



workforce  
SOUTHWEST WASHINGTON

**WSW Executive Board Meeting  
Zoom Conference Call  
August 25, 2021 3:30 – 5:00 pm**

**AGENDA**

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3:30	<u>Welcome</u>	Paige Spratt – Chair
3:35	<u>Consent Agenda</u> <ul style="list-style-type: none"><li>• Approval of Executive Board Minutes</li><li>• Approval of Contract Memo</li><li>• Approval of Policy Memo</li></ul>	Paige Spratt – Chair
3:45	<u>Finance</u> <ul style="list-style-type: none"><li>• Treasurers Memo</li><li>• Quarterly Reports</li></ul>	Renny Christopher – Treasurer Barri Horner – CFO
4:00	<u>Governance</u> <ul style="list-style-type: none"><li>• Lekha Fernandes Nomination</li><li>• Tracy Doriot Nomination</li></ul>	A.D. Simmons – Governance Co-Chair Ralph Clark – Governance Co-Chair
4:15	<u>CEO Report</u> <ul style="list-style-type: none"><li>• September Board Meeting Agenda</li></ul>	Kevin Perkey – CEO
4:35	<u>CEO Search Update</u>	Paige Spratt – Chair
5:00	<u>Adjourn</u>	

**NOTES**

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SOUTHWEST WASHINGTON

**WSW Executive Board Meeting Minutes**  
**June 23, 2021**  
**3:30 p.m.**  
**Zoom Conference Call, WSW**

**Executive Board Members Present:** Chair Paige Spratt, Kelley Foy, John Vanderkin, Renny Christopher, A.D. Simmons, Councilor Karen Bowerman, Ralph Clark.

**Executive Board Members with Excused Absences:** Ted Sprague

**Staff Members Present:** CEO Kevin Perkey and Traci Williams.

**WELCOME**

Chair Paige Spratt opened the meeting at 3:31 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 Board minutes held on May 26, 2021 and Contract Memo and Policy Memo.

Mr. Perkey reviewed the contract memo to the Executive Board and answered questions.

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

**CEO REPORT**

Mr. Perkey shared with the Executive Board that the Interlocal Agreement that is coming up for renewal July 1<sup>st</sup> is out for signatures in all three counties. Mr. Perkey updated the Executive Board on the tentative rollout of the BASE Program with WSUV that will start around the beginning of fall. WSUV is figuring out scheduling and Mr. Perkey will update the Executive board on scheduling. Director of Business Services, Darcy Hoffman is working on pulling together an in-depth report around the Quality Jobs Initiative that will be shared out. Also shared was that job searches will begin the week of July 4<sup>th</sup> for unemployment benefits. Director of Programs, Miriam Halliday will be presenting alongside Spokane WDC around BFET at the virtual NAWB conference this year. Mr. Perkey also mentioned that the Governance Board is still working on Board recruitment seats.

**CEO SEARCH UPDATE**

Chair Spratt updated the Executive Board that the CEO Search Committee had received five search firm proposals back with four moving forward for review. The Search Committee will be reviewing all four proposals and will meet this coming Friday to decide on which proposal will move forward. Once a decision is reached, Mr. Perkey will notify the Executive Board by email. The selected proposal will

then engage with the Search Committee and move forward with the CEO search. A conservative timeline is in the 4–6-month range. Questions were answered by Chair Spratt.

**NEW BUSINESS / OTHER ITEMS**

None were forthcoming.

**ADJOURNMENT**

With nothing further for the good of the order, Chair Spratt adjourn the meeting at 4:10 p.m.

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## CONTRACT MEMO

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**DATE:** AUGUST 19, 2021  
**TO:** KEVIN PERKEY  
WSW EXECUTIVE BOARD MEMBERS  
**FROM:** AMY GIMLIN, WSW CHIEF OPERATING OFFICER  
**RE:** CONTRACT UPDATE (JULY - AUGUST 2021)

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

- Interject Data Systems for \$10,000 to develop fiscal spreadsheets to be used for reporting.
- Cowlitz Economic Development Council for \$25,000 to provide business outreach in Cowlitz County.
- GoodCitizen for \$50,000 to provide candidate search for WSW Chief Executive Officer.

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

- Modified Equus Workforce Solutions' contract for Rapid Response to extend the end date to 12/31/21 and increase the budget by \$5,700 for a total contract of \$283,141.
- Modified Equus Workforce Solutions' contract for EcSA – Thrive services to revise the statement of work and performance.
- Extended Exigy's contract to 10/1/21. Total contract amount remained the same \$55,000.
- Modified Equus Workforce Solutions' contract for PY20 Adult and Dislocated service delivery to adjust the BFET performance and targets. Total contract amount did not change \$1,188,100.
- Modified Equus Workforce Solutions' contract for PY20 One Stop Operator to adjust the budget line items. Total contract amount did not change \$1,323,553.

*Grant notifications:*

- WSW received notification of award for PY21 Opportunity Partnership Program renewal from Workforce Training and Education Coordinating Board for **\$30,000**.
- WSW received executed grant award for PY21/FY22 WIOA Title I allocation:
  - Dislocated Worker - **\$1,254,442**
  - Admin Cost Pool - **\$440,663**
  - Youth - **\$1,373,504**
  - Adult - **\$1,338,019**
- WSW received executed grant award for PY21 Education, Employment and Training renewal from Clark County Juvenile Justice for **\$50,000**.
- WSW received executed budget grant modification for EcSA to reclassify internal spending in the budget. Total grant amount did not change.

**Board Approvals:**

- PY21 Title I Adult contracts beginning October 1, 2021, all contracts to provide services to Adult and Dislocated Workers as part of year 3 of the current youth procurement cycle.
  - Equus Workforce Solutions – Clark County **\$910,776**
  - Equus Workforce Solutions – Cowlitz/Wahkiakum Counties **\$247,321**
  - **Equus Workforce Solutions – Service Delivery Total Contract \$1,158,097**
  
  - Equus Workforce Solutions – One Stop Operator Clark **\$404,859**
  - Equus Workforce Solutions – One Stop Operator Cowlitz **\$121,165**
  - **Equus Workforce Solutions – One Stop Operator Total Contract \$526,024**
  
- Community Development Block Grant (CDBG) from Department of Commerce, to subcontract with **Equus Workforce Solutions** to provide participants who are SNAP eligible, and SNAP enrolled with a time-limited subsidized work experience at a local food bank and/or nutrition program sourced by WSW, with the goal of building capacity to elevate food insecurity and to respond to the exacerbated need for food access due to COVID-19. Contract duration is 18 months and not to exceed **\$761,715.00**. Total includes \$573,750 of CDBG funds and \$187,965 of Title I Adult Funds.
  
- Subcontract with Clark College to initiate a System Liaison position to bridge the gap between quality employment and college students in Clark County, total contract not to exceed **\$100,000**.



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## POLICY MEMO

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

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### **Memorandum of Understanding State Policy 1013-2**

This is a revision to the original policy to bring it up to standard with WIOA regulations. Previously, WSW was required to have our own local policy. With this revision, WSW can adopt and implement [State Policy 1013-2](#). Approval is needed to adopt state policy and no need to write and implement a WSW policy and previous versions are archived.

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.

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### **Supportive Service Policy 3005-7**

Employment Security Department revised the state policy to align with the interpretation in DOL's guidance that supportive services are an allowable expense for Adult and Dislocated Workers in follow up. The revision to the local policy allows for this expense, it is a needed change to help customers who are starting a new job retain that employment while awaiting their first paycheck.

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.

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### **Title I Adult and Dislocated Worker Follow Up Services Policy 3034-1**

Employment Security Department revised the state policy to align with the interpretation in DOL's guidance that supportive services are an allowable expense for Adult and Dislocated Workers in follow up. The revision to the local policy allows for this expense after program completion and provides guidance on entering the service into the State MIS. This is a needed change to help customers who are starting a new job retain that employment while awaiting their first paycheck.

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.

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### **Data Element Validation Policy 3037**

This is a new policy for WSW and a revision to the state policy. In this revision, there are specific responsibilities for the local area. In the WSW policy, we have appointed some of those responsibilities to our Title I service providers. The state revised their policy to align with the federal data validation rules and process.

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.

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### **Dispute Resolution Policy 4007-2**

This was a revision to our Dispute Resolution Policy. After the State Workforce Board revised the Memorandum of Understanding Policy and wrote an Infrastructure Agreement Policy, WSW is required to add these two dispute processes to the current WSW Dispute Resolution Policy.

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.

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### **Eligibility Handbook**

Employment Security Department revised their policy to align with the Department of Labor's Training and Employment Guidance Letters (TEGLS). To follow the state policy, the WSW policy required minimum revisions by clarifying eligibility as it pertains to Unemployment Insurance. There was also a section of this handbook that was written into a new policy, therefore removed from the handbook. This is notification to the board of this revision, no approval necessary. A copy of the revised handbook can be emailed, please send a request to Amy [agimlin@workforcesw.org](mailto:agimlin@workforcesw.org).

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.

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### **Veterans Priority of Service Policy 3019-2**

Employment Security Department revised their policy to update from WIA citations to WIOA references. To follow the state policy, the WSW policy required minimum revisions by clarifying "point of entry" for veterans' services. This is notification to the board of this revision, no approval necessary. A copy of the revised policy can be emailed, please send a request to Amy [agimlin@workforcesw.org](mailto:agimlin@workforcesw.org).

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.

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### **Training Handbook**

Employment Security Department revised their policy to update the Incumbent Worker section and clarify the procedures. To follow the state policy, the WSW policy required minimum revisions by clarifying training provider procurement and employer share of the training. This is notification to the board of this revision, no approval necessary. A copy of the revised handbook can be emailed, please send a request to Amy [agimlin@workforcesw.org](mailto:agimlin@workforcesw.org).

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.

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### **WIOA Infrastructure Agreement State Policy 1024**

This is a new policy written by the State Workforce Board. All local boards are subject to follow State [WIOA Infrastructure Agreement 1024](#). This is notification to the board of this new state policy.

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.

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### **Data Integrity and Performance Policy and Handbook 1020-1**

This is a revision to the original handbook written by Employment Security Department. ESD updated to align with revisions of DOL guidance and change from WIA to WIOA. All local boards are subject to follow State [Data Integrity and Performance Policy 1020-1](#). This is notification to the board of this new state policy.

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.

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### **WIOA Title I-B Administrative Sanctions State Policy 5406-1**

This is a revision to the original state policy to bring it up to standard with WIOA regulations. All local boards are subject to follow State [WIOA Title I-B Administrative Sanctions Policy 5406-1](#). This is notification to the board of this revision to the state policy.

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.

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**WIOA Title I-B Performance Sanctions State Policy 5415**

This is a new policy written by the State Workforce Board. All local boards are subject to follow State [WIOA Title I-B Performance Sanctions Policy 5415](#). This is notification to the board of this new state policy.

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.

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## SUPPORTIVE SERVICE and NEEDS RELATED POLICY

### POLICY #: 3005 Revision 76

Original Policy Date: 4/16/2012

Effective Revision Date: ~~3/10/2023~~ 8/25/2021

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#### Purpose:

Workforce Southwest Washington is issuing this policy to establish the principles and procedures for providing supportive services to participants enrolled in federally funded programs, including but not limited to Workforce Innovation and Opportunity Act (WIOA), other programs that allow participant supportive services, and YouthBuild. Additionally, WIOA calls for the Local Board, in partnership with the One-Stop partners and community service providers, to effectively coordinate resources and the provision of supportive services.

#### Background:

[The Workforce Innovation and Opportunity Act](#), in Section 3 (59), generally define a supportive service as “services such as transportation, childcare, dependent care, and housing, which are necessary to enable an individual to participate in activities authorized under this Act.” [The Final Rules](#) take it one-step further to say supportive services may include the following:

- a) Assistance with transportation
- b) Assistance with childcare and dependent care
- c) Assistance with housing
- d) Needs-related payments (not allowable in our workforce development area)
- e) Assistance with educational testing
- f) Reasonable accommodations for individuals with disabilities
- g) Legal aid services
- h) Referrals to health care
- i) Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
- j) Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes and
- k) Payments and fees for employment and training-related applications, tests, and certifications.

While this definition contains some illustrative examples, WSW will define the local expectations and requirements further in the policy.

#### Policy:

Supportive services are one mechanism available to support participation in program services and/or activities to secure and retain employment or post-secondary education. Registration, pursuant to the provisions of the program of enrollment, is an absolute prerequisite to the delivery of supportive services.

For WIOA Title I youth participants, supportive services are among the 14 required program elements and must be available to all registered participants.

If the support is required to participate in training (occupational skills training), it is not considered a “supportive service” it is considered part of the ITA training cost. If it is not required for training, but necessary to continue training or gain employment it is considered a “supportive service”. If the support is a course requirement it must be written on the course syllabus or part of the registration paperwork for the training and a copy of the requirement documentation must be kept in the participant file as part of the supportive service records.

For work-based learning trainings (OJT, WEX, Internships, Apprenticeships), the items required to participate in the training are considered supportive services and should be charged accordingly.

Allowable training expenses affiliated with training paid by programs other than WIOA Title I (such as Vocational Rehabilitation (VR), Trade Adjustment Assistance (TAA), or community and technical colleges through Worker Retraining (WRT) can be funded by WIOA Title I as a supportive service if:

- The participant is also eligible for and enrolled in a WIOA Title I program.
- A non-WIOA Title I program selected and is paying the tuition for the training.
- Costs for allowable training expenses are not covered by Pell, other financial aid programs or private scholarships.
- The WIOA Title I Program and case manager had no direct involvement in the process of selecting the training, which precludes the establishment of a WIOA-Funded ITA.

However, since supportive services do not trigger or extend participation for adults and dislocated workers, there must be an accompanying Title I-funded career service to trigger a participation episode.

Document training-related expenses as supportive services through case notes, which will prevent the appearance of duplicate spending between WIOA and other federally funded programs.

Supportive services are not entitlements and shall be provided based on a documented financial assessment and/or individual circumstances, the absence of other resources, and the availability of program funds. Reimbursement shall be for actual costs. Supportive services may be provided to a participant who meets the following requirements according to [final rule citation 680.910](#):

- 1) The participant is registered in a WIOA, YouthBuild, or other WSW Program that allows supportive services. For ~~all Title I programs~~ ~~Youth programs~~, the participant can also be receiving follow-up services and support is needed to obtain or retain employment or continue education; and
- 2) The participant is receiving career or training services as defined in WIOA secs. 134(c)(2) and (3). Supportive services cannot be provided as a stand-alone service; and
- 3) Supportive services are necessary to enable continued participation in career or training services; and
- 4) The participant is unable to obtain similar services from another source (non-WIOA or non-YouthBuild). Research was done to show all other resources were exhausted; and

- 5) The participant has a documented financial assessment supported by the youth's ISS/IDP or adult employment plan (IEP).

Service providers must establish internal controls that result in equitable treatment, maximize allocations, documentation requirements, and ensure coordination with, and referral of participants and applicants to, other community resources.

As a part of the assessment, program staff will determine a participant's need for supportive services and appropriate resources. The Individual Service Strategy (ISS for WIOA Youth), Individual Employment Plan (IEP for WIOA Adult or Dislocated Worker), or Individual Development Plan (IDP for YouthBuild) must document the supportive services needed to address barriers to a participant's employment goals and how they will be addressed.

Alternatives to WIOA or YouthBuild-funded supportive services must be sought prior to providing supportive services with WIOA or YouthBuild funds. WSW service providers will ensure that supportive services are available as defined in this policy to all eligible participants. Prior to providing a supportive service, case managers must ascertain if community referrals were made, and all other resources were exhausted. This determination must be documented in case notes. In addition, it may also be documented on the hard copy supportive service form.

For categorizing and defining these participant supportive services, the WSW recognizes the following support:

#### **Career or Training Assistance**

A participant may receive Career or Training Assistance during program participation, provided that the support is determined necessary to: a) facilitate or continue participation; or b) maintain or increase employability by reducing barriers and establish employment eligibility. When assistance is provided, there must be a reasonable expectation that the assistance will resolve the situation; for example, if rent is paid for one month, there must be a reasonable expectation that the participant will obtain the resources to pay rent for the following months. Documentation of the barrier to participate in career or training services must be written in case notes. WSW approves the following supportive services; this list is intended to be an exclusive list services outside of this list are disallowed:

- a) Assistance with childcare or dependent care (read additional section below for more information).
- b) Assistance with transportation costs (read additional section below for more information).
- c) Purchasing uniforms or other appropriate work-related attire or supplies, could include interviewing clothing or required clothing or supplies for employment such as protective eye wear, steel toe boots, business suit, work jeans, uniform, required tools, or items required by the employer for employment and allowable under this policy.
- d) Housing assistance could include one month's rent, referrals to housing agencies.
- e) Grooming supplies/services could include hair cut or personal hygiene items such as shampoo, soap, toothpaste, or toothbrush.

- f) Translation assistance could include interpreting services or document translation services.
- g) Educational testing and accommodations could include GED testing fees.
- h) Reasonable accommodations for disabilities including learning disabilities.
- i) Legal aid could include referral to legal services, attorney down payment up to \$250, assistance/purchasing completion of legal forms up to \$100, or aid in expunging criminal records up to \$250. Total legal aid services not to exceed \$300 for each participant and must be documented as a career or training barrier. Legal aid must only be paid **once** per participant not to exceed a total of \$300 regardless of re-offense or legal aid service provided.
- j) Addressing debts or credit reporting issues, could include referral to credit reporting services or classes on personal finance.
- k) Aid in securing a first-time driver's license, could include Department of Licensing fees and/or driver's training fee total cost up to \$500 (training and fees must be paid directly to a state registered driving school). Fee will only be paid **one time** all reoccurrences of fees is the participant's responsibility.
- l) Aid in securing a Commercial Driver's License, could include Department of Licensing first time fees or renewal fee.
- m) Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes. All items must be listed on the course syllabus or college registration could also include post-secondary registration fee. Exceptions can be made for general school supplies. IE: notebooks, backpacks, pencils, etc. All other community and school resources should be exhausted prior to receiving general school support.
- n) Payments and fees for employment and training-related applications, tests, and certifications. Payments or fees could include fees for state registered occupations (i.e.: nurse, CNA, childcare, or other health care occupations) or other recognized certifications that require a fee. Fee will only be paid **one time** all reoccurrences of fees is the participant's responsibility.
- o) Assistance with health care services could include medical, dental, and optical services or referrals to such services. Payments not to exceed \$150 per participant and
- p) Other supportive services approved by the WSW Program Manager prior to expenditure.

#### **A. Child Care or Dependent Care Assistance**

Childcare or dependent care assistance is a supportive service provided to participants if it is determined that without it a participant will not be able to participate in career or training services or secure employment. Participants will be encouraged to make their own arrangements that they can afford when supportive services terminate. Case managers will document the after-assistance plan in case notes.

Childcare assistance may be provided to participants with children age twelve years or younger. Dependent care assistance may be provided to participants with a family member living in their household that requires adult supervision. Payment will be based on participant attendance; the applicable rate will be paid for each day of participation. Travel time may be added to the actual hours of participation, when necessary. If the participant is absent from training or a no-show to employment, care assistance will not be paid.

Care assistance may be provided as a direct payment to a licensed care provider. Care assistance will not be provided when a competent adult (over the age of 18 years) residing at the same address as the participant and is available to provide care.

Care assistance will be provided at no more than the rate charged by the provider subject to the following maximum rates. Full-time care is defined as five (5) or more hours per day, while part-time care is less than five (5) hours per day. Rates are established as maximums, and should be reduced to reflect the participant's circumstances, estimated needs, and other sources of support. Child/dependent care services shall be paid to a licensed provider. Exceptions can be made if it is clearly demonstrated that such care is not readily available due to the child's age or special needs or in instances when there is no appropriate care available in the area. Such exceptions are intended as a temporary measure to allow the participant to engage in career or training services until acceptable care can be found. Exception must be documented thoroughly in case notes.

Care agreements shall be authorized for a maximum of sixteen weeks; they can be renewable if needed (need must be documented in case notes) and no other support assistance is available.

Requests for care payments will coincide with the submission of attendance reports. Program staff will review and endorse timesheets to verify the accuracy of the participant's request for care payments for career and training activities.

## **B. Transportation Assistance**

Southwest Washington is a mix of rural and suburban environments. This causes a variety of transportation problems for participants who do not own a vehicle or must travel great distances to and from work or training.

WSW service providers may provide transportation assistance in the form of bus passes, trip tickets, a fuel allowance, or personal vehicle repair/maintenance. Participants will be encouraged to use public transportation when available except when doing so will create more costly problems or major inconveniences and must be documented in case notes. Fuel vouchers must be used in lieu of direct payment to the participant.

Personal vehicle repair/maintenance is allowed when utilized for **participant's vehicle only**. The participant must be the registered owner of the vehicle in question of repair. Prior to approving expense, participant must provide a valid driver's license and vehicle registration to service provider. Vehicle repair/maintenance must not exceed \$500 per participant.

Fuel assistance is allowable if participant does not own a vehicle or driver's license but relies on a family member for assistance. If participant does not own the vehicle, it must be documented in case notes that an immediate family member provides transportation and public transportation is not available or feasible, participants may receive fuel assistance not to exceed 23¢ per mile for the estimated number of miles driven each week necessary to participate. This rate is based upon an estimated average cost per gallon of gasoline in your area divided by an estimated average of 15 miles per gallon for participant vehicles. To find your average price per gallon for

your area go to [AAA Gauge Report](#). This formula establishes a maximum weekly amount, which should be reduced to reflect the participant's circumstances, estimated needs, and other sources of support. Service Providers must record the formula used either in case notes or on the signed supportive service form.

### **C. Youth Incentives**

WSW service providers will not administer youth incentives without prior permission from WSW Program Manager. Service provider must submit a waiver request explaining circumstances for which youth incentives are needed.

### **Post-Exit Assistance Program Completion Assistance**

Post-exit Program completion supportive services may be provided for up to one year following exit completion for all Title I program participantss. ~~youth participants only.~~ Post-exit Program completion supportive services must be related to obtaining or maintaining employment or post-secondary education. Service Providers cannot provide assistance related to any training activities including but not limited to work experience, on-the-job training, internship, or occupational skills training as paid training is disallowed as a follow up service. Any other allowable supportive service listed above is allowable in follow up and must be documented in case notes as why the support will help maintain or secure employment or post-secondary education. Supportive services provided during follow up must follow the same procedures as a current participant except for; the case manager must enter the service in ETO as a "post program supportive service" for Youth programs and "follow-up services-supportive assistance" for Adult and Dislocated Worker programs. For additional information see Policy #3034 Follow Up Services for Adult and Dislocated Workers.

### **Procedures and Documentation**

The following procedures are provided to assist in administering supportive services:

- A. Service Providers are authorized to provide supportive services payments up to \$2,500 (including follow-up) enrollment maximum per participant. For participants who are co-enrolled (Adult and Youth and/or YouthBuild), the maximum amount is \$2,500. Service Providers must work together to develop a supportive service plan on those co-enrolled. All individual supportive services caps still exist and must be included in the overall cap.

If a participant is exited from **all** programs and later returns months or years later to re-enroll in services, the enrollment period starts over and therefore the maximum amount starts over as well. The maximum amount is for the enrollment period in WIOA or YouthBuild.

- B. An amount above the maximum for the participant must submit an [exception request](#) to the WSW Program Manager.
- C. Participant files must adequately document that all supportive services are allowable, reasonable, justified, and not otherwise available to the participant and show evidence of collaboration. The file must contain the following:
  - An assessment of the participant's need for supportive services and must be documented in the IEP/ISS/IDP and



- Documentation of participant's personal budget ensuring participant does not currently have the financial resources to obtain the service and
- A determination must be made and documented whether other community resources are available to cover necessary expenses and show evidence of referrals to other resources, including, when feasible, outcome of the referral. Must be documented in case notes and
- Justification of purchase must be documented on the signed supportive service form or agency form. Form must include participant's name, seeker id, date of service, vendor's name, justification for the service, and must include signatures from both the participant and case manager and
- Evidence that other non-WIOA or YouthBuild sources were explored and documented in case notes or on the supportive service form and
- A service/touchpoint must be added to the electronic file on the date the item was received by participant. Must include what was purchased and the amount expended and
- A case note must be entered giving a summary of all above, including but not limited to, the need/justification for why the item was purchased or given, describe other resources exhausted, and amount expended and
- Service provider must make available an itemized list of all supportive services provided to participant. The list must include each supportive service, the date of service, type of service, amount of the service, and a current total of supportive services spent to date.

Supportive services cannot be expended before a participant is enrolled in program. In addition, support may be provided as a follow-up service for up to 12 months after exit for youth programs only. Service Providers must follow the Post-Exit Assistance section above.

### **Disallowed Supportive Services**

Supportive service dollars **cannot** be used to pay for the following items for a participant that is either currently enrolled or in follow up of any WSW funded program.

- Support for expenses incurred prior to participant's enrollment in program. Participant must be enrolled before support can be provided. For example, service provider cannot pay for transportation assistance prior to date of enrollment.
- Fines and penalties such as traffic violations or other criminal related charges.
- Late finance charges, taxes, and interest payments.
- Child support payments.
- Bail or restitution.
- Entertainment - including but not limited to:
  - i. tips
  - ii. theater tickets
  - iii. restaurant gift cards
  - iv. sporting events or
  - v. other venue where entertainment is the sole purpose
- Pet food.
- Alcohol, marijuana, or tobacco products.
- Refundable deposits.

- Contributions or donations, federal funds cannot be used to donate or contribute to an organization on behalf of the participant.
- Items for family members or friends, federal funds cannot be used to purchase items for anyone other than the enrolled participant.
- Groceries
- On site meals during a training or education program.
- Vehicle payment or
- Out of state job search and relocation expenses that are paid for by the prospective employer.

### **Needs Related Payments**

Needs Related Payments (NRPs) are a form of supportive services available to eligible WIOA Adult, Dislocated Workers, and OSY 18-24 enrolled in training and intended for cash assistance. NRP **are not** authorized by Workforce Southwest Washington. Therefore, NRP's **are not allowable** in Southwest Workforce Development Area.

### **Right to Reduce or Eliminate Supportive Services:**

WSW reserves the right to reduce or eliminate supportive services in the event funding is reduced or other budgetary constraints exist. In such circumstances, WSW will work with service providers to determine equitable measures to affect the reduction or elimination, including sufficient prior notice for participants. In no event would a reduction or elimination of funded supportive services be retroactive.

### **Supportive Service Waiver Process**

In some unique circumstances, service providers may be unable to obtain receipts for goods or services. In such circumstances, staff shall investigate the circumstances and document in writing his/her findings and what, if any, corrective action is taken.

On an individual basis, limitations for supportive services may be waived by the WSW Program Manager or his/her designee. Consideration of waiver requests shall ensure to the extent possible that similarly situated participants receive similar payments. Copies of the approved waiver documenting the extraordinary circumstances that exist/existed will be maintained in the participant's file and in the fiscal records.

### **Definitions:**

Exhausted all Resources – a process in which the participant and case manager will research and document all other possibilities for receiving the requested support. Documentation must be written in case notes and hard copy supportive service form should include that all resources were exhausted prior to using WIOA, YouthBuild, or other federal funds.

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.

Needs-related Payments (NRPs) - Financial assistance to participants for the purpose of enabling them to participate in training and a supportive service authorized by WIOA Section 134(d)(3) for adults and dislocated workers and proposed 20 CFR 681.570 for youth. Unlike other supportive services, to qualify for needs-related payments, a

participant must be enrolled in training. Based on approval established by LWDBs and is intended to provide cash assistance to participants [proposed 20 CFR 680.930]. NRP are **not allowable** in the Southwest Region.

Public Assistance – Federal, state, or local government cash payments for which eligibility is determined by a needs or income test. [WIOA Section 3(50)]  
Supportive Services – Services such as transportation, child care, dependent care, housing, tools, payment for employment and training-related applications, tests, certifications, books, fees, and school supplies, and NRPs necessary to enable individuals to participate in activities authorized under WIOA Title I. [WIOA Section 3(59)] Note: A housing-related supportive service can include assistance with mortgage payments.

Unemployed Individual – An individual who is without a job and 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. [WIOA Section 3(61)].

#### References:

- [Workforce Innovation and Opportunity Act of 2014](#)
- [Department of Labor WIOA Final Rules](#)
- [Office of Management and Budget 2 CFR 200](#)
- [Employment Security Department Policy #5602 Rev 3](#)
- [WSW TA Memo #24 WIOA Services](#)
- [TEGL 19-16 Guidance for Adult and Dislocated Worker Programs](#)
- [ESD-WIN0078](#)

#### Supersedes:

- [WSW Policy 3005 Rev 6 last revision date 3/10/2021](#)
- WSW Policy 3005 Rev 5 last revision date 9/23/2020
- WSW Policy 3005 Rev 4 last revision date 9/4/2018
- WSW Policy 3005 Rev 3 last revision date 2/15/2018
- WSW Policy 3005 Rev 2 last revision date 5/24/2017
- WSW Policy 3005 Rev 1 last revision date 10/31/2016
- SWWDC Policy #3021 last revision date 4/27/2016
- SWWDC Policy #3005 last revision date 4/16/2012
- SWWDC Policy #3010 Needs Related Payment

#### Website:

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

## Title I Follow Up Services for Adult and Dislocated Workers

POLICY #: 3034 Rev 1

Original Policy Date: 8/23/2017

Effective Date: 8/23/2017 8/25/2021

### **Purpose:**

To communicate State policy regarding activities that constitute follow-up services for Workforce Innovation and Opportunity Act (WIOA) Title I Adult and Dislocated Workers s. ~~program exiters.~~

### **Background:**

Follow-up services provided to system-exited WIOA Title I Adult and Dislocated Worker program participants are non-monetary activities designed to help those individuals retain the unsubsidized employment resulting from the system-related services received.

### **Policy:**

- A. Follow-up services can only be provided to WIOA Title I Adult and Dislocated Worker program participants who are placed in unsubsidized employment and have system-exited Program Completion recorded in the Management Information System (MIS). Note: WIOA law and regulations define follow-up services as a type of career service, which would typically mean that they can only be provided to participants. However, the U.S. Department of Labor (DOL) has instructed states to follow the guidance issued in TEGL 10-16 Change 1, which states that follow-up services begin after ~~exit~~ program completion.
- B. Follow-up services, if requested by ~~exited~~ individuals and determined by staff to be appropriate for those individuals, must be provided for a period of up to 12 months (i.e., not more than 12 months). Note: WIOA law and regulations state that follow-up services must be provided for not less than 12 months, but DOL has instructed states to comply with the guidance issued in TEGL 19-16.
- C. Follow-up services for ~~system-exited~~ WIOA Title I Adult and Dislocated Worker program participants can include, but are not limited to, two-way exchanges between the service provider or case manager and either the individual (or his/her advocate) or the individual's employer as follows:
  - Counseling individuals about the workplace.
  - Contacting individuals or employers to verify employment.
  - Contacting individuals or employers to help secure better paying jobs, additional career planning, and counseling for the individual.
  - Assisting individuals and employers in resolving work-related problems.
  - Connecting individuals to peer support groups.
  - Providing individuals with information about additional educational or employment opportunities.

- Providing individuals with referrals to other community services.

D. Supportive Services during follow-up are allowable for Adult and Dislocated Workers that have completed the program to help them retain unsubsidized employment. For more guidance on providing supporting services after program completion, see WSW Policy #3005 Rev 7.

~~Note: Because follow-up services can only be provided to individuals who have system exited and supportive services can only be provided to participants, supportive services cannot be provided to individuals as a form of follow-up service.~~

D.E. Follow-up services do not trigger the exit date to change or delay exit for performance reporting as per guidance issued by DOL in TEGL 10-16 Change 1. As such, subrecipients must count each exit of a participant during a program year as a separate period of participation if a participant has more than one exit in that program year.

#### **NOTE:**

A follow-up service has been added to the WorkSource Services Catalog through WorkSource Information Notice 0077 Change 10 to enable the recording of supportive services to Adult and Dislocated Workers that have program completions:

“FOLLOW-UP SERVICES-SUPPORTIVE ASSISTANCE” – Services normally considered supportive services are also appropriate as follow-up services for participants in Adult or Dislocated Worker programs placed in unsubsidized employment whose employment may be at risk due to interruptions to key supports. This follow-up service does not trigger or extend participation and is not durational.

#### **Supersedes:**

- 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.
- WIOA Policy 5620, Follow-Up Services for Adult and Dislocated Worker Exiters
- WSW Policy 3034, Title I Follow Up Services for Adult and Dislocated Workers

#### **References:**

- Public Law 113-128, Workforce Innovation and Opportunity Act of 2014, Section 134(c)(2)(A)(xiii)
- 20 CFR 678.430(c) and 680.150(c)
- Training and Employment Guidance Letter (TEGL) 19-16, Section 4
- Training and Employment Guidance Letter (TEGL) 10-16 Change 1, Section 7

#### **Website:**

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



**Workforce Southwest Washington  
Policies and Procedures**

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**DATA ELEMENT VALIDATION  
POLICY #: 3037**

Date of Original Policy: 8/25/2021

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**PURPOSE**

To provide guidance regarding federal Data Element Validation (DEV) requirements for programs under Title I-B and Title III of the Workforce Innovation and Opportunity Act (WIOA) and the Trade Adjustment Assistance (TAA) program.

This policy aligns with Training and Employment Guidance Letter (TEGL) [07-18](#) and TEGL [23-19](#).

**BACKGROUND**

The Employment Security Department (ESD), as the state administrative entity, provides guidance on data validation and source documentation requirements for WIOA Title I-B formula programs, the Wagner-Peyser Employment Services program as amended by WIOA, including the Monitor Advocate System, and the Trade Adjustment Assistance (TAA) program in [Policy 1003 Revision 2](#).

ESD, as the grantee receiving funding from the U.S. Department of Labor (DOL), requires WIOA Title I-B formula programs to maintain and report accurate and reliable program and financial information. Data validation requires the State to ascertain the validity, accuracy and reliability of report and participant record data submitted to DOL, as set forth in Section 116 of WIOA. Data validation consists of two separate functions: report validation and data element validation (DEV). Report validation checks the accuracy of the state calculations used to generate USDOL performance reports as submitted through the Workforce Integrated Performance System (WIPS). Data element validation checks the validity, accuracy and reliability of the data used by the state to perform the calculations.

DEV is an annual activity conducted by ESD. Selected samples of participant data reported on the most current annual Participant Individual Record Layout (PIRL) data submitted through WIPS is reviewed against source documentation in customer records for compliance with federal definitions. ESD also validates Wagner-Peyser records.

DEV should not be confused with WIOA and TAA eligibility verification requirements. Although DEV may verify the existence of source documentation for some eligibility criteria, the process does not validate participant eligibility. Training and Employment Guidance Letter (TEGL) [23-19](#) contains the most current U.S. Department of Labor, Employment and Training Administration (DOLETA) guidance on documentation requirements.

DEV training, tutorials and frequently asked questions are located on the DOLETA [Data Validation website](#).

## **POLICY**

It is the state's policy to ensure, to the maximum extent feasible, the accuracy of the data entered by WIOA core and non-core programs into the state MIS system. Source documentation for required data elements can be found in [Attachment B](#).

Non-core programs include: Jobs for Veterans State Grants (JVSG), National Dislocated Worker Grants (DWG) and others outlined in TEGL 23-19. Non-core programs are highly encouraged to fully implement data element validation that aligns with this policy. This includes periodic data element reviews to ensure that data entered, and its supporting documentation, is accurate and reliable. Establishing regular (e.g. quarterly) data reviews is a promising practice for identifying and correcting errors to improve performance reporting, as well as ensuring the data accurately reflects the program participants, services, and outcomes.

As recipients of WIOA Title I-B, Title III and TAA funds, ESD and Local Workforce Development Boards (LWDBs) are required to collect and report accurate information for these programs. DOL mandates annual DEV to maintain and demonstrate system integrity, assess the accuracy of submitted participant data, and identify and correct problems associated with data entry processes.

### **a. ESD responsibilities**

1. Provide overall guidance, training and technical assistance for data validation standards in accordance with federal guidance.
2. Conduct DEV activities during annual monitoring visits in accordance with 2 CFR 200.328.
3. Utilize the feedback process outlined in WIOA Title I Policy 5414 (WIOA Title I-B Monitoring) to identify and resolve any errors identified.
4. Maintain records per state and federal records retention rules.
5. Provide annual DEV training as part of Workforce Monitoring tool reviews and
6. Annually review the results of data validation efforts and the effectiveness of the data validation process and revise as needed.

### **b. WSW responsibilities**

1. Provide annual DEV review and training as part of the annual monitoring review of Title I-B programs.
2. Ensure appropriate staff receive statewide data validation training annually.
3. Maintain records per state and federal records retention rules and
4. Ensure that state monitoring staff have access to source documents for review upon notification.

### **c. Service Provider responsibilities**

1. Develop internal controls to ensure data reported in the state MIS system is valid, reliable, and aligns with source documentation in accordance with this policy.



2. Provide training to staff on the importance of correct data entry and allowable source documentation on an annual basis, at a minimum.
3. Quarterly data element review of program data for errors, missing data, and other anomalies, including missing documentation.
4. Ensure appropriate staff receive data validation training annually.
5. Maintain records per state and federal records retention rules and
6. Ensure that state monitoring staff have access to source documents for review upon notification.

#### **d. Data element process and requirements**

[Attachment A](#) details Washington's DEV process and requirements.

#### **e. Approved data elements**

Data elements identified for DEV review in each program year are found in the monitoring tools checklists posted annually on the [Workforce Professionals Center](#) website.

#### **f. Alignment of DEV and eligibility documentation**

Although DEV does not validate participant eligibility, it is the policy of the state to use DEV documentation requirements outlined in TEGl 23-19 as the foundation for WIOA program eligibility documentation for all eligibility components included under DEV requirements. The alignment of these requirements will increase efficiencies and ensure DEV requirements are met (for eligibility components) at the time of participant enrollment. In this way, DEV documentation will fulfill certain eligibility documentation requirements.

#### **g. Allowable source documentation**

[Attachment B](#) details the allowable source documentation for data element validation in Washington. For data elements that allow self-attestation, please see the [WSW Eligibility Policy and Handbook](#) for appropriate procedure and form needed.

### **DATA ELEMENT VALIDATION PROCESS**

The intent of this process is to ensure the accuracy of data entered into the state MIS system and subsequently submitted to USDOL. Service Provider staff collect documentation supporting data elements on an ongoing basis. The required data elements and source documentation are indicated in [Attachment B](#). The process outlined below is in conjunction with State Level Responsibilities above.

#### **1. Scope of review**

- Data from the Participant Individual Record Layout (PIRL) file provided for the annual performance report and caseload reports will be used to randomly select individual records for the annual data validation process.
- The sample size, method, and type of records to be reviewed, as well as the current monitoring checklists, will be published annually for each Title I-



B core program, the Title III Wagner-Peyser program (including MSFW) and the Trade Adjustment Assistance program.

## 2. Data elements reviewed

- Monitoring checklists are the tools used to identify the data elements required to be reviewed each program year.
- A monitoring tool checklist containing all applicable data elements and documentation required during the reporting period will be used to validate that the correct data is entered into the state MIS system.
- Monitoring tools are updated annually and posted under the “Monitoring” section of the [Workforce Professionals Center](#) website.
- The Workforce Monitoring Unit provides annual training to program staff on the monitoring tools.

## 3. Error rate

- ESD scores each applicable data element as either a pass or fail for validation.
    - Each data element that is required to be validated and that is supported or matched by acceptable documentation cited in [Attachment B](#) is scored as a “pass.” Conversely, any data element required to be validated that is not supported by acceptable documentation cited in [Attachment B](#), or is inconsistent with other documentation, is scored as a “fail.” Thus, data elements with source documentation that lacks proper labeling or is unreadable will be scored as “fail” even if the documentation is in the file.
  - The programmatic pass/fail ratio must be a 10% reporting error rate to be considered a passing report for the area.
4. Communication of DEV results including any items to address will be written in the annual monitoring reports and the process to resolve is outlined in the Monitoring Policy [5414](#) and WSW Policy [2003](#).
5. MIS participant records and source documents will be maintained per state and federal record retention and documentation requirements.

## DEFINITIONS

**Data Validation** – A series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data.

**Data Element Validation (DEV)** – The federally mandated process by which the state annually assesses the accuracy of prescribed data elements in randomly sampled participant files against source documents in program files for compliance with federal definitions (refer to TEGL 07-18).

**Self-Attestation** – Self-attestation occurs when participants (applicants) state their status for a particular data element, such as pregnant or parenting youth, and then sign and date acknowledgement forms. The key elements for self-attestation are: (a) participants (applicants) identifying their status for a data element and (b) signing and dating a form attesting to this self-identification. Self-attestation can also be in the form of a signed and dated WIOA eligibility application that is in paper format or either

of two electronic formats (a scanned and uploaded copy of the paper document or an application in the state's case management system with the participants' date-stamped electronic signatures).

#### REFERENCES/RESOURCES:

- [WIOA Section 116](#)
- 20 CFR 667.300
- 2 CFR 200.328
- Training and Employment Guidance Letter (TEGL) [23-19](#) – Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs.
- Training and Employment Guidance Letter (TEGL) [07-18](#) – Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)
- Training and Employment Guidance Letter (TEGL) [10-16 Change 1](#) – Performance Accountability Guidance for WIOA Title I, Title II, Title III, and Title IV Core Programs
- Training and Employment Guidance Letter (TEGL) [14-18](#) – Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by USDOL
- Training and Employment Guidance Letter (TEGL) [5-18](#) – WIOA Annual Statewide Performance Report Narrative
- Training and Employment Notice (TEN) [14-02](#) – Data Validation Initiative
- Workforce Innovation and Opportunity Act Title I Policy [5414](#) – Monitoring

#### WEBSITE

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

#### INQUIRIES

Please contact Amy Gimlin [agimlin@workforcesw.org](mailto:agimlin@workforcesw.org) (360) 567-1059 for questions.



**Workforce Southwest Washington  
Workforce Innovation and Opportunity Act Policies and Procedures**

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**DISPUTE RESOLUTION POLICY**

**POLICY #: 4007 Revision 2**

Original Policy Date: 4/16/2012

Revision Date: ~~6/28/2017~~ 8/24/2021

~~Effective Date: 6/28/2017~~

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**Purpose:**

Workforce Southwest Washington (WSW) is issuing this policy to provide guidance and standards for conflict resolution between partners in the local WorkSource System. This policy applies to disagreements in general and specifically applies to those involving WSW Memorandum of Understanding, Infrastructure Agreement, the One-Stop Operator Agreement, and other policies and procedures regarding the integration and coordination of services throughout the WorkSource System.

**Policy:**

WSW partners will follow these dispute resolution procedures when the dispute involves ~~more than one~~ partner and/or affiliate. All disputes should be resolved at the lowest possible level and must be fully documented at every step. All documentation produced must be delivered to the subsequent entity in the dispute resolution process until such time as the dispute is resolved. The resolving entity is responsible for retaining a complete record of all actions taken from initiation to the point of resolution.

Disputes will generally fall into these categories:

1. General conflicts over the normal course of providing employer and job seeker services.
2. One-Stop Operator disputes, including One-Stop Operator Agreement and amendments.
3. Memorandum of Understanding (MOU) disputes prior to failure to sign, such specific language or clauses in the agreement.
4. MOU disputes regarding failure to sign.
- 4.5. Infrastructure Agreement (IFA) disputes regarding partner's negotiated cost share for the WorkSource Center(s) or Next.

Dispute resolution, under the first ~~three~~ two categories, will proceed as follows:

- All attempts to resolve disputes among or between WSW system partners will begin with negotiations between the disagreeing parties. Partners are expected to put forth good faith efforts in communication and compromise to resolve disagreements in a cooperative and timely manner.
- Should the partners be unable to directly resolve their dispute, they will submit the disputed issue to the Executive Board of WSW, providing an explanation of the matter in writing. The parties shall have the opportunity to present their position to WSW Executive Board at a regularly scheduled meeting. If the dispute involves an interpretation of a policy issued by Employment Security Department Policy Unit

(ESD), ESD will be asked by the WSW Board Chair to review the issue and provide a written opinion as to compliance with that policy. If the dispute does not affect a system-wide policy, the WSW Board Chair may request ESD's assistance in reviewing the dispute. WSW Executive Board will then provide a written recommendation.

If the above local-level resolution process fails and the disagreement proceeds, the following process applies:

- If an issue cannot be resolved at the Executive Board of WSW, the issues shall be forwarded to the Employment Security Department Commissioner for resolution in consultations with the WSW Board Chair and local elected officials.
- If the Chief Local Elected Official disagrees with the Commissioner, assistance may be sought from the Office of Governor.

Disputes regarding failure to sign the MOU or other disputes with the MOU:

All steps in the previous sections must be completed and documented. When the local boards and partners have entered into good faith negotiations and have still reached an impasse, the following additional steps shall be taken in order:

1. The local board and required partners must send a letter to the ~~Commissioner of Employment Security, as the administrative entity of the Workforce Innovation and Opportunity Act, notifying of the impasse and outlining the issues. A copy of that letter must also be sent to the Assistant Commissioner of the ESD Policy. Documentation of the attempts to resolve the dispute should be attached. Workforce Training and Education Coordinating Board (WTECB), as the Governor's designee, notifying the State of the impasse. The letter must outline the issues and parties involved in detail and provide documentation of actions taken, however unsuccessful, to resolve the dispute.~~
2. WTECB will engage WSW, one-stop operator, one-stop partner programs, ~~LCEO(s) CLEO~~ and any other parties mutually deemed appropriate in an effort to resolve the dispute. Prior to issuing its decision, WTECB may seek alternatives such as asking for third-party mediation or dispute resolution with appropriate Federal agencies to propose a resolution.
- 3.
4. ~~WTECB must issue a final written decision to all parties. The Commissioner may seek alternatives to propose a resolution.~~
- 5.4. If an impasse continues, notifications of failure to sign, a report will also be sent to the U.S. Department of Labor as noted in 662.310(b) and to the head of any other Federal agency with responsibility for oversight of a one-stop partner program. sign will be issued with applicable sanctions to the extent of applicable state and federal laws. In addition, any local area in which a local board has failed to execute an MOU with all of the required partners is not eligible for state incentive grants.

Disputes regarding the IFA:

All steps in the previous sections must be completed and documented. When the local boards and partners have entered into good faith negotiations and have still reached an impasse, the State Funding Mechanism is triggered, and the following additional step shall be taken:

1. The local board must send the Governor's designee, WTECB, a notification of impasse. Upon receipt of notification, the Governor must issue guidance, and the WTECB (as the designated Governor's representative) must assist with the issuance of that guidance and with developing the formula used by the Governor under the State Funding Mechanism to determine one-stop center budgets in the event local consensus cannot be reached. Refer to the State IFA Policy 1024 for additional timeline and procedures.

The above steps are intended to provide assistance to resolve disputes and add clarification. They do not supersede or replace language in the Workforce Innovation and Opportunity Act or regulations.

**References:**

- [Workforce Innovation and Opportunity Act of 2014](#)
- [WIOA Notice of Proposed Rule Making: Notice of Proposed Rulemaking on Title I and Title III programs](#)
- [State IFA Policy 1024](#)
- [State MOU Policy 1013](#)

**Supersedes:**

- SWWDC Policy #4007 last revision date [4/16/20126/28/2017](#)

**Website:**

<https://workforcesw.org/results-and-data/policies>  
<http://workforcesw.org/providers#policies>

WSW WIOA <b>ADULT</b> PROGRAM YEAR 2020 & FISCAL YEAR 2021				
YEAR	ALLOCATION	OBLIGATED AS OF 6.30.21		PERCENT OBLIGATED*
WIOA Adult allocation 7.1.20	\$ 1,637,160			
TOTAL CURRENT YR.	\$ 1,637,160	\$ 1,164,593	\$ -	71.13% Up from 56.97%

\* 80% Required by June 30, 2021 **REQUIREMENT WAIVED**      \$ 1,164,593      71.13%

WSW WIOA <b>DISLOCATED WORKER</b> PROGRAM YEAR 2020 & FISCAL YEAR 2021				
YEAR	ALLOCATION	OBLIGATED AS OF 6.30.21		PERCENT OBLIGATED*
WIOA DW allocation 7.1.20	\$ 1,470,340			
TOTAL CURRENT YR.	\$ 1,470,340	\$ 1,162,174	\$ -	79.04% Up from 63.73%

\* 80% Required by June 30, 2021 **REQUIREMENT WAIVED**      \$ 1,162,174      79.04%

WSW WIOA <b>YOUTH</b> PROGRAM YEAR 2020				
YEAR	ALLOCATION	OBLIGATED AS OF 6.30.21		PERCENT OBLIGATED*
WIOA Youth allocation 4.1.20	\$ 1,681,089			
TOTAL CURRENT YR.	\$ 1,681,089	\$ 1,044,133	\$ -	62.11% Up from 53.67%

\* 80% Required by June 30, 2021 **REQUIREMENT WAIVED**      \$ 1,044,133      62.11%

Southwest Washington Workforce Development Council DBA Workforce Southwest Washington  
Statement of Revenues and Expenditures -  
From 7/1/2020 Through 6/30/2021

(In Whole Numbers)

	Current Year Actual	Total Budget - Operating	Total Budget Variance - Operating	Spending Rate Percentage
Internal Expenses				
Personnel	1,573,595	1,576,438	2,843	99.81%
Professional Services	62,595	102,350	39,755	61.15%
IT: Computer Support	29,899	27,390	(2,509)	109.16%
IT: Licensing, annual fees, software	68,256	65,144	(3,112)	104.77%
Supplies	6,703	6,495	(208)	103.20%
Telephones	11,645	11,424	(221)	101.93%
Postage, print, copy, equipment rentals	(314)	1,260	1,574	(24.92)%
Occupancy	120,432	116,976	(3,456)	102.95%
External Printing and Publications	1,207	700	(507)	172.47%
Travel				
LOCAL TRAVEL	374	14,900	14,526	2.50%
LONG DISTANCE TRAVEL	<u>0</u>	<u>3,750</u>	<u>3,750</u>	<u>0.00%</u>
Total Travel	374	18,650	18,276	2.00%
Conferences and Meetings				
CONFERENCES & MEETINGS	2,093	4,750	2,657	44.06%
Washington Workforce Assoc. Annual Conference	0	0	0	0.00%
National Association of Workforce Boards Conference	<u>0</u>	<u>36,000</u>	<u>36,000</u>	<u>0.00%</u>
Total Conferences and Meetings	2,093	40,750	38,657	5.14%
Insurance	15,610	16,275	665	95.91%
Furniture and Equipment	22,130	28,700	6,570	77.10%
Local Meeting Support	9,151	4,350	(4,801)	210.35%
Memberships and Subscriptions	21,162	19,625	(1,537)	107.83%
Staff Training	<u>6,466</u>	<u>23,400</u>	<u>16,934</u>	<u>27.63%</u>
Total Internal Expenses	<u>1,951,004</u>	<u>2,059,927</u>	<u>108,923</u>	<u>94.71%</u>

**Southwest Washington Workforce Development Council DBA Workforce Southwest Washington**

Statement of Revenues and Expenditures - SPECIAL PROJECTS PY20 -

From 7/1/2020 Through 6/30/2021

(In Whole Numbers)

		Current Year Actual	Total Budget - Operating	Total Budget Variance - Operating	Spending Rate Percentage
	Initiatives and Projects				
901	Initiatives and Projects:PEOPLE	46,689	62,000	15,311	75.30%
902	Initiatives and Projects:BUSINESS	23,895	50,000	26,105	47.79%
903	Initiatives and Projects:SYSTEMS	60,503	150,000	89,497	40.33%
	Total Initiatives and Projects	131,087	262,000	130,913	50.03%
	<b>TOTAL</b>	<b>131,087</b>	<b>262,000</b>	<b>130,913</b>	<b>50.03%</b>

**PEOPLE**

Childcare Consultant  
Comcast Internet Services for Target Populations

**BUSINESS**

Linked In Learning  
Jobs EQ Tool  
Launchpad API Tool  
Partners in Diversity Dues  
Virtual Job Fair Platform

**SYSTEMS**

Digital Outreach  
Computers for Checkout -Target Populations  
Career Coach Website



Grant Name/No.:		CDBG		20-6221C-142	
Effective Dates:		1/1/21 - 1/31/23			
Agency/Contact:		WA Dept. of Commerce		Term:	25 months
		6/30/2021			
Grant executed June 2021			24% of Term		
Line Item Expense	Grant Budget	Grant to Date Costs	Budget Balance	Spending %	
WSW Internal (Staff and Indirect)	\$ 63,750.00	1,626.76	62,123.24	3%	
Subcontract Career Services	\$ 95,625.00	-	95,625.00	0%	
Subcontract Participant Support Costs	\$ 182,490.00	-	182,490.00	0%	
Participant Work Experience	\$ 295,635.00	-	295,635.00	0%	
	\$ -	-	-		
Totals	\$ 637,500.00	\$ 1,626.76	\$ 635,873.24	0%	

Total Subcontracts Budget	\$ 573,750.00
	\$ -
Contract Obligations	TOTAL \$ -
Unobligated Balance	\$ 573,750.00

Grant Name/No.:	America's (NW) Promise MOD1			16-60310
Effective Dates:	1/1/2017 - 12/31/2021			
Agency/Contact:	Worksystems Inc			Term: 60 Months
	6/30/2021			
		90% of Term		
Line Item Expense	Grant Budget	Grant to Date Costs	Budget Balance	Spending %
Personnel and Operating	\$ 207,972.00	207,972.00	-	100%
Indirect	\$ 133,994.00	133,994.00	-	100%
Subcontract	\$ 1,018,034.00	964,222.00	53,812.00	95%
			-	
Totals	\$ 1,360,000.00	\$ 1,306,188.00	\$ 53,812.00	96%

Total Subcontracts Budget	\$ 1,018,034.00
Rescare 17-20 MOD 3	\$ 689,298.00
PIC 17-21	\$ 285,673.00
Contract Obligations	\$ 974,971.00
Unobligated Balance	\$ 43,063.00
RSA Estimate	\$ 43,063.00
Unobligated Available	\$ -

Grant Name/No.:		EcSA (Thrive) MOD 3 (4)		7629-07	
Effective Dates:		7/1/19-3/31/22			
Agency/Contact:		Employment Security		Term:	33 months
		6/30/2021			
			73% of Term		
Line Item Expense		Grant Budget	Grant to Date Costs	Budget Balance	Spending %
Staff Salaries	\$	205,221.72	182,157.72	23,064.00	89%
Staff Benefits	\$	48,555.80	45,786.62	2,769.18	94%
Facilities, Travel and Communications	\$	10,048.44	7,879.83	2,168.61	78%
Indirect	\$	222,478.04	188,867.02	33,611.02	85%
Subcontracts	\$	1,113,696.00	587,989.00	525,707.00	53%
Totals*	\$	1,600,000.00	\$ 1,012,680.19	\$ 587,319.81	63%

Total Subcontracts Budget	\$ 1,113,696.00
19-13 LCCAP (Terminated 9.15.20)	\$ 65,891.00
Launchpad Annual License	\$ 31,653.00
19-15 Rescare MOD 3 12/29/20	\$ 480,727.00
19-16 Rescare (OSO)	\$ 15,000.00
19-16 Rescare (OSO) De-obligated	\$ (11,050.00)
19-14 Cowlitz Habitat for Humanity	\$ 364,000.00
20-13 Equus MOD 1 OSO	\$ 140,600.00
Contract Obligations	\$ 1,086,821.00
Unobligated Balance	\$ 26,875.00
RSA Estimate	\$ 16,875.00
Unobligated Available	\$ 10,000.00

Grant Name/No.:	Rapid Response MOD2	7509-10
Effective Dates:	8/16/19 through 12/31/21	
Agency/Contact:	Employment Security	Term: 28 months

	6/30/2021	
		79% of Term

Line Item Expense	Grant	Budget	Grant to Date Costs	Budget Balance	Spending %
Personnel: Salaries	\$	66,800.30	70,274.00	(3,473.70)	105%
Personnel: Benefits	\$	22,712.10	19,237.00	3,475.10	85%
Indirect	\$	27,036.09	27,036.09	-	100%
Travel, Facilities, Office Supplies	\$	8,772.07	8,762.76	9.31	100%
Subcontracts	\$	315,141.44	287,708.11	27,433.33	91%
<b>Totals</b>	<b>\$</b>	<b>440,462.00</b>	<b>\$ 413,017.96</b>	<b>\$ 27,444.04</b>	<b>94%</b>

Total Subcontracts Budget	\$	315,141.44	
ResCare 19-10 MOD 1	\$	283,141.00	
WWA 19-27 (Revised 1/1/21)	\$	4,000.00	
Contract Obligations	<b>TOTAL</b>	<b>\$ 287,141.00</b>	
Unobligated Balance	\$	28,000.44	
RSA Estimate	\$	12,000.44	
Unobligated Available	\$	16,000.00	Case Leap Videos (or RSA)

Grant Name/No.:	COVID-19 DRDW		7580-64	
Effective Dates:	5/1/20-3/31/22			
Agency/Contact:	Employment Security		Term:	23 months
	6/30/2021			
		61% of Term		
Line Item Expense	Grant Budget	Grant to Date Costs	Budget Balance	Spending %
Participant Wages				
Disaster Relief Employment	\$ 258,927.00	148,904.32	110,022.68	58%
Participant Fringe Benefits for Disaster Relief Employment	\$ 63,024.00	41,725.97	21,298.03	66%
Career Services (excluding WEX/Internship)	\$ 68,219.00	49,240.19	18,978.81	72%
Training Services, excluding On-the-Job Training (OJT)	\$ 18,460.00	4,370.62	14,089.38	24%
WDC Admin	\$ 3,750.00	2,799.13	950.87	75%
WDC Indirect	\$ 38,901.00	36,623.41	2,277.59	94%
WDC Indirect Admin	\$ 24,212.00	22,022.65	2,189.35	91%
Totals	\$ 475,493.00	\$ 305,686.29	\$ 169,806.71	64%

**Total Subcontracts Budget - several categories have dollars for Subcontracts**

		\$ 360,411.00
20-09 Equus		\$ 341,951.00
20-11 Equus		\$ 18,460.00
Contract Obligations	TOTAL	\$ 360,411.00
Unobligated Balance		\$ -

Grant Name/No.:	COVID-19 ERDW		7590-64	
Effective Dates:	7/1/20-3/31/22			
Agency/Contact:	Employment Security		Term:	21 months
	6/30/2021			
Executed September 2020		57% of Term		
Line Item Expense	Grant Budget	Grant to Date Costs	Budget Balance	Spending %
Career Services (excluding WEX/Internship)	\$ 316,833.00	151,165.06	165,667.94	48%
Workbased Learning (Wex/Internship)	\$ 160,560.00	47,324.81	113,235.19	29%
Training Services (Excluding OJT)	\$ 216,000.00	-	216,000.00	0%
On-the Job Training	\$ 112,500.00	29,696.47	82,803.53	26%
Supportive Services	\$ 90,000.00	3,062.64	86,937.36	3%
WDC Admin	\$ 3,750.00	3,395.53	354.47	91%
WDC Indirect	\$ 112,500.00	55,923.19	56,576.81	50%
WDC Indirect/Admin	\$ 68,237.00	34,750.98	33,486.02	51%
Totals	\$ 1,080,380.00	\$ 325,318.68	\$ 755,061.32	30%

Total Subcontracts Budget - several categories have dollars for this spending

	\$ 718,408.00
20-13 Equus Operator	\$ 322,500.00
20-11 Equus	\$ 179,908.00
Contract Obligations	TOTAL \$ 502,408.00
Unobligated Balance	\$ 216,000.00

Grant Name/No.:	Opioid Crisis		7530-02	
Effective Dates:	10/26/20-3/31/22			
Agency/Contact:	Employment Security		Term:	17 months
	6/30/2021			
		47% of Term		
Line Item Expense	Grant Budget	Grant to Date Costs	Budget Balance	Spending %
Participant Wages for Disaster Relief Employment	\$ 104,000.00	17,306.19	86,693.81	17%
Participant Fringe Benefits for Disaster Relief	\$ 31,200.00	2,291.28	28,908.72	7%
Career Services	\$ 230,000.00	63,980.77	166,019.23	28%
Training Services	\$ 204,800.00	34,711.77	170,088.23	17%
Supportive Services	\$ 100,000.00	900.99	99,099.01	1%
Administrative Costs	\$ 30,000.00	6,890.36	23,109.64	23%
Totals	\$ 700,000.00	\$ 126,081.36	\$ 573,918.64	18%

**Total Subcontracts Budget - several categories have dollars for this spending**

	\$ 610,000.00
Equus 20-11	\$ 305,200.00
Equus 20-13 MOD 1	\$ 304,800.00
Contract Obligations	\$ 610,000.00
<b>TOTAL</b>	<b>\$ 610,000.00</b>
Unobligated Balance	\$ -

Grant Name/No.:		OPP		21-CAT-354	
Effective Dates:		11/16/20 - 5/31/21			
Agency/Contact:		WTECB		Term:	6 months
		6/30/2021			
			100% of Term		
Line Item Expense		Grant Budget	Grant to Date Costs	Budget Balance	Spending %
Program Expenses		\$ 10,000.00	10,000.00	-	100%
Subcontract		\$ 30,000.00	30,000.00	-	100%
Totals		\$ 40,000.00	\$ 40,000.00	\$ -	100%

Total Subcontracts Budget	\$ 30,000.00
20-12 Equus	\$ 30,000.00
Contract Obligations	TOTAL \$ 30,000.00
Unobligated Balance	\$ -



Grant Name/No.:	CCPG		21-21450212-038	
Effective Dates:	11/17/20 - 6/30/21			
Agency/Contact:	WA Dept. of Commerce		Term:	8 months
	6/30/2021			
		100% of Term		
Line Item Expense	Grant Budget	Grant to Date Costs	Budget Balance	Spending %
Salaries	\$ 21,003.00	21,003.00	-	100%
Benefits (30%)	\$ 6,301.00	6,301.00	-	100%
Goods and Services (technology for partner meetings)	\$ 67.00	67.00	-	100%
Contracted Services	\$ 20,000.00	20,000.00	-	100%
Indirect costs (up to 10%)	\$ 5,189.00	5,189.00	-	100%
Totals	\$ 52,560.00	\$ 52,560.00	\$ -	100%

Total Subcontracts Budget	\$ 20,000.00
19-28 Exigy	\$ 20,000.00
Contract Obligations	TOTAL \$ 20,000.00
Unobligated Balance	\$ -

Grant Name/No.:	DSHS-DVR Summerworks Modified Dec 2020			2012-65746
Effective Dates:	1/1/2020-9/30/2021			
Agency/Contact:	Employment Security			Term: 21 months
<b>FEE FOR SERVICE</b>	<b>6/30/2021</b>	<b>86% of Term</b>		
<b>Line Item Expense</b>	<b>Grant Budget</b>	<b>Grant to Date Revenue</b>	<b>Budget Balance</b>	<b>Earned %</b>
WSW	\$ 994,350.00	\$ 372,021.65	622,328.35	37%
<b>Totals</b>	<b>\$ 994,350.00</b>	<b>\$ 372,021.65</b>	<b>\$ 622,328.35</b>	<b>37%</b>

<b>Total Revenue PY19-PY21</b>	<b>372,021.65</b>	
Paid to Contractor	330,097.68	
NEXT Facilities	57,875.43	
WSW Costs	<u>68,198.00</u>	
<b>Total Expense</b>	<b><u>456,171.11</u></b>	
<b>Net Revenue</b>		<b>\$ (84,149.46)</b>

<b>Total Revenue PY18-PY19</b>	<b>587,839.48</b>	
Paid to Contractor	455,890.78	
NEXT Facilities	40,164.07	
WSW Costs	<u>71,402.13</u>	
<b>Total Expense</b>	<b><u>567,456.98</u></b>	
<b>Net Revenue</b>		<b>\$ 20,382.50</b>

<b>TOTAL FOR PROGRAM - SUMMERWORKS</b>	<b>\$ (63,766.96)</b>
JP Morgan Chase Donation	\$ 15,000.00
Peacehealth Donation	\$ 5,000.00
Youth In-School Funding	<u>\$ 40,000.00</u>
<b>Net Revenue as of 6/30/21</b>	<b>\$ (3,766.96)</b>

Grant Name/No.:	CCJC Employment and Education Training Program				20-21
Effective Dates:	7/1/20-6/30/21				
Agency/Contact:	Employment Security			Term:	12 months
FEE FOR SERVICE	6/30/2021	100% of Term			
Line Item Expense	Grant Budget	Grant to Date Costs	Budget Balance	Spending %	
WSW	\$ 6,600.00	6,600.00	-	100%	
Rescare	\$ 43,400.00	21,380.00	22,020.00	49%	
Totals	\$ 50,000.00	\$ 27,980.00	\$ 22,020.00	56%	

<b>Total Revenue PY20</b>		<b>24,495.00</b>			
Paid to Contractor		21,380.00			
NEXT Facilities		0.00			
WSW Costs		6,600.00			
<b>Total Expense</b>		<b>27,980.00</b>			
<b>Net Revenue</b>			<b>\$ (3,485.00)</b>		

Grant Name/No.:	BFET		2012-94223	
Effective Dates:	10/1/20-9/30/21			
Agency/Contact:	Employment Security		Term:	12 months
Grant to date costs funded by other non-federal sources and reimbursed at 50% for future use.	6/30/2021			
			75% of Term	
Line Item Expense	Grant Budget	Grant to Date Costs	Budget Balance	Spending %
Salaries	\$ 3,187.00	492.66	2,694.34	15%
Fringe Benefits	\$ 1,366.00	200.36	1,165.64	15%
Administrative Services	\$ 44,331.00	31,844.42	12,486.58	72%
Participant Reimbursement-Transportation	\$ 6,000.00	-	6,000.00	0%
Participant Reimbursement-Educational/Credential Testing	\$ 8,000.00	-	8,000.00	0%
Participant Reimbursement-Clothing	\$ 3,200.00	-	3,200.00	0%
Participant Reimbursement-Child Care	\$ 21,250.00	-	21,250.00	0%
Participant Reimbursement-Books & Training Supplies	\$ 8,500.00	-	8,500.00	0%
Participant Reimbursement-Housing and Utilities	\$ 1,500.00		1,500.00	0%
Totals	\$ 97,334.00	\$ 32,537.44	\$ 63,296.56	33%
BFET CONTRACT TO DATE REVENUE		\$ 32,537.44		

Total Subcontracts Budget	\$ 92,781.00	
20-12 Equus MOD 1 Adult Clark	15,000	OPP
20-13 Cowlitz Operator (SS)	15,000	CFSWWA
20-01 Youth Clark	13,179	funded by JPMC
20-02 Youth Cow	4,184.53	funded by JPMC
20-05 Youth WAH	136.97	funded by JPMC

Contract Obligations	TOTAL	\$ 47,500.00	
Unobligated Balance		\$ 45,281.00	CDBG Q1 PY21