



workforce
SOUTHWEST WASHINGTON

WSW Executive Committee Meeting
Zoom Conference Call
October 25, 2023
3:30 – 4:30 pm

| | | |
|------|--|---------------|
| 3:30 | <u>Welcome</u> | Paige Spratt |
| 3:35 | <u>Consent Agenda</u> * <ul style="list-style-type: none">• Minutes, Contract & Policy Memos | Paige Spratt |
| 3:40 | <u>Job Quality Academy Update</u> | Darcy Hoffman |
| 3:55 | <u>Board Business</u> * <ul style="list-style-type: none">• Election of Board Officers<ul style="list-style-type: none">○ Chair of the Board○ Vice Chair of the Board | Paige Spratt |
| 4:15 | <u>WSW Update</u> | Amy Gimlin |
| 4:25 | <u>Open Discussion / Other Items</u> | Paige Spratt |
| 4:30 | <u>Adjourn</u> | Paige Spratt |

* - Action Required

NOTES

December 05, 2023 – Zoom/In-Person – Joint Executive/Finance Committee Meeting



workforce
SOUTHWEST WASHINGTON

WSW Executive Committee Meeting Minutes
September 27, 2023
3:30 p.m.
Zoom Conference Call

Executive Committee Members Present: Chair Paige Spratt, Vice Chair A.D. Simmons, Adrienne Watson, Renny Christopher, Councilor Sue Marshall, Ted Sprague, Mark Tishenko, and Monte Constable.

Executive Committee Members Not Present: Corey Giles.

Staff Members Present: COO Amy Gimlin and Traci Williams.

WELCOME:

Chair Paige Spratt opened the meeting at 3:30 p.m. and welcomed everyone in attendance.

APPROVALS:

Having reached quorum, Chair Spratt entertained a motion to approve the Consent Agenda, consisting of the Executive Committee minutes held on July 26, 2023, Policy Memo that included; WSW's One-Stop Operator Policy #4011, and Administrative Memo that included revisions to the WSW Employee Handbook.

Monte Constable moved to approve the Consent Agenda as presented, second by Ted Sprague. Motion carried.

WSW UPDATE:

COO Amy Gimlin went over scheduling for the remaining Executive Committee meetings for the year, with the Executive Committee agreeing to cancelling the December 27th meeting and changing other scheduled meetings to virtual and in-person. Also shared was that WSW received ARPA funding from the County, along with another round of Opioid funding. State EO monitoring is going on this week and WSW has terminated the Lightcast contract and will send out a new RFP later in the program year.

NEW BUSINESS / OTHER ITEMS

None was forthcoming.

ADJOURNMENT:

With nothing further for the good of the order, Chair Spratt entertained a motion to adjourn the meeting at 3:48 p.m.

Adrienne Watson moved to adjourn the meeting at 3:48 p.m.



CONTRACT MEMO

DATE: OCTOBER 19, 2023
TO: AMY GIMLIN, WSW CHIEF OPERATING OFFICER
WSW EXECUTIVE BOARD MEMBERS
FROM: LINDA CZECH, WSW CONTRACTS MANAGER
RE: CONTRACT UPDATE (JULY-SEPT 2023)

WSW ***modified*** the following contracts:

- Partners in Careers modified WIOA Youth contract to increase budget by \$116,986 for total budget of **\$215,357** and extend end date to **June 30, 2024**.
- Career Path Services modified WIOA Youth contract to increase budget by \$393,966 for total budget of **\$642,692.30** and extend end date to **June 30, 2024**.
- Nancy Pionk Consulting modified to adjust budget, no change in total budget **\$15,755** or end date of **December 31, 2023**.
- Career Team modified WIOA Youth contract to revise the budget, no change in total budget **\$122,216** or end date of **June 30, 2024**.
- Equus modified Fourth Plain Navigator to revise Performance and Productivity, no change to budget or end date.
- Equus modified Career National Dislocated Worker to extend end date to **June 30, 2024**. No change in budget.
- Equus modified State EcSA (Economic Security for All) to revise performance and productivity details. No change in budget or end date.

WSW ***executed*** the following contracts:

- Greater Vancouver Chamber for **\$70,000** to lead business development activities in "NEXT", ending **June 30, 2024**.
- Love Overwhelming for **\$25,000** to provide access to high-quality employment and advancement opportunities in Cowlitz and Wahkiakum counties, ending **September 30, 2024**.
- Career Path Services for **\$448,420** for One Stop Operator ending **September 30, 2024**.

WSW ***notification of grant award/execution:***

- WSW received a grant award for the Basic Food Employment & Training (BFET) from Department of Social & Health Services amount is **\$158,766**, end date **September 30, 2024**.
- WSW received a grant modification for Federal Economic Security for All, no change in total amount or end date.
- WSW received notice of award for American Rescue Plan Act (ARPA) from Clark County Community Grant Program II total grant amount is **\$100,000**.
- WSW received notice of award for Opioid Disaster Recovery National Dislocated Worker Grant (NDWG) total grant amount is **\$687,000** end date **September 30, 2025**.

Board Approval Needed

- Approval needed for Opioid Disaster Recovery National Dislocated Worker Grant (NDWG) with Equus Workforce Solutions, contract for October 1, 2023, to September 30, 2025. Contract amount not to exceed **\$620,095** to provide services in Clark, Cowlitz, and Wahkiakum counties.
 - Program aimed at supporting individuals impacted by Opioid Use Disorder through career services, training (education, OJTs, WEXs), supportive services, and it will pay for three FTE peer navigator positions (12 mos. each, wages, and benefits). There will also be a strong element in assisting re-entry/justice involved individuals.



POLICY MEMO

DATE: OCTOBER 19, 2023
TO: AMY GIMLIN
WSW EXECUTIVE COMMITTEE MEMBERS
FROM: TRACI WILLIAMS, WSW OFFICE MANAGER/EXECUTIVE ADMINISTRATOR
RE: POLICY UPDATES

WSW Monitoring Policy #2003-5

This was a revision to our Monitoring Policy. In this revision, WSW added the Equal Opportunity monitoring process and procedure to allow separation of documented reports, while still conducting simultaneously with program and fiscal monitoring. Furthermore, added to the term definitions and clarified timelines for the monitoring process.

Based on the approval process, this policy approval falls under **Tier 3 Executive Committee** and Full Board **approval**.

Tier 3 – Substantial

Definition: Substantial revisions consist of significant revisions to a current policy or a State or Federal mandated “new” policy with local revisions made that will affect service delivery. These revisions require approval from both the **Executive Committee** and **Full Board**.

WSW Careers NDWG Policy #3041

This is a new policy for WSW. Previously WSW provided guidance for Careers NDWG supportive services through TA Memo 38 and the subcontract. During the last round of DOL monitoring, it was decided The Collaborative must use the same policy written by WorkSystems. Policy includes information conveyed through the TA memo, TEGL 25-20, TEGL 16-21, TEGL 10-16, Change 2, and regional guidance from WSI. The policy provides comprehensive guidance for eligibility criteria, support services, and training services, as well as requirements for documentation, performance, and MIS.

Based on the approval process, this policy approval falls under **Tier 3 Executive Committee** and Full Board **approval**.

Tier 3 – Substantial

Definition: Substantial revisions consist of significant revisions to a current policy or a State or Federal mandated “new” policy with local revisions made that will affect service delivery. These revisions require approval from both the **Executive Committee** and **Full Board**.



MONITORING POLICY POLICY #: 2003 Revision 5

Date of Original Policy: 02/17/2009

Effective Revision Date: ~~11/12/16~~ 12/2022 2023

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 ~~as~~ ensure 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 executes 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, unless as otherwise required per grantors agreement.
- 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.
- 10) ~~During the pandemic and at At~~ the discretion of WSW monitoring staff, pieces or all the review may be done ~~remoter~~ remotely.

PROCEDURES:

WSW will conduct, in most cases, program and fiscal monitoring simultaneously. Equal Opportunity Monitoring may be conducted in conjunction with program and fiscal monitoring or may be scheduled separately. 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 2_CFR_200, 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 compliance using the process outlined in the WIOA Equal Opportunity and Nondiscrimination Monitoring guide. Review could include but not limited to, signed participant notification, grievance procedures, walk through of facility, staff and participant interview, or medical information storage.
- Review of documents or other publications that describe a project or program to ensure compliance of the inclusion of specific language acknowledging federal funding when publicly communicating as outlined in the Stevens Amendment.
- 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.

Process and Timeline

1. Monitoring scheduled – the annual calendar is created no later than July 1 for the program year; dates are included in executed copies of subcontracts and placed in Outlook calendar.
- 4.2. WSW conducts a risk assessment – 30-60 days prior to monitoring date
- 2.3. 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. WSW entrance review meeting – on date published in calendar and in subcontract.
5. Program and Fiscal data are gathered and reviewed ~~– within 15 working days of monitoring entrance meeting.~~
6. WSW will follow up with questions/concerns. ~~– within 20 working days following entrance date.~~
7. If necessary, WSW will conduct an exit monitoring meeting. ~~within 20 working days after entrance meeting.~~
8. Initial Report issued – within 10 working days from the exit meeting or exit email.
9. *EO Monitoring review will be included as a summary section within the Initial Report, if conducted in unison with program and fiscal monitoring, and follow the same response and finalization of monitoring report timeframe. The summary will include specific best practices, observations, noncompliance issues found, and recommendations for achieving compliance.
- ~~9-10.~~ Subrecipient initial response and resolution time – within 30 working days of Initial Report issued.
11. Final Report issued – within 105 working days of subrecipient initial response. If no subrecipient response is warranted and/or no unresolved issues remain, a final report will be issued.
- ~~10-12.~~ *A separate EO Monitoring Report will be issued with the Final Monitoring Report. The report will document the details of the EO Section of the Initial Report in detail, addressing each Non-Discrimination Plan (NDP) element. When areas of non-compliance remain, the monitoring report will list the specific issue and provide corrective action(s) to be taken.
- ~~11-13.~~ Subrecipient final response and resolution time – within 30 working days of Final Report issuance date.
- ~~12-14.~~ WSW review and determination of response within 15 working days of final response. Steps #10 and #11 may be repeated and a revision of the Final Report issued, if necessary, to resolve issues identified.
- ~~13-15.~~ Corrective Action Plan issued, if applicable to resolve exceptions, issues, or concerns.
- ~~14-16.~~ Monitoring closed – upon all exceptions, issues, concerns, or questions resolved.

***Equal Opportunity Monitoring**

1. If necessary, WSW may alter EO monitoring process to conduct EO monitoring separate from Program and Fiscal Monitoring.
 - A. WSW will email EO Monitoring Report to the Subrecipient for review and comment, no later than one month after the on-site visit. The report will document the review including best practices, areas found to be in compliance, and any noncompliance issues found, addressing each NDP element. When areas of non-compliance remain, the monitoring report will list the specific issue and provide corrective action(s) to be taken.

- B. The Local EO Officer is available to provide technical assistance regarding compliance.
- C. WSW will issue a closeout email sent to the Subrecipient once any necessary changes have been made.

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.”

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, equal opportunity noncompliance, or other issues identified by WSW. Plan will outline corrective action and steps taken by subrecipient to comply. Failed corrective action could result in loss of contract and/or funding. WSW can issue corrective action at any time during the contract period.

Daily Observation Report (DOR) – An optional monitoring tool WSW may use to document and communicate progress with subrecipient. The DOR includes all observations from that day: noted practices, items to address, briefing of other items found throughout the day including any recommendations, allowable cost activity discussions throughout the day including any questioned costs or disallowed costs, items that were resolved on site, or no issues identified. issues identified.

Disallowed Costs - Identified during monitoring and included in the Initial Daily Observation Report, Management Letter, Draft Final Report and Final Monitoring Report. In addition, disallowed costs above \$25,000 are also identified as a Finding in the Monitoring Report. Disallowed Costs include any expenses of WIOA grant or contract funds that are determined to be unallowable, unallocable, or unreasonable based upon federal or state law or regulations.

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.

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.

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 comply. Failed corrective action could result in loss of contract and/or funding. WSW can issue corrective action at any time during the contract period.

Nondiscrimination Plan (NDP) - a document that describes to USDOL how Washington's WorkSource system will provide workforce development programs and services in a manner which ensures equal opportunity and nondiscrimination. The NDP consists of nine elements: State-level and local EO Officers; Notice and communication; Assurances; Affirmative outreach; Disability requirements; Data collection; Monitoring for compliance; Discrimination complaint process; and corrective actions and sanctions.

Questioned Costs - Costs questioned by the monitor as being unallowable, unallocable or unreasonable. Questioned costs are costs which (a) resulted from a violation or possible violation of a statute, regulation, or the terms and conditions of a Federal or state award, including for funds used to match Federal funds (unallowable); (b) where the costs, at the time of the monitoring visit, are not supported by adequate documentation (unallocable); or (c) where the costs incurred appear unreasonable and do not reflect the actions a prudent person would take in the circumstances (unreasonable). Questioned costs will be resolved in one of two ways: (a) Questioned Costs that are determined to have been allowable, allocable and reasonable are considered allowed; or (b) Questioned Costs that are determined to be unallowable, unallocable or unreasonable will be disallowed.

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.

Technical Assistance - To identify areas for improvement in the program and in recipient and sub-recipient operations during monitoring and compliance review visits. May include assistance in developing a performance improvement plan.

REFERENCES/RESOURCES:

- [Workforce Innovation and Opportunity Act](#)
- [Office of Management and Budget Super Circular 2 CFR Part 200](#)

- [State Policy No. 5414 Rev 1](#)
- [State Policy No. 5402 Rev 3](#)
- [WSW's Procurement Policy #1003](#)
- [WSW's Property Management and Inventory Directive Policy #2001 Rev 3](#)
- [Workforce Professionals Center - Equal Opportunity Compliance \(wa.gov\)](#)

WEBSITE:

<http://workforcesw.org/providers#OperationsPolicies>

SUPERSEDES:

- **WSW Monitoring Policy #2003 Rev 3**
- **WSW Monitoring Policy #2003 Rev 4**

INQUIRIES:

Please contact Tamara Toles ttoles@workforcesw.org (360) 567-1075 for questions.



CAREERS National Dislocated Worker Grant POLICY #: 3041

Date of Original Policy: 12/12/2023

PURPOSE:

The National Dislocated Worker CAREER grant (CAREER) is an award from the US Department of Labor. The grant builds on emerging public investments toward universal preschool, fills gaps in public funding for childcare, and provides supports that are necessary to implement an effective workforce-childcare program that can support families in poverty and open pathways into family-sustaining careers.

Priority is given to historically marginalized communities, those individuals unemployed for 27 or more consecutive weeks (long-term unemployed), those who have exhausted Unemployment Insurance compensation or other Pandemic Unemployment Insurance programs and those in need of childcare support to attend training.

A historically marginalized community is defined for this grant as women and people of color, due to the denial of full participation in the workforce and other economic activities in the local labor shed.

BACKGROUND:

This funding was awarded to WSI by way of the Columbia Willamette Workforce Collaborative and a subaward to WSW for services in Southwest Washington. This funding specifically supports the provision of training and identification of and payment for childcare and are funded by Workforce Innovation and Opportunity Act (WIOA) per [TEGL 25-20](#).

POLICY:

A. Participant Eligibility

To receive CAREER services, participants must meet the following eligibility criteria:

- Have a qualifying WIOA Dislocated Worker condition, with a qualifying dislocation date. (See below for more detail on this eligibility requirement.)
- Be in compliance with Selective Service Registration requirements.
- Be a resident of Clark, Cowlitz, and Wahkiakum Counties

B. I-Trac Information

Eligibility determination is based on I-Trac data entry of birthdate, selective service documentation and qualifying Dislocated Worker condition.

C. WIOA Dislocated Worker Eligibility

An applicant is a Dislocated Worker if one of the following situations applies.

Terminated or Laid-off Worker

The applicant must meet *each of the requirements* in A, B and C:

- A. Has been terminated or laid off, or has received a notice of termination or layoff, from employment, including a separation notice from active military service (refer to Separating Service Member below for additional detail).
- B. Is either eligible for or has exhausted their unemployment insurance compensation or have been employed for a period of at least three months to show attachment to the workforce, but they are not eligible for unemployment insurance compensation due to insufficient earnings or having worked for an employer that is not covered under the State unemployment compensation law.
- C. Is unlikely to return to their previous industry or occupation. This can be due to any of the following circumstances:
 - 1. Because of negative economic conditions or sudden economic impact on industries or occupations (e.g., pandemic or natural disaster impacts).
 - 2. Because there is a decline in the applicant's previous occupations in the local market.
 - 3. Because of circumstances that cause significant barriers to employment, such as criminal background, lack of high school diploma or GED, disability, homelessness, cultural or language barriers, older worker (55+) or deficient in basic skills.
 - 4. Because their previous industry or occupation has been eliminated or the applicant has been unable to secure a position at a compensation level comparable to their previous occupation.
 - 5. Because they exhausted their unemployment benefits and have been unable to find a job in their previous industry or occupation.
 - 6. Because they were seasonally employed and unlikely to return because of mechanization or significant variance to normal seasonal employment patterns, resulting in uncertain return-to-work duties.

Business Closed or has had a Substantial Lay-off

The applicant must meet *one of the following* requirements:

- A. Has been terminated or laid off, or has received notice of termination or layoff, from employment because of the permanent closure of, or any substantial layoff at (defined as 10 or more affected workers) the company (includes a plant, facility, military installation, or business enterprise).
- B. Is employed at a company where the employer has made a general announcement that the company or location will close within 180 days. A general announcement may include media coverage, filing of a WARN with the State, corporate written notice of intent to close within 180 days (written notice includes email communication, employer website and/or social media postings).

Self-Employed and Business Closed

The applicant must meet the following requirement:

- A. Was self-employed (including employment as a farmer, rancher, fisherman, or an independent contractor or consultant not technically an employee of a firm or agency) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters.

Additional Guidance – Self Employed and Business Closed

To assist an applicant in determining if they meet this definition, consider the following.

A person is self-employed when they meet one of the following conditions:

- Files taxes as self-employed for their business on their personal taxes.
- Is considered an independent contractor by the business.
- Meets all the following criteria:
 - Is not required by the business to complete an IRS W-4 form.
 - Is not required to pay federal income tax or FICA payments from their paycheck(s).
 - Liability or workers' compensation insurance for the individual is not paid by the business.
 - Creates or provides the products or services they sell or sets the price for the products or services they sell.
 - Is responsible for the business expenses and losses.
 - Receives profits from the business.

Economic condition is defined as the present situation in the overall economy of the area where the individual resides. When a local economy contracts or is weakened it may impact self-employed individuals. Examples include recession, impacts of pandemic, impacts of major employers that support a high percent of employment and local purchasing power, such as:

- Failure of one or more businesses to which the self-employed individual supplied a substantial portion of products or services.
- Failure of one or more businesses from which the self-employed individual obtained substantial proportion of products or services.
- Substantial layoffs from, or a permanent closure of, one or more plants or facilities that support a significant portion of the local economy.
- The unemployment rate for the county exceeds the State overall unemployment rate.
- Depressed prices or markets for articles produced by the self-employed individual.

Displaced Homemaker

The applicant must meet *one of the following* requirements:

- A. The applicant has been providing unpaid services to their family in the home, has been dependent on the income of another family member but is no longer supported by that income and is unemployed or underemployed and experiencing difficulty in obtaining or upgrading employment.
- B. The applicant has been providing unpaid services to their family in the home and 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, a permanent change of station or the service-connected death or disability of the service member. The applicant is unemployed or

underemployed and is experiencing difficulty in obtaining or upgrading employment.

Additional Guidance – Underemployed

Underemployed is defined as any one of the following applying to the applicant's situation:

- The applicant is employed less than full-time and is seeking full-time employment.
- The applicant is employed in a position that is inadequate with respect to their skills and training.
- The applicant is employed but their family annual income does not exceed the higher level of the poverty line or 70 percent of the LLSIL.
- The applicant is employed, but their current job's earnings are not sufficient compared to their previous job's earnings from their previous employment.

Military Spouse

The applicant must *meet one of the following* requirements:

- A. The applicant is the spouse of a member of the Armed Forces on active duty and has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of the Armed Forces member.
- B. The applicant is the spouse of a member of the Armed Forces on active duty and is unemployed or underemployed and having trouble in obtaining or upgrading employment. Refer to Additional Guidance – Underemployed.

Separating Service Member

The applicant must meet the following requirement *and documentation with a DD-214 is required*:

- A. The applicant is a member of the Armed Forces who is separating from service to enter or re-enter the civilian labor force (being discharged).

D. Eligibility Documentation

Birth Date

One of the allowable documents which reflects a birth date that supports the participant's age is to be Uploaded using the tool and process provided through I-Trac. Follow Customer Secure Document Upload Tool instructions found on the I-Trac Resources/User Instructions tabs.

| | |
|-----------------------------------|--------------------------------------|
| Baptismal certificate | Passport |
| Birth certificate | Public assistance record |
| DD-214 Military Separation Record | School record or identification card |
| Government issued ID | Driver's License |
| Hospital record of birth | Tribal record |

Applicant attestation documented with the signed application may be used when the applicant does not have one of the allowable birthdate validation documents available. When applicant attestation is used for date of birth documentation, it is required that securing documentation to secure employment (I-9) be part of the service plan.

Selective Service Registration

If applicant is required to register for Selective Service and documentation under one of the categories outlined below cannot be collected, the applicant is not eligible to be enrolled in either the WIOA Adult or Dislocated Worker program. Applicants who would like additional information regarding Selective Service registration may be referred to this website: <https://www.sss.gov/Registration-Info>.

| Required to Register (All elements must be true) | Not Required/Exempt from Registering (Any one of the elements must be true) |
|--|---|
| <ol style="list-style-type: none">1. Sex-assigned male at birth2. US Citizen OR immigrant residing in the US between the ages of 18 and 253. Age 18 or older4. Born on or after January 1, 1960 | <ol style="list-style-type: none">1. Sex-assigned female at birth2. Born before 19603. Under the age of 184. A seasonal agricultural worker on a H-2A visa5. A lawful non-immigrant on a current non-immigrant visa6. Was incarcerated / hospitalized / institutionalized continuously between 18th and 26th birthdays7. Was not living in the United States between 18th and 26th birthdays8. Was on active US Military, Coast Guard duty or a student in an Officer Procurement Program continuously between 18th and 26th birthdays |

Documentation Types are defined by the requirement to register and whether the applicant registered or did not register for the Selective Service:

| IF Requirement is | AND Registration Status is | Then Documentation Types must be one of the following |
|----------------------------|--|--|
| Required | Registered | <ul style="list-style-type: none"> • Selective Service Registration Acknowledgement Letter • Selective Service Registration Card • Stamped Post Office Receipt of Registration |
| | Not Registered: Applicant was unaware of the requirement to register and is now age 26 or older. | <ul style="list-style-type: none"> • Request for Status Information Letter & Supporting Documentation • Selective Service Status Information Letter |
| | Not Registered: Applicant willingly and lawfully chose not to register. | No document and applicant is not eligible. |
| Not Required/Exempt | Not Required to Register | <ul style="list-style-type: none"> • Signed Application (Age/Sex at Birth) • DD-214 Military Separation Record • Immigrant/Non-Immigrant Allowable Documents (refer to Appendix 1) • Records of Incarceration/ Hospitalization/ Institutionalization |

Additional Selective Service Registration Notes **Incarceration/Hospitalization/Institutionalization**

Applicants who were required to register but can provide documentation that they were incarcerated, hospitalized and/or institutionalized from their 18th birthday to their 26th birthday are exempt from registration. **However, please note:** If at any time between their 18th and 26th birthday the applicant was not incarcerated, hospitalized, or institutionalized then they were required to register, and the exemption does not apply. If the applicant did not register, then follow the requirements for documenting under “Required to Register and Did Not.”

Military Service

If the applicant was in the US Military, Coast Guard or Officer Training between their 18th and 26th birthday they are not required to register and their DD-214 Military Separation Record is the documentation. **However, please note:** If at any time between their 18th and 26th birthday the applicant was not in the US Military, Coast Guard or Officer Training, then they were required to register, and the exemption does not apply. If the applicant did not register, then follow the requirements for documenting under “Required to Register and Did Not.”

Required to Register and Did Not

Applicants who are required to be registered, who are over age 26, and cannot document that they are registered through one of the means listed above must complete the Selective Service System’s [Request for Status Information Letter](#) and attach copies of the documentation required for their reason for non-registration.

Where the request is completed and not yet submitted – A copy of the letter and supporting documents is to be provided to WorkSource, and a WIOA Title I program manager must review it to determine that the applicant has established by a

preponderance of the evidence that the failure to register was not knowing and willful. If this determination is made the Request for Status Information Letter and documents are to be filed with all other eligibility documentation with the WIOA program manager approval signature, and the choice “Request for Status Information Letter & Support Documentation” selection in I-Trac is to be used.

The applicant should be instructed to submit the Letter and documents as directed on the form for a formal determination by the Selective Service System. **Note:** It is not required that staff follow-up to ensure the submission occurs nor is it required that the Selective Service System response be returned and filed. The WIOA program manager is authorized to make the determination at the time of WIOA documentation.

Where the *request has been submitted and the Selective Service response received*

– If the applicant already completed the Status Information Letter Request process with the Selective Service and has their Status Information Letter determination returned from Selective Service which says that they are found to be exempt from the requirement, a copy of the Response Letter is to be maintained as documentation and “Selective Service Status Information Letter (returned from Selective Service)” selection in I-Trac is to be used.

WIOA Dislocated Worker

- Separating Service Member: Requires a copy of the Military Separation Record (DD-214).
- All other Dislocated Worker types are customer attestation; the signed application serves as the attestation documentation.

Addendum A – Selective Service

LIST OF ACCEPTABLE DOCUMENTS

DO NOT send original documents.

COPIES ONLY

IMMIGRANTS/NONIMMIGRANTS may present a combination of

[One selection from List A AND one from List B] OR [One Selection from List A AND one from List C AND one from List D].

| Documents that Establish FIRST DATE OF ENTRY into the United States. | | | | | | |
|---|-----|---|----|--|-----|---|
| Documents must cover entire duration in the United States | | | | | | |
| Documents that Establish IDENTITY | | First Date of Entry to U.S. after reaching 26 years of age | | First Date of Entry to U.S. was before turning 26 YEARS OLD | | Provide proof from first entry and any others. |
| LIST A | AND | LIST B | OR | LIST C | AND | LIST D |
| 1. Foreign Passport containing photograph, Visa, and U.S. Customs and Border Protection (CBP) Entry stamp. | | 1. Students on an F or M category U.S. Visa can submit a USCIS I-20 Form. | | 1. Foreign Passport with U.S. Customs and Border Protection (CBP) Entry stamp. | | 1. Students on an F or M category U.S. Visa can submit a USCIS Form I-20. |
| 2. USCIS issued Resident Card (Green Card) | | 2. Nonimmigrants on a U.S. Visas can submit a USCIS I-94 Form with Entry stamp or Electronic I-94 showing First Date of Entry. | | 2. USCIS Form I-94 with Entry stamp or Electronic I-94 showing First Date of Entry. | | 2. Certified copy of school records/transcript issued by a school accredited by a U.S. state, jurisdiction or territory. A report card is not accepted. |
| 3. Driver's license or ID card issued by a State or outlying possession of the United States provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address | | 3. Official letter from U.S. Citizenship and Immigration Services (USCIS) indicating that the individual's First Date of Entry and lawfully in the U.S. under a valid, nonimmigrant visa status. | | 3. Boarding passes the individual used to enter the U.S. It must show the Date of Entry/Arrival. (Can only be used if submitting Foreign Passport off of List A) | | 3. USCIS Form I-797 (A/B/C/D) Notice of Action displaying individual's name. (Depending on the purpose and nature of the form, the I-797 may not be accepted. The I-797 for an I-765 petition is not accepted.) |
| 4. ID Card issued by federal, state, or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address | | 4. Official school letter from school registrar's office indicating that the individual's Enrollment Date and status as an International Student. | | 4. Official letter from U.S. Citizenship and Immigration Services (USCIS) indicating that the individual's First Date of Entry and lawfully in the U.S. under a valid, nonimmigrant visa status. | | 4. Official company letter from company's human resource office indicating the individual's employment start date and employment status. |
| 5. Driver's license issued by Canadian government authority | | 5. Boarding passes the individual used to enter the U.S. It must show the Date of Entry/Arrival. (Can only be used if submitting Foreign Passport off of List A) | | | | 5. Those traveling on Department of State issued BCV and in the U.S. more than 30 days, must provide all entry and exit dates. |
| 6. USCIS issued I-766 Employment Authorization Card | | 6. USCIS Form I-797 (A/B/C/D) Notice of Action displaying individual's name. (Depending on the purpose and nature of the form, the I-797 may not be accepted. The I-797 for an I-765 petition is not accepted.) | | | | |
| 7. Department of State issued Border Crossing Card (BCC). | | 7. Documentation indicating residence was in another country, outside the United States. Accepted evidence with name and foreign address includes, but not limited to: a) Dated pay slip or vouchers from an employer; b) Certified copy of school records/transcript issued by a school outside the U.S.; c) Photocopies of entry or exit stamps in passport to indicate entry into another country after departing U.S.; d) Dated bank records showing transactions in your home country to indicate you were not in the U.S. | | | | |
| 8. Department of State issued Border Crossing Visa (BCV). | | | | | | |

LIST OF ACCEPTABLE DOCUMENTS

| NONIMMIGRANT VISAS CATEGORIES | |
|--|---|
| A/G – Diplomatic and International Organization Personnel | I – Media Representatives |
| B – Visitors for Business or Tourism | L – Intracompany Transferees |
| O – Individuals of Extraordinary Ability or Achievements | J – Exchange Visitor |
| Q – Cultural Visitor | P – Athletes and Entertainers |
| E-1/E-2 – Treaty Traders and Treaty Investors | R – Religious Workers |
| H-1B/E-3 – Special Occupation Workers | TN – NAFTA Professional |
| H-2 – Temporary Agricultural and Non-Agricultural Workers | K/V – Nonimmigrants Intending to Adjust Status |
| H-3 – Trainees | F/M – Student; Academic, Vocational |

*If you entered the United States with the last five (5) years, you can access your CBP arrival/departure record information (Form I-94) online at <https://i94.cbp.dhs.gov/i94/#/history-search>.

E. Service Definitions

1:1 Individual Training Plan Development

A session with staff where a plan for skill attainment required to secure employment is developed or modified. The plan is a document that identifies:

- Employment goals and objectives and the combination of services that can assist the participant in reaching them.
- Planned training opportunities, education and/or skill development, including identification of the responsible parties.
- Support services and other planned activities or resources needed to accomplish the employment goals, including identification of the responsible parties.

Individual Training Plans are to be reviewed with the participant and updated on a regular basis to reflect changes in goals, barriers, or service needs.

Career Coaching

Staff guidance about general job search and acquisition techniques that prepare a participant to be successful in securing and retaining employment. Job Coaching includes service planning; assistance with resume development, professional resume review, and interview preparation; resource assistance; and labor exchange services such as the provision of information on in-demand industry sectors and occupations and provision of information on non-traditional employment. These are services that are provided directly to a participant. This does not include following up with a training provider to find out if a participant completed training or leaving a voice message or an email with no response.

Pre-Apprenticeship Programs

A type of work experience listed under WIOA sec. 129(c)(2)(C). A program designed to prepare participants to enter and succeed in a Registered Apprenticeship Program and should have at least one, if not more, documented partnership(s) with a Registered Apprenticeship Program that will assist in placing participants who complete the pre-apprenticeship program into their Registered Apprenticeship Program.

F. Training Services

All Training services are funded through WorkSource. There are two categories of training services offered through the WorkSource system – Classroom and Cohort Training and Work Based Training. Services provided through the WorkSource Centers are to be coordinated with Center staff. Please refer to the [WSW Training Policy Handbook](#) for detailed information on local policy and procedures related to training services.

Classroom and Cohort Training

- **Occupational Skills Training**

The training must be an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate or advanced levels. Occupational Skills Training must:

- Be instructor-led in either an in-person or virtual format.
- Be outcome-oriented and focused on an occupational goal specified in the Training Plan.

- Be of sufficient duration to impart the skills needed to meet the occupational goal.
 - Lead to the attainment of a DOL-recognized credential (refer to [TEGL 10-16, Change 2](#) for more detail).
- **Pre-Requisite Training**
Any class or training that is required by the training provider prior to enrolling into an Occupational Skills Training program as defined above. This excludes activities defined under Workforce Preparation. The training program as listed on the ETPL must indicate the pre-requisite course is required for entry into the training program.
 - **Workforce Preparation**
Activities, programs, or services designed to help an individual acquire any combination of the skills necessary for the successful transition into and completion of postsecondary education or training, or successfully entering employment. Activities may include but are not limited to computer literacy, forklift operator, flagger, bartending certificate, first-aid required for an employment position, food handlers' certificate and other occupational skills education leading to non-credentialed certifications that are required for entry level, health, or safety employment requirements. Workforce Preparation services are not required to be on the ETPL and do not place the participant in the denominator for WIOA Measurable Skill Gains and Credential performance. Fees associated with Workforce Preparation services are covered under the support service payment type of Professional Test/License/Organization Fees.

Work Based Training

- **On the Job Training (OJT)**
An agreement between the WorkSource program and an individual employer who agrees to act as a training provider. The OJT is a hire-first program; the trainee is hired as an employee of the company, a training plan is developed to outline the skills the trainee is lacking to be proficient in the position, and the employer agrees to provide the necessary training on the job to bring the trainee up to entry-level standards for the position. The employer is compensated for the extraordinary costs and decreased productivity associated with training the participant.
- **Work Experience**
Work Experience (WEX) services provide participants with career exposure, opportunities to practice workplace skills and work ethic and, in some instances, provide a reconnection to the workforce. Participating employers provide a structured work environment while wages are paid by an approved Employer of Record. A WEX worksite may be in the private for-profit, non-profit, or public sector.

The WEX is a planned, structured, short-term learning/training experience that takes place in an employer's workplace and involves work that is defined by a written, signed training agreement with the employer. The agreement outlines the expectations and responsibilities of all parties and specifies learning objectives and criteria for demonstrating learning and skills gained. In a WEX an employer-employee relationship exists, and a wage is paid. The Internal Revenue Service Fair Labor Standards Act applies, and completion of an I-9 form is required.

WEX services are to be:

- No more than 40 hours per week (no overtime).
- A maximum of 300 hours for the total WEX training.
- Paid at or above the current minimum wage for the State. No WEX will pay a wage less than the area minimum wage.
- Wages will be paid by an Employer of Record.
- Participants are not paid for holiday, vacation, or sick leave.

Participants must follow WEX guidance for procedures (5.2), requirements (5.3), forms/documentation (5.4), and data entry (5.5) outlined in [WSW Training Policy Handbook](#), except as pertaining to the allowable maximum 300 hours specified by the grant, to document a WEX service:

G. Support Services

Overview

Support services are financial assistance to offset expenses necessary for a participant to engage in CAREER activities or to seek or retain employment. Participants cannot receive a support service post-exit. Support services are considered payments and do not extend program participation; therefore, every support service should be delivered with an appropriate staff service on the same day (e.g., 1:1 Job Coaching).

Prior to considering support service payments, efforts must be made to identify resources in the community or from other grant resources that may provide the same support and use those available resources first. Processes must be in place for appropriate referrals to such services as Supplemental Nutrition Assistance Program resources, community-based social services, and housing agencies. Staff is responsible for assisting participant exploration of resources from community sources and/or within the participant's personal support system.

When other resources are not available, and based on individual assessment and availability of funds, support services may be provided through CAREER program services.

Prerequisites to Receive Support Services

Participants who seek support services must complete the following prerequisite activities:

- Determined eligible for and enrolled in the CAREER grant.
- Financial Assessment - an assessment recorded at the time of enrollment or shortly after registration of the participant's budget often used to determine self-sufficiency and support needs. Providers can use the Self-Sufficiency Calculator or the Budget Calculator on the Job Match side of WorkSourceWA.

In addition, the support must be necessary to enable the participant to engage in education, training, job search activities or employment.

H. Administrative Requirements

Documentation

All support services are to be tracked in the participant's I-Trac record on the Payments Tab in the support services control. When a Support Service is paid directly to the participant a signature that acknowledges receipt of the support

payment must be on file with the back-up payment documentation noted below in Support Service Definitions.

When a gas card is provided as the support payment, receipts for the total amount of the card that reflect the purchase of allowable and approved items is required with the fiscal documentation file.

Fiscal Procedures

Each service provider must establish a written process to ensure proper fiscal procedures are followed, including paying from original invoices or childcare logs, securing original receipts, and appropriate participant acknowledgment of direct payments made to reimburse participants.

Documentation of Support Service payments is maintained in the financial records attached to the payment record. A copy of the participant's financial assessment documenting the participant's need must be saved in I-Trac.

Each service provider must also establish and follow a process for reconciling pre-purchased support services (i.e., bus passes, pre-paid gas cards, retail store vouchers, etc.). This reconciliation must occur at least quarterly (monthly preferred), with the documentation maintained on-site and made available during WSW, Worksystems, or funder monitoring, as requested.

Support service payments/reimbursement must be made from funds during the program year in which they were incurred.

I. Support Service Definitions

Service providers may offer the following types of support service. If the support is not defined below it is not allowable for payment under this policy, either due to local area restrictions or because the support is not allowable by funding source(s).

Books and Fees

Costs associated with required books, school supplies and fees for participants enrolled and officially registered in post-secondary education or training, including testing fees, or books and fees required for occupational skill training.

Required Documentation: The original store receipt, school record or test receipt (for fees) that reflects an itemization of the purchased items.

Child and Dependent Care

Childcare costs are for a child(ren) age 12 and under during the time the participant is engaged in program services — including travel to and from the service delivery site. Due to the high cost and limited resources this support should only be considered on a case-by-case basis.

A spouse, sibling, or other family member residing within the same household may not be paid with Support Service funds to provide childcare for the participant's children. Costs for care of an individual age 13 or over may only be paid if there is a documented disability stating the individual may not be left alone.

Required Documentation: A care log (completed by the participant and signed by the care provider verifying dates, times, and cost) is to be used to track the costs being reimbursed. The log must be retained in the financial documentation for the payment.

Clothing/Personal Care

Clothing and/or related footwear or incidentals (including grooming and hygiene products) for interview, work, or training. This may include such items as a uniform/safety attire, or a type of work shoe or protective eye wear required for the job by an employer (and not provided by the employer) or required of trainees by the training provider. Utilize community resources for interview attire whenever possible.

Required Documentation: The original store or merchant receipt that reflects an itemization of the purchased items.

Credit Repair

Credit counseling and other services necessary to assist participants with critical skills related to household budgeting, managing money, accessing a personal credit report, and resolving personal credit problems that will contribute to the participants' work readiness. Credit repair services are to assist the participant to be ready to enter training, job search and/or maintain employment. Whenever possible, community resources should be utilized.

This assistance does not include the payment or modification of a debt.

Required Documentation: The original receipt that reflects an itemization of the services provided and associated cost.

Employment Documentation

Payment of fees required to secure or replace documentation required to complete an I-9 with an employer to secure employment.

Required Documentation: Receipts that itemize the fees necessary to obtain the approved document with staff attestation (notation and signature on receipt copy is sufficient) that the identification documentation was secured.

Housing Assistance

To support and contribute to the participant's readiness to enter training, education, or employment, assistance with housing costs may be provided.

To be considered for housing assistance support, staff must determine that the situation would impede the participant's ability to conduct an efficient job search, maintain employment or participate in training without the housing payment assistance, and that the participant has a plan for future payments.

Where community resources are available and the participant eligible, those resources must be used before support service payments can be utilized.

Housing Payment

Grant funds may be used to assist with housing payments (current and arrears) that will contribute to the participants' readiness to enter training, education, or employment.

Note: WIOA funds may not be used to pay late fees associated with past-due rent or mortgage payment.

CDBG funds may not be used to pay any mortgage expense.

Required Documentation: Clear verification (copy of rental agreement, mortgage statement, voucher, or detailed receipt) of charges due and participant residency is required. For mortgage assistance the participant must be one of the named borrowers/homeowners on the mortgage statement. For rent assistance, the address on the lease must match the participant I-Trac record if the participant is not named on the lease agreement. Payment must be made to the leaseholder/owner or mortgage holder.

Housing Stability Education

Grant funds may be used to pay the costs associated with community housing stability education services that will contribute to the participants' work readiness through stabilized housing.

Required Documentation: An invoice from the community service provider is required. Payment must be made directly to the education provider.

Moving Costs

Payments for services or items necessary to move into stable housing may be considered and approved. Examples include but may not be limited to: Application and move-in fees, security deposits, motel vouchers for temporary housing, fees for access to Community Warehouse, household items, temporary storage unit costs, U-Haul or similar truck or van rental to move furniture. Whenever possible, community resources such as Goodwill and Community Warehouse should be utilized.

Required Documentation: Direct payment from an invoice to landlord/rental company or itemized receipt from the motel, store, or merchant where the purchase was made.

Laptop Computer

Purchase of a basic laptop computer when needed to participate in program services, engage in training or secure and/or maintain employment (when not provided by the employer or training provider).

Required Documentation: The original store or merchant receipt that reflects an itemization of the purchased items.

Legal Services

When necessary to assist a participant in expunging a criminal record or to maintain legal to work documentation to secure employment or participate in a training. Where community resources are available and the participant eligible, those resources must be used before support service payments are utilized.

Required Documentation: Itemized invoice that clearly details the services provided and the published rate for the service. Payment must be made to the vendor.

Medical/Dental/Optical

This Includes medical/dental/optical testing/treatment, prescriptions, mental health testing, counseling. Funds may only be used for co-payments and expenses of the participant and cannot be used for costs of family members. Due to the high cost and limited resources, efforts should be made to first utilize Washington Apple Health, County health care resources, and/or sliding scale fee structures with providers and support service should be limited to the minimum required to permit the person to participate in training, job search, accept employment, or maintain employment.

Note: WIOA funds cannot be used for drug-use testing.

Required Documentation: Co-payments may be reimbursed to the participant and require a receipt from the health care/service provider showing the date and amount of payment. All other payments must be made directly to the health care/service provider based on an original detailed invoice (no statements).

Professional Test/License/Organization Fees

When professional licenses/certifications/test/test preparation fees or membership/professional event registration are required or necessary to ensure a participant obtain employment or provides increased access to employment opportunities in the associated sector. Support may include the cost for professional licenses; certifications; test fees and/or test preparation materials, including GED; business, technical and professional organization fees; professional event registration fees, etc.

Required Documentation: Original receipt(s).

Relocation

When a participant accepts a job offer at a location out of Clark, Cowlitz, or Wahkiakum County and more than 50 miles away, grant funds may be used to share in the cost of moving to that location (e.g., U-Haul costs, etc.).

Required Documentation: A written, bona fide job offer must be documented to qualify for relocation support. Original receipt(s) of all approved relocation expenses must be maintained with the payment record.

Tools

When participants are required to purchase their own tools for employment or training, this cost may be covered by support service payments. Examples include mechanic, shop, electrician tools, etc.

Tools or equipment that is supplied by the employer, e.g., industrial equipment, stationery, machinery, safety equipment, etc., may not be paid for with support services.

Required Documentation: Original itemized receipts that reflect the allowable and agreed upon item(s). In addition, for tool purchases for training, documentation from the training provider of the required items is to be maintained in the file. For employment, a bona fide, written job offer that shows the requirement of employees providing their own tools or equipment (must be specific) must be provided prior to the approval of funds.

Transportation

Support services are available to provide transportation assistance to participants to allow them to engage in services and activities that support training and education, job search, and/or employment. Transportation types (and associated requirements) include:

Auto or Bicycle Repair

Funds may pay for repair and replacement of essential parts and safety equipment to an automobile or bicycle only if it can be verified there is no other reasonable way for the participant to transport themselves to a training or work site. For Auto Repair, the vehicle must be titled and registered in the participant's name, be properly insured and there must be written verification by a reputable certified mechanic that the repairs are needed.

Required Documentation: Original invoices/receipts are required for car and bike repair payments. Quotes or work orders will not be accepted for payment receipts. Auto Repair payment must be made to the invoicing certified mechanic and a copy of the auto registration, documentation of a valid driver's license, and proof of insurance card must be included with the payment record and verified to be the same vehicle on which repairs were made.

Auto Insurance

Support Service payment may be provided for auto insurance coverage required by the State of Oregon or Washington and can only be justified in a situation where, without the insurance, the participant would not be able to travel to the training site and/or place of employment. The vehicle must be titled and registered in the participant's name and the participant must have a valid driver's license in their state of residence.

Required Documentation: The original insurance billing with payment directly to the insurance company is required. In addition, documentation of a valid driver's license, a copy of the auto registration, and proof of insurance card is to be included with the payment record.

Auto Registration

Costs associated with DEQ test fees, title transfer and/or registration or renewal may be paid to allow participants to register their auto for the purposes of completing training or securing and/or maintaining employment. Note that the Department of Motor Vehicles may require a valid driver's license and proof of auto insurance attached to the vehicle.

Required Documentation: The original registration/transfer/test receipt(s) and a photocopy of the new title and/or registration in participant's name must be collected and maintained in the Support Service financial file.

Bicycle Purchase

When a participant chooses and it is determined that the purchase of a bicycle is as, or more, cost effective than other types of transportation assistance, support service funds may be used to purchase a bicycle, including an appropriate bike helmet if the participant does not own one. If appropriate staff may require the participant engage in a bicycle safety class or may purchase a child's helmet or seat if the bicycle transportation is being used to drop children at school or childcare to allow participant to work or attend training, and this cost may also be covered through support service payment.

Service providers should develop a relationship with Community Cycling Center where consultation assistance on the decision and purchase, education and repair options are available (<https://communitycyclingcenter.org/>) for reasonable costs.

Staff due diligence is required to determine and document:

- Using a bicycle as a means of transportation to and from the participant's job, school or training location is reasonable and, over time, more cost effective and convenient than other forms of transportation. Staff determine reasonableness by evaluating with the participant things like distance, times, work schedule, long-term viability.
- The participant does not currently own a bicycle or have other modes of transportation available.
- The purchase price is reasonable based on some form of price comparison documentation (price quotes, including refurbished when available) for the type of bicycle being purchased.
- The type of bicycle being purchased is appropriate for the intended use (e.g., distance, night riding).

Once purchased no other forms of Transportation assistance may be provided via support services.

Required Documentation: The itemized receipt for the purchase and documentation of price comparisons to support the final selection decision are to be maintained in the financial file. Written attestation from the participant that they are choosing a bicycle for their transportation, they understand they will not be provided with other forms of transportation assistance once a bike is purchased, they do not currently own a bicycle, and justification that a bicycle is a reasonable mode of transportation for the purposes of getting to/from school, training and/or employment is to be maintained in the participant file.

Parking

When necessary, to enable the participant to engage in career services or training activities (e.g., college campus parking fees).

Required Documentation: Original receipts that reflect a location and time in line with approved service provision (i.e., a class schedule).

Public Transportation, Car Share, Fuel

Includes all modes of transportation (e.g., public transportation passes or tickets, gas for a personal vehicle, car share service, Uber/Lyft/taxi service, bicycle/scooter share service) to help participants engage in services and activities that support training and education, job search and/or employment.

Staff are required to determine that assistance provided is not duplicated, such as a bus pass for a month and gas purchase during the same month. Additionally, funds should not pay for the monthly cost of share vehicle services but can reimburse for the month(s) that the participant uses the service for allowable activities. This should be managed through verification of attendance logs and communication with the participant documented in file.

Required Documentation: A log must be kept that tracks activities supported with transportation assistance. A signature on the log for bus passes, bus ticket packages (not individual tickets), and gas card distribution to participants that includes the participant's signature acknowledging receipt can be used as documentation. For other types of transportation, a detailed receipt showing date and time must support reimbursement payment and must align with activities noted in the log. A signed receipt for each instance of transportation support payment in the file can replace a log as long as the tie to services is noted. Receipts are required for gas cards and must show allowable and approved purchase (i.e. gasoline and not items from the mini mart).

Utilities

Utility assistance may be provided to assist a participant in stabilizing their living situation and to conduct an efficient job search, maintain employment or participate in training. This includes past due utility payments, utility deposits, internet cell phones and cell phone bills (but does not include any sort of television/cable expenses). Prepaid cell phone service may be paid for with Support Services funding.

The original bill must be provided before payment can be approved, with verification that the utilities/phone are for the participant's personal residence or in the participant's name (in the case of cell phones).

Note: WIOA funds may not be used to pay interest charges or late fees associated with past due utility expense.

Required Documentation: Clear verification (copy of detailed utility invoice that matches participants address in I-Trac) of charges due. Payment must be made to the vendor.

J. Performance

CAREER grant performance applies to all participants unless they exit under a Global Exclusion reason (see below for more detail). All data is tracked, managed, and reported through I-Trac.

| Measure | Calculation Methodology | Performance Cohort (Measurement Period) | Reporting Cohort (Reporting Period) |
|---------------------------|--|---|-------------------------------------|
| Employment Rate Q2 | Denominator: All participants enrolled. Numerator: Those employed during the second quarter following the exit quarter. | Q2 after Exit | Q4 after Exit |
| Employment Rate Q4 | Denominator: All participants enrolled. Numerator: Those employed during the fourth quarter following the exit quarter. | Q4 after Exit | Q6 after Exit |
| Median Earning | Total Quarterly earnings for all participants employed during the second quarter following the exit quarter. | Q2 after Exit | Q4 after Exit |

| Measure | Calculation Methodology | Performance Cohort (Measurement Period) | Reporting Cohort (Reporting Period) |
|------------------------------|---|--|-------------------------------------|
| Credential Attainment | Denominator: All participants enrolled in an Education or Training Service any time during participation (does not include OJT or Pre-Apprenticeship). Numerator: Those that attain a DOL recognized credential between participation date and 1 year after exit date. | 1 Year after Exit | 1 Year after Exit |
| Measurable Skill Gain | Denominator: All participants enrolled in a Secondary or Post-Secondary Education or Training Service that leads to a recognized post-secondary credential or employment (does not include Pre-Apprenticeship). Numerator: Those that achieve a measurable skill gain. | By June 30 for every program year participant engages in a Training or Education Service | Program Year Q4 |

Credential Definitions

In all circumstances a copy of the credential is required to be on file to document the performance.

| Credential Type | Additional Definition |
|---|---|
| High School Diploma | To report in this category the participant must also be employed or in a Post-Secondary Education/Training Program that leads to a recognized post-secondary credential in the year following exit. |
| GED or High School Equivalency Diploma | To report in this category the participant must also be employed or in a Post-Secondary Education/Training Program that leads to a recognized post-secondary credential in the year following exit. |
| Associates Degree | |
| Bachelor's Degree | |
| Post-Graduate Degree | |
| Non-DOL Approved Credential | Certificates awarded for Workforce Preparation such as Forklift, Flagger, OSHA, CPR/First Aide. Certificates awarded for completion of a Pre-Apprenticeship service |
| Other Recognized Diploma, Degree, or Certificate | To report in this category the credential must be awarded from an accredited post-secondary institution. (e.g., a Human Resource Management certificate from Portland State University). |
| Occupational Certification Awarded by a certification body | A Credential awarded by a certification body based on an individual demonstrating through an examination process that they have acquired the designated knowledge, skills, and abilities to perform a specific job. The examination can be either written, oral, or performance based. (e.g., Microsoft, Apprenticeship, Security Certifications, BankWork\$, CareerWork\$ Medical, Guest Services Gold). |

| Credential Type | Additional Definition |
|--|---|
| Occupational Skills License Awarded by a government agency | A Credential awarded by a government agency that grants legal authority to do a specific job. Licenses are based on some combination of degree or certificate attainment, certifications, assessments, or work experience; are time-limited; and must be renewed periodically. (e.g., a license from the Oregon State Board of Nursing to be a practicing RN, LPN, CNA; commercial driver's license). Certificates such as OLCC server permit, food handlers or first aid certificates are not within the scope of this definition. |
| Occupational Skills Certificate Awarded by an education institution | A Credential awarded by an educational institution based on completion of all requirements for a program of study, including coursework and test or other performance evaluations (e.g. Career Pathways Certificate). Certificates are typically awarded for life (like a degree). Certificates of attendance (e.g., 1 day) or participation in a workforce development activity (e.g. forklift) are not in the definitional scope for these certificates. |

Measurable Skill Gain Definitions

| Gain Element | Description | File Documentation |
|---|--|--|
| High School Diploma/Equivalent/GED | Attainment of a High School Diploma, Equivalent, or GED. | Copy of the Credential |
| Educational Function Level (EFL) Achievement (Secondary Education) | One or more EFL gain on an accepted pre/post assessment. | Copy of the DOL approved assessment delivered during the program year which depicts the EFL gain from the previous assessment. |
| Secondary Education Achievement | <p>Secondary Achievement (specific to participants attending high school) measured by a transcript that shows the participant is meeting the State's academic standard for the school's academic period:</p> <ul style="list-style-type: none"> • Quarter – 1.5+ credits • Trimester – 2.0+ credits • Semester – 3.0+ credits | Copy of the Transcript which shows credits awarded during the measurement period. |
| Post-Secondary Education Achievement | <p>Post-Secondary Achievement measured by a transcript that shows credit hours awarded for the period based on FT or PT student status:</p> <ul style="list-style-type: none"> • If FT, 12 credit hours awarded in one semester or term. • If PT, 12 credit hours awarded in two semesters or terms during a 12-month period. | Copy of the Transcript which shows credits awarded during the measurement period. |
| Training Milestone | Satisfactory or better progress report toward established milestones from the employer or training provider who is providing training. Examples: Completion of On-the-Job Training plan; completion of | Copy of employer or training progress report. |

| Gain Element | Description | File Documentation |
|--------------------|--|--------------------|
| | one year of a Registered Apprenticeship program; completion of a term in a Career Pathways or Occupational Skills Training program. | |
| Skills Progression | Completion of an occupational exam or by meeting occupational benchmarks in a trade for which the participant is receiving training. Example: DOL recognized Credential. | Copy of Credential |

I-Trac Data Entry and File Documentation

| Performance Element | I-Trac Data Entry Fields | File Documentation |
|---------------------------|--|--|
| Employment Rate Q2 and Q4 | Outcomes Tab <ul style="list-style-type: none"> • Employment Information Control • Employment Confirmation Control | I-Trac Employment Information and Confirmation or Education & Training Placement and Confirmation records. <ul style="list-style-type: none"> ○ Employment Leave and Earnings Statements ○ Employment Verification Letter on Letterhead ○ Follow-up Survey (Signed) ○ Income Tax Records ○ Pay Stub ○ Payroll Slip ○ Quarterly Tax Payment Forms ○ Sales Commission Worksheet ○ State Department of Revenue or Taxation Record ○ W-2 Form ○ UI Crossmatch |
| Median Earning | Outcomes Tab <ul style="list-style-type: none"> • Employment Information Control • Employment Confirmation Control | Same as what is chosen for Employment Rate Q2 and Q4 |
| Credential Attainment | Services Tab <ul style="list-style-type: none"> • Training, Post-Secondary Education & Employment Skills Control Outcomes Tab <ul style="list-style-type: none"> • Credentials Control | Copy of Credential |

| Performance Element | I-Trac Data Entry Fields | File Documentation |
|------------------------|--|--|
| Measurable Skill Gains | Services Tab <ul style="list-style-type: none"> Training, Post-Secondary Education & Employment Skills Control Assessment Tab <ul style="list-style-type: none"> Measurable Skills Gains Control | See above <i>Measurable Skill Gain Definitions</i> |

ETO Data Entry and File Documentation

For all enrolled participants, all services and enrollment must be entered into the Efforts to Outcomes (ETO) or its successor local program using the program naming convention: **Program Name: WDA 7 Career NDWG**. ETO must be used to document eligibility, co-enrollment, and to store electronic documentation unable to be stored in I-Trac.

Additional Performance Definitions

Global Exclusions for Performance

Participants who find themselves in certain types of circumstances beyond their control and that preclude them from continuing participation may be manually exited from the program. If this type of exit is recorded the participant will not be included in any of the performance measures. To exit a participant for any of these global exclusion reasons requires file documentation supporting the exit reason recorded.

- **Reserve Forces/Called to Active Duty:** For more than 90 days. A case note is required that includes the name and title of the military representative that verified the call, or a copy of the military orders must be in the file.
- **Deceased:** A copy of the death certificate or a copy the obituary or newspaper article must be in the file.
- **Health/Medical:** Exits program because of a medical treatment and that treatment is expected to last longer than 90 days. A case note that includes the name and contact information of the family member or agency staff person providing the exclusion information (do not put specific medical diagnoses or specific medical information into either the file or the I-Trac record).
- **Institutionalized:** Becomes incarcerated in a correctional institution or is a resident of an institution or facility providing 24-hour support such as a hospital or treatment center while receiving services. A copy of public information verifying the incarceration, or a case note that includes the name and contact information for the family member or agency staff person providing the exclusion information.

Training Completer

A participant who completes a planned program of training with a certificate of completion or Credential. Training completion must be reflected in the I-Trac record. Credentials obtained by completing training must be entered in I-Trac and a copy uploaded to I-Trac using the tool and process provided through I-Trac. Follow Customer Secure Document Upload Tool instructions found on the I-Trac Resources/User Instructions tabs.

REFERENCES/RESOURCES:

[TEGL 10-16, Change 2](#)

[TEGL 16-21](#)

[TEGL 25-20](#)

WEBSITE:

<http://workforcesw.org/providers#OperationsPolicies>

INQUIRIES:

Please contact Tamara Toles ttoles@workforcesw.org (360) 567-1075 for questions.