case-by-case basis. All off-site work arrangements must allow for all functions of your position to be performed to the same standard as on-site work. Employees working off site are expected to carry out their job tasks with at least the same level of quality and quantity of work that you produce while working in the office. Missed deadlines, not completing deliverables in a timely manner and other poor performance may result in loss of off-site work privileges.

Additionally, employees who are working off-site must adhere to following expectations.

- Employees must maintain regular contact and communication with your manager and other colleagues.
- Off-site work locations should provide a productive space to work and be free of interruptions.
- If your position requires contact with partners, clients, or other third parties, off-site work locations should allow for professional communication, free from excess noise and interruptions. If you participate in a video conference, take care to ensure that the area visible to the camera is neat and appropriate for a client or third party to view.
- Employees are responsible for ensuring they have the necessary equipment to perform assigned tasks. WSW generally does not cover costs associated with off-site work, such as Internet access, office equipment, meals and refreshments.
- Off-site work locations, equipment, and communications technology should allow for proper handling of private or confidential information and maintaining security.
- **Non-exempt** employees working from a home will be paid for travel time to and from required meetings or events only if the employee performs some work prior to traveling to the meeting or event.

Employees working off-site or telecommuting for an extended period of time may be provided a more detailed set of guidelines.

Attendance & Punctuality

WSW believes that good attendance and punctuality are essential functions of everyone’s job. Being ready to work at your starting time and location each day is considered a basic performance expectation. At the same time, we understand there may be times when an absence from work will occur.
Excessive absenteeism creates a burden on other employees, interferes with production and partner relations and interrupts the routine activities of WSW. Arriving to work on time, returning from meal and rest periods promptly and avoiding excessive incidences of leaving work early generally builds strong co-worker relationships. Should absenteeism, undue tardiness or early departure become apparent, disciplinary action may be required.

Absences attributed to scheduled vacations, health conditions protected under any company and/or legally entitled leave benefit or other situations as determined by WSW are not counted when determining excessive absenteeism and tardiness. To ensure you receive all time off and leave benefits available to you, we encourage you to let your manager know if you will be out due to a health issue, the health issue of a family member, or reasons related to domestic violence or victim leave, bereavement, jury duty or military duty. If you are not comfortable talking to your manager about the reasons for your time off, you also can talk to the Chief Operating Officer.

**Required Notice for Unscheduled Absences, Tardiness or Early Departures**

When you are unexpectedly unable to report to work or will be late for any reason, please notify your manager as soon as possible and no later than your regular starting time each day via phone, email or text message. This will allow us to arrange for temporary coverage of your duties as needed and helps other employees to continue work in your absence.

If you become ill while at work or must leave work for some other reason before the end of the workday, be sure to inform your manager of the situation. If your manager is not available, notify another person in charge such as a key co-worker or another manager who can ensure your manager receives the message.

Employees who do not report for work and do not communicate with the Company for two consecutive days will be assumed to have resigned voluntarily as of their last day of work.

**Required Notice for Planned Absences & Late Arrivals**

When planning for time off or a late arrival to work, notify your manager and Chief Operating Officer as soon as possible, requesting planned time off at least 30 days in advance whenever possible. When requesting time off for sick or health-related reasons, employees should request time off at least 10 days in advance, unless not practical. Each request for time off or late arrival will be considered separately, in light of your needs and the needs of the Company.

**Inclement Weather/Emergency Closings**

At times, emergencies such as severe weather, fires, power failures or natural disasters can disrupt company operations. WSW does not expect employees to risk injury to themselves or others by driving or working in unsafe conditions. If you are unable to travel to or for work due to poor road conditions, please treat the instance as an unplanned absence or late arrival and contact your manager no less than one hour before you are expected to arrive at work.

The decision to close the office is made by the Chief Executive Officer, employees will receive official notification from their manager. Ensuring your manager has an up-to-date telephone number and e-mail address will ensure you receive these messages.

Time off from scheduled work due to emergency closings will be paid for all employees. If the office is not closed but employees are unable to be present due to inclement weather, the time will be unpaid for all non-exempt employees; however, employees may use any PTO (paid time off) available to them. Exempt employees will be paid in accordance with applicable wage and hour laws. In certain circumstances, employees may be authorized or required by their manager to work from home.
**Meal & Break Periods**

WSW encourages employees to take reasonable breaks during the workday to maintain productivity. Non-exempt employees who are scheduled for a work period of five hours or greater must take at least a 30-minute unpaid meal period during which the employee is relieved of all work duties. Meal breaks are generally taken during a time designated by your manager to ensure we maintain quality customer service and department coverage. Employees without scheduled meal breaks should take their breaks in the middle of their shift and at times that will not disrupt customer service and department coverage. If you are uncertain when to take your meal break, please talk to your manager. On the rare occasion an employee is called back to work during a meal break, the employee may be eligible to be paid for the time in which the employee is re-engaged. If this happens, you should discuss it with your manager.

In addition, non-exempt employees must take a paid 10-minute rest period generally occurring in the middle of each four-hour work period and at a time that is not disruptive to customer service or department coverage. If you are uncertain as to when you can take your rest break, please talk to your manager.

Please take your meal and rest breaks away from your work area to minimize the chance for work interruptions. Rest periods must be taken in addition to and separately from time allowed for meals, and employees may not waive their rights to breaks. Employees may not leave early or extend their meal period in lieu of not taking meal or rest breaks. Rest periods are considered time worked for purposes of calculating overtime for non-exempt employees.

**Lactation Breaks & Accommodations**

WSW provides reasonable accommodations and breaks for employees who need to express breast milk for a child. Employees may take reasonable rest periods and we will make a reasonable effort to provide a suitable location for employees to express milk in private. An employee who intends to express milk for her child should notify the Chief Operating Officer as soon as possible so that appropriate arrangements can be made.

**Timekeeping**

Accurately recording time worked is the responsibility of every employee. You may not delegate your time recording responsibility to another employee and/or misrepresent time worked. You are expected to report all paid time off, such as PTO, and other personal time away from work, such as leaves of absence, to ensure the proper recording of leave usage.

Non-exempt employees must record all time actually spent performing any work-related tasks, including the time they begin and end their work, and the time they start and end their unpaid meal breaks. All overtime work performed by a non-exempt employee must receive a manager’s prior authorization.

If your hours are considered billable to a specific project, grant, and/or funding stream, you are responsible for accurately documenting time spent. This may include logging your hours in multiple places to facilitate preparation of required reporting. Accuracy of time attributed to specific projects and grants is very important. If you are not sure how to record your time or in what increments to record your time, please talk to your manager.

We consider attempts to falsify timekeeping records a very serious matter. By submitting timesheets or time records, you are certifying their accuracy. Under or over reporting your hours worked may result in disciplinary action, up to and including employment separation.

Reported hours and any changes to your time records are reviewed and must be approved by your manager. Questions regarding the timekeeping system should be directed to your manager. In addition, employee absences due to illness that are over three days consecutively should be reported to the Chief Operating Officer to
understand whether there are benefits and/or return to work obligations that may result from the continuous absence.

**Dress & Appearance**

Professional appearance is important anytime you come in contact with our external employees, partners or community members. Employees should be neat, clean, well-groomed and dressed appropriately for our business and for their position in particular.

When interacting with external employees, partners, or community members, employees should dress in a manner similar to the most senior executives with whom they may interact.

The dress code at WSW is best described as business casual. Examples of appropriate business attire include a polo shirt or button-up shirt, nice jeans, slacks, skirts, dresses and any form of shirt, including t-shirts and, provided this attire is appropriate for the activity you are engaging in and with whom you are interacting. Clothing that is torn or footwear such as flip flops are not appropriate.

We expect employees will exercise good judgment regarding their appearance; however, we reserve the right to determine appropriateness. If you are “unsure” whether a particular grooming and/or dress option meets our standard, we encourage you to consult with your manager in advance. Any employee who is improperly dressed will be counseled or in severe cases may be sent home to change clothes. Exceptions to our appearance guidelines may be made on a case-by-case basis as a religious accommodation.

**Confidentiality/Non-Disclosure**

The protection of confidential business information and trade secrets is vital to the interests and success of WSW. Additionally, our external employee partners and vendors entrust us with personal and proprietary information, and we have an obligation to maintain the confidentiality of this information. We expect employees to take care to safeguard confidential information entrusted to them. Such confidential information includes, but is not limited to, the following examples.

- Proprietary or confidential external employee information and agreements;
- Non-public financial information;
- Marketing strategies;
- Pending projects and proposals;
- Proprietary production processes and work product;
- Computer processes, code and programs; and
- Intellectual property such as patents, prototypes, innovations and/or trade secrets.

Please note that, in accordance with the Defend Trade Secrets Act (DTSA), employees may disclose trade secrets in the following circumstances: (1) the disclosure of the trade secret is made to a federal, state, or local government official or an attorney for the sole purpose of reporting a suspected legal violation; (2) the disclosure is made in a complaint or other document filed in a lawsuit, provided the filing is made under seal; or (3) the trade secret is disclosed in connection with a retaliation lawsuit filed by the employee against the employer for reporting a violation of the law.

Any personal identifiable information (PII) must be encrypted if sent via email.

If you are uncertain whether it is proper to share particular information or documents with a third party, please discuss it with your manager before doing so. Employees who improperly use or disclose confidential business
information may be subject to disciplinary action, up to and including employment separation and, when appropriate, legal action.

**Conflict of Interest**

WSW requests that employees avoid situations that might cause their personal interests to conflict with the interests of the Company or to compromise its reputation or integrity. A conflict of interest, or the appearance of one, occurs when you, a member of your immediate family or a close personal friend, use your position with WSW for personal benefit through an investment, association, or business relationship that interferes, or may appear to interfere, with your ability to exercise independent judgment on the Company’s behalf. An example would be having a financial interest in or working for any organization that is a contractor or competitor of WSW.

If you believe you may have an actual or perceived conflict of interest, you must report it to your manager or the Chief Operating Officer immediately.

**Tobacco-Free/Smoke-Free Environment**

WSW is committed to providing a safe and healthy environment for all employees, external employees and visitors. Therefore, the use of tobacco products, including cigarettes, cigars, e-cigarettes/vaping, and chewing tobacco, is not permitted anywhere on the company property or at assigned work locations, except in authorized, designated locations outside of buildings. Employees should follow all rules posted in designated smoking areas. This includes when employees are traveling on company business and/or when transporting others for work-related reasons.

**Drug & Alcohol Policy**

WSW is committed to protecting the safety, health and wellbeing of its employees and all people who come into contact with its workplace and property. Recognizing that drug use and alcohol abuse can pose a significant obstacle to this goal, we have established a drug and alcohol-policy that balances our respect for individuals with the need to maintain an environment free of drugs and disruptive alcohol use. Our policy is intended to comply with all federal and state laws governing drug testing and is designed to safeguard employee privacy rights to the fullest extent of the law.

**Unacceptable Conduct**

In keeping with this commitment, the unlawful or improper presence or use in the workplace of drugs or alcohol by employees will not be tolerated. Specifically, the following expectations apply to all employees during their working hours, when on-call, while on the company property and whenever they are conducting business on behalf of or representing the Company.

- The manufacture, distribution, possession, sale, exchange, transfer or purchase of illegal drugs, drug paraphernalia, controlled substances of abuse or alcohol is not allowed, except in the instance of company authorized activities involving alcohol, as described below.
- The possession or use of illegal drugs, drug paraphernalia, controlled substances of abuse or alcohol, including such items being on an employee’s person, among an employee’s personal belongings, in work or storage areas and in vehicles brought onto company or external employee property, is not permitted, except in the instance of company authorized activities involving alcohol, as described below.
- Being under the influence of illegal drugs, controlled substances of abuse or alcohol is prohibited, except when the use is pursuant to a doctor’s orders and the doctor has advised the employee that the
substance does not adversely affect the employee’s ability to safely perform his or her job duties, or in the instance of company authorized activities involving alcohol, as described below.

• Working while under the influence of prescription or over-the-counter drugs is not allowed to the extent that such use, influence or presence in the body may affect the safety of employees, external employees, visitors and/or members of the public, the employee’s job performance or safety, and/or the safety and efficiency of our workplace.

• Failing to fully cooperate with any aspect of an investigation into unacceptable behavior under this policy, such as a refusal to submit to required testing, searches or inspections, failure to complete rehabilitation conditions imposed by the Company, or submission of adulterated, diluted, or invalid specimen samples for testing, is unacceptable.

Please note: Although some states have legalized marijuana, possessing and/or using marijuana at the workplace, as well as testing positive for marijuana use, is a violation of our drug and alcohol policy. If you use marijuana for medicinal purposes, please reach out to the Chief Operating Officer to discuss the situation, including what, if any reasonable accommodations may be available. Similarly, please let us know if you feel you may be at risk of violating this policy due to a prescribed drug.

WSW does not desire to intrude into the private lives of its employees, but recognizes that employees’ off-the-job involvement with drugs and alcohol may have an impact on the workplace. Therefore, WSW reserves the right to take appropriate disciplinary action for drug use, sale or distribution while off company premises. All employees who are convicted of, plead guilty to or are sentenced for a crime involving an illegal drug are required to report the conviction, plea or sentence to the Chief Operating Officer at your location within five (5) calendar days. Failure to comply will result in automatic separation. Cooperation in complying may result in suspension without pay to allow management to review the nature of the charges and the employee’s past record with WSW.

WSW may conduct searches of workspaces and personal items that are carried onto or removed from company or external employee property if there is reasonable cause to believe this policy has been violated. This includes searches of outerwear, purses, wallets, pockets, bags, vehicles, office furniture and equipment.

Definitions

The following definitions will assist in clarifying this policy:

• Alcohol: All beverages and other liquids containing ethyl alcohol, including without limitation beer, wine and distilled liquors.

• Company property and/or the workplace: All company-owned or leased property or property otherwise in possession or control of the Company or provided to employees by the Company, including, but not limited to buildings, desks, lockers, vehicles, offices and parking areas. All other premises, property and buildings in which employees are carrying out their job duties, engaged in company business and/or otherwise representing WSW.

• Controlled substance of abuse: Any substance listed in Schedules I-V of Section 202 of the Controlled Substance Act.

• Drug: Any chemical substance that produces physical, mental, emotional or behavioral change in the user, including prescribed medications and medications obtainable without a prescription, illegal drugs or controlled substances of abuse.

• Drug paraphernalia: Equipment, a product or material that is used or intended for use in concealing an illegal drug, or otherwise introducing a drug into the human body.

• Illegal drug:
Any drug, or derivative thereof, whose use, possession, sale, transfer, attempted sale or transfer, manufacture or storage is illegal or regulated under any federal, state or local law or regulation, including marijuana, cocaine, opiates, amphetamines, and phencyclidines ("PCP").

Any drug, including, but not limited to, a prescription drug, used for any reason other than that prescribed by a physician, or used by anyone other than the named recipient of the prescription.

Inhalants used illegally.

- **Possession:** On one’s person, in one’s personal effects or vehicle on Company property, in the workplace or under one’s control.

- **Under the influence:** A state of not having the normal use of mental or physical faculties resulting from the voluntary introduction into the body of alcohol or a drug or testing positive for the presence of any amount of a drug or alcohol in body.

- **Use:** Any form of consumption, including ingestion, inhaling or injecting.

**Company Authorized Activities**

From time-to-time, WSW may allow the possession, consumption, or use of alcoholic beverages. Drinking to excess, however, is unacceptable during these company authorized activities. Excessive alcohol consumption can endanger your health and safety and the health and safety of those around you, as well as tarnish WSW’s reputation. Employees who choose to consume alcohol during company authorized activities are responsible for ensuring their alcohol consumption is in moderation and they remain capable of carrying out work tasks and behaving in accordance with usual business standards and company policies. Employees who are overindulging may be relieved from work for the remainder of the day and should not attempt to drive. In these situations, we will assist in obtaining alternative arrangements for getting home, as appropriate.

**Drug & Alcohol Testing**

WSW employees may be asked to submit to a drug and/or alcohol test if we have reasonable suspicion that an employee is in violation of this policy, in accordance with all federal, state and local laws and regulations. Reasonable suspicion may exist when an employee demonstrates observable symptoms of being under the influence; there is unexplained significant deterioration in an employee’s job performance or unexplained or suspicious absenteeism or tardiness; an employee engaging in erratic or unsafe job-related activities that poses significant danger to themselves or others; or we receive credible reports of individual or group drug or alcohol use in violation of this policy.

**Consequences of Policy Violations**

Any employee determined to be in violation of this policy may be subject to disciplinary action, up to and including immediate employment separation. WSW reserves the right to involve law enforcement officials for any conduct that it believes might be in violation of state or federal law.

**Drug & Alcohol Treatment**

WSW recognizes that alcohol and drug abuse and addiction can be treatable. Employees who have drug or alcohol dependency problems, or who feel they may have such problems, are encouraged to seek assistance. The Chief Operating Officer can help you reach out to some available resources.

WSW will support voluntary treatment efforts. It is the employee’s responsibility, however, to pursue and complete treatment before the problem results in unsatisfactory job performance, attendance, safety concerns or other misconduct, and before a violation of this policy occurs. An employee who tests positive for an illegal drug, for example, cannot immediately enter a drug treatment program to avoid the possibility of a disciplinary action or
Use of Personal Vehicles for Work

If you use a personal vehicle to perform your job, please be aware of and follow these requirements:

- You must possess and carry a valid driver’s license and evidence of satisfactory insurance while driving. (Please note that in the case of an accident, WSW’s insurance will be secondary to your personal insurance.)
- You are expected to drive in a safe and lawful manner. WSW will not take responsibility for any violations or citations received or liabilities that result from any unsafe and/or unlawful actions you engage in while using your vehicle.
- Please refrain from using portable devices while driving, including cell phones, smart phones and tablets.
- Do not operate a vehicle under the influence of drugs, alcohol or any controlled substance.
- If you are in an accident while traveling for a work-related reason, you must notify the Chief Operating Officer as soon as possible, regardless of how insignificant the accident may seem.

Driver’s License/Driving Record

If you are in a position where the operation of a motor vehicle is an essential duty of your job, you will be required to present and maintain a valid driver’s license, maintain an acceptable driving record and provide proof of auto insurance on the vehicle used for work purposes. Please be aware that WSW may conduct periodic driving record checks. Employees who regularly operate a motor vehicle to carry out their job duties are encouraged and expected to immediately notify the Chief Operating Officer of any changes to their driving record.

If you are uncertain whether operation of a motor vehicle is an essential duty of your position, please ask your manager.

Social Networking & Media

Social media and networking activities can take many different forms, including internet forums, blogs and microblogs, online profiles, wikis, podcasts, pictures and video, e-mail, instant messaging, and posting to social media sites, to name just a few. Examples of social media applications include, but are not limited to, LinkedIn, Facebook, Myspace, Pinterest, Instagram, Snapchat, Wikipedia, YouTube, Twitter, Yahoo groups, Tumblr, Google+, Reddit and Flickr.

At WSW, authorized social networking and blogging is used to support WSW’s mission and vision. These authorized activities are done through designated job roles and oversight to ensure that the use of these communications maintain WSW’s identity, integrity and reputation while minimizing actual or potential legal risks, whether used inside or outside the workplace. Please be aware that employees do not own company-related accounts or any of the authorized activities conducted through social networking or blogging tools. Therefore, unless specifically instructed, employees may not speak on behalf of WSW in social networking and social media forums, and should not hold their personal views out as those of the Company.

Guidelines for Authorized Social Networking

The following guidelines apply to social networking and blogging when authorized by WSW. The rules and guidelines apply to all company-related blogs and social networking.
EMPLOYEE HANDBOOK

- Only authorized employees may prepare and modify content for WSW’s blogs and social networking sites.
- Any copyrighted information where written reprint authorization has not been obtained in advance may not be posted.
- Authorized employees may remove any content that does not meet the guidelines of this policy or that may be illegal or offensive, without permission from the author/poster or advance notice.
- Guest bloggers and providers of content are expected to abide by the guidelines of this policy. We may remove, without advance notice or permission, any content produced by guests that is considered inaccurate or offensive and may take legal action against guests who engage in unlawful conduct.

Personal Blogs & Social Networking

WSW respects the right of employees to write blogs and use social networking and does not want to discourage employees from self-publishing and self-expression. We do not discriminate against employees who use these media for personal interests and affiliations or other lawful purposes. Employees, however, are expected to follow these guidelines and policies, which are designed to provide a clear line between you as the individual and you as the employee.

Please take care to ensure your postings are consistent with this policy. Inappropriate postings that include confidential information, discriminatory remarks, harassment, threats of violence or similar inappropriate, unprofessional or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including employment separation, and if necessary, legal action. Employees are personally responsible for their commentary on blogs, social media and networking sites.

When engaging in online activities, WSW wants to make sure you understand the expectations and consequences for your conduct. The following is important to know:

- Please be aware that WSW may monitor comments or discussions about the Company, its employees, partners, external employees and the industry, including products and competitors, posted on the Internet by anyone, including employees.
- Employees may not use company equipment and tools or company facilities or time, to conduct personal blogging or social networking activities.
- Use of blogs or social networking to engage in harassment or discriminate against employees or anyone associated with or doing business with WSW will not be tolerated. (See our policy on Anti-Discrimination/Anti-Harassment in the Making WSW a Great Place to Work section of this Handbook.)
- Employees may not represent their personal views as those of the Company, or any person or organization affiliated or doing business with WSW.
- Confidential information, including internal documents, or details about our partners, external employees, vendors or suppliers, may not be posted without prior approval from your manager. (See our policy on Confidentiality/Non-Disclosure in the Navigating Our Workplace section of this Handbook.)

WSW will not interpret these guidelines in a manner that limits an employee’s right to discuss the terms and conditions of employment with other employees or to otherwise engage in activities that are protected by the National Labor Relations Act.
USING COMPANY TECHNOLOGY & PROPERTY

WSW provides employees with a variety of company-owned technology, equipment, and other property necessary for completing the job duties assigned to them. The following guidance outlines the acceptable use and limitations of use for company property. Misuse of company property and violations of these guidelines may result in loss of use and disciplinary action up to and including employment separation. If you have any questions about these guidelines, please talk with your manager.

Electronic Devices, Communications & Network Systems

WSW encourages employees to use our electronic devices and communications and network systems, such as internal and external electronic mail (e-mail), telephone voicemail, internet access, and computer hardware and software. These are important tools for carrying out your job duties efficiently and effectively. We ask, however, that you use these electronic devices and systems appropriately.

Employees are expected to observe the following guidelines when using our electronic devices, communications, and network systems.

- WSW’s electronic devices, communications and network systems have been made available to employees for business purposes. You may use these devices, communications and systems for personal reasons, provided your use is not excessive, the sites you visit are appropriate and not offensive, and your use does not violate these guidelines. We also discourage personal use during working hours to avoid disruptions to company operations and employee productivity. Additionally, you may not use the Company’s electronic devices, communications and systems for your own commercial activity or for the benefit of any entity or person other than yourself or WSW.

- Please be aware that any message or document created or put into our electronic devices, communications and network systems is not a private communication or document and may be accessed and reviewed by WSW. We may monitor and access electronic devices, communications and systems to ensure they are safe and secure, to confirm compliance with company policies and to safeguard against WSW’s confidential information entering the public domain.

- Employees should take care not to use our electronic devices, communications and network systems in any way that violates any licensing agreements or any other person’s or entity’s copyright. This includes no copying, storing, sharing, installing or distributing software, movies, music, and other materials currently protected by copyright, except as permitted by licensing agreements or fair use laws.

- Employees are expected and encouraged to observe common standards of etiquette and good taste in connection with all communications sent through our systems. We will not tolerate the use of our systems to make harassing or inappropriate communications of any kind (for example, dirty or off-color jokes, sexual or offensive communications, etc.), or to participate in or support illegal activity, such as threats of physical harm, sexual or other harassment, stalking, forgery or fraud.

- Employees may not share passwords or access codes to company electronic devices, communications and network systems with any other person, except the Chief Operating Officer or other WSW employees upon approval of the Chief Operating Officer.

- Employees may not use passwords or access codes for company electronic devices, communications and network systems with any other person, except the Chief Operating Officer or other WSW employees upon approval of the Chief Operating Officer. Similarly, employees may not “hack” into other systems, “crack” other passwords or access codes, or create, transmit, store or alter an electronic communication that attempts to hide the true identity of its creator or sender, or present false information. Notify Chief Operating Officer to recover your
password, if needed. If a computer or network password, Chief Operating Officer will contact WSW’s IT provider for recovery options.

- Employees must obtain management approval before installing any software, apps or other programs on company computers, devices and network systems.

- Employees are expected to protect and take proper care of company electronic devices, including maintaining them in good condition, ensuring they are in a secure location when removed from their office, and reporting loss or theft immediately to their manager.

**Company Mobile Phones**

Some employees may be provided mobile phones by WSW to assist with carrying out job duties. Employees receiving these phones should observe the following guidelines:

- Company mobile phones are intended for business use, however personal calls and text messaging may be allowed from time to time, provided no additional charges are incurred and use is not disruptive to external employee service or employee productivity.

- **Non-exempt** employees may not use their company mobile phones for work purposes outside of their normal work schedule without authorization in advance from their managers. Non-exempt employees who use a company mobile phone for work purposes outside of their normal work schedule must record all time spent working on their timesheet.

- Employees may not use their company mobile phone for work purposes during periods of unpaid leave without authorization from their managers.

- Employees are expected to follow applicable state or federal laws or regulations regarding the use of mobile phones at all times. Employees who are charged with traffic violations resulting from the use of their personal devices while driving will be solely responsible for all liabilities that result from such actions.

Please remember that WSW may, at any time, monitor and preserve any communications that utilize our electronic devices, communications and network systems in any way, including personal data, voicemails, telephone logs, internet use, e-mails and other items on company mobile phones. This means we may request at any time that an employee produce a company mobile phone for inspection, and we may review and retain personal and company-related data on the mobile phone, as well as release any of the retained data to government agencies or third parties during an investigation or litigation.

**Other Company Property**

Other company property includes, but is not limited to, office supplies and equipment, desks, file cabinets, tools, and all other equipment and/or property provided by the Company. We ask that you use this equipment and property appropriately and for the activities in which they are intended to be used. Specifically, employees should observe the following guidelines:

- Company property is made available to employees for business purposes only. You may use company equipment and property for personal reasons, provided your use is not excessive and does not violate these guidelines. We also discourage personal use during working hours to avoid disruptions to company operations and employee productivity. Additionally, you may not use company property for your own commercial activity or for the benefit of any entity or person other than yourself or WSW.

- Please exercise care when using company property and equipment to avoid any undue damage or wear and tear. If a piece of equipment or property is in need of repair, maintenance or replacement, please notify the appropriate person or your manager immediately.
• Employees should take care not to allow any company property to be used in connection with illegal activities or activities that violate company policies, such as threats of imminent physical harm, harassment, forgery or fraud.

Please be aware that we cannot guarantee the privacy or security of information or items stored in or on company property. WSW may search unlocked and/or publicly used company property at any time without notice or consent. We also may request a search of personal property at the worksite or locked in company property assigned to an individual if there is reasonable suspicion of illegal or unacceptable activities, or to obtain company property that is believed to be inside and needed before an employee is available to provide it. Lack of cooperation with any such request may result in disciplinary action up to and including employment separation.
WORKPLACE SAFETY

Maintaining a Safe Work Environment
WSW takes workplace safety issues seriously. Each employee is responsible for obeying safety rules and exercising caution and common sense in all work activities. Employees should practice safety awareness by thinking defensively, anticipating unsafe situations and reporting unsafe conditions. You should immediately report any unsafe or potentially unsafe conditions, to your manager. Employees who violate safety standards and/or cause hazardous or dangerous situations may be subject to disciplinary action up to and including employment separation. You will not be subject to discipline or retaliation of any kind for making a legitimate good-faith report of an unsafe or potentially unsafe condition. Our policy on Complaints and Investigations in the Making WSW a Great Place to Work section of this Handbook applies to all safety-related reports and complaints.

Pet Policy
WSW is responsible for providing a safe and healthy work environment for all employees and visitors. Animals are generally prohibited from all WSW’s facilities and premises with the exception of approved service animals. WSW recognizes that, in some circumstances, a service animal may be a reasonable accommodation to an individual with a disability under the Americans with Disabilities Act (ADA).

Reporting Injuries or Illness
While WSW takes precautions to avoid workplace injuries and illness, they can happen. Employees who observe or are involved in an incident that results in injury, regardless of how insignificant the injury may appear, must notify their manager within 24 hours. In the event of an emergency, employees should call 911 or go to the nearest hospital emergency room for treatment. If you or any other employee requires medical attention while at work, you should notify your manager, who will strive to facilitate appropriate care and take other necessary steps to ensure employee safety. You will not be subject to discipline or retaliation of any kind for making a legitimate good-faith report of an injury or illness. Our company policy on Complaints and Investigations in the Making WSW a Great Place to Work section of this Handbook applies to all reports of workplace injuries and illnesses.

If you are injured on the job, WSW provides workers’ compensation insurance in accordance with applicable law. Workers’ compensation insurance provides medical and income assistance to all employees who experience a work-related illness or injury. For more information about our workers’ compensation benefit or process, please reach out to the Chief Operating Officer.

Building Security
All employees who are issued key cards to company buildings are responsible for their safekeeping. Employees may not let any other person use the key cards issued to them, and should notify their manager immediately if they misplace their key card.

The last employee, or a designated employee, who leaves the building at the end of the business day is responsible for ensuring that lights are out and doors are locked and safely secured. For safety reasons, employees should not be on company property after normal working hours without prior authorization from their manager.
Visitors in the Workplace
To provide for the safety and security of employees, visitors and the facilities at WSW, only authorized visitors whose visits are brief and non-disruptive are allowed in the workplace. All visitors must check in with the front desk and be escorted while on company property. Restricting unauthorized visitors helps ensure security, decreases insurance liability, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances.

Workplace Violence
It is the goal of WSW to provide a safe workplace for all employees—free from intimidation, threats, violent acts and dangerous weapons. In particular, dangerous weapons are not allowed on company property, including in vehicles in parking lots. Dangerous weapons include, but are not limited to, firearms, explosives, knives and other weapons that might be considered dangerous or that could cause harm and are unnecessary for carrying out assigned job tasks.

Workplace violence can include acts committed by an employee, against an employee, and/or on company premises. Conduct or acts such as physical injury, direct or implied threats, hostile behaviors that create reasonable fear of injury or emotional distress, intentional property damage, arson, possession or use of a weapon, or any other conduct of a similar nature, as determined at the sole discretion of the Company, are considered violations of this policy.

Potentially dangerous situations are taken seriously at WSW and must be reported immediately to your manager or the Chief Operating Officer. This includes concerns related to domestic violence that has the potential to spill into the workplace. If you have secured a restraining order that excludes an individual from being at or near your place of employment, please let your manager or the Chief Operating Officer know immediately.

If you receive or overhear any threatening communications from a co-worker or an outside third party, please report it to your manager or the Chief Operating Officer at once. Do not engage in a physical or verbal confrontation with a potentially violent individual. If you encounter an individual who is threatening immediate harm to another person on company property or while you are conducting your job duties, please contact an emergency agency (such as 911) immediately.

You will not be subject to discipline or retaliation of any kind for making a legitimate good-faith report related to workplace violence. Our policy on Complaints and Investigations in the Making WSW a Great Place to Work section of this Handbook applies to reports of workplace violence.
PERFORMANCE EXPECTATIONS & PAY

Employee Performance Management
While most performance feedback should be informal and on-the-spot or close to the time of the actual performance, planned feedback also is important. Regular employee feedback on the quality and quantity of work performance builds understanding and provides guidance for continuing good performance, correcting performance concerns, and developing employee skills for success.

Job Descriptions
Every employee has a job description. Your job description describes the essential duties and responsibilities of a job as well as the skills, knowledge and abilities required to carry out the duties in accordance with our values. As such, your job description establishes the foundation for your performance reviews. It is important for you to review your job description with your manager periodically to ensure that it accurately reflects the tasks being performed. If you feel your job duties are unclear or have changed significantly, we encourage you to meet with your manager to discuss the issue.

Regular Performance Reviews
Managers may schedule routine check-ins with employees to discuss progress and/or aid in removing obstacles to successful performance. Review sessions are designed for the manager and the employee to discuss his or her current job tasks, encourage and recognize positive attributes and activities, and discuss positive, purposeful approaches for meeting work-related goals. In addition, this is an opportunity to discuss emerging or shifting priorities and corrective performance needs.

WSW also provides performance reviews on a more formal and regular basis. Employees generally receive a written performance evaluation annually. This evaluation is a summary of the past review period, and may or may not link to wage and salary decisions. The process includes the opportunity for employees to participate by completing a self-evaluation in preparation for the conversation.

These reviews provide a great opportunity for collaborative, two-way communication between you and your manager about your interests and work-related goals, as well as ways for you to advance and make your employment with us more fulfilling.

Standards for Workplace Conduct
WSW is committed to promoting and maintaining an environment in which all employees, external employees, partners, vendors and visitors are treated with respect and dignity. We strive to create a workplace that is characterized by teamwork, and quality work. To achieve this, employees are expected to conduct themselves in a civil and cooperative manner and to avoid behavior that interferes with the ability of others to work efficiently and productively and feel comfortable in our workplace. While work rules and standards cannot be listed to cover every situation, WSW has created the following non-exhaustive list to describe some of the conduct in the workplace that we consider unacceptable. Employees engaging in this type of conduct may be subject to disciplinary action, up to and including employment separation.

• Theft or inappropriate removal or possession of company or external employees or partners property;
• Fraudulent, illegal or improper conduct or activities;
• Providing false information on an employment application, timekeeping records or other company documents;
In turn, WSW commits to fostering an environment that is:

- **Free from disrespect, disruptive behavior, bullying, harassment and violence in the workplace.** WSW will not tolerate this conduct from any employee (including management), vendor, external employee partners or visitor. Such conduct will be investigated, and if substantiated will be dealt with appropriately.
- **Fair to all parties.** All information, evidence and circumstances will be carefully considered when deciding upon a course of action related to misconduct and/or unacceptable behavior.
- **Efficient and confidential.** All actions taken to investigate, resolve, prevent or address potential misconduct and/or improper behavior will be conducted in as timely and confidential a manner as possible under the circumstances.

### Performance Improvement/Disciplinary Action

WSW wants all employees to succeed at their jobs. For this reason, we may use performance improvement measures to advise employees when they are not meeting performance standards and to develop a plan for improving performance. In these situations, our primary goal is to help an employee improve and develop so that they can meet WSW performance standards.

Performance improvement/disciplinary action may involve a verbal warning, written warning, suspension with or without pay, demotion or separation. WSW expressly reserves the right to determine the preferred method of addressing performance issues in each individual case.

Nothing in this policy provides any contractual rights regarding employee discipline or counseling, nor should anything in this policy be read or construed as modifying or altering the at-will employment relationship between WSW and its employees. The performance improvement process will be determined on a case-by-case basis by the Company and may include any combination and/or order of disciplinary steps as the Company determines is necessary.
Compensation Practices

We believe in the importance of recognizing employee contributions by maintaining competitive pay. Employee compensation will vary based on individual and company performance, the nature and scope of job duties, what other employers pay their employees for comparable jobs (external equity), and what we pay employees in comparable positions (internal equity). Merit increases or bonuses may be implemented from time-to-time as determined by the Chief Executive Officer. They may or may not occur at or around the time performance reviews are provided.

WSW is committed to ensuring there is no wage discrimination within the compensation practice. In reviewing our pay scale, WSW’s goal is to eliminate any systemic bias and discrimination and to ensure employees are treated on the same basis in terms of compensation for the work they perform. All employees performing the same or similar work of equal value will be compensated on the same pay scale. WSW’s pay scale is intended to meet or exceed legislated wage requirements and industry standards, and to compensate, on the same basis, individuals performing the same or similar work, or work of equal value.

Paydays

Employees are paid monthly between the 1st and 5th of each month. Employees may request a mid-month draw on the 15th of each month. We take all reasonable steps to assure that employees receive the correct amount of pay in each paycheck and that employees are paid promptly on the scheduled payday. If you believe you have been paid incorrectly, please discuss this concern immediately with your manager or the Chief Operating Officer.

WSW encourages employees to participate in direct deposit of their pay. This can be accomplished by filling out an authorization form electing direct deposit. If changes to your personal banking occur, it is important to submit an updated direct deposit form to ensure the funds are directed to the account of your choice.

If a regular payday falls during a day you are off from work and you do not participate in direct deposit, your paycheck will be held in the Fiscal Department until you return to the office or, upon request, it can be mailed to your home address on record with us. If you want your paychecks to be mailed to your home address, you must arrange this through the Fiscal Department. Your paychecks will not, under any circumstances, be given to any person other than you without your written authorization.

Overtime

Overtime compensation is paid to non-exempt employees in accordance with federal and state wage and hour laws. Overtime is payable for all hours worked over 40 hours in a workweek at a rate of one and one-half times the non-exempt employee’s regular rate. For overtime purposes, WSW’s standard workweek begins on Sunday at 12:01 a.m. and ends on Saturday at midnight. Time off such as holidays, PTO or any leave of absence will not be considered hours worked when calculating overtime.

All overtime work performed by a non-exempt employee must receive a manager’s prior authorization. Overtime worked without prior authorization from a manager may result in disciplinary action, up to and including employment separation.

Travel Time

Non-exempt employees will be paid for travel time in accordance with state and federal law. Paid travel time is counted for purposes of calculating overtime and should be reflected on timesheets. Although not an exhaustive list, below is general guidance for whether travel time should be paid. If you have any questions about whether particular travel time is paid, please contact your manager.
- **Normal home-to-work and work-to-home travel at the beginning and end of one workday** -- Generally, this time is not paid; however, some exceptions apply.

- **Travel in the course of a day's work from one job site to another** -- Generally, this time is paid. Once the employee arrives at the first required location, the employee is "on the clock" and the subsequent travel time is paid.

- **One-day assignments to a city other than where their primary work location is located** -- Generally, additional travel time over and above an employee’s average home-to-work commute time is paid.

- **Travel that keeps an employee away from home overnight** -- If a non-exempt employee is engaged in overnight travel, travel time is counted if it takes place during the employee's normal working hours, even if occurring on normally non-working days. Travel time beyond this is counted if the employee is working during travel time. Time spent working or in conference during normal working hours at any meeting, conference, or event is time worked.
ADDITIONAL COMPANY POLICIES

Personal Information & Employment References

WSW asks that you ensure we have your most up-to-date personal information at all times. There are many employee systems both within our Company, such as payroll, and with our external partners, such as benefit vendors, Immigration and Naturalization, the IRS and the Social Security Administration, who depend on our ability to provide accurate information on employees and their dependents. In addition, in the event of an emergency, we want to be in the best position to respond while under pressure. This requires access to up-to-date employee information. Employees are responsible for promptly notifying the Chief Operating Officer of any changes in personal information such as:

- Mailing address, e-mail address and telephone numbers;
- Name;
- Marital status and/or changes to beneficiaries;
- Number and names of dependents; and
- Individuals to be contacted in the event of an emergency.

WSW will maintain the confidentiality of your personal information, disclosing it only to those with a need to know.

Occasionally, WSW may be asked to provide a reference for a current or former employee who is seeking new employment. If an employee provides WSW with a written authorization and release of claims, we will provide a more detailed reference. In all other situations, we generally provide only job title and verification of employment dates. Managers and employees may not provide a reference or comment on a current or former employee’s job performance while at WSW without express authorization from the Chief Operating Officer.

Employee Files

Employee files include such documents as resumes and/or job application forms, employee performance reviews, documents reflecting coaching or disciplinary actions taken, and other pertinent information regarding employees. Employee files are considered confidential company property and access to the information is restricted. Only authorized management personnel, the Chief Operating Officer and financial audit staff who have a legitimate reason to review an employee’s file are allowed to do so.

If you would like to review your file, please contact your manager or the Chief Operating Officer. With reasonable advance notice, we will make arrangements for you to do so.

Immigration Law Compliance

WSW employs only United States citizens and those non-U.S. citizens authorized to work in the United States in compliance with the Immigration Reform and Control Act of 1986.

Each new employee, as a condition of employment, completes the Employment Eligibility Verification Form I-9 and presents documentation establishing identity and employment eligibility. Employees whose documents expire may be required to provide additional documentation during the course of their employment.

We participate in E-Verify, where required by state law. This means we will provide the Social Security Administration (SSA) and, if necessary, the Department of Homeland Security (DHS), with information from a new employee’s Form I-9 to confirm work authorization.
**Solicitation & Distribution of Literature**

To avoid disruption in the workplace, WSW requests that employees limit solicitations and the distribution of literature on company property to times when they are not working, such as before or after their shifts, or during lunch and rest breaks. Similarly, employees may not solicit or distribute literature to other employees while those employees are working or to employees who state they are not interested in receiving the information or items offered. Documents and materials related to solicitations or the distribution of literature may not be left out on desks, tables or other work surfaces in work areas.

In some instances, the collection of money for presents, flowers, parties, donations or for cases of particular hardship can be considered appropriate for display in work areas. If you would like to facilitate such a collection, please talk to the Chief Operating Officer. Employees may participate in these approved solicitations only during non-work time, unless we indicate otherwise.

Non-employees are not permitted to solicit or to distribute written material for any purpose on WSW property. These guidelines will not be interpreted to limit an employee’s right to engage in activities that are protected by the National Labor Relations Act.

**Outside Employment**

Employees may hold outside jobs in non-related businesses or professions that do not pose a conflict of interest with WSW. Please talk to your manager about any outside employment opportunity you are considering so that he or she can determine if it presents a conflict of interest with the Company.

Employees holding an outside job are expected to continuously meet the performance standards for their position with us. Unless an alternative work schedule has been approved, you will be subject to the Company’s scheduling demands, regardless of any existing outside work assignments. During working hours, only WSW business may be conducted. Additionally, our company office space, equipment, buildings and other property are not to be used for outside employment.

**Employment of Relatives**

To avoid perceived or actual favoritism or personal conflicts from outside the work environment spilling over into the workplace, relatives of persons currently employed by WSW may be hired only if they will not be working directly for or managing a relative, and will not occupy a position in the same line of authority where an employee can initiate or participate in any part of an employment decision regarding a relative. Such employment decisions include, but are not limited to, hiring, separation, transfer, promotion, wages and leave requests.

**Dating Policy**

WSW encourage employees to develop friendships and share a spirit of teamwork and camaraderie both in the workplace and outside of work. We also strongly value a work environment where employees maintain clear boundaries between employee personal and business interactions because doing so will help all employees to be comfortable and productive at work. Although we do not prevent the development of friendships or romantic relationships between co-workers, we do expect that employees will conduct themselves in a manner that is appropriate for the work environment. Personal relationships should not interfere with the quality of work, effectiveness, or productivity at the workplace.

WSW takes issues related to sexual harassment seriously. For this reason, employees engaged in romantic, amorous and/or sexual relationships with other team members other than marriage (“dating relationship”) should notify the Chief Operating Officer.
If you are engaged in a dating relationship with another employee of WSW, during nonworking time, such as lunches, breaks, and before and after work periods, your personal exchanges on Company property should observe an appropriate workplace manner. Employees are strictly prohibited from engaging in physical contact that would in any way be deemed inappropriate to the workplace, including public displays of sexual affection, sexual innuendo, suggestive comments and sexually oriented joking. Employees should also avoid any conduct that could reasonably be regarded by co-workers as favoritism. Additionally, employees who allow personal relationships with co-workers to adversely affect our work environment or the performance of any employee will be subject to discipline up to and including employment separation.

Individuals in supervisory or managerial roles, and those with authority over others, are subject to more stringent requirements under this policy. This is due to their status as role models, their access to sensitive information, and their ability to affect the terms and conditions of employment of individuals in subordinate positions. When any supervisor, manager, executive, or other Company official in a sensitive or influential position with WSW discloses the existence of a romantic or sexual relationship with another co-worker, we will evaluate whether any conflict of interest exists because of the relative positions of the individuals involved. When a conflict-of-interest problem or potential risk is identified, we will work with the parties involved to consider options for resolving the problem or risk. Matters such as hiring, firing, promotions, performance management, compensation decisions, and financial transactions are examples of situations that may require reallocation of duties to avoid any actual or perceived reward or disadvantage.

Gifts & Entertainment
Accepting or soliciting gifts from external employees, partners or vendors can create the perception of a conflict of interest. For this reason, employees may not solicit or accept for personal benefit, directly or indirectly, any gift, loan, or any item of substantial monetary value ($25 or more) from a person or company that is seeking to conduct or is currently conducting business with us. If you receive any such gift, please talk to your manager about how to handle the situation.

Work-Related Expenses
Only authorized persons may purchase supplies in the name of WSW. Employees whose regular duties do not include purchasing may not incur any expense on behalf of WSW or bind WSW by any promise or representation without prior written approval from a manager. If you need to obtain an item for WSW and you are unsure how to go about doing so, please talk with your manager.

WSW will reimburse pre-approved, reasonable work-related expenses. The Chief Operating Officer can provide you with a copy of our Procurement Policy.

Public Relations & The Media
WSW believes in developing and encouraging a positive two-way relationship with the media. It views any potential media relationship as an excellent opportunity to inform the public of its programs and related activities.

We have designated the Director of Communications as the WSW representative responsible for conversing with the media on our behalf. Having a single point of contact ensures that the information provided is accurate and consistent. If you are approached by a member of the media, please let the person know you are not authorized to speak on behalf of WSW and direct the person to the Director of Communications. Similarly, all official WSW press releases, newsletters, mass mailings, brochures and flyers, or social media marketing efforts of any kind must be approved in advance by the Director of Communications or a designated representative.
If You Should Leave Us

There are many questions employees have when they separate employment. This includes questions regarding their final pay, benefits continuation when applicable and work projects. The following information should assist in providing guidance on the most commonly asked questions.

Resignation Notice

WSW prefers to receive a minimum of two weeks’ notice of an employee’s resignation (one-month for management level employees) whenever possible. To report your resignation, you may submit a letter or e-mail stating your resignation effective date and the reason you are leaving to your manager and Chief Operating Officer.

Before determining your last day of work, please speak with your manager to coordinate how your last days in the workplace will be structured. Things to consider include: What are the top priority work areas that will need attention during this period of time? Who would be the best back-up to certain job duties if the position remains open after your last day of work?

Your Final Pay & Benefits

Generally, your final pay will be issued as a check or direct deposited and made available to you on the next scheduled pay date using the bank account we have on file. Alternatively, you may request in writing that the check be deposited in the bank account we have on record on the next regular pay day or that it be mailed to your home address on record with us. Accrued but unused PTO and PTO accrued during the final month of employment will be cashed out and paid according to PTO policy and included with your final paycheck. Any eligible fringe benefits will be paid in full one final time and included with final paycheck.

Benefit-eligible employees and their dependents may be eligible to continue medical, dental and vision benefits for a period of time at the employee’s own expense. If you are participating in benefits at the time of your separation, you will be given a packet of information on or before your last day, or one will be sent to you by mail at the home address we have on record shortly after your last day. The packet of information will include instructions regarding enrollment and deadlines. It is the employee’s responsibility to ensure timely enrollment based on the information provided in the packet. Inform the Chief Operating Officer if you wish to continue medical benefits by the last day of your final month of employment. Generally, all benefits except medical end your last day of employment. Medical Insurance will end the last day of the month of your employment.

WSW Property

Any employee who separates employment with WSW must return all files, records, keys, equipment, and any other materials that are property of WSW no later than his or her last day of employment.

Unemployment Benefits

Should your employment with us end, you may be eligible to receive benefits through the state unemployment department. You will need to apply for these benefits either on-line or by contacting the UI Center in your area to apply by phone.

Exit Information
Sharing with us information regarding your experience as an employee at WSW helps us to understand how we can be a better employer, as well as the areas that our employees have found to be the most satisfying. Each separating employee is invited to provide details of what worked well at WSW and areas in which we can improve.
EMPLOYEE BENEFITS

Health Benefits
Employees who are eligible for company benefits will be provided additional information regarding these benefits. Generally, employees working an average of 20 or more hours per week are eligible for benefits on the first of the month after their employment start date. If you believe you are eligible for benefits, but have not been provided documents regarding them, please talk to your manager or the Chief Operating Officer.

Under the Washington Mini-COBRA law, employees or members of an employee’s family who are enrolled in our group medical, dental and/or vision benefits but will be losing eligibly for these benefits may be able to continue their coverage at their own expense.

Fringe Benefits
WSW employees are eligible for internet allowance if they are working from home 75-100% of the time and internet is a requirement of the job. Allowance is approved for $100 per month. Allowance will be paid through monthly paycheck and is considered a taxable fringe benefit.

All employees must adhere to this Personnel Handbook and the Data Security Requirements Policy. Home internet connections must be secured with strict password requirements and monitored for outside breaches.

Time Off Benefits
To promote a healthy, sustainable, and productive workforce, WSW provides paid time off benefits to its employees, consistent with all applicable federal, state and local laws and regulations. Below are details on each of our time off benefits.

Holidays
All regular full-time and regular part-time employees are eligible for the following paid holidays in each calendar year immediately upon date of hire.

- New Year’s Day
- Dr. Martin Luther King Jr. Day
- President’s Day
- Memorial Day
- Independence Day
- Labor Day
- Veterans Day
- Thanksgiving Day
- Day After Thanksgiving
- Christmas Day

If a WSW holiday falls on a Saturday, it will be observed on the Friday before. If a WSW holiday falls on a Sunday it will be observed on the following Monday. The Chief Executive Officer may designate additional paid holidays with Executive Board approval.

Employees will receive holiday pay for hours equal to their average scheduled work hours for the day of the week on which the WSW holiday falls. For full-time employees, this will typically be 8 hours. Employees must be working or on approved time off on the last scheduled day before a WSW holiday and the first scheduled day after a WSW holiday to be eligible for holiday pay.

Holiday pay is paid based on an employee’s base rate of pay; it does not count towards overtime and is not paid to employees on emergency medical leave or unpaid leaves of absence.

Commented [A5]: After last monitoring, it was decided we could/should change our parking reimbursement to a fringe benefit rather than a reimbursement from receipts. In addition, changing parking to internet while working remotely.

Do we want to add a parking allowance in here for when that comes back or wait and revise if and when it comes back?
Paid Time Off
WSW offers paid time off to eligible employees for any reason, including rest, relaxation, personal pursuits, and illness and other health-related reasons.

Paid time off is available to all regular full-time and regular part-time employees. Employees begin accruing PTO upon their date of hire and can begin using accrued hours as they are accrued.

Employees accrue PTO over the course of the year on a per-pay-period basis. The accrual rate depends on length of service, as demonstrated below. Part time employees accrue PTO based on the number of hours per week they are scheduled to work.

<table>
<thead>
<tr>
<th>Years of Service</th>
<th>Hours/Per Pay Period</th>
<th>Days Per Year</th>
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</thead>
<tbody>
<tr>
<td>First Year</td>
<td>13.33</td>
<td>20</td>
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<tr>
<td>1</td>
<td>14</td>
<td>21</td>
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<td>2</td>
<td>15.33</td>
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<td>15+</td>
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Year of service is based on an employee’s anniversary date. “Year 2” starts on the second anniversary of an employee’s date of hire. Full time employees may accrue up to a maximum accrual of 240 hours. The maximum accrual of annual leave by employees will be modified based on the number of hours they are regularly scheduled to work as a percentage of FTE. For example, a part-time employee who is normally required to work 20 hours per week (or half the pay period) may accrue up to 120 hours of annual leave (50 percent of the 240 hours allowed for full-time employees). Once an employee’s balance reaches the applicable maximum accrual amount, no additional PTO is accrued until the balance drops below the maximum accrual amount.

Non-exempt employees may use PTO in one-hour increments; exempt employees may use PTO in full-day increments (exempt employees are assumed to work 8 hours per day, unless established otherwise).

All PTO requests must be submitted to and approved by your manager. Employees should follow the Attendance and Punctuality policy when requesting PTO, including submitting time off requests at least 30 days in advance whenever possible. Each request for time off or late arrival will be considered separately, in light of your needs and the needs of WSW. Hours must accrue before they are used. Deficit hours are not allowed. Generally, employees must exhaust their PTO before requesting unpaid time off.

While on PTO, it is encouraged and expected that employees will not perform any work, absent unusual circumstances. If you are required to work during time that you have designated as PTO, please notify your manager to ensure your use of PTO is properly recorded.

Illness beyond three consecutive workdays may require a medical verification to support the absence.

PTO is paid based on an employee’s base rate of pay and does not count towards overtime. Accrual will not occur while an employee is out on Emergency Medical Leave or unpaid leave.

Employees may request to cash out up to 80 hours of PTO each year in October. On occasion, Chief Executive Officer may expand this opportunity to multiple times a year or revise the eligibility requirements. Below are the standard cash out eligibility requirements:
• Employees must have used at least 40 consecutive hours of annual leave in the 12 months previous to October (that is, October – September). Paid holidays may not be used to satisfy the 40-hour requirement; however, paid holidays which fall within the 40 hours of annual leave will not negate the “consecutive requirement”; and

• Have at least 80 hours of accrued, unused annual leave remaining as of October 31st, after October’s annual leave is added and the payout hours and any hours used during October are removed from their accrued annual leave balance; and

• Complete and submit a “Request for Annual Leave Payout” form to the Chief Operating Officer by October 15th. The form must identify the dates when 40 consecutive hours of annual leave were taken during the previous 12 months and the number of payout hours requested. The Chief Operating Officer will verify that the employee meets the payout requirements outlined above. The request will be approved or denied by the Chief Executive Officer. The payout, which is subject to all regular payroll taxes, will be included in the employee’s October paycheck.

Accrued, unused PTO is paid at the time of separation.

Employees who accrue more than 240 hours of PTO, will continue to accrue sick time at the rate of one hour for every 40 hours worked. Up to 40 hours a year are eligible for carry over.

Any remaining sick leave hours will not be paid out upon separation, however, will be reinstated if an employee is rehired within 12 months.

Emergency Medical Leave

Emergency medical leave is a benefit provided by WSW to assist an employee who is faced with an unplanned and serious or life-threatening illness, disability, or medical condition of their own, their spouse, child (including step-child or adopted child), parent, parent-in-law, sibling, or grandparent that requires hospitalization or supervised medical treatment, recuperation, or care in their home. Emergency medical leave may also be used by the employee to bond with a newborn child or adoption or foster placement of a child under 18.

PTO must be exhausted before emergency medical leave may be used. Documentation of the illness, disability, treatment program or medical condition may be required from the attending physician, along with the employee’s expected date of return to work, to qualify. WSW reserves the right to require, at WSW’s expense, a second opinion from a qualified medical facility chosen by WSW.

Hours absent must be consecutive in order to qualify for paid emergency medical leave. Emergency medical leave terminates on the first day employee is able to return to work full time.

All employees, except temporary employees, accrue emergency medical leave in addition to annual leave, commencing on the first day of the month following the date of hire. Full-time employees accrue four (4) hours of emergency medical leave per pay period, up to a maximum of 320 hours. Accrued but unused emergency medical leave is not paid upon termination of employment with WSW. Non-exempt employees may use emergency medical leave in one hour increments; exempt employees may use emergency medical leave in full-day increments (exempt employees are assumed to work 8 hours per day, unless established otherwise).

Part-time employees accrue emergency medical leave based upon the percent of FTE that they are regularly scheduled to work. The maximum accrual of emergency medical leave for part-time employees shall be based upon the percent FTE that they are regularly scheduled to work.

With approval from the Chief Executive Officer, employees may donate emergency medical leave hours to a co-worker who meets the criteria described above for emergency medical leave but has exhausted emergency medical leave and PTO hours in his or her account. Employees may donate a maximum of 20 hours per calendar year and only if a minimum of 60 hours of emergency medical leave remains in the donating employee’s account.
Hours donated to a co-worker will remain in the co-worker’s account, even if unused. Emergency medical leave cannot be used or donated until it has been accrued.

While on emergency medical leave, it is encouraged and expected that employees will not perform any work, absent unusual circumstances. If you do work during time that you have designated as emergency medical leave, please notify your manager to ensure your use of sick time is properly recorded.

Emergency medical leave pay is based on regular straight time rate of pay and does not count towards overtime. Accrual of PTO and Emergency Medical Leave will not occur while an employee is out on Emergency Medical Leave or unpaid leave.

**Jury & Witness Duty**

All employees are eligible to receive time off for jury duty as of their date of hire. Unless an employee’s job responsibilities require it, WSW will not ordinarily ask or encourage an employee to request to be excused from or postpone a call to jury duty.

Non-exempt employees required to perform jury duty may take either PTO or unpaid time off. Exempt employees will be paid in accordance with wage and hour laws, and may use PTO if this results in an unpaid workday.

Employees required to appear in court in compliance with a subpoena or to serve as a witness will be allowed time off to do so, provided the employee is not a party to the case, appearing as an expert witness for compensation or receiving compensation for such appearances (other than normal witness fee paid by the court), and their appearance is not directly related to any outside employment or business activities. Non-exempt employees may take either PTO time or unpaid time off while on witness duty. Exempt employees will be paid in accordance with wage and hour laws, and may use PTO if this results in an unpaid workday.

An employee will be expected to work any part of a regularly scheduled work day during which he or she is not required to be present in court. Employees may be required to submit documentation verifying the dates/times they performed jury or witness duty.

Jury duty and witness duty pay is based on regular straight time rate of pay, does not count towards overtime, and is not available to an employee out on Emergency Medical Leave or unpaid leave.

Please notify your manager or the Chief Operating Officer as soon as practicable if you will be taking time off for jury or witness duty.

**Bereavement Leave**

WSW recognizes that bereavement is a difficult life event, requiring time to grieve and fulfill family obligations. All employees are eligible to receive time off for bereavement leave. Employees may request up to three days of paid time off related to the death of an immediate family member. Employees may request to use available PTO or Emergency Medical Leave to cover any additional days off related to bereavement.

This time off may be used to grieve, arrange for and attend a funeral or memorial service and attend to other related family matters. Immediate family includes an employee’s parents, grandparents, spouse/domestic partner, children, siblings, grandchildren, corresponding in-laws and other person with whom the employee has had a similar close personal relationship. Employees may be asked to submit documentation or statement verifying the death of the immediate family member.

Bereavement leave is based on regular straight time rate of pay, does not count towards overtime, and is not available to an employee out on Emergency Medical Leave or unpaid leave. Employees must return to work from bereavement leave to be eligible for bereavement leave pay.

Please notify your manager or the Chief Operating Officer as soon as practicable if you will be taking bereavement leave.
Leaves of Absence

WSW provides unpaid leaves of absence for a number of reasons, including in accordance with federal, state and local laws and regulations. Additional information about many of these leaves of absence is available. You also can inquire about a leave of absence by talking with your manager or the Chief Operating Officer.

Unless stated otherwise, employees should give a minimum of 30 days’ notice in advance of any leave of absence, whenever possible. When advanced notice is not possible, you should give verbal notice as soon as practicable. Upon receiving an inquiry for a leave of absence, WSW will provide you with details regarding the process and parameters for requesting and taking leave.

Generally, if you accept any employment with another organization, or go into business, while on a leave of absence, you will be considered to have voluntarily resigned from employment as of the day on which you began your unpaid leave. Similarly, if you do not return from a leave of absence as expected, you will be considered as having voluntarily resigned as of the day on which you began your unpaid leave. An employee who fails to return from leave also may be responsible for reimbursing WSW for costs related to benefits.

Protected Leaves of Absence

WSW provides unpaid protected leaves of absence for the following reasons, as mandated by federal and state law. Availability of these leaves of absence, and your rights under them, will depend on your work location and length and type of employment with WSW.

- For disability reasons relating to pregnancy, childbirth, or other related conditions.
- To undergo a medical procedure to donate bone marrow, and related activities.
- For medical treatment, counseling, and other services to ensure health and safety of employees and/or their child or dependents that are the victim of domestic violence, harassment, sexual assault or stalking.
- Attending required annual military reserve training or other active military duty.

Protected leaves of absence protect your job or position for a period of time established by federal and state laws. WSW may or may not continue to subsidize the cost of any or all of your insurance benefits while you are on leave, depending on the reason and length of leave.

Employees may be required take PTO concurrently with this leave. Time off benefits do not accrue and are not paid while an employee is on an unpaid leave of absence, with the exception of any PTO used concurrently.

Employees may be required to submit documentation regarding the reason for requested leave.

Additional information about these protections is posted in the workplace as required by law. If you believe you may be eligible for a protected leave of absence, please see the Chief Operating Officer for more details and required forms for requesting this leave.

Washington Paid Family and Medical Leave

All employees who work 820 hours or more, in the state of Washington, in the qualifying period before a requested leave begins are eligible for Washington Paid Family and Medical Leave. The qualifying period is either: The first four of the last five completed calendar quarters or the last four completed calendar quarters.

Generally, eligible employees may receive up to 12 weeks, and in some cases up to 16 weeks, of leave when family and medical leave are used in combination within a 12-month period for one of the following reasons:

- Serious health condition leave for the employee’s own serious health condition, or to care for a spouse, child, parent, parent-in-law, step parent, sibling or step sibling, grandparent, grandparent in-law,
grandchild, same-gender domestic partner or parent or child of same-gender domestic partner with a serious health condition.

- Parental leave during the year following the birth of a child or adoption or foster placement of a child under 18.
- Pregnancy disability leave (a form of serious health condition leave) taken by a female employee for an incapacity related to pregnancy or childbirth, occurring before or after the birth of the child, or for prenatal care. A woman using pregnancy disability leave is entitled to two additional weeks of leave in the same leave year for any qualifying leave purpose.
- Certain military-connected events.

Time off benefits do not accrue and are not paid while an employee is on an unpaid leave of absence, with the exception of any PTO or Emergency Medical Leave used concurrently. Employees may be required to submit a medical certification or other documentation regarding the reason for requested leave.

Additional information about these protections is posted in the workplace as required by law. Please see the Chief Operating Officer for more details and required forms for requesting this leave.

**Personal/Un-Protected Leaves of Absence**

All regular full-time and regular part-time employees may be eligible for a personal/un-protected leave of absence upon completing one year of employment. Generally, unpaid personal leave may not exceed 30 days.

Eligible employees may request an unpaid personal leave of absence for personal reasons of a compelling nature. Approval of such leave is at the discretion of management and depends on the reason and length of leave requested, length of service, performance and the business needs of WSW at the time of the leave request. Employees may be required to submit documentation regarding the reason for requested leave.

Employees must exhaust their current accrual of PTO and/or Emergency Medical Leave before taking unpaid personal leave. Employees may be required to continue their benefits coverage at their own expense during a personal leave of absence. Time off benefits do not accrue and are not paid while an employee is on an unpaid leave of absence.

Employees returning from a personal leave are not necessarily guaranteed a return to their former job. WSW’s staffing needs and the reason for the leave, among other factors, will dictate what position will be offered to an employee upon returning from leave.

Please see the Chief Operating Officer for more details and required forms for requesting this leave.
Acknowledgement of Receipt

I acknowledge that I have received the WSW Employee Handbook effective January 1, 2020. I further acknowledge that this Handbook supersedes all other preceding handbooks that are in circulation.

I acknowledge that this Handbook covers all WSW employees and as such it is a guideline applicable to me and my employment at WSW. I understand that I am expected to read the policies in this Handbook and talk to my manager or the Chief Operating Officer if do not understand or have questions about any of the policies in this Handbook.

I understand that this Handbook is not a contract, and that more detailed information may be available in other documents. I also understand that from time to time WSW may revise, modify, delete or add to any and all programs, policies, procedures, work rules, or benefits stated in this Handbook or in any document at any time. I understand WSW will endeavor to keep me informed of changes in programs, benefits, policies, work rules, and procedures that will affect me and that no oral statements or representations can in any way change or alter the provisions of the Handbook.

I further acknowledge that WSW is an “at-will” employer. Simply stated, this means that my employment is not for any specific time period and that either WSW or I have the right to conclude the employment relationship with or without notice, for any or no reason.

____________________________________________  ____________________________
Employee Signature                                      Date

____________________________________________  ____________________________
Employee’s Name (Print Name)                           Department Name

Please sign and keep this acknowledgement for your records.

(Employee Copy)
Acknowledgement of Receipt

I acknowledge that I have received the WSW Employee Handbook effective January 1, 2020. I further acknowledge that this Handbook supersedes all other preceding handbooks that are in circulation.

I acknowledge that this Handbook covers all WSW employees and as such it is a guideline applicable to me and my employment at WSW. I understand that I am expected to read the policies in this Handbook and talk to my manager or the Chief Operating Officer if do not understand or have questions about any of the policies in this Handbook.

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I further acknowledge that WSW is an “at-will” employer. Simply stated, this means that my employment is not for any specific time period and that either WSW or I have the right to conclude the employment relationship with or without notice, for any or no reason.

__________________________________________
Employee Signature

__________________________________________
Date

__________________________________________
Employee’s Name (Print Name)
MONITORING POLICY
POLICY #: 2003 Revision 32

Date of Original Policy: 02/17/2009
Effective Revision Date: 03/20/2019

PURPOSE:
To establish monitoring standards for subrecipients of all funding streams provided by Workforce Southwest Washington (WSW).

BACKGROUND:
Federal and State funding administered by WSW requires a monitoring system that provides regular oversight of each subrecipient and their funded activities. Monitoring must assure compliance with applicable requirements and that performance expectations are being achieved. Regulations also require WSW to continuously monitor grant-supported activities in accordance with uniform administrative requirements, the grant requirements and OMB 2 CFR Part 200.

POLICY:
WSW is responsible for oversight of the programmatic and financial activities of its subrecipients to ensure proper stewardship of grant funding. WSW fulfills this statutory responsibility described in WIOA Section 183 and OMB 2 CFR Part 200 as outlined below:

1) WSW will conduct monitoring of each subrecipient on an annual basis for all Title I funded contracts. Subrecipients contracted through other funding sources will be monitored in accordance with the funding requirements.

2) WSW establishes and adheres to appropriate systems for award of all contracts per WSW #1003 Procurement Policy. All subrecipients and contractors are expected to follow this policy and WSW will verify compliance during monitoring.

3) WSW enters into contracts with subrecipients that establish clear performance goals and financial obligations in unambiguous terms. These programmatic and financial terms will be monitored to ensure accountability.

4) WSW will evaluate subrecipient risk of non-compliance with Federal statutes, regulations, and the terms and conditions incorporated in the contract. Determining risk factors could include, but not limited to:
   a. Prior experience with similar contracts.
   b. The results of previous audits and/or monitoring and the extent to which the same or similar contract has been reviewed.
   c. New personnel and/or new or substantially changed systems.
   d. Budget amount in relation to the grant budget.
5) WSW takes prompt and appropriate corrective action upon becoming aware of any evidence of violation of federal or state associated regulations, state provisions, WSW policy, or subrecipient agreement.

6) WSW will provide technical assistance as necessary to meet federal, state standards or to meet contractual obligations.

7) Based on the risk assessment, WSW may or may not perform an on-site review.

8) WSW staff with expertise in each of the compliance areas will conduct the review.

9) It is a requirement that the subrecipient permit WSW to have access to records, financial statements, facilities, staff, and participants.

9)10) During the pandemic and at the discretion of WSW monitoring staff, pieces or all of the review may be done remote.

PROCEDURES:
WSW will conduct, in most cases, program and fiscal monitoring simultaneously. Monitoring activities will help identify potential weaknesses before such weaknesses result in substandard performance or questioned costs. The specific monitoring tasks and related procedures conducted by WSW to fulfill its responsibilities include but are not limited to the following:

- Submission of an annual Monitoring Plan as required by grantors.
- Review of previous subrecipient monitoring reports.
- A thorough review of invoices and supporting documents submitted by the subrecipient to assure that expenditures are appropriately charged against cost categories and within cost limitations, including proper indirect and management fee charges, where applicable.
- A thorough review of a selected sampling of financial records and source documents, i.e., invoices, receipts, vouchers, cancelled checks, time sheets, etc.
- WSW generates its own required invoice for each subrecipient, which serves as an ongoing monitoring tool. Program managers review for planned versus actual spending and to ensure budgeted line items are charged appropriately.
- Review of compliance with WIOA (or other funding source terms and conditions), federal regulations including OMB Super Circular 2CFR200, state and local policies, and the local strategic plan.
- A review of internal controls, including but not limited to cash management, proper documentation, separation of duties, methods of determining allowability of direct and indirect costs, providing participant supportive services, or personnel management.
- A review of property inventory in accordance with WSW #2001 Property Management.
• A review of Equal Opportunity and grievance procedures. Review could include but not limited to, signed participant notification, walk through of facility, staff and participant interview, or medical information storage.

• A thorough review of participant records, i.e., electronic participant files including eligibility, training, and supportive services documentation. Staff will review for completeness, accuracy, and internal consistency of documentation.

• Review of participant services and support payments provided. Ensure appropriate documentation is available in participant file to determine eligibility and allowability according to contract, regulations, or policy.

• If applicable, a review of previous year’s findings or issues to ensure corrective action was taken.

• Review of performance outcomes and contract deliverables. Review includes planned versus actual performance and equity in service delivery.

• Performance is monitored on a quarterly basis through reports submitted by subrecipients and reports available through the case management system.

• Review with the subrecipient at time of monitoring, any exceptions, issues, or lack of internal controls found during review.

Report

Upon completion of the monitoring, WSW will issue an Initial Report outlining any exceptions, issues, concerns, observations or unanswered questions. The subrecipient will: answer questions, provide feedback, correct exceptions, issues, or concerns within the allotted time provided. A Final Monitoring Report will be issued with any unresolved exceptions, issues, concerns, or unanswered questions. If after the final response from the subrecipient there are still unresolved exceptions, issues, or concerns, a resolution plan will be implemented to ensure compliance and follow through. The resolution plan could include but not limited to corrective action plan, improvement plan, additional time for corrections, or technical assistance from WSW.

Timeline

1. WSW conducts a risk assessment - 30-60 days prior to monitoring date
2. WSW determines level of monitoring - 30-60 days prior to monitoring date
3. Monitoring scheduled – the annual calendar is published for all monitoring no later than July 1 for the program year.
4. Program and Fiscal data is gathered – 7-14 working days prior to monitoring date.
5. WSW review – on date published in calendar
6. WSW will follow up with questions/concerns – 7-14 working days prior to monitoring date and immediately following monitoring date.
7. Initial Report issued - within 10 working days of monitoring date from the completion of the review.
8. Subrecipient initial response and resolution time - within 15-30 working days of Initial Report issued

9. Final Report issued - within 5 working days of subrecipient initial response. If no subrecipient response is warranted and/or no unresolved issues remain, a final report may will be issued anytime within 30 working days after the monitoring date.

10. Subrecipient final response and resolution time - within 30 working days of Final Report issuance date.

11. WSW review and determination of response within 15 working days of final response. Steps #10 and #11 may be repeated, if necessary, to resolve issues identified.

12. Corrective Action Plan issued, if applicable to resolve exceptions, issues, or concerns.

13. Monitoring closed – upon all exceptions, issues, concerns, or questions resolved.

DEFINITIONS:

Subrecipient – WSW defines subrecipient in accordance with OMB 2CFR 200.330, which identifies a subrecipient as an entity receiving a portion of a Federal award that creates a Federal assistance relationship and is responsible for listed tasks and determinations within the provision of services to the public.

Contract – WSW defines a contract in accordance with OMB 2 CFR 200.22, which states, in part, that “Contract means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award.”

Management Information System (MIS) – An Internet based Case Management System is the primary system used to document services in accordance with state and/or WSW policy and procedures.

Providers are also responsible to maintain a fiscal management system that will support the federal and program requirements. General ledger and payroll systems must have the ability to segregate program costs and document time and effort adequately, within a system of proper internal controls.

Levels of Risk – All subrecipients of WSW are measured against the current risk assessment tool prior to first contract and at each monitoring checkpoint. According to score, risk levels can be, “high”, “medium” or “low”. These results will influence WSW’s ability to initiate a contract, decide on a monitoring level and determine monitoring sample sizes.

Levels of monitoring – Based on current risk assessment tools the location and sampling patterns of formal monitoring procedures may differ.

Corrective Action Plan – a plan written by WSW Program Manager to subrecipient when a subrecipient is behind in spending, below targets for performance, there are continuous data entry and/or program eligibility errors, disallowed costs, lack of adequate internal control processes, or other issues identified by WSW. Plan will outline
corrective action and steps taken by subrecipient to be in compliance. Failed corrective action could result in loss of contract and/or funding. WSW can issue corrective action at any time during the contract period.

REFERENCES/RESOURCES:
- Workforce Innovation and Opportunity Act
- Office of Management and Budget Super Circular 2 CFR Part 200
- State Policy No. 5414

WEBSITE:
http://workforcesw.org/providers#OperationsPolicies

INQUIRIES:
Please contact Amy Gimlin agimlin@workforcesw.org (360) 567-1059 for questions.
ELIGIBILITY GUIDELINES AND DOCUMENTATION REQUIREMENTS

POLICY #: 3028 Revision 34

Original Policy Date: 8/28/2013  Revision Date: 3/13/2021
Effective Date: 7/1/2015

Purpose:
To communicate integrated eligibility guidelines and documentation requirements for Wagner-Peyser, Workforce Innovation and Opportunity Act Title 1 Youth, Adult, Dislocated Worker, Jobs for Veterans State Grant, and Trade Adjustment Assistance programs.

Background:
This integrated WIOA eligibility policy includes an eligibility and documentation “Handbook” that details specific WIOA Title I Youth, Adult, and Dislocated Worker program eligibility criteria and incorporates supplemental guidance specific to WIOA Title I programs.

The Handbook identifies acceptable documentation of various eligibility criteria that align with the data element validation (DEV) requirements as of the issuance of TEGL 22-153-19. The Handbook will be updated and revised accordingly when WIOA DEV requirements are issued by the U.S. Department of Labor Employment and Training Administration (DOL/ETA).

Policy:

a. Program Eligibility

This policy addresses eligibility requirements for Wagner-Peyser, Title 1 Adult, Dislocated Worker, Youth, Jobs for Veterans State Grant, and Trade Adjustment Assistance programs.

Program eligibility requirements are detailed in the handbook.

b. Data Element Validation (DEV) and Documentation Requirements

Service Providers are required to maintain adequate documentation to ensure credibility of eligibility determinations and to support DEV requirements in alignment with this policy, and WorkSource Policy 1003 – Data Element Validation.

The U.S. Department of Labor (DOL) mandates annual DEV to assess the accuracy of reported participant data through specific documentation requirements. Several of the data elements validated through this process pertain to program eligibility.

It is the policy of the state to align WIOA program eligibility documentation with existing DEV documentation requirements for any eligibility components that are included under DEV (refer to handbook Sec. 6). Aligning these requirements will increase efficiencies and...
ensure DEV requirements are met (for eligibility components) at the time of participant enrollment. In this way, eligibility documentation will support future data validation efforts.

As noted, the Handbook identifies acceptable documentation of various eligibility criteria that align with WIA DEV requirements as of the issuance of TEGL 22-153-19. The Handbook will be updated and revised accordingly when DEV requirements for WIOA are issued by DOL. Until that guidance is available, Service Providers are directed to continue referring to WIA-based DEV requirements in TEGL 22-15.

In addition to the alignment described above, there are other eligibility components not addressed by DEV. The state has aligned its policy with additional documentation requirements provided by DOL (e.g. Selective Service Registration) and the state (e.g. Unemployment Insurance), and ESD has established eligibility documentation requirements for additional eligibility components that are not addressed by DOL.

c. Self-Attestation

It is the policy of WSW to utilize self-attestation as a minimum documentation requirement for any eligibility component unless specific documentation requirements are provided in DOL guidance (i.e. DEV requirements in TEGL 22-153-19 or Selective Service documentation requirements in TEGL 11-11, Change 2) or state law (i.e. the requirements governing UI eligibility determination). In an effort to reduce the amount of administrative burden resulting from the capture and maintenance of paper documentation, WSW allows the use of self-attestation (as defined in this document, its handbook and TEGL 22-15) wherever permissible under federal guidelines. These guidelines have been noted in the attached handbook.

To ensure properly documented customer self-attestation, WSW requires Service Providers to use the attached sample self-attestation form. Improperly documented self-attestation or self-attestation on eligibility elements not permitted under federal law or guidance or this policy may result in disallowed costs. Properly documented self-attestation serves as documentary evidence of eligibility determination and does not, by itself, warrant disallowed cost findings. At the same time, properly documented self-attestation does not, by itself, preclude disallowed cost findings if it is determined during monitoring, reviews, or audits that the attestation was false.

Definitions:
For a complete list of definitions refer to the attached handbook.

Data Element Validation (DEV) – The federally mandated process by which the state annually assesses the accuracy of reported participant data (refer to WorkSource System Policy 1003 Rev 1 and TEGL 23-19 TEGL 22-15).

Self-Attestation – Self-attestation occurs when a participant (applicant) states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. The key elements for self-attestation are: (a) a participant (applicant) identifying his or her status for a permitted data element and (b) signing and dating a form attesting to this self-identification. These forms can be accessed in Sec. 7 of the attached handbook.

References:

WSWSWWDC Policy #3028 Eligibility Guidelines and Documentation Requirements Page 2 of 4
• Workforce Innovation and Opportunity Act of 2014
• WIOA Final Rule; 20 CFR Parts 676, 677, and 678; Federal Register, Vol. 81, No. 161, August 19, 2016
• Public Law 107-288, Jobs for Veterans Act (JVA) of 2002
• Training and Employment Guidance Letter (TEGL) 22-04
• Training and Employment Guidance Letter (TEGL) 22-04, Change 1
• Training and Employment Guidance Letter (TEGL) 17-05
• Training and Employment Guidance Letter (TEGL) 10-09
• Training and Employment Guidance Letter (TEGL) 11-11, Change 2
• Training and Employment Guidance Letter (TEGL) 9-12
• Training and Employment Guidance Letter (TEGL) 11-12
• Training and Employment Guidance Letter (TEGL) 19-13
• Training and Employment Guidance Letter (TEGL) 19-13, Change 1
• Training and Employment Guidance Letter (TEGL) 19-13, Change 2
• Training and Employment Guidance Letter (TEGL) 23-14
• Training and Employment Guidance Letter (TEGL) 08-15
• Training and Employment Guidance Letter (TEGL) 10-16
• Training and Employment Guidance Letter (TEGL) 10-16, Change 1
• Training and Employment Guidance Letter (TEGL) 19-16
• Training and Employment Guidance Letter (TEGL) 21-16
• Veterans Program Letter (VPL) 03-14
• Veterans Program Letter (VPL) 03-14, Change 1
• Veterans Program Letter (VPL) 03-14, Change 2
• Veterans Program Letter (VPL) 04-14
• WorkSource System Policy 1003, Revision 1 - Data Element Validation
• WorkSource System Policy 1009, Revision 2 - Priority of Service for Veterans and Eligible Spouses
• WIOA Title I Policy 1019, Revision 3 - Eligibility Guidelines and Documentation Requirements
• WIOA Title I Policy 5403 - Records Retention and Public Access
• WIOA Title I Policy 5607, Revision 3 - Employer Criteria and Cost-Sharing for Training Provided to Incumbent Workers
• WorkSource Information Notice (WIN) 0027, Change 3 - Use of UI Claimant Web Site in Place of WIA001 Report
• WorkSource Information Notice (WIN) 0041 - Address Confidentiality Program
• WorkSource Information Notice (WIN) 0084, Change 1 – Supplemental State Guidance for the WIOA Title I Youth Program

Supersedes:
• 3028 Eligibility Guidelines and Documentation Requirements Rev 31

Website:
http://workforcesw.org/providers#policies

Attachments:
Attachment A: Eligibility Handbook (click here)
Attachment B: Self Attestation Adult/Dislocated Worker Form (click here)
Attachment C: Self Attestation Youth Form (click here)
# Table of Contents

Introduction .......................................................................................................................... 1  
Definitions .......................................................................................................................... 3  
References .......................................................................................................................... 7  

1. Alignment of Wagner-Peyser and WIOA Title 1 Services ........................................... 9
   1.1 Purpose ................................................................................................................... 9  
   1.2 Career Services ................................................................................................... 9  
   1.3 Training Services ................................................................................................. 10  

2. Youth Program .............................................................................................................. 12
   2.1 Youth Program Requirements ............................................................................. 12
      2.1.1 In School Youth ............................................................................................ 12  
      2.1.2 Out of School Youth .................................................................................... 13  
   2.2 Defining Low Income .......................................................................................... 16  
   2.3 Exceptions to Youth Eligibility Requirements ..................................................... 17  

3. Adult Program ............................................................................................................... 18
   3.1 Adult Program Requirements .............................................................................. 18  
   3.2 Priority for Services under the Adult Program .................................................... 18  

4. Dislocated Worker Program ........................................................................................ 21
   4.1 Dislocated Worker Program Requirements ........................................................ 21
   4.2 Serving Military Service Members and their Spouses ......................................... 22
      4.2.1 Military Service Members (Dislocated Worker – Category 5) ....................... 22
      4.2.2 Spouses of Military Service Members (Dislocated Worker – Category 6) .... 23
   4.3 Eligibility for Employed Individuals .................................................................. 24
   4.4 Stop Gap Employment ......................................................................................... 25

5. Additional Program Guidance ...................................................................................... 26
   5.1 U.S. Citizenship or Legal Right to Work in the U.S. .............................................. 26
   5.2 Selective Service Requirements ......................................................................... 26
   5.3 Priority of Service for Veterans and Eligible Spouses ....................................... 27
   5.4 Assisting Victims of Human Trafficking ............................................................. 27
   5.5 Use of Unemployment Insurance Self Service Web Site .................................... 28
   5.6 Income Verification and Family Size for the Low-Income Criteria ................... 29
   5.7 Washington’s Marriage Equality Act ................................................................. 30
   5.8 Disabled Veterans Outreach Program (DVOP) Eligibility ............................... 30
   5.9 Trade Act Assistance (TAA) Eligibility ............................................................. 31
   5.10 Incumbent Workers ............................................................................................ 31
6. Eligibility Documentation Requirements ........................................................................33
7. Self-Attestation Forms ................................................................................................44
8. Includable and Excludable Income ...........................................................................47
Introduction

The content of this procedural handbook is equivalent to WorkSource System Policy 1019, Revision 4. This handbook serves as the vehicle for implementing and managing eligibility policy changes.

This handbook provides guidance to staff and partners concerning eligibility requirements for the youth, adult and dislocated worker programs under WIOA Title I and Wagner-Peyser Act under WIOA Title III. Specific components of this handbook provide guidance on requirements.

Sections 2, 3 and 4 cover program eligibility requirements for the WIOA Title 1 youth, adult and dislocated worker programs. Specific parameters and guidance are provided in the subsequent sections under each program. Section 5 covers additional guidance that applies to multiple (though not necessarily all) programs.

The Eligibility Matrix in Section 6 serves as a tool to review eligibility requirements for each program, including the corresponding documentation requirements.

The Eligibility Policy Handbook is being issued at this time in order to provide system partners with information needed to make eligibility determinations. The information is based on the best information available at this time per WIOA law and final rules, DOL guidance, and state policies and guidance. The handbook will be revised and as relevant DOL guidance is received. Compliance with eligibility policy will be based on the version of the handbook in effect at the time of the action or activity under review.
Definitions

- **Basic Skills Deficient** – An individual who:
  1. is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
  2. who is a youth or adult, that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

- **Career Pathway** – A combination of rigorous and high-quality education, training, and other services that:
  1. Aligns with the skill needs of industries in the economy of the State or regional economy involved;
  2. Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the “National Apprenticeship Act”; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.) (referred to individually in this Act as an “apprenticeship”, except in section 171);
  3. Includes counseling to support an individual in achieving the individual’s education and career goals;
  4. Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
  5. Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
  6. Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and
  7. Helps an individual enter or advance within a specific occupation or occupational cluster.

- **Case Notes** – For the purpose of Data Element Validation (DEV), case notes refer to either paper or electronic statements by staff that identify, at a minimum, the following: a participant’s status for a specific data element, the date on which the information was obtained, and the staff who obtained the information (TEGL 23-192-15 – Attachment A).

- **Covered Person (for Priority of Service)** – A veteran or his or her eligible spouse.

- **Cross- Match** – For the purpose of DEV, a cross-match requires validating staff to find detailed supporting evidence for the data element in a database (TEGL 23-19 TEGL 22-15, Attachment A).

- **Data Element Validation (DEV)** – The federally mandated process by which the state annually assesses the accuracy of reported participant data (refer to WorkSource System Policy 1003, Revision 1 and TEGL 23-19 TEGL 22-15—Attachment A).

- **Displaced Homemaker** – An individual who has been providing unpaid services to family members in the home and who:
  1. (i) has been dependent on the income of another family member but is no longer supported by that income; or
  2. is the dependent spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States Code) and whose family income is significantly reduced because of a deployment (as defined in section
991(b) of title 10, United States Code, or pursuant to paragraph (4) of such section, a call or order to active duty pursuant to a provision of law referred to in section 101(a)(13)(B) of title 10, United States Code, a permanent change of station, or the service-connected (as defined in section 101(16) of title 38, United States Code) death or disability of the member; and

2. Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

- **Disadvantaged Adult** – An adult who received an income, or is a member of a family that received a total family income, that, in relation to family size, does not exceed the higher of:
  1. the poverty line; or
  2. 70 percent of the lower living standard income level.

- **Eligible Spouse (of a Veteran)** – The spouse of any of the following (JVA Section 2(a)):
  1. Any veteran who died of a service-connected disability;
  2. Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
     a. missing in action;
     b. captured in line of duty by a hostile force; or
     c. forcibly detained or interned in the line of duty by a foreign government or power;
  3. Any veteran who has a total disability resulting from a service connected disability, as evaluated by the Department of Veterans Affairs; or
  4. Any veteran who died while a disability, as indicated in paragraph (3) of this section, was in existence.

- **Employment that leads to Self-Sufficiency** – Employment lasting more than 6 consecutive months which provides the worker a wage that is equal to or greater than 90% of his/her wage at the time of dislocation.

- **General announcement of plant closing** – Plant closing as confirmed by written notice from employer or layoff or termination notice; WARN notice; newspaper article; documentation that disaster necessitated business closure or layoff; foreclosure notice; or self-certification in absence of other documents (must include reason why other documentation is unavailable).

- **Homeless Individual** – Defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)).

- **Homeless Youth** – Defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)).

- **Individual with a Barrier to Employment** – A member of 1 or more of the following populations:
  1. Displaced homemakers.
  2. Low-income individuals.
  3. Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166.
  4. Individuals with disabilities, including youth who are individuals with disabilities.
  5. Older individuals.
7. Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))).
8. Youth who are in or have aged out of the foster care system.
9. Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers.
10. Eligible migrant and seasonal farmworkers, as defined in WIOA section 167(i).
11. Individuals within 2 years of exhausting lifetime eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.).
12. Single parents (including single pregnant women).
13. Long-term unemployed individuals.

- **Low income** – An individual who:
  1. Receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.) (Food Stamp Program), the program of block grants to States for temporary assistance for needy families program under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.) (TANF Assistance), or the supplemental security income program established under title XVI of the Social Security Act (42 U.S.C. 1381 et seq.) (SSI), or State or local income-based public assistance;
  2. Is in a family with total family income that does not exceed the higher of—
     a. the poverty line; or
     b. 70 percent of the lower living standard income level;
  3. Is a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), or a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));
  4. Receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.);
  5. Is a foster child on behalf of whom State or local government payments are made; or
  6. Is an individual with a disability whose own income meets the income requirement of clause (2), but who is a member of a family whose income does not meet this requirement.

- **Lower Living Standard Income Level (LLSIL)** – Income level (adjusted for regional, metropolitan, urban, and rural differences and family size) determined annually by the Secretary of Labor based on the most recent lower living family budget issued by the Secretary. See WSW Policy #3018 Income Chart.

- **Offender** – An adult or juvenile –
  1. Who is or has been subject to any stage of the criminal justice process, and for whom services under this Act may be beneficial; or
  2. Who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

- **Older Individual** – Means an individual age 55 or older.

- **Requires Additional Assistance (youth)** – An individual who requires “Additional Assistance” to complete an educational program, or to secure and hold employment, locally defined as:
1. Personal/family substance abuse  
2. Gang involved/affiliated/affected  
3. Lacking affordable housing  
4. Victim of domestic violence/sexual or child abuse  
5. Identified social adjustment or mental health issue(s)  
6. Lacking a significant or positive work history and document one other additional assistance need  
7. Individual or member of a family that recently exhausted TANF benefits  
8. OTHER additional assistance for education or employment not listed can be submitted to WSW for consideration of approval prior to program participation

- **Self-Attestation** – Self-attestation occurs when a participant (applicant) states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. The key elements for self-attestation are: (a) a participant (applicant) identifying his or her status for a permitted data element and (b) signing and dating a form attesting to this self-identification (with a disclaimer concerning the self-identification). Refer to Section 7 of this handbook.

- **Service Provider** – The agency that WSW is contracting with to administer WIOA services.

- **Substantial Layoff** (Dislocated Worker) – a reduction (excluding a plant closing) that results in an employment loss at a single site of employment for at least 30 full-time employees during a 6 month period, or any reduction in force of at least 25% of a company's workforce at a single site during a 6 month period.

- **State Management Information System (MIS)** – For the purpose of DEV, State MIS refers to specific, detailed information that is stored in the state's information system that supports a data element ([TEGL 23-19 TEGL 22-15 – Attachment A](#)).

- **Stop-Gap Employment** – An eligible dislocated worker remains eligible for assistance after dislocation as long as the individual has not been employed in a job since dislocation and prior to application that paid a wage defined by WSW as a self-sufficient dislocated worker wage or leading to self-sufficiency or providing more than stop-gap employment. Stop-gap employment means work an individual does only because s/he has lost the customary work for which s/he is qualified through prior training, experience or work history. There may be times when stop-gap employment provides a self-sufficient wage, e.g., contract employment or employment obtained through a temporary employment services agency. Such employment would not change the individual's dislocated worker status. Determinations regarding stop-gap employment must be made on a case by case basis and take into consideration an individual's personal, family, financial, and employment situation.

- **Unemployed as a result of general economic conditions** (for use in determining the eligibility of self-employed individuals including family members and farm and ranch hands) – Unemployed, including from self-employment, due to economic conditions in the local community because of natural disasters or general economic conditions which include, but not limited to: the failure or closure of one or more businesses in the community or substantial layoffs in one or more businesses in the community that had a direct effect on the individual's unemployment; depressed price(s) or market(s) for articles produced by the self-employed individuals; inability to turn a profit during preceding 12 months; inability to obtain capital necessary to continue operations; or other event indicative of the likely insolvency of the farm, ranch or business.

- **Unemployed Individual** – An individual who is without a job and who wants and is
available for work. The determination of whether an individual is without a job, for purposes of this paragraph, shall be made in accordance with the criteria used by the Bureau of Labor Statistics of the Department of Labor in defining individuals as unemployed.

- **Unlikely to return to previous occupation** (**dislocated worker**) - Refers to the status of an unemployed worker as having limited opportunities for employment or reemployment in the same or similar occupation in the area in which the individual resides as confirmed by labor market information and/or labor analysis by the Employment Security Department or recent local labor market events.

- **Veteran** – For the purpose of providing Priority of Service (using the broad definition) and Dislocated Worker eligibility, veteran means a person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). Active service also includes full-time duty in the National Guard or a Reserve component, other than full time duty for training purposes.

References

- Workforce Innovation and Opportunity Act of 2014
- Public Law 107-288, Jobs for Veterans Act (JVA) of 2002
- Training and Employment Guidance Letter (TEGL) 22-04
- Training and Employment Guidance Letter (TEGL) 22-04, Change 1
- Training and Employment Guidance Letter (TEGL) 10-09
- Training and Employment Guidance Letter (TEGL) 11-11 Change 2
- Training and Employment Guidance Letter (TEGL) 9-12
- Training and Employment Guidance Letter (TEGL) 11-12
- Training and Employment Guidance Letter (TEGL) 19-13
- Training and Employment Guidance Letter (TEGL) 19-13, Change 1
- Training and Employment Guidance Letter (TEGL) 19-13, Change 2
- Training and Employment Guidance Letter (TEGL) 23-14
- Training and Employment Guidance Letter (TEGL) 08-15
- Training and Employment Guidance Letter (TEGL) 23-192-15
- Training and Employment Guidance Letter (TEGL) 10-16
- Training and Employment Guidance Letter (TEGL) 10-16, Change 1
- Training and Employment Guidance Letter (TEGL) 19-16
- Training and Employment Guidance Letter (TEGL) 21-16
• Veterans Program Letter (VPL) 03-14
• Veterans Program Letter (VPL) 03-14, Change 1
• Veterans Program Letter (VPL) 03-14, Change 2
• Veterans Program Letter (VPL) 04-14
• WorkSource System Policy 1003, Revision 1 - Data Element Validation
• WorkSource System Policy 1009, Revision 2 - Priority of Service for Veterans and Eligible Spouses
• WSW #3019 Rev 1 Veterans Priority of Service
• WIOA Title I Policy 1019, Revision 3 – Eligibility Guidelines and Documentation Requirements
• WIOA Title I Policy 5403 - Records Retention and Public Access
• WIOA Title I Policy 5602, Revision 1 – Supportive Services and Need-Related Payments
• WSW #3005 Rev 4 Supportive Services
• WIOA Title I Policy 5607, Revision 3 – Employer Criteria and Cost Sharing for Training Provided to Incumbent Workers
• WorkSource Information Notice (WIN) 0027, Change 3 - Use of UI Claimant Web Site in Place of WIA001 Report
• WorkSource Information Notice (WIN) 0041 - Address Confidentiality Program
• WorkSource Information Notice (WIN) 0078, Change 1 – Provision of Title I Follow-up and Supportive Services Before and After Exit for Adults and Dislocated Workers
• WSW Training Handbook
• WorkSource Information Notice (WIN) 0084, Change 1 – Supplemental State Guidance for the WIOA Title I Youth Program
1. Alignment of Wagner-Peyser and WIOA Title 1 Services

1.1 Purpose

According to Training and Employment Guidance Letter (TEGL) 04-15, the overarching vision for the One-Stop system is the coordination of fully integrated programs, services and governance structures so job seekers have access to a seamless system of workforce investment services. This intent is accomplished by establishing career services that are consistent across federally-funded workforce development programs. In addition, the U.S. Department of Labor (DOL) has furthered its integration efforts by establishing common performance metrics (TEGL 10-16, Change 1) and developing an integrated performance reporting system (Participant Individual Record Layout or PIRL) for DOL-funded workforce programs.

States and local areas are encouraged to utilize common intake, case management, and job development systems in order to take full advantage of the One-Stop potential for efficiency and effectiveness. WIOA Title I programs and Wagner-Peyser are mandated to provide the same set of career services described at WIOA Section 134(c)(2)(A). There is a natural alignment of service delivery under Wagner-Peyser since all individuals legally entitled to work in the U.S. are eligible for these services.

NOTE: Personal records of WIOA registrants are private and confidential and not disclosable to the public. Refer to WIOA Title I Policy 5403 and RCW 50.13 for additional guidance on data privacy and security.

1.2 Career Services

There are three types of career services: basic, individualized, and follow-up. There is no sequence requirement for these services. They can be provided in any order to provide flexibility in targeting services to the needs of the customer. Section 4 of TEGL 19-16 identifies the services that fall under the basic, individualized, and follow-up categories.

Per 20 CFR 680.120 and 680.130 and TEGL 19-16, individuals 18 years of age or older who are registered, meet the eligibility criteria for, and are enrolled in the WIOA adult program are eligible to receive career services. Per 20 CFR 680.130, individuals who meet WIOA dislocated worker program criteria are also eligible to receive career services.

Staff-assisted Wagner-Peyser employment services fall under the category of basic career services and must be provided in coordination with other one-stop center partners. Wagner-Peyser staff can also provide individualized career services in coordination with other one-stop center partners. Although Wagner-Peyser employment services are available to all individuals, only those who are legally entitled to work in the U.S. can obtain employment. To ensure that individuals who apply or are referred are legally entitled to work in the U.S., the WorkSourceWA.com registration requires customer attestation to legal entitlement to work in the U.S.

In addition to universal access under Wagner-Peyser, basic career services can be provided with WIOA Title I funding. Individuals must be registered, determined eligible and enrolled to
receive WIOA Title I funded, staff-assisted career services beyond self-service or informational activities. These services are offered under WIOA Title I (in addition to Wagner-Peyser) to ensure seamless service delivery in the One-Stop Center to minimize referrals and to ensure leveraging of resources between programs.

Per 20 CFR 680.110, self-service and informational activities are services made available and accessible to the general public that are designed to inform and educate individuals about the labor market and the range of services appropriate to their situation, and that do not require significant staff involvement with the individual in terms of resources or time. Both can be provided before registration and neither constitutes enrollment as neither is formally recognized as a staff-assisted WIOA Title I service. TEGL 17-05 clarifies that “significant staff involvement” includes staff’s assessment of a participant’s skills, education or career objectives to assist the participant in making a decision or accessing information as opposed to staff providing a participant with readily-available information that does not require an assessment.

NOTE: This policy covers basic eligibility requirements for Wagner-Peyser, including priority of service requirements for Covered Persons (using the broad definition of veteran – see Section 5.3). For verification of veteran status, the Wagner-Peyser program has specific requirements. For an overview of services for veterans (using the standard definition) under Wagner-Peyser, please refer to Wagner-Peyser Employment Service Policy 4030 - Services for Veterans.

All Wagner-Peyser funded services must be provided by state merit staff as per 20 CFR 652.215 and TEGL 11-12.

1.3 Training Services

Training services are funded and provided to jobseekers under the WIOA Title I programs. Individuals provided training services funded by WIOA Title I must be registered, determined eligible and in need of additional service beyond career services to obtain or retain employment per proposed 20 CFR 680.210.

As part of the aforementioned eligibility process, individuals must receive, at a minimum, an interview, evaluation or assessment and career planning or other means by which eligibility for WIOA-funded training services can be determined (proposed 20 CFR 680.220 and TEGL 19-16).

Per WIOA Section 134(c)(3)(A)(iii), proposed 20 CFR 680.220, and TEGL 19-16, there is no requirement that career services first be provided as a condition of receiving training services. However, if career services are not provided before training, Service Providers must document the circumstances justifying their course of action.

DOL encourages the referral of Wagner-Peyser recipients to WIOA Title I programs for training services when appropriate (TEGL 11-12).

1.4 Supportive Services
Per TEGL 19-16, WIOA Title I Policy 5602 Revision 1, and WIN 0078 Change 1, supportive services can be provided to WIOA Title I adults and dislocated workers during participation (not during follow-up or after exit) subject to having also received a career or training service (i.e., supportive services cannot be the only service in a participant record). The supportive service can be recorded on or after the date of the career or training service and should include a case note explaining how the supportive service connects to a career or training service.

Per TEGL 21-16 and WIN 0084, supportive services for WIOA Title I youth can be provided either during participation or after exit as Program Elements 7 and 9, respectively.

Per TEGL 10-16 and TEGL 19-16, Attachment II, individuals in incumbent worker training are not eligible to receive supportive services unless they meet eligibility for and are co-enrolled in either the WIOA Title I adult or dislocated worker programs and receive a qualifying career service or training. In other words, supportive services cannot be provided to individuals who are in incumbent worker training only. See also Section 10.5 – Incumbent Worker Training.

Note: food and groceries are prohibited as supportive services as DOL has determined that they are beyond the scope of WIOA. For more information see Supportive Service Policy #5602 Rev 1 and WSW #3005 Rev 4.
2. Youth Program

2.1 Youth Program Requirements

Youth program requirements are distinguished by In-School youth and Out-of-School youth, which have different eligibility requirements.

2.1.1 In School Youth

Service Providers within the WSW area will not enroll In-School youth without prior approval from the Youth Initiatives Manager.

Individuals must meet the following eligibility guidelines to be In-School youth:

- U.S. citizen or otherwise legally entitled to work in the U.S.;
- Attending school as defined by state law;
- Age 14 through 21;
- Selective Service Registration (males who are 18 or older and born on or after January 1, 1960), unless an exception is justified (see Section 5.2 for guidance on Selective Service registration);
- Low income individual (see Section 2.3 for guidance on exceptions); and
- One or more of the following:

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Basic skills deficient</td>
</tr>
<tr>
<td>2</td>
<td>An English language learner</td>
</tr>
<tr>
<td>3</td>
<td>An offender²</td>
</tr>
<tr>
<td>4</td>
<td>A homeless individual (as defined in Section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), a homeless child or youth (as defined in Section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))), or a runaway</td>
</tr>
<tr>
<td>5</td>
<td>An individual in foster care or has aged out of foster care system or who has attained the age of 16 years of age and left foster care for kinship guardianship or adoption; a child eligible for assistance under Section 477 of the Social Security Act (42 U.S.C. 677), or in an out of home placement</td>
</tr>
<tr>
<td>6</td>
<td>An individual who is pregnant or parenting³</td>
</tr>
<tr>
<td>7</td>
<td>A youth who is an individual with a disability</td>
</tr>
<tr>
<td>8</td>
<td>An individual who requires additional assistance to complete an educational program or to secure or hold employment⁴</td>
</tr>
</tbody>
</table>

¹ Section 4 of TEGL 21-16 conditions the designation of home-schooled individuals as In-School Youth (ISY) or Out-of-School Youth (OSY) based on state and/or local education agency policies. In Washington, state statutes for the Office of Superintendent of Public
Instruction (RCW 28A.200, 28A.225.010(4)) articulate the requirements for being recognized as home-schooled individuals. Individuals whose home-schooling activity meets those requirements can seek eligibility as ISY; if not, they need to meet OSY eligibility criteria.

2 Section 4 of TEGL 21-16 addresses eligibility related to “offender” status for ISY and OSY. Youth who have been charged with an offense, but subsequently directed to community-based diversion programs rather than the formal court system, meet the definition of having been “subject to any stage of the criminal justice process” due to having been charged with an offense, even though they have not been remanded to the court system.

3 Section 4 of TEGL 21-16 clarifies that an individual who is parenting can be a mother or father, custodial or non-custodial, and that the age the youth becomes a parent does not factor into this definition as long as the youth is within the WIOA youth age eligibility. One important distinction is that the father does not attain parenting status under WIOA until the child is born; that status does not convey to the father during pregnancy. To be clear, only the expectant mother can be a pregnant individual.

4 Per proposed 20 CFR 681.300, WSW defines “Requires Additional Assistance” as an individual who requires “Additional Assistance” to complete an educational program, or to secure and hold employment, locally defined as:
   1. Personal/family substance abuse
   2. Gang involved/affiliated/affected
   3. Lacking affordable housing
   4. Victim of domestic violence/sexual or child abuse
   5. Identified social adjustment or mental health issue(s)
   6. Lacking a significant or positive work history and document one other additional assistance need
   7. Individual or member of a family that recently exhausted TANF benefits
   8. OTHER additional assistance for education or employment not listed can be submitted to WSW for consideration of approval prior to program participation

Service Providers must document why the youth requires additional assistance at enrollment.

Refer to Section 6 for an overview of eligibility criteria and documentation requirements.

2.1.2 Out of School Youth

Individuals must meet the following eligibility guidelines to be Out-of-School youth:

- U.S. citizen or otherwise legally entitled to work in the U.S.;
- Not attending school as defined by state law;
- Age 16 through 24;
- Selective Service Registration (males who are 18 or older and born on or after January 1, 1960), unless an exception is justified (see Section 5.2 for guidance on Selective Service registration); and
- One or more of the following:
<table>
<thead>
<tr>
<th>Category 1</th>
<th>A school dropout</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category 2</td>
<td>A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter.</td>
</tr>
<tr>
<td>Category 3</td>
<td>A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is basic skills deficient or an English language learner.</td>
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<tr>
<td>Category 4</td>
<td>An individual who is subject to the juvenile or adult justice system.</td>
</tr>
<tr>
<td>Category 5</td>
<td>A homeless individual (as defined in Section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), a homeless child or youth (as defined in Section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))), or a runaway.</td>
</tr>
<tr>
<td>Category 6</td>
<td>An individual in foster care or has aged out of foster care system or who has attained the age of 16 years of age and left foster care for kinship guardianship or adoption; a child eligible for assistance under Section 477 of the Social Security Act (42 U.S.C. 677), or in an out of home placement.</td>
</tr>
<tr>
<td>Category 7</td>
<td>An individual who is pregnant or parenting.</td>
</tr>
<tr>
<td>Category 8</td>
<td>A youth who is an individual with a disability.</td>
</tr>
<tr>
<td>Category 9</td>
<td>A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.</td>
</tr>
</tbody>
</table>

1 The state’s dropout reengagement program authorized under [RCW 28A.175.100](#) provides educational opportunities and access to services to older youth ages 16 to 21 who have dropped out of high school or are not accumulating sufficient credits to reasonably complete a high school diploma in a public school before the age of 21 and are unlikely to re-engage in education by re-enrolling in a traditional or even alternative high school. [RCW 28A.175.110](#) states that youth in this program are regularly enrolled students of the school district in which they are enrolled.

Section 4 of [TEGL 21-16](#) on high school equivalency programs and dropout re-engagement programs states that “Youth attending high school equivalency (HSE) programs, including those considered to be dropout re-engagement programs, funded by the public K–12 school system that are classified by the school system as still enrolled in school are considered ISY.” Because Washington’s Open Doors program, which is cited in state RCW and WAC, recognizes a range of models or approaches with varying degrees of school or school district engagement, DOL acknowledges that Washington’s In-School Youth (ISY) and Out-of-School Youth (OSY) determination is situational and depends on the degree to which schools and school districts are service providers and funders in dropout re-engagement programs. If schools or school districts, despite having enrolled the youth into school, largely cede service provision to other entities (e.g., WIOA Title I youth providers, community-based organizations, non-profits), have minimal...
financial investment, and require little or no district-based accountability of participants, youth in those programs can be designated OSY. Conversely, if schools or school districts are substantially directive, invested, and accountable (e.g., WIOA Title I Youth program only provides supportive services to participants), those youth should be designated ISY. This also applies to dropout re-engagement programs not connected to Open Doors. Based on these guidelines, local areas must thoroughly document OSY designation when youth participants in dropout re-engagement programs are enrolled in school.

2 Per WIOA Section 3(54), the term “School Dropout” means an individual who is no longer attending any school and who has not received a secondary school diploma or its recognized equivalent.

3 Per RCW 28A.225.010, the age of compulsory school attendance in Washington is eight (8) years of age to under 18 years of age. For the purpose of WIOA out of school youth, that encompasses 16-17 year olds.

4 Section 4 of TEGL 21-16 addresses eligibility related to “offender” status for ISY and OSY. Youth who have been charged with an offense, but subsequently directed to community-based diversion programs rather than the formal court system, meet the definition of having been “subject to any stage of the criminal justice process” due to having been charged with an offense, even though they have not been remanded to the court system.

5 Section 4 of TEGL 21-16 clarifies that an individual who is parenting can be a mother or father, custodial or non-custodial, and that the age the youth becomes a parent does not factor into this definition as long as the youth is within the WIOA youth age eligibility. One important distinction is that the father does not attain parenting status under WIOA until the child is born; that status does not convey to the father during pregnancy. To be clear, only the expectant mother can be a pregnant individual.

6 Per proposed 20 CFR 681.300, WSW defines Requires Additional Assistance as an individual who requires “Additional Assistance” to complete an educational program, or to secure and hold employment, locally defined as:

1. Personal/family substance abuse
2. Gang involved/affiliated/affected
3. Lacking affordable housing
4. Victim of domestic violence/sexual or child abuse
5. Identified social adjustment or mental health issue(s)
6. Lacking a significant or positive work history and document one other additional assistance need
7. Individual or member of a family that recently exhausted TANF benefits
8. OTHER additional assistance for education or employment not listed can be submitted to WSW for consideration of approval prior to program participation

Service Providers must document why the youth requires additional assistance at enrollment.

Refer to Section 6 for an overview of eligibility criteria and documentation requirements.
2.2 Defining Low Income

Referencing the definition of low-income at WIOA Section 3(36), a low income individual meets one of the following:

1. Receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.) (Food Stamp Program), the program of block grants to States for temporary assistance for needy families program under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.) (TANF Assistance), or the supplemental security income program established under title XVI of the Social Security Act (42 U.S.C. 1381 et seq.) (SSI), or State or local income-based public assistance;

2. Is in a family with total family income that does not exceed the higher of—
   a. the poverty line; or
   b. 70 percent of the lower living standard income level;

3. Is a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), or a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));

4. Receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.);

5. Is a foster child on behalf of whom State or local government payments are made; or

6. Is an individual with a disability whose own income meets the income requirement of clause (2), but who is a member of a family whose income does not meet this requirement

See Section 8 for a list of includable and excludable income and reference the WSW Income Chart #3018 to determine 70% of the lower living standard income level.

WIOA Section 129(a)(2) states that low-income additionally includes youth living in high-poverty areas with proposed 20 CFR 681.260 defining a high-poverty area as a Census tract, a set of contiguous Census tracts, Indian Reservation, tribal land, or Native Alaskan Village or county that has a poverty rate of at least 30 percent as set every 5 years using American Community Survey 5-year data.

20 CFR 681.250 and 681.270 allow that low-income for ISY further includes youth who receive (or are eligible to receive) free or reduced price lunches under the Richard B. Russell National School Lunch Act. Per Section 4 of TEGL 21-16, however, if schools offer all students with free or reduced price lunches, this criterion cannot be used to determine individual low-income eligibility for ISY. Also, with that same qualifier, OSY who are parents of children living in the same household who receive (or are eligible to receive) free or reduced price lunches meet low-income criteria based on their children’s qualification.

WIOA Section 3(36)(A)(vi) and proposed 20 CFR 681.280 allow that the income eligibility level for youth with disabilities is based on the disabled youths’ own income rather than their family income.
2.3 Exceptions to Youth Eligibility Requirements

Exceptions to the low-income requirement  In any single program year, no more than 5 percent of a local area’s total youth participants can be those who have a low income eligibility requirement (in-school youth or out-of-school youth in Category 3 or 8), but are not low income. [WIOA Section 129(a)(3)(A)(ii) and proposed 20 CFR 681.250]]. All exceptions must be approved prior to enrollment by the WSW Youth Initiatives Manager.

Limitation on In-School youth requiring additional assistance  In any single program year, no more than 5 percent of a local area’s total in-school youth participants can be those who require additional assistance to complete an educational program or to secure or hold employment (Category 7). [WIOA Section 129(a)(3)(B)] Service Providers within the WSW area will not enroll In-School youth without prior approval from the Youth Initiatives Manager.
3. Adult Program

3.1 Adult Program Requirements

Individuals must meet the following eligibility criteria for the adult program:

- U.S. citizen or otherwise legally entitled to work in the U.S.;
- Age 18 or older; and
- Selective Service Registration (males who are 18 or older and born on or after January 1, 1960), unless an exception is justified (see Section 5.2 for guidance on Selective Service registration).

Refer to Section 6 for eligibility criteria and documentation requirements.

3.2 Priority for Services under the Adult Program

Priority selection is established for and local areas must target certain populations in accordance with WIOA Section 134(c)(3)(E), 20 CFR 680.600, and 20 CFR 680.640. These targeted populations must first meet the eligibility requirements for the Title I adult program. Note: priority selection does not apply to individuals receiving only basic career services.

The table below describes the order and rationale for prioritization based on the requirements in WIOA Section 134(c)(3)(E), 20 CFR 680.600, 20 CFR 680.640, and TEGL 10-09. For purposes of this section, the term “covered person(s)” refers to veterans and eligible spouses per priority of service for veterans.

Priority requirements for the WIOA Title 1 adult program are as follows:

<table>
<thead>
<tr>
<th>Priority</th>
<th>Mandatory Priority Group</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>First</td>
<td>Covered persons (veterans and eligible spouses) who are low income, recipients of public assistance, or basic skills deficient.</td>
<td>Guidelines for serving covered persons (WorkSource System Policy 1009 Revision 2 – Priority of Service AND WSW Veterans Priority of Service Policy #3019) apply within the mandatory priority criteria of low-income / public assistance recipient / basic skills deficient.</td>
</tr>
<tr>
<td>Second</td>
<td>Individuals (non-covered persons) who are low-income (may include unemployed individuals), recipients of public assistance, or basic skills deficient.</td>
<td>The mandatory priority criteria (low-income / public assistance recipients / basic skills deficient) have preference over covered persons (veterans and eligible spouses) who do not meet the mandatory priority criteria.</td>
</tr>
<tr>
<td>Third</td>
<td>Covered persons (veterans and eligible spouses) who are not low-income and not basic skills deficient.</td>
<td>Guidelines for serving covered persons (WorkSource System Policy 1009 Revision 2 – Priority of Service AND WSW Veterans Priority of Service Policy #3019) apply in the third category (individuals who are not low-income / public assistance recipients / basic skills deficient).</td>
</tr>
<tr>
<td>-------</td>
<td>-------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Fourth</td>
<td>Individuals (non-covered persons) who are not low-income and are not recipients of public assistance with income under 175% of poverty and are not basic skills deficient.</td>
<td>Individuals (non-covered persons) with income under 175% of poverty have precedence over those not low income.</td>
</tr>
</tbody>
</table>
| Fifth | Eligible adults who do not fit into the four priorities listed above may be served on a case-by-case basis. Customers served under this fifth priority must:  
- Be approved in writing by a designated WSW staff person; **and**  
- Be submitted & given approval using a standard format; **and**  
- Include the estimated amount of WIOA adult funds to be spent on the individual; **and**  
- The adult applicant must have one or more significant barriers to full-time employment leading to self-sufficiency, including but not limited to a disability. | The mandatory priorities established by DOLETA do not prohibit WIOA Title I adult services to only the recipients of public assistance and other low income individuals. The LWDB and the Governor may establish a process that gives priority for services to other individuals meeting eligibility criteria, as long as the mandatory priority groups are given priority. |

NOTE: An adult with a disability can be considered a family of one for low-income determinations (refer to Section 5.6.2). For income verification refer to Section 5.6.1

**Priority Selection for Career Services and Training Services Funded with WIOA Statewide (15%) Discretionary Grants/Contracts**

For purposes of WIOA Title I statewide activities funds, the Governor has determined that these funds will be prioritized as follows:
1. Eligible veterans and spouses;
2. Unemployed individuals;
3. Low-income individuals;
4. Other Washington job seekers.

As indicated by the first priority, recipients of WIOA statewide activities funds must continue to provide priority selection of veterans for career and training services as required under P.L. 107-288 “Jobs for Veterans Act” and in alignment with WorkSource System Policy 1009 Revision 2. In applying this policy to such projects, veterans who are unemployed and/or low-income, have priority over all other individuals served under these projects.

**Compliance**

To align with TEGL 7-20, the following metric will be used. For those individuals enrolled in the WIOA Adult program and receiving an individualized career or training service, priority must be given to those in the categories one (1) or two (2) above. At least 75% of the participants must be from category one (1) or two (2) and no lower than 50.1%. Additional benchmarks may be given to Subrecipients in their contract.
4. Dislocated Worker Program

4.1 Dislocated Worker Program Requirements

Individuals must meet the following eligibility guidelines for the Dislocated Worker Program:

- U.S. citizen or otherwise legally entitled to work in the U.S.;
- Selective Service Registration (males who are 18 or older and born on or after January 1, 1960), unless an exception is justified (see Sec. 5.2 for guidance on Selective Service registration) or the individual is less than 18 years of age; and
- One of the Dislocated Worker categories (see table below).

NOTE: For an overview of eligibility criteria and documentation requirements refer to Section 6.

The matrix on the following page is meant to provide clarity on the requirements within each Dislocated Worker category. Military Service Members (Category 5) and Spouses of Dislocated Military Service Members (Category 6) have been included as individual categories to allow for specificity, though it is commonly understood that these categories fall under the General Dislocation category (1). Refer to Section 5.7 for guidance related to the impact of Washington’s Marriage Equality Act.

<table>
<thead>
<tr>
<th>Category</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. General Dislocation</td>
<td>1.1 An individual who was terminated, laid off, or received a notice of termination or layoff. AND</td>
</tr>
<tr>
<td></td>
<td>1.2 Is determined unlikely to return to previous industry or occupation (see Definitions); AND</td>
</tr>
<tr>
<td></td>
<td>1.3.1 Is eligible for or has exhausted entitlement to unemployment compensation; OR</td>
</tr>
<tr>
<td></td>
<td>1.3.2 Is not eligible for unemployment compensation but can demonstrate attachment to the workforce of sufficient duration. Applicant is ineligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under State unemployment compensation law.</td>
</tr>
<tr>
<td>2. Dislocation from Facility Closure / Substantial Layoff</td>
<td>2.1 An individual who was terminated, laid off, or received a notice of layoff from employment at a plant, facility, or enterprise as a result of: • Permanent closure; or • Substantial layoff (see Definitions); OR</td>
</tr>
</tbody>
</table>
### 2.2 An individual employed at a facility at which the employer has made a general announcement that such facility will close within 180 days.

### 3. Self-employed Dislocation

| 3.1 An individual who was self-employed (including employment as a farmer, rancher or a fisherman), but is unemployed as a result of: |
| - General economic conditions in the community in which the individual resides; or |
| - A natural disaster. |

### 4. Displaced Homemaker

| 4.1 An individual who was dependent on the income of another family member and is no longer supported by the income of another family member; |
| OR |
| 4.2 Is the dependent spouse of a member of the armed forces on active duty and whose family income is significantly reduced because of a deployment, a call or order to active duty, or a service connected death or disability of the member AND |
| 4.3 Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment. |

**Note:** Displaced military service members, veterans and other covered persons are eligible for Priority of Service (POS) as described in ESD POS Policy 1009, Revision 1 & WSW Policy #3019.

### 5. Dislocated Military Service Members

| 5.1 A non-retiree military service member who was discharged or released from service under other than dishonorable, or has received a notice of military separation (see Section 4.2.1). Per proposed 20 CFR 680.660, separating military service members automatically qualify as unlikely to return to a previous industry or occupation and as eligible for or exhausted entitlement to Unemployment Insurance. |

### 6. Spouses of Military Service Members

| 6.1 A spouse of a member of the armed forces on active duty, and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; |
| OR |
| 6.2 A spouse of a member of the armed forces on active duty and who is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment. |

**Note:** A military spouse may also qualify as a displaced homemaker (category 4).

### 4.2 Serving Military Service Members and their Spouses

#### 4.2.1 Military Service Members (Dislocated Worker – Category 5)

Refer to Section 6 for a breakdown of eligibility criteria and documentation requirements. A
military service member who is separated from military service under conditions other than dishonorable, or who receives a notice of future separation, may be eligible under the WIOA Dislocated Worker program based on the “termination” criteria. This may include National Guard or Reserve members who have been discharged from active duty service, but not necessarily from other reserve commitments, such as training. Note: Retirement orders do not qualify as “terminated” or “laid off.”

Veterans and other covered persons determined eligible for the Dislocated Worker program are given priority for services according to the Jobs for Veterans Act and WorkSource (see WorkSource System Policy 1009 Revision 2 – Priority of Service AND WSW Veterans Priority of Service Policy #3019).

The following serves as an outline of Dislocated Worker eligibility criteria as it applies to discharged service members and those separating from the military:

Section (3)(15)(A)(i): Has been terminated or laid off or received notice of termination or layoff.

TEGL 22-04 states that a discharge from the military under honorable circumstances meets the “termination” criterion. A DD-214 form is the most common documentation used to determine discharge status.

Washington has determined that still-active, transitioning military service members may also qualify for Dislocated Worker services. While these individuals may be eligible to receive WIOA Dislocated Worker services and funds, they would not be considered ‘veterans’ for the purposes of DOL reporting.

For the purposes of serving still-active transitioning service members under the “notice of termination or layoff” eligibility criterion, documentation must align with the DEV requirement for “Date of Actual Qualifying Dislocation” (refer to Handbook Section 6).

WSW established a designated timeframe of up to 12 months prior to a qualified service member’s planned separation during which they are eligible to receive Dislocated Worker services.

4.2.2 Spouses of Military Service Members (Dislocated Worker – Category 6)

Refer to Section 6 for an overview of eligibility criteria and documentation requirements. TEGL 22-04 Change 1 provides clarification and flexibility to serve spouses of military service members (military spouses) under the dislocated worker program. DOL affords local areas significant flexibility to serve military spouses. TEGL 22-04 clarifies that the term “military spouse” includes individuals who are married to active duty service members (including National Guard or Reserve personnel on active duty) and surviving spouses of active duty service members who lost their lives while on active duty service in combat-related areas (e.g., Afghanistan or Iraq). Refer to Section 5.7 for guidance related to Washington’s Marriage Equality Act.

When the spouse is unable to continue an employment relationship due to the service member’s permanent change of military station, or the military spouse loses employment as
a result of the spouse’s discharge from the military, then the separation from employment meets the termination component of the WIOA definition of Dislocated Worker. Eligibility determinations must align with UI policy regarding “good cause” for voluntary quits. Below are two common scenarios that would qualify:

- The spouse of a military service member voluntarily quits because he/she is relocating with the service member to a new duty location.
- The spouse of a military service member is no longer eligible to work on the base as a result of the (military service member’s) discharge.

NOTE: Good cause is not found when claimants quit work to relocate someplace other than their military spouse’s or domestic partner’s new duty location, including relocation to the home of record or elsewhere.

As provided in TEGL 22-04 and TEGL 22-04 Change 1, “termination” of military spouses based on the circumstances described above can be considered to determine “unlikely to return to a previous industry or occupation” to qualify as a dislocated worker.

Determination is a matter of judgment based on relevant circumstances, but in most cases, military spouses impacted by a service member’s duty reassignment or discharge will meet the “unlikely to return to a previous industry or occupation” criterion under WIOA and could be served as dislocated workers.

Military spouses can also be served as dislocated workers if they meet the definitional requirements for displaced homemakers at WIOA Section 3(15)(A)(ii).

Veterans and eligible spouses must be given priority in all DOL funded employment and training programs. In the proposed regulations, it is suggested DOL will issue a TEGL as additional guidance. Currently DOL has the following TEGL’s as reference to veterans:

- **TEGL 5-03** – Implementing the Veterans’ Priority Provisions of the “Jobs for Veterans Act”
- **TEGL 22-04** – Serving Military Service Members and Military Spouses under the WIA Dislocated Worker Formula Grant
- **TEGL 22-04 Change 1** – Serving Military Spouses and Dislocated Workers under the WIA Dislocated Worker Formula Grant
- **TEGL 10-09** – Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in whole or in part by the US Department of Labor

### 4.3 Eligibility for Employed Individuals

#### 4.3.1 Under-Employed Workers

Per Section 11 of TEGL 19-16, the State allows under-employed workers to qualify for the WIOA Title I Dislocated Worker program if they have been dislocated from full-time employment and meet one of the following eligibility criteria:
1. Employed less than full-time but actively seeking full-time employment
2. Employed in a position that is inadequate with respect to documented skills and training
3. Employed but meet the definition of “low-income” in WIOA Section 3(36)
4. Employed but current earnings are insufficient compared to earnings from previous employment

Note: Underemployed workers also qualify for the WIOA Title I Adult Program, while those who meet the "low income" definition also receive priority of service.

Employed adults are eligible for career services if they are 18 years of age or older and additionally eligible for training services if they are determined to be in need of such services to obtain or retain self-sufficient employment (WIOA Section 134(c)(3)(I)).

Self-sufficiency for Dislocated Workers shall be defined as employment lasting more than 6 consecutive months which provides the worker a wage that is equal to or greater than 90% of his/her wage at the time of dislocation. The special needs of individuals with disabilities or other barriers to employment should be taken into account when determining self-sufficiency.

4.4 Stop Gap Employment

Stop-gap employment is temporary work an individual accepts only because they have been laid off from the customary work for which their training, experience or work history qualifies them. Stop-gap employment must be temporary in nature with the intent to end employment upon completion of training, obtaining self-sufficient employment or as specified in the individual employment plan (IEP).

Typically, stop-gap employment will pay less than the individual’s wage of self-sufficiency where stop-gap employment does provide a sufficient wage temporarily but is not considered permanent employment that leads to self-sufficiency. This stop-gap employment would not change the individual’s dislocated worker status if it meets the criteria.

An otherwise eligible dislocated worker remains eligible if either prior to or during Title I Dislocated Worker program participation, their stop-gap employment is obtained for the purpose of income maintenance. If dislocation from a stop-gap position occurs, the job of dislocation remains the original job that established the self-sufficient income. If, at any time, an individual obtains employment that meets the definition of self-sufficiency, including a scenario where the employment period exceeds the established criteria for temporary employment, then that position would be considered the self-sufficient job of dislocation in the event of a future dislocation.
5. Additional Program Guidance

5.1 U.S. Citizenship or Legal Right to Work in the U.S.

As outlined in Sections 2, 3.1 and 4.1, Service Providers are required to verify U.S. citizenship or legal right to work for all WIOA Title I programs. WSW requires verification by using [I-9 Documentation](#), such as: driver’s license / ID card along with Social Security card. Other documentation may only be used to supplement accepted I-9 documentation.

5.2 Selective Service Requirements

To be eligible to receive WIOA Title I-funded services, all males born on or after January 1, 1960 must present documentation showing compliance with the Selective Service registration requirements or exceptions, One Stop Management or WSW Designee must determine that the failure to register was not knowing and willful. Complete Selective Service registration requirements and exceptions are found in [TEGL 11-11, Change 2](#), including acceptable documentation to determine registration status and procedures for determining whether or not failure to register was knowing and willful.

Additionally, the [Selective Service System Website](#) provides additional information about registration requirements, including the [Who Must Register Quick Reference Chart](#).

Males 25 Years and Under

Before being enrolled in WIOA Title I services, all males who are not registered with the Selective Service and have not reached their 26th birthday must register through the [Selective Service website](#) or provide documentation indicating they are covered by an exception (i.e., serving in the military on full-time active duty or a non-U.S. male on a valid non-immigrant visa). Males turning 18 while participating in WIOA Title I services must complete their Selective Service registration no later than 30 days after turning 18 to continue to receive WIOA Title I services. Males between 18 and 25 years of age who refuse to register with the Selective Service must be suspended from WIOA Title I services until registered.

If a youth fails to provide verification of Selective Service registration within 30 days of his 18th birthday, services must be suspended (i.e. on the 31st day after his 18th birthday). Service Providers must stop providing services to participants who have not met Selective Service registration requirements until the requirements are met.

Males 26 Years and Over

Before enrolling in WIOA Title I services, all males 26 years of age or older must provide (1) documentation of compliance with Selective Service registration requirements; (2) documentation showing they were not required to register; or (3), if they were required to register but did not, documentation establishing that their failure to register was not knowing and willful.
Determining Knowing and Willful Failure to Register

**TEGL 11-11, Change 2** provides local areas with detailed information about requesting a Status Information Letter and the process for determining knowing and willful failure to register. The intent of the TEGL is to provide a framework for local areas to make determinations through a local process where determinations are based on the individual circumstances (e.g., questions, considerations, statements, status information letter) and relevant documentation (i.e., documentation that supports the reason for not registering or further supports the belief that it was not knowing or willful). Because circumstances will vary and need to be considered, there is not an established and definitive list of acceptable documentation.

### 5.3 Priority of Service for Veterans and Eligible Spouses

All WIOA programs and service delivery must align with federal law, regulations, and guidance on Priority of Service. Priority of service entitles eligible veterans or spouses to enrollment and services before eligible non-covered persons. Refer to 38 US Code 4215, 20 CFR Part 1010, WorkSource System Policy 1009 – Priority of Service for Veterans and Eligible Spouses, VPL 07-09, and TEGL 10-09 for additional guidance on Priority of Service. Refer to Section 3.2 for specific guidance on priority of service for the Title I Adult program.

### 5.4 Assisting Victims of Human Trafficking

This guidance is appropriate for one-stop center staff, especially intake workers and frontline staff who may encounter individuals they believe may be victims of human trafficking. If individuals are under immediate threat and/or state that they are in danger, staff should call 911.

On October 24, 2012, the U.S. Department of Labor (DOL), Employment and Training Administration (ETA) released **TEGL 9-12**, which provides additional information and updates earlier guidance on the importance of providing workforce training and referral services to victims of human trafficking. Below are instructions and guidelines for staff.

#### Recognizing the Characteristics of Victims and Referring Individuals to Proper Authorities and Resources

Many victims of trafficking do not self-identify. A role for staff is to recognize the characteristics of potential victims of trafficking and refer them to proper authorities and resources. See **TEGL 9-12** Attachments A and B for information on how to identify potential victims of trafficking and a current list of hotlines that one-stop staff can call to get help for potential victims.

#### Employment and Training Services for Victims of Human Trafficking:

U.S. citizens or lawful residents who are victims of trafficking can receive the same services provided to the general public under WIOA. In addition, under the Traffic Victims Protection Act, certain foreign nationals are also eligible for WIOA Title I services. This includes victims of both a severe form of trafficking in persons and individuals granted a nonimmigrant “T”
To be eligible for WIOA Title I services as a victim of a severe form of trafficking:

- Individuals 18 years of age or older must have been subjected to an act or practice described in the definition of “severe forms of trafficking in persons” and have received a letter of certification issued by the U.S. Department of Health and Human Services (HHS).

- Children under 18 years old who have been subjected to a severe form of trafficking need not be certified by HHS to be eligible for services; instead, HHS issues Letters of Eligibility to minor victims of trafficking. As with any participant, they must meet all applicable program eligibility requirements to receive WIOA Title I services.

Individuals who are granted “T” visas by the U.S. Department of Homeland Security (DHS) are also eligible for WIOA Title I services. The “T” nonimmigrant status (T visa) is available to individuals who are or have been victims of human trafficking and protects these individuals by allowing them to remain in the United States to assist in an investigation or prosecution of human trafficking.

Employment and training services should be provided to victims of trafficking to the same extent as and following the same procedures and case management processes for other one-stop customers. However, services to victims of trafficking may need to be tailored and adapted to meet the particular needs of this population. For instance, victims of trafficking may have Limited English Proficiency (LEP), criminal records (including from being forced into prostitution), or limited resumes.

Offering Information and Referrals to Other Wrap-Around Services and/or Law Enforcement

In most cases, victims of trafficking will approach one-stop centers toward the end of their rehabilitation process and will have already been working with other federal, state, local or non-profit organizations and agencies. In the event that the victim has not yet received services, it is important for staff to be aware of and utilize local resources and service providers, particularly non-profit organizations that provide services to trafficking victims. Service providers for trafficking victims can also refer or accompany their clients to the nearest one-stop center when they are ready for employment and training services.

A description of available services for victims of trafficking offered either directly by federal agencies or provided by local service providers with funding from the federal government can be found in the document, Services Available to Victims of Human Trafficking: A Resource Guide for Social Service Providers.

5.5 Use of Unemployment Insurance Self Service Web Site

WorkSource Information Notice (WIN) 0027, Change 3 provides information on the use of data accessible to Unemployment Insurance (UI) claimants through the Unemployment Insurance Self Service web site to secure information that can assist in determining Dislocated Worker program eligibility. Staff can use printouts of UI information provided by UI claimants who have Secure Access Washington (SAW) accounts that allow them to access,
5.6 Income Verification and Family Size for the Low-Income Criteria

5.6.1 Income Verification:

Unemployed individuals do not automatically meet local parameters regarding low-income. The intent is to prioritize services to individuals based on family income (low-income).

Using the definition of low-income at WIOA Section 3(36), service providers will use WSW Income Chart #3018 to determine 70% of the lower living standard income level. Section 8 of this handbook provides samples of excludable and includable income. To determine whether an individual is low-income under the definition at WIOA Section 3(36), it is also necessary to consider family size and family income.

To determine whether an individual is low-income under the definition at WIOA Section 3(36), it is also necessary to consider family size and family income.

DOL has provided the following guidance for use in determining low-income status:

- Unemployment insurance, child support payments and old-age survivors insurance are includable income for adults and dislocated workers (TEGL 19-16).

- Military pay or allowances paid while on active duty or paid by the Department of Veterans Affairs (VA) for vocational rehabilitation, disability payments, or related VA-funded programs are not includable income (TEGL 19-16; 20 CFR 683.230).

- Unemployment insurance and child support payments are includable income for youth (TEGL 21-16).

5.6.2 Determining Family Size:

For these purposes, “family” under WIOA means two or more individuals related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:

- A married couple, and dependent children;
- A parent or legal guardian and dependent children; or
- A married couple.

Refer to Section 5.7 for guidance related to the impact of Washington’s Marriage Equality Act.

NOTE: Based on proposed 20 CFR 681.280, even if the family of a disabled individual does not meet the income eligibility criteria, the disabled individual may be considered a low-income individual if their income meets the income criteria of WIOA section 3(36)(A) or 3(36)(B). Disabled individuals would be considered a family of one and only their income considered in determining low-income.
5.6.3 Defining Dependent:
WIOA does not define dependent. To avoid uncertainty in making eligibility decisions regarding family size and income, the State has identified three circumstances where youth must be considered dependents of parents or legal guardians for the purpose of determining family size for WIOA Title I youth and adult program eligibility:

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Youth not yet 18, who are not emancipated youth nor runaway youth, living “at home” with their parents or legal guardians, including individuals in the temporary care of another individual or household (but not claimed as a dependent by that household).</td>
</tr>
<tr>
<td>2</td>
<td>Youth age 18-19 who are full-time students in a secondary school or equivalent and are living “at home” with their parents or legal guardians.</td>
</tr>
<tr>
<td>3</td>
<td>Youth age 18-24 who are not full-time students and are living “at home” with their parents or legal guardians and who are primarily supported by their parents.</td>
</tr>
</tbody>
</table>

A legal guardian is a blood relative (e.g., grandparent, aunt or uncle) or other legally recognized relative (e.g., by decree of the court) who claims the youth as a dependent. The key factors are:

- Relationship by blood or decree of court;
- Living in a single residence; and
- The youth is claimed as a dependent.

5.7 Washington’s Marriage Equality Act

Washington’s Marriage Equality Act (RCW 26.60) expands the definition of a “married couple” beyond that of a male and female. Furthermore, in June 2013, the U.S. Supreme Court ruled unconstitutional Section 3 of the federal Defense of Marriage Act. Accordingly, with respect to this policy, the State’s definition of a married couple extends beyond that of a male and female.

This expanded definition applies to all WIOA policy guidance and specifically impacts: family size, eligible spouses (Priority of Service), military spouses (Dislocated Worker eligibility), and displaced homemakers (Dislocated Worker eligibility).

5.8 Disabled Veterans Outreach Program (DVOP) Eligibility

Eligibility for the Disabled Veterans’ Outreach Program (DVOP) under the Jobs for Veterans State Grant (JVSG) is separate and distinct from consideration of either veterans’ and eligible spouses’ priority of service under the WIOA Title I Adult program (refer to Section 3.2) or Dislocated Worker program eligibility for transitioning military service members and eligible spouses (refer to Section 4.2).

Individuals eligible for case-managed DVOP employment and training services include the following:
1. Special disabled veterans and other disabled veterans as defined by 38 U.S.C. 4211, with an emphasis on those who are economically or educationally disadvantaged.

2. Veterans discharged under other than dishonorable conditions who do not meet the criteria in (1), but attest to meeting at least one of the following criteria representing Significant Barriers to Employment (SBE):
   - Being homeless or in danger of becoming homeless, to include those fleeing or attempting to flee a hostile home environment
   - Receiving/pending U.S. Department of Veterans Affairs compensation for a disability
   - Currently or has previously been incarcerated
   - Receiving or eligible for public assistance
   - Being discharged in the past three years and unemployed for 27 weeks or longer in the past 12 months
   - Lacking a high school diploma or high school equivalency degree
   - Being between the ages of 18 and 24 inclusive
   - Being a Wounded Warriors or caregiver for Wounded Warriors
   - Separated from the military under other than dishonorable conditions and being discharged due to forced downsizing
   - Having a Department of Defense (DD) Form 2648 (Preseparation Counseling Checklist) on which they have been deemed “not career status ready”

5.9 Trade Act Assistance (TAA) Eligibility

Eligibility for Trade Adjustment Assistance (TAA) is based on an affirmative decision by the DOL’s Office of Trade Adjustment Assistance (OTAA) to certify a TAA petition that covers a defined worker group. To that end, OTAA issues to the worker group a decision titled, "Certification Regarding Eligibility to Apply for Worker Adjustment Assistance" that covers all members of the worker group who are separated or threatened with separations during the period beginning one year before the petition was filed and ending two years after the date of the certification. Each certification describes the worker group and specifies the beginning and ending dates.

Certified TAA petitions in Washington, including the “Certification Regarding Eligibility to Apply for Worker Adjustment Assistance,” can be found on-line on the DOL’s searchable web page for listings of petitions and determinations or by contacting ESD’s State TAA Program Operator.

5.10 Incumbent Workers

WIOA Section 134(d)(4) and 20 CFR 680.780 directs states and local areas to establish policies and definitions to determine which workers, or groups of workers, are eligible for incumbent worker training (IWT) services. Per 20 CFR 680.780, to qualify, incumbent workers need to be employed, meet Fair Labor Standards Act requirements for an employer-employee relationship, and have established employment histories with the employer for six months or more by the time the IWT contract is fully executed. However, if the training is
provided to a cohort or group of employees, only a mathematical majority must meet the six months or more employment history requirement.

Because IWT is a business service (per TEGL 10-16 and 19-16 individuals in IWT are not participants), service providers must document that employers meet the eligibility requirements in WSW Training Handbook – Incumbent Worker Training and ensure that employers document that their IWT employees meet incumbent worker eligibility requirements in Policy 5607 and WSW Training Handbook as conditions for approving IWT for employers. Per 20 CFR 680.780 and Section 13 of TEGL 19-16, incumbent workers need not meet the WIOA Title I eligibility requirements for adults or dislocated workers to receive career and training services unless they are also co-enrolled as participants in the WIOA Title I Adult or Dislocated Worker programs. For Southwest area eligibility and training requirements reference the WSW Training Handbook – Incumbent Worker Training.

Per 20 CFR 682.320-340 and TEGL 19-16, IWT funded by first-year statewide Rapid Response funds must be associated with and documented as part of a layoff aversion strategy designed to prevent layoffs or minimize durations of unemployment resulting from layoffs.

Per TEGL 10-16 and TEGL 1916, Attachment II, IWT does not trigger participation and individuals in IWT are not program participants. Accordingly, individuals in IWT are not eligible to receive supportive services unless they meet eligibility for and are co-enrolled in either the WIOA Title I adult or dislocated worker programs and receive a qualifying career service or training service (presumably the former as they are already engaged in IWT). In other words, individuals in IWT only are not eligible to receive supportive services.
6. Eligibility Documentation Requirements

The matrix below provides a comprehensive overview of program eligibility criteria and documentation requirements. The requirements in this matrix outline eligibility criteria and utilize Data Element Validation (DEV) requirements for alignment purposes. There are, however, additional DEV requirements beyond the eligibility documentation requirements described in this matrix, including different DEV requirements for career services. Refer to WorkSource System Policy 1003 Revision 1 and TEGL 23-19 for comprehensive information on the Data Reporting and Validation System (DRVS) and Data Element Validation (DEV) requirements.

Instructions for the eligibility and documentation matrix:

Criteria
This column represents all eligibility components for WIOA Title I Youth, Adult, and Dislocated Worker (DW) categories, in addition to the components that apply to multiple programs.

Eligibility Requirement
This column includes each program with an indicator in each row if the eligibility criterion applies to the specific program as outlined in Sections 2, 3 and 4 of this handbook.

Documentation Requirement
The corresponding eligibility documentation requirements to the right align with DEV documentation requirements for each eligibility criteria/category. The Enterprise Data Reporting and Validation System (EDRVS) number (if the criteria is included under DEV) or other source (if not included under DEV) is listed above each list of documentation. Note: EDRVS numbers reflected are subject to change based on issuance of DOL/ETA guidelines for DEV applicable to WIOA.

One document in this column is required for each relevant eligibility criteria/category. Each criteria is connected to one or more potential DRVS lists, but only one document (from the relevant list) is necessary (i.e., low-income and youth category 3 include multiple “options” but only one option is necessary).

Service providers may use supplemental data to document wage information for those jobs that are not captured through UI Wages and State systems. All supplemental data must be uploaded into MIS under employment verification.

Self-attestation
The self-attestation column indicates whether or not the corresponding documentation list allows self-attestation. All service providers must use the self-attestation forms provided in Section 7 of this Handbook. Furthermore, staff must document the reason for using self-attestation in case notes. If permissible in the below table, self-attestation can be a signed and dated WIOA eligibility application that is either in paper format or one of the two forms of electronic documentation (a scanned and uploaded copy of the paper document or an application in the state’s case management system with the participant’s date-stamped electronic signature).

Improperly documented self-attestation or self-attestation on eligibility elements not permitted under federal law or guidance or this policy may result in disallowed costs. Properly
documented self-attestation serves as documentary evidence of eligibility determination and does not, by itself, warrant disallowed cost findings. At the same time, properly documented self-attestation does not, by itself, preclude disallowed cost findings if it is determined during monitoring, reviews, or audits that the attestation was false.

**Note:** Under [WorkSource System Policy 1023, Revision 1](#), local areas formally implementing Integrated Service Delivery with co-enrollment can utilize self-attestation to document that participants are 18 years of age or older, are legally entitled to work in the U.S., and have registered for Selective Service (as applicable) for the purposes of eligibility determinations for the WIOA Title I adult and dislocated worker programs so long as those individuals are **provided basic career services only**. If those participants subsequently pursue individualized career services or training services, full eligibility documentation is required.
<table>
<thead>
<tr>
<th>Eligibility Requirement For:</th>
<th>Documentation Requirement</th>
<th>Self-Attestation</th>
</tr>
</thead>
</table>
| **Legally Entitled to Work in the U.S.** | • Self-Attestation and/or signed registration form  
• Accepted I-9 Documentation, such as: driver’s license / ID card along with Social Security card.  
Note: for more information on employment eligibility guidance and alignment with I-9 documentation please see M-274, Instructions for Completing Form I-9 | **Yes** |

| **Age** (date of birth) | **EDRVSData Element Number 2008 - Date of Birth:**  
• Driver’s license  
• Baptismal record  
• Birth certificate  
• DD-214  
• Report of Transfer or Discharge paper  
• Federal, state or local ID card  
• Passport  
• Hospital record of birth  
• Public assistance/social service records  
• School records or ID cards  
• Work permit  
• Family Bible  
• Cross-match with Department of Vital Statistics (Department of Health’s Center for Health Statistics)  
• Tribal records  
• Hard or electronic case notes (noting that staff saw proof of age document) for basic career services only.  
• Self-Attestation and/or signed registration form for basic career services only. | **Yes** (self-service and basic career services only) |

| **Selective Service Registration** | **TEGL 11-11 Change 2:**  
• Selective Service acknowledgement letter  
• Form DD-214 “Report of Separation”  
• Screen printout of the Selective Service Verification site  
• Selective Service Registration Card; Selective Service Verification (Form | **Yes** (self-service and basic career services only) |

---

1 Refer to Section 5.2 and TEGL 11-11 Change 2 for additional guidance on determining whether or not failure to register was knowing / willful. Selective Service Registration applies to youth who are 18 years of age or older, either at the time of enrollment or during participation.
| Low Income | N/A | ✓ | ✓ | ✓ | N/A |

**EDRVS 43, 38, or 40 for Adult**

**EDRVS Data Element Number 80243 - Low Income:**
- Alimony Agreement
- Applicant Statement
- Award letter from veteran's administration
- Bank statements
- Compensation award letter
- Court award letter
- Pension statement
- Employer statement/contact
- Family or business financial records
- Housing authority verification
- Pay stubs
- Public assistance records
- Quarterly estimated tax for self-employed persons
- Social Security benefits
- UI claim documents
- Copy of Authorization to Receive Cash Public Assistance
- Copy of Public Assistance Check
- Public Assistance Eligibility Verification
- Cross-Match with Refugee Assistance Records
- Cross-Match with Public Assistance Records
- Cross-Match with UI Wage Records
- Self-Attestation
- State MIS (Signed WIOA eligibility application in ETO and at least one uploaded document from EDRVS).

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2 Income as an eligibility requirement for the Adult program is determined by Section 3.2. Income as an eligibility requirement for youth does not apply to youth enrolled in the 5% window or OSY youth unless determined Category 3.

3 Applicant statement, which is acceptable for low income documentation when providing individualized career services and training services, is not synonymous with self attestation. Though generally similar, applicant statement is distinguished from self attestation in that the former requires a signed and dated statement that is prepared (either handwritten or typed) by the individual whereas the latter is documented through a signed and dated form with pre-posed yes/no checkboxes such as those provided in Section 7 of the Handbook.
Data Element Number 802 - Low Income list
- Self-attestation for basic career services only
- Hard or electronic case notes (noting that staff saw proof of public assistance document) for basic career services only.

EDRVS Data Element Number 60038 - TANF:
- TANF Eligibility Verification
- TANF Period of Benefit Receipt Verification
- Referral Transmittal from TANF
- Cross-match with TANF public assistance records
- Self-attestation for basic career services only
- Hard or electronic case notes (noting that staff saw proof of TANF document) for basic career services only.

Data Element Number 602 – SSI/SSDI:
- SSI/SSDI Receipt of Benefits Verification
- Referral Transmittal from SSA
- SSI/SSDI Eligibility Verification
- Cross-Match with SSA Database
- Self-attestation for basic career services only
- Hard or electronic case notes (noting that staff saw proof of TANF document) for basic career services only.

EDRVS Data Element Number 49-604 - Other Public Assistance (State/Local General Assistance or Refugee Cash Assistance, or Food Stamp Assistance) Recipient:
- Copy of authorization to receive cash public assistance
- Copy of public assistance check
- Medical card showing cash grant status
- Public assistance records eligibility verification
- Refugee assistance records Cross-Match with Refugee Assistance Records
<table>
<thead>
<tr>
<th>Category</th>
<th>EDRVS Data Element Number</th>
<th>Details</th>
</tr>
</thead>
</table>
| **1**    | 35 409 - School Status at Program Entry Participation | - Self-attestation (as a last resort, not preferred)  
- Cross-match with postsecondary education database  
- Copy of educational institution enrollment record  
- Applicable records from education institution (GED certificate, diploma, attendance record, transcripts, report card, drop out letter, school documentation)  
- Signed intake application or enrollment form  
- Electronic records  
- WIOA intake or registration form  
- State MIS |
| **2**    | 409 35 (refer to list above) | Yes |
| **3**    | 804 - Basic Skills Deficient/Low Levels of Literacy at Program Entry | - Standardized assessment test(s)  
- School records  
- Case notes  
- Assessment test results  
- Application records from education institution (transcripts, academic assessments, or other school documentation) |
| **4**    | 42-801 - Ex-Offender Status at Program Entry | - Self-attestation  
- Documentation from juvenile or adult criminal justice system  
- Written statement or referral |

**Youth Program – Out-of-School**

- Cross-match with public assistance database  
- Cross-match with State MIS Database  
- State MIS (ETO) for basic career services only  
- Self-attestation for basic career services only  
- Hard or electronic case notes (noting that staff saw proof of public assistance document) for basic career services only.
| Category 5 | Document from a court or probation officer  
|---|---|
| | Referral Transmittal from a Reintegration Agency  
| | Signed intake application or enrollment form  
| | Case notes  
| | Needs Assessment  
| | Signed individual service strategy  
| | Federal Bonding Program Application  
| | Documented phone call with court or probation representatives  
| | WIOA intake or registration form  
| EDRVS 41 Data Element Number 800 (homeless / runaway youth) or  
| EDRVS 51 Data Element Number 704 (foster care)  
| | Yes (only for 80041)  

| Category 6 | EDRVS Data Element Number 48.701 – Pregnant or Parenting Youth:  
|---|---|
| | Yes  
| | Self-attestation  
| | Case Notes  
| | Needs Assessment  

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Page 39 of 50
<table>
<thead>
<tr>
<th>Category 7</th>
<th>EDRVS  Data Element Number 49-702 - Youth who needs additional assistance:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Category 8</td>
<td>EDRVS  Data Element Number 49-702 (refer to list above)</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>Youth Program – In-School</td>
<td></td>
</tr>
<tr>
<td>Category 1</td>
<td>EDRVS 50Data Element Number 804 — Basic Skills Deficient/Low Levels of Literacy at Program Entry literacy skills deficiency:</td>
</tr>
<tr>
<td></td>
<td>No</td>
</tr>
<tr>
<td>Category 2</td>
<td>EDRVS 50Data Element Number 804 (refer to list above)</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>Category 3</td>
<td>EDRVS 42Data Element Number 801 — Ex-Offender Status at Program Entry:</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
</tbody>
</table>

- WIC Eligibility Verification
- TANF Single Parent Eligibility Verification
- Signed Intake Application or Enrollment Form
- Signed Individual Service Strategy
- Copy of child’s birth certificate
- Baptismal record
- Observation of pregnancy status
- Doctor’s note confirming pregnancy

EDRVS  Data Element Number 49-702 - Youth who needs additional assistance:

- Self-attestation
- Signed Intake Application or Enrollment Form
- Needs Assessment
- Signed Individual service strategy
- Case notes
- WIOA intake or registration form
- State MIS

EDRVS 50Data Element Number 804 — Basic Skills Deficient/Low Levels of Literacy at Program Entry literacy skills deficiency:

- Standardized assessment test
- School records
- Case notes
- Assessment test results
- Application records from education institution (transcripts, academic assessments, or other school documentation)

EDRVS 50Data Element Number 804 (refer to list above)

EDRVS 42Data Element Number 801 — Ex-Offender Status at Program Entry:

- Self-attestation
- Documentation from juvenile or adult criminal justice system
- Written statement or referral document from a court or probation officer
- Referral Transmittal from a Reintegration Agency
- Signed intake application or enrollment form
- Case notes
<table>
<thead>
<tr>
<th>Category 4</th>
<th>Category 5</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Needs assessment</strong></td>
<td><strong>Self-attestation</strong></td>
</tr>
<tr>
<td><strong>Signed individual service strategy</strong></td>
<td><strong>Case Notes</strong></td>
</tr>
<tr>
<td><strong>Federal bonding program application</strong></td>
<td><strong>Needs Assessment</strong></td>
</tr>
<tr>
<td><strong>Documented phone call with court or probation representatives</strong></td>
<td><strong>Written confirmation from social services agency</strong></td>
</tr>
<tr>
<td><strong>WIOA intake or registration form.</strong></td>
<td><strong>Self-Attestation</strong></td>
</tr>
<tr>
<td><strong>EDRVS 41 Data Element Number 800</strong></td>
<td><strong>Foster Care Agency Referral Transmittal</strong></td>
</tr>
<tr>
<td>(homeless / runaway youth) or <strong>EDRVS 51 Data Element Number 704</strong> (foster care)</td>
<td><strong>Signed Intake Application or Enrollment Form</strong></td>
</tr>
<tr>
<td><strong>EDRVS 41 Data Element Number 800</strong></td>
<td><strong>Signed Intake Application or Enrollment Form</strong></td>
</tr>
<tr>
<td>Homeless participant, Homeless Children and Youths, or Runaway Youth at Program Entry</td>
<td><strong>Needs Assessment</strong></td>
</tr>
<tr>
<td><strong>EDRVS 51 Data Element Number 704</strong></td>
<td><strong>Self-Attestation</strong></td>
</tr>
<tr>
<td>Foster Care Youth Status at Program Entry</td>
<td><strong>Case Notes</strong></td>
</tr>
<tr>
<td><strong>EDRVS 48 Data Element Number 701</strong></td>
<td><strong>Needs Assessment</strong></td>
</tr>
<tr>
<td>Pregnant or Parenting Youth</td>
<td><strong>Signed Individual Service Strategy</strong></td>
</tr>
<tr>
<td><strong>Self-attestation</strong></td>
<td><strong>WIC Eligibility Verification</strong></td>
</tr>
<tr>
<td><strong>Case Notes</strong></td>
<td><strong>TANF Single Parent Eligibility Verification</strong></td>
</tr>
<tr>
<td><strong>Needs Assessment</strong></td>
<td><strong>Signed Intake Application or Enrollment Form</strong></td>
</tr>
<tr>
<td><strong>Yes (only for 41)</strong></td>
<td><strong>Yes</strong></td>
</tr>
<tr>
<td>Category 6</td>
<td>Data Element Number 702EDRVS 49 - Youth who needs additional assistance:</td>
</tr>
<tr>
<td>------------</td>
<td>--------------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>- Self-attestation</td>
</tr>
<tr>
<td></td>
<td>- <strong>Signed</strong> Individual service strategy</td>
</tr>
<tr>
<td></td>
<td>- <strong>Copy of child’s birth certificate</strong></td>
</tr>
<tr>
<td></td>
<td>- <strong>Baptismal record</strong></td>
</tr>
<tr>
<td></td>
<td>- <strong>Observation of pregnancy status</strong></td>
</tr>
<tr>
<td></td>
<td>- <strong>Doctor’s note confirming pregnancy</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Category 7</th>
<th>EDRVS 49 Data Element Number 702 (refer to list above)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category 1</td>
<td>EDRVS Data Element Number 4107 - Date of Actual Qualifying Dislocation:</td>
</tr>
<tr>
<td></td>
<td>- Self-attestation (to include signed WIOA eligibility application)</td>
</tr>
<tr>
<td></td>
<td>- Verification from employer</td>
</tr>
<tr>
<td></td>
<td>- Rapid Response list</td>
</tr>
<tr>
<td></td>
<td>- Notice of layoff</td>
</tr>
<tr>
<td></td>
<td>- Public announcement with follow-up cross-match with UI database</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Category 2</th>
<th>Data Element Number 410EDRVS 47 (refer to list above)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category 3</td>
<td>EDRVS Data Element Number 410 47 (refer to list above)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Category 4</th>
<th>EDRVS 46 Data Element Number 807 - Displaced Homemaker at Program Entry:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>- Self-attestation</td>
</tr>
<tr>
<td></td>
<td>- <strong>Signed intake application or enrollment form</strong></td>
</tr>
<tr>
<td></td>
<td>- <strong>Cross-match with Public assistance records</strong></td>
</tr>
<tr>
<td></td>
<td>- <strong>Copy of applicable Court records</strong></td>
</tr>
<tr>
<td></td>
<td>- <strong>Copy of Divorce records Papers</strong></td>
</tr>
<tr>
<td></td>
<td>- <strong>Bank records</strong></td>
</tr>
<tr>
<td></td>
<td>- <strong>Copy of Spouse’s layoff notice</strong></td>
</tr>
<tr>
<td></td>
<td>- <strong>Copy of Spouse’s death record</strong></td>
</tr>
<tr>
<td></td>
<td>- <strong>Copy of Spouse’s permanent change of station (PCS) orders (for a military program)</strong></td>
</tr>
<tr>
<td>Category 5&lt;sup&gt;4&lt;/sup&gt;</td>
<td>EDRVS-47Data Element Number 410 (refer to list above) or a DD-214</td>
</tr>
<tr>
<td>-------------------</td>
<td>---------------------------------------------------------------</td>
</tr>
<tr>
<td>Category 6</td>
<td>EDRVS-47Data Element Number 410 (refer to list above)</td>
</tr>
</tbody>
</table>

<sup>4</sup> Per Section 4.2, transitioning service members may qualify under the Dislocated Worker program even if a DD-214 has not yet been obtained. While these individuals may be eligible to receive WIOA Dislocated Worker services and funds, they would not be considered ‘veterans’ for the purposes of DOL reporting.
7. Self-Attestation Forms

You can download the Adult & DW Self-Attestation form [here].

### WIOA Title I Adult & DW Self-Attestation Form

<table>
<thead>
<tr>
<th><strong>Applicant Information:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Last Name:</strong></td>
</tr>
<tr>
<td><strong>Address:</strong></td>
</tr>
<tr>
<td><strong>Legally entitled to work in US</strong></td>
</tr>
<tr>
<td>Yes ☐ No ☐</td>
</tr>
</tbody>
</table>

| **Individuals entering WIOA services may self-attest to the information below:** |
| **1. Are you low-income? (please explain below)** |
| Note: To determine low-income use Income Chart #3018 to determine income eligibility and use the definition of low-income individual at the beginning of the Handbook and the excludable and includable income in Sec. 8 of the Handbook. |
| Yes ☐ No ☐ |

<table>
<thead>
<tr>
<th><strong>Explanation:</strong></th>
</tr>
</thead>
</table>

| **2. Have you been terminated, laid off, or received a notice of termination or layoff? (DW Categories 1 and 2) AND unlikely to return to previous occupation (explain above)** |
| Yes ☐ No ☐ |

| **3. Are you a military service member who was discharged or released from service (under conditions other than dishonorable) or has received a notice of military separation? (DW Category 5)** |
| Yes ☐ No ☐ |

| **4. Were you unable to continue employment due to your spouse’s permanent change of military station, or did you lose employment as a result of your spouse’s discharge from the military? (DW Category 6)** |
| Yes ☐ No ☐ |

| **5. Were you self-employed, but are unemployed as a result of general economic conditions in the community in which you reside? (DW Category 3)** |
| Yes ☐ No ☐ |

| **6. Are you a displaced homemaker? (DW Category 4)** |
| Note: A displaced homemaker is an individual who was dependent on the income of another family member and is no longer supported by the income of another family member. |
| Yes ☐ No ☐ |

<table>
<thead>
<tr>
<th><strong>Dislocation Information</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Date</strong> Separation Date (if known mm/dd/yyyy):</td>
</tr>
<tr>
<td><strong>Job Title</strong></td>
</tr>
<tr>
<td><strong>Business Name</strong></td>
</tr>
<tr>
<td><strong>Address</strong></td>
</tr>
<tr>
<td><strong>City, State, Zip</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Current Employment Information</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Start Date mm/dd/yyyy:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Self-Attestation Statement:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>I certify that the information provided on this document is true and accurate to the best of my knowledge and belief. I understand that such information is subject to verification and further understand that the above information, if misrepresented or incomplete, may be grounds for immediate termination from any WIOA program and/or penalties as specified by law.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>SIGNATURE OF PARTICIPANT</strong></th>
<th><strong>DATE</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Staff Verification Statement:</td>
<td></td>
</tr>
<tr>
<td>------------------------------</td>
<td></td>
</tr>
<tr>
<td><em>I certify that the individual whose signature appears above provided the information recorded on this form.</em></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SIGNATURE OF STAFF</th>
<th>DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>
You can download this Youth Self-Attestation form [here](#).

### WIOA Title I Youth Self-Attestation Form

#### Applicant Information:

<table>
<thead>
<tr>
<th>Last Name:</th>
<th>First Name:</th>
<th>Middle Initial:</th>
<th>Legally entitled to work in US</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Yes ☐ No ☐</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address:</th>
<th>City:</th>
<th>State:</th>
<th>Zip:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

#### Individuals entering WIOA services may self-attest to the information below:

1. **Are you low-income? (please explain below)**
   - Yes ☐ No ☐
   - Note: To determine low-income use Income Chart #3018 to determine income eligibility and use the definition of low-income individual at the beginning of the Handbook and the excludable and includable income in Sec. 8 of the Handbook.
   - Explanation:

2. **Have you dropped out of school?**
   - Yes ☐ No ☐

3. **Are you homeless or did you run away from home?**
   - Yes ☐ No ☐

4. **Are you pregnant or currently parenting a child?**
   - Yes ☐ No ☐

5. **Are you an offender?**
   - Yes ☐ No ☐

6. **Do you Require Additional Assistance (includes individuals with disabilities).**
   - Yes ☐ No ☐
   - Explanation:

#### Self-Attestation Statement:

_I certify that the information provided on this document is true and accurate to the best of my knowledge and belief. I understand that such information is subject to verification and further understand that the above information, if misrepresented or incomplete, may be grounds for immediate termination from any WIOA program and/or penalties as specified by law._

**SIGNATURE OF PARTICIPANT**

X

**DATE**

---

**Staff Verification Statement:**

_I certify that the individual whose signature appears above provided the information recorded on this form._

**SIGNATURE OF STAFF**

X

**DATE**
8. Includable and Excludable Income

Income requirements are computed by recording the total reportable family income for six months prior to the date the application is signed and then multiplying by two (2). This is the total annual family income.

The following are income types that fall into either includable or excludable income for purposes of WIOA eligibility.

Include the following when computing annual family income:
- Pay stubs (wages and salaries before any deductions)
- Net receipts from non-farm self-employment (recipients from a person's own unincorporated business, professional enterprise, or partnership after deductions for business expense).
- Unemployment insurance
- Child support payments
- Old Age and Survivors Insurance (OASI)
- Net receipts from farm self-employment (receipts from a farm which one operates as an owner, renter, or sharecropper, after deductions for farm operating expenses).
- Regular payments from railroad retirement, strike benefits from union funds and worker's compensation (not lump sum) training stipends.
- Alimony
- Pensions whether private, government employee (including military retirement pay), law enforcement firefighters (LEF) disability income.
- Regular insurance or annuity payment.
- College or university grants, fellowships, and assistantships, state work-study (not needs based scholarships): the key is whether or not the money is a loan to be paid back. If it is to be paid back, then it is a loan and excludable income if not, then it is includable.
- Dividends, interest, net rental income, net royalties, and periodic receipts from estates or trusts.
- Net gambling or lottery winnings.
- L & I paid on a monthly basis.
- Social Security Disability (SSDI) Insurance payments (Title II of the Social Security Act, Federal Old-Age, Survivors and Disability Insurance). SSDI pays benefits to individuals that have worked in the past, paid Social Security taxes, and are currently unable to work for a year or more because of a disability. SSDI in considered income replacement.

Exclude the following when computing annual family income:
- Public assistance payments (including TANF, SSI, RCA, GA).
- Training stipends under WIOA
- Foster child care payments
- Military pay or allowances paid while on active duty or paid by the Department of Veterans Affairs (VA) for vocational rehabilitation, disability payments, or related VA-funded programs are not includable income (TEGL 19-16; 20 CFR 683.230).
- Financial assistance under Title IV of the Higher Education Act, i.e. Pell grants, federal opportunity grants and federal work study, as well as needs-based scholarships (loans are debt and not income).
- Capital gains
Any assets drawn down as withdrawals from a bank.
Tax refund, gifts, loans, inheritance, one-time insurance payments, or compensation for injury.
Non-cash benefits such as employer fringe benefits, food or housing received in lieu of wages, Medicare, Medicaid, food stamps, school meals, fuel or housing assistance.
Certain one-time cash payments including: tax refunds; one-time gifts; loans, which are debt and not income; assets from the sale of a home, property, or car; one-time insurance settlements; lump sum inheritances; one-time compensation for injury; etc.
Job Corps payments.
Wages paid through the Senior Community Service Employment Program funded under Title V of the Older Americans Act.
Payments received under the Trade Adjustment Assistance (TAA).
U. S. Housing and Urban Development (HUD) rental assistance subsidies.
Stipends received in the following programs: VISTA, Peace Corps, Foster Grandparent Program, YouthWorks/AmeriCorps Programs, and Retired Senior Volunteer Program.

If payment is a one-time lump sum, it is generally excludable. If a payment occurs in monthly installments, then it is generally includable. If the payment does not meet one of the excludable criteria, then the payment will be includable income.
MEMO

DATE: FEBRUARY 24, 2021
TO: WSW EXECUTIVE BOARD
FROM: RENNY CHRISTOPHER - TREASURER OF THE BOARD
KEVIN PERKEY – CHIEF EXECUTIVE OFFICER
RE: WSW FINANCE COMMITTEE REPORT OUT

The Finance Committee of the WSW Board of Directors met on February 17, 2021. 2nd quarter spending and obligations reports for the fiscal year ending 6/30/21 (PY20) were reviewed and discussed. A DRAFT copy of the WSW 2019 IRS form 990 was presented to the committee copy attached. Corrections are forthcoming to the list of Executive Board members on page 7 of the 990.

QUARTERLY REPORTS

WIOA Obligations: Plans were presented and discussed regarding the requirement to have 80% of Adult, Dislocated Worker, and Youth formula funds obligated by 6/30/2021 as budgeted. Report attached.

Operations and Special Projects: Spending for WSW operations is on track for mid-point in the fiscal year at 47% of budgeted spending projections. Special Projects spending is off to a slower start at 13% of budget, but expected to reach nearly 100% by the end of the fiscal year per planned investments. Reports attached include explanatory notes regarding spending and variances.

Grant Budget vs Actual Spending: Competitive and other state and federal grants with fixed grant period terms and line item budgets are on track to be spent in the defined period. Reports attached.

Subcontract Spending and Performance: Most subcontract spending is within an acceptable range of forecasted with no major concerns. Enrollments are low in Adult, Dislocated Worker and Youth programs. Performance issues are directly related to the pandemic and are being addressed. Several new contracts funded by the National Dislocated Worker grants have been executed. Reports attached include explanatory notes regarding spending and variances as well as performance metrics.

The WSW budget for the upcoming fiscal year is in the beginning stages of development. An RFP will soon be released to contract with an outside agency or individual to overhaul the WSW budget development tools and worksheets. The expected resulting product will give a clearer more straightforward picture of revenue and expenditures for current and future periods and allow for better integration with existing reporting tools and accounting systems.

Federal WIOA Planning Allocations by State for PY21/FY22 have been released by the Department of Labor. Overall the allocation to the state of Washington is down 10%. Additional funds may be coming but nothing is yet finalized at the federal level. Local allocations have not yet been released by the state.
<table>
<thead>
<tr>
<th>Goal</th>
<th>Indicator</th>
<th>Target</th>
<th>Current</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Businesses have access to, hire, develop, and invest in the skilled workers they need to recover &amp; grow.</td>
<td>Percentage of WSW industry partners who adopt one or more quality jobs metrics</td>
<td>1000</td>
<td>10</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td>Number of employment placements from our regional pool of highly skilled workers</td>
<td>1000</td>
<td>300</td>
<td>30%</td>
</tr>
<tr>
<td></td>
<td>Employment rate of participants</td>
<td>1000</td>
<td>25</td>
<td>3%</td>
</tr>
<tr>
<td></td>
<td>Number of OJT, IWTs, Paid &amp; Unpaid Internships, and Work Experiences, Pre-Apprentices &amp; Apprentices</td>
<td>1000</td>
<td>500</td>
<td>50%</td>
</tr>
<tr>
<td></td>
<td>Amount invested in OJT, IWTs, Paid &amp; Unpaid Internships, and Work Experiences, Pre-Apprentices &amp; Apprentices</td>
<td>1000</td>
<td>750</td>
<td>75%</td>
</tr>
<tr>
<td></td>
<td>Number of new businesses that WSW engages with and supports</td>
<td>1000</td>
<td>850</td>
<td>85%</td>
</tr>
<tr>
<td></td>
<td>Number of historically underserved people receiving workforce services</td>
<td>1000</td>
<td>10</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td>Percentage of people served who enter post-secondary education</td>
<td>1000</td>
<td>300</td>
<td>30%</td>
</tr>
<tr>
<td></td>
<td>Percentage of people served placed into qualified talent pool for employment</td>
<td>1000</td>
<td>25</td>
<td>3%</td>
</tr>
<tr>
<td></td>
<td>Measurable skills gain</td>
<td>1000</td>
<td>500</td>
<td>50%</td>
</tr>
<tr>
<td></td>
<td>Median household income</td>
<td>1000</td>
<td>750</td>
<td>75%</td>
</tr>
<tr>
<td></td>
<td>Wage data based on race &amp; gender</td>
<td>1000</td>
<td>850</td>
<td>85%</td>
</tr>
<tr>
<td></td>
<td>Unemployment rate</td>
<td>1000</td>
<td>850</td>
<td>85%</td>
</tr>
<tr>
<td></td>
<td>Poverty rate</td>
<td>1000</td>
<td>850</td>
<td>85%</td>
</tr>
<tr>
<td></td>
<td>Number of program evaluations completed</td>
<td>1000</td>
<td>850</td>
<td>85%</td>
</tr>
<tr>
<td></td>
<td>Number of partnerships with organizations and individuals who serve historically underserved populations</td>
<td>1000</td>
<td>10</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td>Business &amp; Job Seeker customer satisfaction scores</td>
<td>1000</td>
<td>300</td>
<td>30%</td>
</tr>
<tr>
<td></td>
<td>Number of funder partnerships</td>
<td>1000</td>
<td>25</td>
<td>3%</td>
</tr>
<tr>
<td></td>
<td>Number of new Local, State, National policies enacted to support our local workforce development system goals</td>
<td>1000</td>
<td>500</td>
<td>50%</td>
</tr>
</tbody>
</table>
## Mission
Lead a regional workforce development system where every individual has access to high-quality employment and every business has access to a highly skilled workforce

## Vision
A region where economic prosperity and growth exists for every person

### Values
Our values are the lenses by which we evaluate every decision

- **Equity** - Promoting justice, impartiality and fairness within processes, and the distribution of resources by institutions or systems
- **Diversity** - Collectively interweaving differences and similarities that include, for example, individual and organizational characteristics, values, beliefs, experiences, background, preferences, and behaviors
- **Inclusion** - Building a multicultural workforce climate where every community member can safely share their voice and be heard
- **Innovation** - Introducing new ideas, methods, or products to make changes
- **Collaboration** - Working jointly with our customers, community and colleagues to achieve our shared goals
- **Impact** - Positively influencing and affecting our community

### Goal 1: Business Recovery & Growth
Businesses have access to, hire, develop, and invest in the skilled workers they need to recover & grow.

### Goal 2: Economic Mobility
Historically underserved populations have equitable access to obtain and advance in high-quality employment.

### Goal 3: Systems Change
An effective and equitable workforce system exists, advancing the community and economic development goals of the region.

<table>
<thead>
<tr>
<th>Strategies</th>
<th>Strategies</th>
<th>Strategies</th>
</tr>
</thead>
</table>
| 1. Lead the development and expansion of high-quality jobs across our region  
2. Develop a regional pool of diverse, qualified workers, matching them to our business partners’ in-demand hiring needs  
3. Engage business partnerships to inform the workforce system of emerging hiring trends to address skill and opportunity shortages and prepare future workers  
4. Invest in and provide support for businesses to develop pre-apprenticeship, apprenticeship, on-the-job training, incumbent worker training, internships, and other earn-and-learn models | 1. Develop and implement programs that holistically serve families and communities  
2. Expand virtual career coaching and job training that leads to high quality employment  
3. Expand Next strategy for talent development into rural communities  
4. Develop and sustain population-specific programs  
5. Develop and implement programmatic evaluation strategy | 1. Develop and implement a method to actively involve community-based organizations to provide input, improve access, and inform continuous improvement  
2. Expand relationships across organizations and government systems to break down barriers, increase access and improve outcomes  
3. Advocate for investments, policies, strategies and economic development goals that enhance community prosperity  
4. Communicate WSW’s impact, lessons learned, promising practices and labor market information |
<table>
<thead>
<tr>
<th>Indicators</th>
<th>Indicators</th>
<th>Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Percentage of WSW industry partners who adopt one or more quality jobs metrics</td>
<td>1. Number of historically underserved people receiving workforce services</td>
<td>1. Number of partnerships with organizations and individuals who serve historically underserved populations</td>
</tr>
<tr>
<td>2. Number of employment placements from our regional pool of highly skilled workers</td>
<td>2. Percentage of people served who enter post-secondary education</td>
<td>2. Business &amp; Job Seeker customer satisfaction scores</td>
</tr>
<tr>
<td>3. Employment rate of participants</td>
<td>3. Percentage of people served placed into qualified talent pool for employment</td>
<td>3. Number of funder partnerships</td>
</tr>
<tr>
<td>4. Number of On-the-Job Trainings (OJTs), Incumbent Worker Trainings (IWTs), Paid &amp; Unpaid Internships, and Work Experiences, Pre-Apprentices &amp; Apprentices</td>
<td>4. Measurable skills gain</td>
<td>4. Number of new Local, State, National policies enacted to support our local workforce development system goals</td>
</tr>
<tr>
<td>5. Amount invested in On-the-Job Trainings (OJTs), Incumbent Worker Trainings (IWTs), Paid &amp; Unpaid Internships, and Work Experiences, Pre-Apprentices &amp; Apprentices</td>
<td>5. Median household income</td>
<td></td>
</tr>
<tr>
<td>6. Number of new businesses that WSW engages with and supports</td>
<td>6. Wage data based on race &amp; gender</td>
<td></td>
</tr>
<tr>
<td>7. (could also consider an indicator around our support for ec/dev referrals on relo, expansion and retention projects)</td>
<td>7. Unemployment rate</td>
<td></td>
</tr>
<tr>
<td></td>
<td>8. Poverty rate</td>
<td></td>
</tr>
<tr>
<td></td>
<td>9. Number of program evaluations completed</td>
<td></td>
</tr>
</tbody>
</table>

**Green** = have baseline data and can track moving forward  
**Yellow** = do not have baseline data, but may be able to track moving forward  
**Red** = do not have baseline data, very difficult or impossible to track moving forward
February 5, 2021

Dear Workforce Development Area Directors:

As we now enter the second year of the COVID-19 pandemic, we wish to recommmunicate the Workforce Board’s expectations and timelines for the approval of local workforce development area plans. Initially, local planning guidance was issued in January 2020 and local plan approval was anticipated in June 2020. But as with all things in our world, the demands placed on our system due to the economic and public health situation required flexibility. In April 2020, the Board was aiming for late summer or early fall 2020 for a local plan review process, yet noted even then it would also consider the trajectory of the COVID-19 crisis and the impact on local agencies to establish the later submission date if necessary.

The federal Workforce Innovation and Opportunity Act (WIOA) does not require specific deliverable timeframes for local plans, leaving the scheduling to states. However, the law requires that each local board have an approved plan in order to receive formula WIOA funds. The Employment Security Department has the ability to extend the life of an approved plan for contracting purposes, with the exception of needing certain information updated periodically:

- Identification of the local entity responsible for disbursement of the grant funds per WIOA Section 108(b)(15);
- Description of the competitive process to be used to award the subgrants and contracts to carry out local WIOA Title I activities per WIOA Section 108(b)(16), including Local Workforce Development Board (LWDB) requests for waivers to provide direct services per WIOA Title I Policy 5404;
- And a set of assurances regarding administration of funds signed by chief local elected official and board chair.

Workforce Board and Employment Security staff will coordinate with local workforce development areas to collect any needed updates necessary for FY22 contracts over the coming months, separate and independent from the local planning process. The Board will issue further guidance on a local plan approval timeline around mid-year, but does not anticipate undertaking a local plan approval process until pandemic conditions ease, and not before mid-2021 at the earliest.
Thanks to you and your staffs for your hard work and servant leadership in trying conditions. Please direct questions you have to Eric Wolf, Director of Policy and Programs, at eric.wolf@wtb.wa.gov.

Sincerely,

Eleni Papadakis
Executive Director
MEMO

DATE: FEBRUARY 12, 2021
TO: KEVIN PERKEY
WSW EXECUTIVE BOARD MEMBERS
FROM: MIRIAM HALLIDAY, DIRECTOR OF PROGRAMS
RE: PROGRAM UPDATE – DEPT OF VOCATIONAL REHABILITATION PRE-EMPLOYMENT TRAINING SERVICES (PRE-ETS - SUMMERWORKS)

This is a programmatic and financial update regarding the Department of Vocational Rehabilitation (DVR) Pre-Employment Training Services (Pre-ETS - SummerWorks) Grant Agreement with WSW, and subsequent Subcontracts with Equus Workforce Solutions, Educational Service District 112, and The Underdog Mentality.

In October 2020 it was found that DVR over-obligated the Pre-ETS funding to grantees across Washington State, including WSW. Leadership from DVR met with WSW to review their requests for a subsequent grant modification in November 2020. WSW received the modified grant document effective November 1st, 2020. The grant end date is still September 30th, 2021. The original maximum grant amount was $1,463,660.00, and the modified grant amount is $994,350.00. The total amount decrease is $469,310.00.

In efforts to maintain the subcontractor cost per participant rate, WSW is proposing to leverage WIOA In School Youth funds to cover internal costs associated with overseeing the program Summer 2021. The total Program Year 20 Title 1 Youth Allocation is $1,681,089.00. The maximum funds needed to cover the projected internal costs is $40,000.00, or less than 2.4% of our total PY 20 Title 1 Youth allocation. Slight change from Program Year 19, when 1.43% of Title 1 Youth Allocation was expended on In School Youth in Wahkiakum County. This contract in Wahkiakum County was not renewed for PY 20.

Post Summer 2021, WSW will reevaluate the cost per participant to ensure that costs are modified to match the renegotiated grant amount from DVR.
# How SNAP E&T Works

## Federal SNAP E&T Funding

<table>
<thead>
<tr>
<th>E&amp;T Program Grant (100 Percent) Funds</th>
<th>50 Percent Reimbursement (50-50) Funds</th>
<th>ABAWD (&quot;Pledge State&quot;) Grant Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Formula-based grants to States to plan, implement, and operate SNAP E&amp;T services</td>
<td>- Reimbursement grants (50 cents per dollar obligated) for SNAP E&amp;T program costs exceeding those covered by 100 percent funds or for supportive services provided to participants</td>
<td>- For States pledging to offer qualifying E&amp;T services to ABAWDs at risk of losing SNAP eligibility due to time limits</td>
</tr>
<tr>
<td>- Total funding available in FFY 2016: $90 million</td>
<td>- Funds eligible for reimbursement can include state or local funds or non-federal funds put up by &quot;third-party&quot; providers contracted by States to offer E&amp;T services</td>
<td>- States may request to be a &quot;pledge&quot; State and thus, receive these funds</td>
</tr>
<tr>
<td>- All States receive 100 percent funding. Some States do not spend their full allocations; remaining dollars may be reallocated to other States</td>
<td>- States may request 50-50 funds from FNS</td>
<td>- Currently capped at $20M annually for all pledge States, allocated based on size of ABAWD population</td>
</tr>
</tbody>
</table>

## SNAP E&T Services

- SNAP E&T is a package of services that includes participant assessment, employment and training activities, and supportive services.
- States must describe services in an annual SNAP E&T Plan that is submitted to USDA.
- SNAP E&T services are offered by States or State partners (Colleges, CBOs, American Job Centers contracted/engaged by State).

### Participant Assessment
- Assessment for SNAP E&T eligibility
- Assessment of employment and training needs/interests

### Employment & Training Activities
- (States select one or more to offer)
  - Job Search/Job Search Training
  - Workfare or Community Service
  - Work Experience (e.g. on-the-job training, apprenticeships)
  - Self-Employment Program
  - Educational programs, including basic skills and English language learning, directly linked to employment
  - Vocational Education
  - Job Retention (for 90 days post-employment)

### Supportive Services
- Reasonably necessary and directly related to participation in employment and training activities. Examples:
  - Transportation
  - Dependent care costs
  - Safety equipment
  - Supplies & books

## SNAP E&T Funds Can Pay For:

### 100 Percent or 50-50 Funds

**Administrative Expenses**
- State staffing and overall planning, implementation, and operations
- Partner provider administrative expenses

**Direct Program Expenses**
- Tuition and fees
- Case management/career navigation
- Job development

### 50-50 Funds Only

**Participant Expenses**
- Reasonably necessary and directly related to program participation (supportive services), including:
  - Transportation
  - Dependent care
  - Equipment and supplies related to training
  - Books
  - Uniforms
  - Licensing fees