



## Executive Finance Committee Agenda

09/12/2024 ▪ 2:30-4:00p

Join online via Microsoft Teams

Meeting ID: 284 831 687 094

Passcode: ryDY8X

### **I. Welcome & Check-In Items**

- A.** Introductions & Establish Quorum
- B. Action Item:** Motion to Approve June 13, 2024 EFC Minutes (Attachment #1)
- C.** Board Chair Comments
- D.** [CEO Report](#)

### **II. Discussion & Action Items:**

- A. Discussion & Action Item:** PacMtn Policy Regarding Increased Capacity Training (Attachment #2)
  - i. Action Item:** Motion to Approve PacMtn Policy Regarding Increased Capacity Training and Recommend Do Pass to the WDC Board
- B. Discussion & Action Item:** Update to PacMtn Policy #5000R1 WIOA Adult & Dislocated Worker Program Eligibility (Attachment #3)
  - i. Action Item:** Motion to Approve Update to PacMtn Policy #5000R1 WIOA Adult & Dislocated Worker Program Eligibility and Recommend Do Pass to the WDC Board
- C. Discussion & Action Item:** Update to Administrative Policy #3010R1 Conflict of Interest (Attachment #4)
  - i. Action Item:** Motion to Approve Update to Administrative Policy #3010R1 Conflict of Interest and Recommend Do Pass to the WDC Board
- D. Discussion & Action Item:** Update to Policy #3230R1 Funding Statements in Publicly Distributed Outreach and Marketing Materials (Attachment #5)
  - i. Action Item:** Motion to Approve Update Policy #3230R1 Funding Statements in Publicly Distributed Outreach and Marketing Materials and Recommend Do Pass to the WDC Board
- E. Discussion & Action Item:** Update to Policy #3025 Data Security and PII (Attachment #6)
  - i. Action Item:** Motion to Approve Update to Policy #3025 Data Security and PII and Recommend Do Pass to the WDC Board
- F. Discussion & Action Item:** Board Member Nomination (Attachment #7)
  - i. Action Item:** Motion to Approve Nominees and Recommend Do Pass to the



#### WDC Board and Consortium

- Stacie Vaughan, Vaughan Co. Inc, Vice-President, 3 year term - Expiring June 30, 2027
- Kevin Shetty, Economic Development Council of Mason County, Executive Director, 3 year term - Expiring June 30, 2027

### **III. Fiscal Items:**

#### **A. Discussion and Action Item: PacMtn Bank Signer Update (Attachment#8)**

- i. **Action Item:** Motion to Approve the Update to PacMtn Bank Signers as presented and Recommend Do Pass to the WDC Board

### **IV. Executive Session**

*The Board can move to close the meeting for select and appropriately limited conversation on matters best conducted in confidence including meeting with an auditor on sensitive financial issues, handling top-level personnel matters including the CEO's compensation and performance review, planning for an important transaction like a real estate deal or a merger, matters where "personal or organizational confidentiality is requested or prudent", dealing in a preliminary way (including investigation) with crisis situations or with allegations of improper conduct by the CEO or a board member - before disclosure to staff or others who ordinarily attend full board meetings. Any specific action requiring a vote will be taken in the public portion of the meeting.*

There has been NO Executive Session requested at this time.

### **V. Committee & Task Force Updates (Committee Leads)**

- A.** One Stop Operations Committee
- B.** Priority Populations Committee
- C.** Adult Basic Education & Literacy (ABEL)
- D.** Business and Sector Engagement (BaSE)

### **VI. Good of the Order & Announcements**



**Executive Finance Committee Members**

<b>Name</b>	<b>Business</b>	<b>County</b>	<b>Position</b>
1. Michael Cade	Thurston Economic Development Council	Thurston	Board Chair
2. Dr. Lorie Thompson	Capital STEM Alliance	Regional	Vice Chair
3. Christina Riley	Labor and Apprenticeship Representative	Regional	Treasurer
4. Alissa Shay	Port of Grays Harbor	Grays Harbor	Previous Chair
6. Cheryl Heywood	Timberland Regional Library	Regional	One Stop Committee Lead
7. Jonathan Pleger	Morningside	Regional	Targeted Populations Committee Co-Lead
9. Sharon Trask	Mason County Commissioner	Mason	Consortium Chair, Ex Officio
<b>10. Vacant</b>			ABEL Committee Lead
11. Derek Epps	Seattle Shellfish	Mason	Business At-Large
12. David Schaffert	Thurston County Chamber of Commerce	Thurston	BaSE Co-Lead

**Workforce Development Speak (Commonly Used Acronyms)**

<b>ABE</b>	Adult Basic Education	<b>IFA</b>	Infrastructure Funding Agreement
<b>CBO</b>	Community Based Organizations	<b>ITA</b>	Individual Training Account
<b>CJ</b>	Community Jobs	<b>MOU</b>	Memorandum of Understanding
<b>CLEO</b>	Chief Local Elected Official	<b>MyJob</b>	My Journey Out Beyond
<b>CSO</b>	Community Service Offices	<b>OJT</b>	On the Job Training
<b>DOL</b>	Department of Labor	<b>OURR</b>	Opioid Use Reduction & Recovery
<b>DSHS</b>	Department of Social and Health Services	<b>TAA</b>	The Trade Adjustment Assistance
<b>DVR</b>	Division of Vocational Rehabilitation	<b>TANF</b>	Temporary Assistance for Needy Families
<b>ESD</b>	Employment Security Department	<b>WDA</b>	Workforce Development Areas
<b>DW</b>	Dislocated Worker	<b>WEX</b>	Work Experience
<b>ESD 113</b>	Educational Service District - Capital Region	<b>WIOA</b>	Workforce Innovation & Opportunity Act
<b>ETPL</b>	Eligibility Training Provider List	<b>WTECB</b>	Workforce Training & Education Coordinating Board



### **PacMtn Board Member Values**

**Customer needs are priority #1.  
Innovate and be creative.**

**Ensure all counties are included.  
Honor diverse perspectives.**

**In all things demonstrate: Integrity, honesty, transparency, personal excellence,  
constructive self-assessment, continuous self-improvement, and mutual respect**

**Duty of Attention**= Full participation and Practical inquiry

**Duty of Allegiance**=Address conflict of interest & confidentiality, care about funding sources & potential opportunities

**Duty of Agreement** = abide by Federal, State & Local laws and PacMtn mission, vision, values, services, policies & programs

### **Board Member Reminders**

**Conflict of Interest:** In accordance with the Workforce Innovation and Opportunity Act and the standards of honorable business practice. Workforce Development Council members (WDC), as well as members of WDC Committees and Task Forces, who directly represent, are employed by, or act as consultants to organizations or agencies having business before the Council shall not vote on any matter or issue regarding said organization or agency. Any member having a conflict of interest will declare the conflict prior to any discussion on the matter and must recuse themselves from any formal action related to the conflict.

**Concern about misuse of public resources:** PacMtn Board of Directors takes seriously all matters of fiscal integrity and the ethical and lawful conduct of its business. Any concerns about fraud, abuse or unethical conduct should be reported to a Board Officer, the CEO or the [State Auditor's Office \(SAO\)](#).



## Executive Finance Committee Minutes

06/13/2024 ▪ 2:30 - 4:00p

PacMtn Offices & Online Via Microsoft Teams

**Attendees:** Michael Cade, Dr. Lorie Thompson, Alissa Shay, David Schaffert, Sharon Trask, Johnathan Pleger, Cheryl Heywood, Christina Riley

**Staff:** William Westmoreland, Wil Yeager, Arissa De Lima, Dan Cooling, Matthew Hanusa, Wes Smith, Christina Gorman, Marco Hernandez, Megan Fiess, Aaron Pentland

**Guests:** Jason Hosenev

### I. Welcome & Check-In Items

#### A. Introductions & Establish Quorum

Michael Cade called the meeting to order at 2:36pm. Quorum established and self-introductions were made.

#### B. Action Item: Motion to Approve February 8, 2024, EFC Minutes

*Johnathan Pledger motioned to Approve the February 8, 2024, EFC Minutes as presented. David Schaffert seconded. **Motion carries.***

#### C. Board Chair Comments

Michael thanks everyone for being present and their dedication to the work.

#### D. CEO Report

William shared highlights from his CEO report. For review of the CEO report please refer to our website [www.pacmtn.org](http://www.pacmtn.org)

### II. Discussion and Action Items:

#### A. **Discussion & Action Item:** PacMtn Policy #9300 - Community Reinvestment Fund Incentive (Attachment #3)

Aaron Pentland leads the discussion on PacMtn Policy #9300

Wil Yeager explains how the committee can provide input on this policy

##### i. **Action Item:** Motion to Approve PacMtn Policy #9300 as presented

*Cheryl Heywood Motioned to Approve PacMtn Policy #9300 and Recommend Do Pass to the WDC Board and Consortium. Sharon Trask Seconded. **Motion Carries.***

#### B. **Discussion Item:** Regional Strategic WA Workforce Training and Coordinating Board

Feedback (Attachment #4)

Megan reviewed feedback and responses to the local plan provided to the WTECB. She also reviewed next steps with the committee.

**C. Discussion Item: WorkSource Leases**

Megan led the discussion during the board meeting. She reviewed current facility leases and updated the committee on agenda topics for upcoming lease discussions.

**III. Fiscal Items:**

**A. Discussion Item: Financial and Single Audit Report PY22 (attachment #5)**

Wil leads the discussion and states that PacMtn had a successful audit and there were no findings. In the Audit there was an item that needed to be addressed but was taken care of during the audit. You can view these in the memo and on [pacmtn.org](http://pacmtn.org) in the Reports and Resources section.

Micheal queries about the process for auditors and if PacMtn issues an RFP for an auditor every year or does the state provide someone for PacMtn? Wil responds in short that PacMtn is not a state agency and is not required to use the state. PacMtn has been back and forth with the state and ends up using them for auditing every year but is not technically required to.

**B. Discussion Item: PY22 Tax Form 990 (Attachment #6)**

Wil reviews PY22 Tax Form 990 with the committee and filing requirements. The full filing can be found on [pacmtn.org](http://pacmtn.org).

**C. Discussion Item: PY24 Preliminary Budget (Attachment #7)**

Wil leads the PY24 Preliminary Budget Discussion

- i. **Action Item:** Motion to Approve PY24 Preliminary Budget and Recommended Do Pass to the WDC Board and Consortium

*Johnathan Pleger Motioned to Approve PY24 Preliminary Budget and Recommend Do Pass to the WDC Board. Christina Riely Seconded. **Motion Carries.***

**IV. Executive Session**

No Executive Session was requested at this time

**V. Committee & Task Force Updates (Committee Leads)**

- A.** One Stop Operations Committee - Committee has been working on updating a number of policies that have not been updated in years. There will be more discussion during the board meeting. They have taken the regional Plan and created an Operational Plan. Matching the service delivery model to the outcomes expected.
- B.** Priority Populations Committee - Dan discussed the law and what is required for the WDB in WA state and how to better run this committee. The plan is to collect data and analyze, do stakeholder engagement, program evaluations and some policy work that will involve

focusing on certain communities and how to we get feed back and make sure we are doing the right things and making sure that programs are doing what they need to do to help participants succeed.

- C. Adult Basic Education & Literacy (ABEL) - Megan talks about Matt Hanusa and his experience and discusses setting up college president meetings in the future.
- D. Business and Sector Engagement (BaSE) - April BaSE Committee visited Providence in centralia, informative tour, and discussed their experience. In June plan on being out in Grays Harbor to visit the Ocean Companies.

**Good of the Order and Announcements**

Cheryl shared that in addition to the 460 Mason County Government staff who will be issued a library cards, Deputy CEO of Medicine Creek Enterprise Co is working with TRL to issue 900 library cards and wants to focus first on the 600 employees at the casino. TRL has saved Nisqually Indian Tribe some funds annually by issuing library cards instead of subscribing to LinkedIn learning. TRL has also recently worked with Choice Regional Health Network. TRL Surveys are being sent out for 2025-2029. Partnering with Lori and the Capital Stem Alliance we put together Moving Forward Together 3<sup>rd</sup> session focusing on childcare, there were keynote speakers, and they discussed what’s being done about childcare in the region. Refresh of the Westport TRL Anywhere library is up and running in all 5 counties now.

Lorie Thompson shared that Capital STEM Alliance held its quarterly partner meeting and Chrisina Riley did a wonderful presentation. The alliance is planning their 3<sup>rd</sup> Try a Trade event where 14 school districts have responded and over 100 students will be attending.

Meeting adjourned at 4:20p.

Submitted by: Arissa De Lima, Chief of Staff | WDC Board Liaison

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## MEMORANDUM

To: PacMtn WDC Executive Finance Committee

Subject: New Policy regarding Increased Capacity Training (ICT)

Date: 09/05/2024

### Recommended Action:

Motion to accept the new policy for ICT and have it placed on the consent agenda for the September 26th board meeting.

### Background:

There is a need in the PacMtn region for additional training providers. ICT should be considered when a lack of training capacity limits customer choice and customers are not able to enroll in training of their choice on a timely basis or are otherwise required to choose another training program. This could occur because there are an insufficient number of Eligible Training Providers (ETPs) locally to fully utilize Individual Training Accounts (ITAs) that are not on the state approved list.

PacMtn board staff, in consultation with the One Stop Committee, created a policy that mirrors state policy to address the need to increase training options for participants in our area.

### Additional Items:

Passage of this policy is the first step to set the region on a course to expand the community-based organizations or other private organizations that can provide training in our region.

PacMtn will also need to modify is local plan to include the following:

LWDBs that intend to use ICT must describe in their local plans:

- i. The competitive process to be used to procure contract services.
- ii. How training services will be provided using training contracts.
- iii. How the LWDB will serve as the point of access to contracted training services for participants.
- iv. How services are to be coordinated with individual training accounts.

- v. How the LWDB will ensure informed customer choice in selecting training programs regardless of how those services are provided.
- vi. How costs will be shared.
- vii. How contracted training providers will be monitored and audited.

While we discuss the desire to do ICT in our local plan a fully outlined process as outlined above; required by federal and state law is not clearly outlined. PacMtn will be working with the State Workforce Board to make the necessary changes to our recently adopted local plan, and will keep the board informed of its progress.

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**Type:** Program Policy

**Date Established:**

**Date Last Revised:**

**Date Posted to Website:**

**Status:** Draft

**Supersedes:** N/A

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## **Purpose**

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To provide local guidance on Increased Capacity Training (ICT) under Title IB of the Workforce Innovation and Opportunity Act (WIOA).

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## **Policy**

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Competitively procured contracts may be used to pay for group training, in lieu of individual training accounts, when the training is otherwise approvable under federal and state law and policy, along with local policy, and only if the individual's rights for consumer choice are not superseded.

ICT contracts should be considered when a lack of training capacity limits customer choice and customers are not able to enroll in training of their choice on a timely basis or are otherwise required to choose another training program. This could occur because there are an insufficient number of Eligible Training Providers (ETPs) locally to fully utilize Individual Training Accounts (ITAs).

ICT may be used when it is efficient to contract with an effective local community-based organization (CBO) or other private organization training program to do the training.

ICT contracts should also be considered when it would facilitate the training of multiple individuals in high-demand occupations.

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## **Policy Guidelines**

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PacMtn will select ICT providers through the the following methods:

- A. Utilization and selection from the Eligible Training Provider (ETP) List.
- B. Utilization and selection of additional training providers under the following conditions:
  - 1. Establish demonstrated effectiveness of the contracted ICT provider, including:
    - i. Financial stability of the provider (e.g., how long in business, financial statements, etc.);
    - ii. Performance in delivering services to hard to serve populations. Performance may be demonstrated by:
      - A. Program completion rates
      - B. Skill attainment levels
      - C. Certificates, credentials or degrees delivered
      - D. Placement rates in unsubsidized employment
      - E. Employment retention rates, and/or
      - F. Connection of the training program to needs identified in the local plan.
- b. LWDBs that intend to use ICT must describe in their local plans:

- i. The competitive process to be used to procure contract services.
  - ii. How training services will be provided using training contracts.
  - iii. How the LWDB will serve as the point of access to contracted training services for participants.
  - iv. How services are to be coordinated with individual training accounts.
  - v. How the LWDB will ensure informed customer choice in selecting training programs regardless of how those services are provided.
  - vi. How costs will be shared.
  - vii. How contracted training providers will be monitored and audited.
- c. ICT must be competitively bid in accordance with applicable federal and state laws, rules and policies.
- d. ICT must directly link to an in-demand industry sector or occupation, or a sector with high potential for sustained demand or growth, either locally or where participants are willing to relocate.
- e. ICT and individual training accounts can be combined to provide training services, including allowing individuals with ITAs to obtain contracted training services.
- f. ICT contracts must at a minimum document the following:
- i. The type of training provider (e.g., non-profit, private career school, college, etc.).
  - ii. The type of training program and credential.
  - iii. How the provider will record and report participant information and expenditures.
  - iv. Detailed information about costs and payments.
  - v. Outcome and performance measures to be used.
  - vi. An agreement to adhere to state and local policies.
  - vii. Any required boilerplate language.
- h. Each training contract recipient and subrecipient must:
- i. Maintain a written code of standards or conduct governing the performance of persons engaged in the award and administration of WIOA contracts and subgrants.
  - ii. Ensure that no individual in a decision-making capacity shall engage in any activity, including participation in the selection, award, or administration of a subgrant or contract supported by WIOA funds, if a conflict of interest (real, implied, or apparent) would be involved.
- i. No member of the LWDB can cast a vote, or participate in any decision-making capacity, on the provision of ICT contract services by such member (or any organization which that member directly represents), or on any matter that would provide any direct financial benefit to the member or to the member's organization.
- j. The governor may approve a waiver to allow the LWDB to be a provider of ICT according to the process that will be outlined in WIOA Title I Policy 5404 (Procurement and Selection of One-Stop Operators and Service Providers).

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## Definitions

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**Consumer choice** – Any individual eligible for WIOA training shall receive services that maximize their choice to select and be referred to training from the list of eligible training providers, and eligible for payment for those training services through an individual training account, coordinated with funding

from other training program sources. Priority should be given to training that leads to recognized post-secondary trade-skills and/or credentials aligned with in-demand industry sectors or occupations.

**Contract for services** – Contracting with an entity to provide training to a classroom.

**Eligible training provider** – A provider on the official list of training programs eligible to provide training to individuals who qualify for an ITA funded by the WIOA, or for additional weeks of unemployment insurance benefits through the Washington State Training Benefits Program.

**Pay-for-performance contract** – A contract for a specified fixed amount paid for training services provided by an eligible service provider within a defined timetable, and which may provide bonus payments to that provider to expand their capacity to provide effective training. The eligible service provider must achieve specified levels of performance on primary performance indicators for target populations as identified by the local board.

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## References

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Workforce Innovation and Opportunity Act of 2014

WIOA Final Rule; 20 CFR Parts 676,677, and 678; Federal Register, Vol. 81, No. 161, August 19, 2016

WIOA Final Rule; 20 CFR Parts 603, 651, 652, et al; Federal Register, Vol. 81, No. 161, August 19, 2016

Public Law 113-128, Workforce Innovation and Opportunity Act of 2014; Section 134(c)(3)(F)(i) through (v) and (G)(ii) - Use of Funds For Employment and Training Activities; Section 108(b)(19) - Local Plan Contents; and Section 121(e)(1)(B) - Establishment of One-Stop Delivery Systems  
20 CFR 680.320(a)(4) - Under what circumstances may mechanisms other than Individual Training Accounts be used to provide training services?

Washington Career Bridge

WIOA Title I Policy 5404, Revision 1 – Procurement and Selection of One-Stop Operators and Service Providers

ESD Policy 5619, Revision 1 – Increased Capacity Training

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## DATE APPROVED: TBD

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**Direct Inquiries to:**

**Pacific Mountain Workforce Development Council**

**201 5<sup>th</sup> Ave SW Se. 401, WA 98501**

**Telephone: (360) 704-3568**

**Email: [Info@pacmtn.org](mailto:Info@pacmtn.org)**

PacMtn is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. WA Relay 711.



## MEMORANDUM

To: PacMtn WDC Executive Finance Committee

Subject: Updated Policy 5000R1 Adult Dislocated Worker Program Eligibility

Date: Update. 09/05/2024

### Recommended Action:

Motion to accept the Updated Policy 5000 R1 WIOA Adult and Dislocated Worker Program Eligibility Policy and have it placed on the consent agenda for the September 26<sup>th</sup> board meeting.

### Background:

PacMtn is required to have Policies in place that follow both state and federal eligibility rules for participants to be enrolled in WIOA Adult and Dislocated Worker Programs. PacMtn board staff prepared a draft revision to Policy 5000. To be reviewed and receive input from the One Stop Committee.

PacMtn board staff, in consultation with the One Stop Committee, has updated the policy to include the following changes.

- Update all respective citations, policy, procedures numbers and references
- Modify language to be more inclusive and specific around selective service registration requirements
- Defined more specific eligibility and definitions for employed individuals to include underemployed workers, stop gap employment, and UI Good Cause Voluntary Quits
- Outlines that no triggering services shall be provided until individuals meet programmatic requirements and determined eligible
- Requires individuals to complete a Self-Sufficiency calculator



## TITLE: WIOA Adult & Dislocated Worker Program Eligibility Policy # 5000R1

**Type:** Program Policy

**Date Established:** 07/01/2016

**Date Last Revised:** 8/15/2024

**Date Posted to Website:** 07/07/2016

**Status:** DRAFT

**Supersedes:** WIA Policies # 500, 501, 510, 515, 590,

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### Purpose

WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy.

This policy provides guidance for determining the eligibility of individuals to be enrolled and provided services through the WIOA Adult and Dislocated Worker Programs. The WIOA Adult and Dislocated Worker formula programs are one pivotal piece of the WorkSource delivery system, which is the foundation of the workforce system.

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### Policy

WIOA Program Staff are to ensure that all individuals interested in, in need of, and eligible to receive services through the WIOA Adult and Dislocated Worker funded programs are determined eligible to receive participant triggering services after satisfying all applicable programmatic requirements for the provision of services.

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### Policy Guidelines

Enrollment into a WIOA funded program occurs after an individual satisfies all applicable programmatic requirements for the provision of services. Participant triggering services shall not be provided to an individual until they meet programmatic requirements and have been determined eligible.

#### Eligibility for Career and Training Services under WIOA Title 1B – Adult and Dislocated Worker Programs.

##### Adult Program Eligibility Requirements

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

- U.S. citizen or otherwise legally entitled to work in the U.S.
- Age 18 or older; and
- Selective Service Registration (cisgender males and/or transgender females who are 18 or older and born on or after January 1, 1960), unless an exemption is warranted.

Note: Transgender males (born females, but identify as or transitioned to males) are exempt from the Selective Service requirements.

For a comprehensive list of additional exemptions and requirements, please refer to the PacMtn Selective Service Guidance document.

### Priority for Services under the Adult Program

Priority selection is established for and local areas must target certain populations in accordance with WIOA Section 134(c)(3)(E) and proposed 20 CFR 680.600 and 20 CFR 680.640. These targeted populations must first meet the eligibility requirements for the adult program.

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

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

Priority	Mandatory Priority Group	Explanation
First	Covered persons (veterans and eligible spouses) who are low income, recipients of public assistance, or basic skills deficient.	Guidelines for serving covered persons - WorkSource System Policy 1019, Revision 10 apply within the mandatory priority criteria of low-income / public assistance recipient/basic skills deficient individuals.
Second	Individuals (non-covered persons) who are low-income (may include unemployed individuals), recipients of public assistance, or basic skills deficient.	The mandatory priority criteria (low-income / public assistance recipients / basic skills deficient) have preference over covered persons (veterans and eligible spouses) who do not meet the mandatory priority criteria.
Third	Covered persons (veterans and eligible spouses) who are not low-income and not basic skills deficient.	Guidelines for serving covered persons - WorkSource System Policy 1019 Rev. 10 – Priority of Service apply in the third category (individuals who are not low-income / public assistance recipients / basic skills deficient).
Fourth (optional)	LWDBs (in consultation with CLEOs) may establish additional priority groups for priority for services beyond minimum adult eligibility - WorkSource Policy 1019, <a href="#">Revision 10</a> - Section 3.C, III – Local Responsibilities, Adult Program.	Guidelines and procedures for serving additional priority groups as set forth in PacMtn’s Adult Eligibility Procedures # 5001P.

**NOTE:** An adult with a disability can be considered a family of one for low-income determinations (refer to Section 5.6.2) of WorkSource System Policy 1019, Revision 10 supplemental Eligibility Handbook.

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

With respect to funds allocated to a local area for adult employment and training activities, WIOA section 133(b)(2)(A) and (3)(A), states that priority shall be given to recipients of public assistance,

low-income individuals, and individuals who are basic skills deficient for receipt of careerservices described in paragraph (2)(A)(xii) and training services.

#### **4th Priority of Service**

In the PacMtn region, WIOA Program staff may also serve these other eligible individuals who are not recipients of public assistance, not low-income, and not basic skills deficient after first serving eligible individuals who meet the established priority selection criteria;

AND

These individuals are required to complete a Self-Sufficiency calculator.

**NOTE:** Up to twenty percent (20%) of the total number of participants enrolled in any program year may be enrolled using the 4<sup>th</sup> priority criteria.

**NOTE:** Washington’s Marriage Equality Act (RCW 26.60) expands the definition of a “married couple” beyond that of a male and female couple. The US Department of Justice will no longer defend the federal “Defense of Marriage Act” as a number of courts have held it is unconstitutional, including the 1<sup>st</sup> and 2<sup>nd</sup> Circuit Court of Appeals. Accordingly, in relation to this policy, the state is expanding its definition of a married couple beyond that of a male and a female.

Per TEGL 7-20, at least 50.1 percent of all Title I-B Adult participants that receive individualized career services and training services in each program year must be from at least one Adult priority of service population.

#### **Priority Selection for Career and Training Services Funded with WIOA Statewide Activities Funds**

For purposes of WIOA statewide activities funds, the Governor has determined thatthese funds will be prioritized as follows:

- Eligible veterans and spouses;
- Unemployed individuals;
- Low-income individuals;
- Other Washington job seekers.

As indicated by the first priority, recipients of WIOA statewide activities funds must continue to provide priority selection of veterans for career and training services as required under Public Law 107- 288 “Jobs for Veterans Act” and in alignment with WorkSource System Policy 1019, Revision 10. In applying this policy to such projects, veterans who are unemployed and/or low-income have priority over all other individuals served under these projects.

#### **Dislocated Worker Program**

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

- U.S. citizen or otherwise legally entitled to work in the U.S.;
- Selective Service Registration (cisgender males and/or transgender females who are 18 or older and born on or after January 1, 1960),unless an exemption is warranted;

- One of the Dislocated Worker categories listed within the Dislocated Worker Eligibility Criteria Matrix, page 13 of the Eligibility Handbook.

The matrix which follows is meant to provide clarity on the requirements within each Dislocated Worker category. Military Service Members (Category 5) and Spouses of Dislocated Military Service Members (Category 6) have been included as individual categories to allow for specificity, though it is commonly understood that these categories fall under the General Dislocation category (1). Refer to Section 7.6 of the Eligibility Handbook for guidance related to the impact of Washington's Marriage Equality Act.

## **Eligibility for Employed Individuals**

Employed individuals who are not earning a self-sufficient wage are eligible to be enrolled in the WIOA Adult and/or Dislocated Worker program to receive services necessary to obtain or retain employment that will lead to self-sufficiency.

### Underemployed workers:

Per Section 11 of TEGL 19-16, the State allows under-employed workers to qualify for the WIOA Title I Dislocated Worker program if they have been dislocated from full-time employment and meet one of the following eligibility criteria:

1. Employed less than full-time but actively seeking full-time employment
2. Employed in a position that is inadequate with respect to documented skills and training
3. Employed but meet the definition of "low-income" in WIOA Section 3(36)
4. Employed but current earnings are insufficient compared to earnings from previous employment.

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

### Stop Gap Employment:

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

Typically, stop-gap employment will pay less than the individual's self-sufficiency wage (defined in PacMtn Self-Sufficiency Policy #5020). However, there may be specific circumstances where stop-gap employment does provide a sufficient wage temporarily but is not considered permanent employment that leads to self-sufficiency.

### UI Good Cause Voluntarily Quits

Individuals can qualify under Category 1 (General Dislocation) if they file and are approved for Unemployment Insurance (UI) benefits after having been determined by the Employment Security Department (ESD) as having voluntarily left employment due to no fault of their own for one of the following good cause reasons (RCW 50.20.050; WAC 192-150, et al):

- Illness or disability of the claimant or death, illness, or disability of an immediate family member.
- Relocate to follow spouse's or registered domestic partner's employment.
- Need to protect the claimant or immediate family member from domestic violence or stalking.
- Usual hours, compensation, or benefits are reduced by 25 percent or more.
- Involuntary change in work site or location (no minimum distance or mile threshold).

- Work site safety has deteriorated.
- Illegal activities at work site
- Usual work changed to work that violates religious or moral beliefs.
- Left part-time work to accept full-time job that was eliminated without prior knowledge.

Under these circumstances, claimants have satisfied criteria 1.1. because ESD recognizes them as terminated even though they, rather than their employers, are the moving party. Such individuals must also be determined unlikely to be return to the industry or occupation they left for a UI good cause voluntarily quit reason (criteria 1.2). Finally, they must satisfy criteria 1.3.1 (1.3.2 is not an option) by documenting their status as having been determined eligible for or exhausted UI benefits as good cause voluntary quits are inseparably tied to UI and documented through separation determination letters provided by the Employment Security Department or, if that is not available, other documentation in the form of UI correspondence from the Employment Security Department.

The following information outlines the general requirements which must be met by WIOA Adult and Dislocated Worker program applicants for consideration of enrollment by WIOA Program Staff into the applicable Adult and or Dislocated Worker program.

**For complete WIOA Dislocated Worker eligibility criteria and documentation requirements; to include each of the following, please refer to Sections 4 & 8 of the ESD Eligibility Handbook and Policy 1019, Revision 10.**

- Serving Non-Retiree Military Service Members and their Spouses
- Non-Retiree Military Service Members (Dislocated Worker – Category 5)
- Spouses of Military Service Members (Dislocated Worker - Category 6)

**For additional program guidance for each of the following, please refer to ESD Handbook and Policy 1019, Revision 10.**

- U.S. Citizenship or Legal Right to Work in the U.S.
- Selective Service Requirements
- Priority of Service for Veterans and Eligible Spouses
- Assisting Victims of Human Trafficking
- WIA001 Report and Disallowed Use of UI GUIDE Screen Prints
- Income Verification and Family Size for the Low-Income Criteria
  - Income Verification
  - Determining Family Size
  - Defining Dependent
  - Washington’s Marriage Equality Act

**For Adult and Dislocated Worker Eligibility Documentation Requirements, please refer to Adult and Dislocated Worker Eligibility Procedures # 5000P**

*Any discrepancies arising between PacMtn policy and or procedures with federal and state provisions due to current or future revisions will default to the current minimum federal and state regulations and guidance available. PacMtn policy and or procedures may set forth stricter requirements than provided by federal and state guidance, but in no case will PacMtn policy and or procedures not meet minimum federal and state policy.*

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## **References**

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Workforce Innovation and Opportunity Act of 2014

WIOA Final Rule; 20 CFR Parts 676,677, and 678; Federal Register, Vol. 81, No. 161, August 19, 2016

WIOA Final Rule; 20 CFR Parts 603, 651, 652, et al; Federal Register, Vol. 81, No. 161, August 19, 2016

WIOA Section 134(c)(3)(E)

Training and Employment Guidance Letters (TEGL) 3-15, 10-09, 15-10, 22-04 Change 1

WorkSource System Policy 1003 Revision 6 – Data Element Validation

WorkSource System Policy 1019 Revision 10 & Attachment B - Eligibility Policy Handbook

PacMtn Procedures #5000P Adult Eligibility

PacMtn Procedures # 5000P Dislocated Worker Eligibility

PacMtn Self-Sufficiency Policy #5020

PacMtn Self-Sufficiency Procedures #5020P

PacMtn – 2024 Income Guidelines

Compliance with the state's eligibility policy will be based on the version of the handbook in effect at the time of the action or activity that may be at issue.

**DATE APPROVED: June 4, 2016, June 13, 2019**

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**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW., Suite 401**  
**Olympia, WA 98501 Telephone: (360) 515-5134**  
**Email: [Info@pacmtn.org](mailto:Info@pacmtn.org)**

PacMtn is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. WA Relay 711.



## MEMORANDUM

To: Executive Finance Committee

Date: September 12, 2024

Subject: Administrative Policy #3010R1 Conflict of Interest

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### **Background**

Local Workforce Development Boards (LWDB) must have a conflict of interest policy that minimally addresses 6 specific items. Some items are specific to LWDB members and members of standing committees, but some are broader and include "persons engaged in the award and administration of WIOA contracts and subgrants" and "employees;" not just board members. PacMtn WDC's current conflict of interest policy, Administrative Policy #3010, clearly addresses the items required for council members, committee members and task force members; it does not address those items that are also required of employees. PacMtn WDC's current Personnel Handbook addresses conflict of interest for employees but not the specific items in Policy 5405 Rev2.

### **Activities and Progress**

PacMtn has reviewed Policy #3010 and has updated it to incorporate required employee facing items.

### **Recommendation Action**

Motion to Approve Updated Administrative Policy #3010 R1 Conflict of Interest and Recommend Do Pass to the WDC Board

***\*\* Page Numbers will populate starting on the second page***

## TITLE: Administrative Policy# 3010R1 Conflict of Interest

**Date Established:** 07/01/1998  
**Date Last Revised:** 09/12/2024  
**Date Posted to Website:** 04/17/2017  
**Status:**  
**Supersedes:** Administrative Policy #3010  
Conflict of Interest

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### Purpose

This policy provides guidance on conducting business in an open, sensitive manner, which avoids any conflict of interest issues and provides a written code of standards in accordance with State and Federal guidance. All staff, partners, subrecipients, Board members and any other organization funded with Federal dollars are expected to read, understand and apply this policy to ensure system integrity.

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### Policy

*In accordance with the Workforce Innovation and Opportunity Act (WIOA) and the standards of honorable business practice, Workforce Development Council members (WDC), as well as members of WDC Committees and Task Forces, who directly represent, are employed by, or act as consultants to organizations or agencies having business before the Council shall not vote on any matter or issue regarding said organization or agency. Any member having a conflict of interest will declare the conflict prior to any discussion on the matter.*

The above statement will be attached to Board and pertinent committee agendas. Prior to any applicable action the Members should consider any real or potential conflicts and take appropriate action to notify and recuse.

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### Guidelines

The Council is a collaborative of interested parties and it is acknowledged that Council members will have organizational and/or sector-specific self-interests. Conflicts of interest, sometimes referred to as duality of interest, can occur often and may be inevitable if you are working with community, business and labor leaders who are active in critical matters affecting the region. The proper and transparent management of conflict of interest is therefore the Council's primary goal.

Business transactions between the WDC, its staff and any Member in which that member or officer has an interest shall not be prohibited, but they shall be subject to close scrutiny. Scrutiny of such proposed transactions shall be raised by any Member and reviewed carefully to determine that they are in the best interests of the WDC and that they will not lead to conflict of interest. A potential conflict exists with an action or transaction if a member or officer:

- has a substantial financial interest in it, or
- has a substantial financial interest in any organization involved in the proposed transaction, or
- holds a position as trustee, member of the board of directors, general manager, or principal officer in any organization directly tied to the transaction.

Prior to the start of any Council formal action, vote, discussion, negotiation, or consideration of a grant request by the organization, members and officers are expected to make full disclosure to the best of their knowledge of any dual interest in a proposed transaction by notifying the CEO or Board Chair. In matters requiring prior approval of the WDC or one of its committees, the CEO or other officer shall ensure that the WDC or committee is informed of the potential for conflict of interest before a vote is taken. A WDC member or officer with a dual interest in a proposed transaction shall not vote on or participate in any decision making on the matter and shall declare this conflict of interest before entering any discussion of the matter as described in our conflict of interest statement.

WDC staff, members, as well as members of WDC Committees and Task Forces, making awards cannot solicit or accept gratuities, favors, or anything of monetary value from awardees, potential awardees, or other parties to agreements. Exception may be permissible for unsolicited items of nominal value worth \$50.00 or less.

Disciplinary actions may be taken up to and including termination board membership for violation of this policy. The Executive Finance Committee may evaluate violations on a case-by-case basis and recommend appropriate actions as necessary.

#### CONFLICT of INTEREST and DUTY to LOYALTY

WDC staff, members or officers shall not use inside information of the WDC for his/her personal benefit or to unfairly advantage and thereby create a biased benefit for his/her business or organization; or use such inside information or his/her position as a WDC staff, member or officer to the detriment of the WDC. Inside information is information obtained through the individual's position as a WDC staff or board member that has not become public information.

If, due to a member's affiliation (Labor, education, CBO, private sector, etc.), there is a conflicting opinion by that affiliation, not in agreement with the WDC's publicly articulated stance on a particular issue, it is incumbent on the board member to bring that conflicting opinion to the attention of the CEO or Board Chair prior to it becoming a public stance.

Each staff, member and officer has a "standard of loyalty" duty to place the interests of the WDC foremost in any dealings involving the organization and has a continuing responsibility to comply with the requirements of this Policy. Upon hire or appointment to the WDC, each staff or member is required to read and sign a copy of this Policy. Annually each member will declare affiliations, members and board positions and shall update them as that status changes.

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## References

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Employment Security Department-Policy 5405R2, Conflict of Interest  
P.L. 113-128  
2 CFR Part 200 and Part 900, 200.318  
20 CFR 679.410(a)(3), 679.430, 683.200(c)(5)  
RCW 42.20.070, 42.20.080, 42.52.160  
PacMtn Policy 3060R3 Procurement

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## Attachments

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PMWDC Members' Affiliation with Other Organizations and Associations Form

**DATE APPROVED: April 14, 2017, 8/11/2022**

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**Direct Inquiries to:**

**Pacific Mountain Workforce Development Council**

**201 5<sup>th</sup> Ave Suite 401 Olympia, WA 98501**

**Telephone: (360) 515-5134**

**Email: [info@pacmtn.org](mailto:info@pacmtn.org)**

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# Pacific Mountain Workforce Development Council Members' Affiliation with Other Organizations and Associations Form

## POLICY: CONFLICT OF INTEREST & CODE OF CONDUCT

### CONFLICT OF INTEREST STATEMENT

*In accordance with the Workforce Innovation and Opportunity Act and the standards of honorable business practice, Workforce Development Council members (WDC), as well as members of WDC Committees and Task Forces, who directly represent, are employed by, or act as consultants to organizations or agencies having business before the Council shall not vote on any matter or issue regarding said organization or agency. Any member having a conflict of interest will declare the conflict prior to any discussion on the matter.*

The above statement will be attached to Board and pertinent committee agendas. Prior to any applicable action Members should consider any real or potential conflicts and take appropriate action to notify and recuse.

### CONFLICT OF INTEREST

The Council is a collaborative of interested parties and it is acknowledged that Council members will have organizational and/or sector-specific self-interests. Conflicts of interest, sometimes referred to as duality of interest, happen all the time and may be inevitable if you are working with community, business and labor leaders who are active in critical matters affecting the region. The proper and transparent management of conflict of interest is therefore the Council's primary goal.

Business transactions between the WDC, its staff and any Member in which that member or officer has an interest shall not be prohibited, but they shall be subject to close scrutiny. Scrutiny of such proposed transactions shall be raised by any Member and reviewed carefully to determine that they are in the best interests of the WDC and that they will not lead to conflict of interest. A potential conflict exists with an action or transaction if a member or officer:

- has a substantial financial interest in it, or
- has a substantial financial interest in any organization involved in the proposed transaction, or
- holds a position as trustee, member of the board of directors, general manager, or principal officer in any organization directly tied to the transaction.

Prior to the start of any Council formal action, vote, discussion, negotiation, or consideration of a grant request by the organization, members and officers are expected to make full disclosure to the best of their knowledge of any dual interest in a proposed transaction by notifying the CEO or Board Chair. In matters requiring prior approval of the WDC or one of its committees, the CEO or other officer shall ensure that the WDC or committee is informed of the potential for conflict of interest before a vote is taken. A WDC member or officer with a dual interest in a proposed transaction shall not vote on the matter and shall declare this conflict of interest before entering any discussion of the matter as described in our conflict of interest statement.

CONFLICT OF INTEREST and DUTY to LOYALTY

WDC staff, members or officers shall not use inside information of the WDC for his/her personal benefit or to unfairly advantage and thereby create a biased benefit for his/her business or organization; or use such inside information or his/her position as a WDC member or officer to the detriment of the WDC. Inside information is information obtained through the individual's position as a WDC staff or board member that has not become public information. If, due to a member's affiliation (Labor, education, CBO, private sector, etc.), there is a conflicting opinion by that affiliation, not in agreement with the WDC's publicly articulated stance on a particular issue, it is incumbent on the board member to bring that conflicting opinion to the attention of the CEO or Board Chair prior to it becoming a public stance. Each staff, member and officer has a "standard of loyalty" duty to place the interests of the WDC foremost in any dealings involving the organization and has a continuing responsibility to comply with the requirements of this Policy. Upon appointment to the WDC, each member is required to read and sign a copy of this Policy. Annually each member will declare affiliations, members and board positions and shall update them as that status changes.

I agree to the conditions set forth by this policy. I declare the following organizations and associations with which I am affiliated:

	Organization/Association	Role
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____
6.	_____	_____

Using the back of this form, in the last 12 months please describe any direct personal and business transactions between yourself and/or members of your family and the WDC:

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PRINT NAME

SIGNATURE

DATE



## MEMORANDUM

To: PacMtn WDC Executive Finance Committee

Subject: Updated Policy #3230R1 Funding Statements

Date: September 12, 2024

### **Recommended Action**

Motion to Approve Updated Policy #3230R1 Funding Statements in Publicly Distributed Outreach and Marketing Materials and Recommend Do Pass to the full WDC Board.

### **Background**

When issuing statements, press releases, requests for proposals (RFPs), bid solicitations, and other documents and publications (see subsection B. Documents Subject to Disclose) describing projects or programs funded in whole or in part with Federal funds, all grantees receiving those funds must state:

1. The dollar amount of Federal funds for the project or program,
2. Federal funding entity (name of the fund allocation, grant, or program),
3. The funding period, and
4. Any other non-governmental sources of funds for the project or program.

Monitoring from the State of Washington indicated that PacMtn WDC must update the information provided in their funding statement to be consistent with WorkSource System Policy 1027. In addition, PacMtn WDC must either update their policy to be consistent with WorkSource System Policy #1027, or PacMtn WDC must redact their policy #3230 and follow WorkSource System Policy #1027.

PacMtn Board Staff opted to update PacMtn Policy #3230.



## TITLE: Administrative Policy # 3230R1 Funding Statements in Publicly Distributed Outreach and Marketing Materials

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**Type:** Administrative Policy

**Date Established:** 10/18/2021

**Date Last Revised:** 09/12/2024

**Date Posted to Website:**

**Status:** Proposed

**Supersedes:** 3230

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### Purpose

PacMtn has established the following policy pursuant to P.L. 117-328, Division H, Title V, Section 505. P.L. 117-328, Division H, Title V, Section 505 is an appropriations provision that requires grantees of the Departments of Labor (DOL), Health and Human Services (HHS), and Education, and related agencies appropriations act, 2023, to disclose for a grant program the dollar amount of Federal funds for the project or program, Federal funding entity (name of the fund allocation, grant, or program), The funding period, and Any other non-governmental sources of funds for the project or program.

The policy requirements below are separate from those in 2 CFR 200 and, when appropriate, both must be complied with.

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### Policy

#### A. Stevens Amendment Language Content

PacMtn staff as well as PacMtn's Subrecipient Program Operators and Manager, when issuing statements, press releases, requests for proposals (RFPs), bid solicitations, and other documents and publications (see subsection b. below) describing projects or programs funded in whole or in part with Federal funds, **all grantees** receiving those funds must state:

1. The dollar amount of Federal funds used to support the project, activity, or program,
2. Federal funding entity (name of the fund allocation, grant, or program),
3. The funding period, and
4. The dollar amount of non-federal sources that will be used to support the project, activity, or program.

#### B. Documents Subject to Disclosure

Under the Stevens Amendment, "documents" is any communication including but not limited to, public statements, social media posts, toolkits, resource guides, websites, and visual presentations. For example, an emailed newsletter intended for the public that describes a federally funded program

requires the disclosure statement.

The following list includes some examples of documents or other publications that may describe a project or program that federal money funds in whole or in part:

- Bids for solicitations
- Blogs/vlogs
- Brochures
- E-mail blasts
- Manuals
- Press releases
- Promotional materials (e.g., fliers, posters, advertisements)
- Requests for proposals (e.g., supplemental and continuation proposals)
- Resource guides
- Documents that include statements about the program or project
- Toolkits
- Visual presentations (e.g., PowerPoint presentations)

C. Organizational websites “describing projects or programs,” defined as: *any communication in furtherance of accomplishing the goals of the federal project or program for which the grantee has an award*, are subject to the Stevens Amendment disclosure statement.

For example, an organizational website page that describes DOL programs over which the organization has administrative and/or operational oversight, such as WIOA Title I-B, Wagner-Peyser Employment Service, Trade Adjustment Assistance, Jobs for Veterans State Grant, Reemployment Services and Eligibility Assistance, Unemployment Insurance, National Dislocated Worker Grants, etc.

D. Contracts do not require the Stevens Amendment disclosure statement. The disclosure is necessary only when issuing statements, press releases, RFPs, bid solicitations, and other *publicly available* documents describing projects or programs funded in whole or in part with federal money.

The following are considered some examples of documents that are not required to have Stevens Amendment language:

- WEX and OJT Contracts
- RESEA Action Plans
- Unemployment Insurance claim-specific communications, including eligibility letters, requests for information and determination letters (whether by US Mail, eService’s notification, or web message)

E. The Stevens Amendment is not required on all pages of a document or communication nor is it required on each separate web page. At least one page must contain the disclosure statement.

F. In an effort to minimize waste of costly resources, existing printed material documents that do not include the Stevens Amendment disclosure need not be thrown away and may continue to be

used, but any reprinting, republication of existing documents, or creation of new documents or materials must be updated subsequent to publication of this policy and future printings must meet Stevens Amendment requirements.

G. Allowance of Hyperlinks and/or Quick Response (QR) codes

- i. When it is not practical to include all 4 elements as outlined in A. within a communication, a shortened statement (see options below) with a hyperlink to the funding information is sufficient.

To that end, PacMtn has developed a link to the pacmtn.org site with a list of most grants received by program year or fiscal year, with funding levels, which can be <https://pacmtn.org/about/active-contracts/>. The information will be updated, at a minimum, by July 1 and October 31 each year, with ad hoc updates when new discretionary grants are received. It will not be revised when minor adjustments in funding are made.

OPTION ONE:

- ii. PacMtn may create their own funding page which includes the following elements:
  1. The dollar amount of Federal funds used to support the project, activity, or program,
  2. Federal funding entity -name of the fund allocation, grant, or program,
  3. The funding period, and
  4. The dollar amount of non-federal sources that will be used to support the project, activity, or program.

If linking to PacMtn’s funding page, the following shortened statement is sufficient:

*“[Local Board Name] [fill in the blank project/program(s)] receive(s) support and funding from a US Department of Labor [fill in the blank] grant(s). Read more about this USDOL grant funding at (program specific or local board website funding page).”*

*Example: Pacific Mountain Workforce Development Council’s Workforce Innovation and Opportunity Act (WIOA) programs are federally support 100% by the U.S. Department of Labor as part of an award totaling \$4,888,596.00. Read more about this grant funding at <https://pacmtn.org/about/active-contracts/>.*

- iii. In instances where brevity is essential, specific to social media posts or blogs/vlogs, a QR code may be used, provided it includes an explanation of the USDOL funding and information viewers may obtain by following the QR code.

**Examples of appropriate compliance statements:**

If the document includes all four (4) of the elements in Section A. (above) in the body of the document, no additional Stevens Amendment statement or weblink is needed.

1. Full Stevens Amendment funding statement containing all the elements in section A.

For Example:

### **Version 1: PacMtn-Specific Information**

"The local WIOA Youth program is supported by the USDOL Employment and Training Administration. \$765,123 is financed by the PY23 allocation of Federal funds to Pacific Mountain Workforce Development, and \$50,000 is being financed by other sources to ensure comprehensive services for youth in the Pacific Mountain region."

### **Version 2: PacMtn Funding Link and Statement**

"This job fair receives support and funding from the U.S. Department of Labor WIOA Title I-B Youth Grants. Read more about this grant funding at <https://pacmtn.org/about/active-contracts/>."

### **Version 3: Link to PacMtn Webpage**

"This youth training program receives support and funding from a U.S. Department of Labor WIOA Title I-B Youth grant. Read more about this USDOL grant funding at <https://pacmtn.org/about/active-contracts/>."

OR

2. QR Code and accompanying grant funding statement:

For Example:



*“XXX Activity is funded through a USDOL grant. To learn more about funding, follow this QR code.”*

- a. DOL Direct Grants

DOL grants received directly by PacMtn – and therefore not reflected on the [esd.wa.gov/about/stevens-amendment](https://esd.wa.gov/about/stevens-amendment) webpage developed and managed by the State – must be addressed directly and not through link or QR code to the State’s site.

**Option 1:** PacMtn and/or its contractors will embed the document with their own weblink or QR code directing to its webpage describing the fund(s) name, effective dates (i.e., PY24), dollar amount in federal funds, and any other contributing non-federal funds;

OR

**Option 2:** The document or publication must contain the Stevens Amendment statement in example 3 above.

b. Compliance and Monitoring

Grantees are not required to develop their own Stevens Amendment Language policy or procedures, but it is the responsibility of PacMtn as pass-through entities to communicate this policy's requirements to their subrecipient(s), service providers, and/or contractors and to ensure compliance through monitoring. Additionally, it is the responsibility of Employment Security Department (ESD) to ensure compliance for the DOL-funded programs it administers.

PacMtn, as the Administrative Entity and Fiscal Agent for the Pacific Mountain Workforce Area and its subrecipients of WIOA funds, will formally monitor annually, the outreach and marketing materials distributed by self or subrecipients receiving state or federal dollars in accordance with the grant requirements.

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## Policy Guidelines

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None

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## Attachment

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None

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## References

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Consolidated Appropriations Act of 2023, Pub. L. No. 117-328, div. H, Title V, Sec. 505 (Dec 29/2022)

ESD System Policy 1027, R1

2 CFR Part 200 - Uniform Administrative Requirements, Cost Principles, and Audit requirements for Federal Awards November

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## DATE APPROVED:

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**Direct Inquiries to:**  
**201 5<sup>th</sup> Ave., SW., Suite 401**  
**Olympia, WA 98501**  
**Telephone: (360) 515-5134**  
**Email: [info@pacmtn.org](mailto:info@pacmtn.org)**

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## MEMORANDUM

To: PacMtn WDC Executive Finance Committee

Subject: Updated Policy #3025 Data Security and PII

Date: September 12, 2024

### Recommended Action:

Motion to accept updated Policy #3025 Data Security and PII and have it placed on the consent agenda for the full WDC Board.

### Background:

Washington State WorkSource System Policy #1026 Safeguarding Personally Identifiable Information (PII) requires that all LWDBs have in place internal controls and written policies that address 8 specific items. PacMtn WDC's current Administrative Policy #3025 Data Security is very thorough and gives detailed guidance and information on the organization's data storage and network security and breach protocols. The policy does not, however, address some of the required items from Policy #1026 such as:

"Staff training and education content including: requirement to complete annual privacy and security awareness training; staff "need to know" expectations in their official capacity having access to PII; consequences for carelessness or negligence, including unauthorized access to such records including corrective action, sanctions, dismissal, and potential criminal penalties under the Privacy Act of 1974;" or the required reporting steps to ESD of data breaches which can be found in Policy #1026 section 3.b.

Policy #3025 has been updated to include the additional requirements as outlined in our monitoring report and now includes the required items from the ESD Policy.



## TITLE: Administrative Policy # 3025R1 Data Security and PII

Administrative Policy

**Date Established:** 02/14/2020

**Date Last Revised:** 8/11/2022

**Date Posted to Website:** 4/27/2020

**Status:** Final

**Supersedes:** N/A

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### Purpose

To establish methods of compliance, security, and integrity within the computer network systems and media storage that PacMtn staff and agents use in the course of service delivery and administration of local, state, and federal programs. Maintenance to secure sensitive and protected information as well as Personally Identifiable Information (PII) of program participants is of the utmost critical nature. All data storage, exchange, and disposition will follow strict rules to ensure compliance with applicable program, state, and federal regulations.

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### Policy

PacMtn, in coordination with other State Agencies and organizations in which shared networks are established, will implement, and follow guidance on all data security requirements.

PacMtn maintains a computer network that restricts access to only staff and approved contracted staff. Unique user profiles and passwords are created for each user upon hire and access is limited to only applicable files and rights necessary to fulfill job requirements.

Administrative access to the network is limited to contracted IT vendors and a staff member who oversees daily oversight of users. If PacMtn staff will be using networks other than those maintained by PacMtn, all processes and forms required by the applicable hosting agency will be followed and documented with approvals from program supervisors.

Oversight and review of access to networks will be done regularly through account reports. Access to outside networks will be reviewed annually via reports from applicable agencies to confirm only authorized users are listed. Access to networks or specialized software can be removed immediately upon request.

Staff shall not share access with unauthorized users nor share access information between other staff. Any staff who violates this, circumvents security, or otherwise puts the network or data at risk will be at a minimum required to go through training, but further disciplinary action, up to termination may occur depending on the severity of the violation.

Program requirements may sometimes include the gathering and storing of data that is highly confidential (Category 4 data). All program staff that may come in contact with such data must go through training on the applicable requirements as set forth by federal and state regulations, including but not limited to the Health Insurance Portability and Accountability Act (HIPAA), Pub.

L. 104-191 as amended by the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH), 45 CFR Parts 160 and 164; the Family Educational Rights and Privacy Act(FERPA), 20 U.S.C. §1232g; 34 CFR Part 99; Internal Revenue Service Publication 1075 (<https://www.irs.gov/pub/irs-pdf/p1075.pdf>); Substance Abuse and Mental Health Services Administration regulations on Confidentiality of Alcohol and Drug Abuse Patient Records, 42 CFR Part 2; and/or Criminal Justice Information Services, 28 CFR Part 20. Data of this nature shall only be stored on approved networks and software as provided by and secured by the agency that requires it. Furthermore, access to software and databases that house this information shall require additional approvals and training by the governing agency per their policies.

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## **Policy Guidelines**

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### **1. Definitions:**

#### **Personally identifiable information (PII) -**

1. Any information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Examples include, but are not limited to name, address, phone number, email address, social security number, passport number, driver's license or state identification card information, date and place of birth, mother's maiden name, or biometric records; and
2. Any other information that is linked or linkable to an individual such as medical, educational, financial, demographic, gender, race, and employment information. Images disclosing physical characteristics, photographic image, fingerprints, retinal scans, or voice signature in any medium and from any source, are also considered PII.

**Breach** - Actual or suspected compromise, unauthorized disclosure, unauthorized acquisition, unauthorized access, and/or any similar occurrence where:

1. A person other than an authorized user accesses or potentially accesses PII, or
2. An authorized user accesses or potentially accesses PII for other than authorized purposes.

**Security incident** - A set of events that have been examined and determined to indicate a violation of security policy or an adverse effect on the security status of one or more systems within an organization or entity.

### **2. Administrative Controls**

PacMtn is committed to ensuring the integrity and security of its networks and the data stored therein. Administrative controls are documented in this policy to provide the necessary requirements to follow to maintain that integrity. Additionally, further risk assessments will be for any new system(s) housing the Category 4 Data.

#### **2.1 Authorization, Authentication and Access**

Controls and processes have been established to limit access to networks and files containing sensitive data and to secure authorization procedures to maintain security at all times.

Controls in place include:

- a. Restricted access of administrative functions to authorized staff such as contracted vendor or staff maintaining the network.
- b. Restricted access of users to staff or contracted staff as authorized via email or Microsoft planner. The contracted staff authorization email must be approved by a

- supervisor or higher.
- c. User accounts are unique and allows for tracking of actions made.
  - d. User/employee's access to the network/Data is suspended immediately:
    - 1. Upon suspected compromise of the user credentials.
    - 2. When their employment, or the contract under which the Data is made available to them, is terminated.
    - 3. When they no longer need access to the Data to fulfill the requirements of the contract.
  - e. Periodic reviews of network users and access levels, both internal and users on external networks housing the data.
  - f. Password restrictions and logon requirements
    - 1. Passwords will have a minimum length of 8 characters and contain at least three of the following character classes: uppercase letters, lowercase letters, numerals, and special characters such as an asterisk, ampersand, or exclamation point.
    - 2. The password must not contain a user's name, logon ID, or any form of their full name.
    - 3. The password should not consist of a single dictionary word. A password may be formed as a passphrase which consists of multiple dictionary words.
    - 4. Passwords must also be significantly different from the previous four passwords. Passwords that increment by simply adding a number are not considered significantly different.
  - g. If Personally Identifiable Information (PII) or any other confidential information needs to be accessed from an external location (the Data will traverse the Internet or otherwise travel outside the network), additional security measures are required to mitigate risk.
    - 1. Ensuring mitigations applied to the system don't allow end-user modification.
    - 2. Not allowing the use of dial-up connections.
    - 3. Using industry standard protocols and solutions for remote access. Examples would include RADIUS and Citrix.
    - 4. Encrypting all remote access traffic from the external workstation to Trusted Network or to a component within the Trusted Network. The traffic must always be encrypted while traversing any network, including the Internet, which is not a Trusted Network.
    - 5. Ensuring that the remote access system prompts for re-authentication or performs automated session termination after no more than 30 minutes of inactivity.
    - 6. Passwords or PIN codes may meet a lesser standard if used in conjunction with another authentication mechanism, such as a biometric (fingerprint, face recognition, iris scan) or token (software, hardware, smart card, etc.) in that case:
      - 1) The PIN or password must be at least 5 letters or numbers when used in conjunction with at least one other authentication factor.
      - 2) Must not be comprised of all the same letter or number (11111, 22222, aaaaa, would not be acceptable)
      - 3) Must not contain a "run" of three or more consecutive numbers (12398, 98743 would not be acceptable)
  - h. If PII or any other confidential information is stored on a Mobile Device, passcodes used on the device must:
    - 1. Be a minimum of six alphanumeric characters.
    - 2. Contain at least three unique character classes (upper case, lower case,

letter,number).

3. Not contain more than a three consecutive character run. Passcodes consisting of 12345, or abcd12 would not be acceptable.
4. Render the device unusable after a maximum of 10 failed logon attempts.

### **3. Protection of Data**

Confidential client PII and data shall only be stored within the applicable MIS database systems as allowable and required by the awarding agency. No sensitive data will be stored on the local workstation hard disks or in shared folders within the network. Workstation access is limited to authorized users and requires unique identification and passwords. If sensitive, confidential participant data is provided in hard copy, paper form, all records shall be maintained in a separate, secure, locked, cabinet in an area that does not allow public access. Only authorized users will have access to these areas. If PacMtn staff use portable electronic devices to gather and record information the device itself should be maintained in a secure area to avoid unauthorized access. Each portable device will be password protected and data should not be stored on the device harddrive.

### **4. System Protection**

Ongoing protection of the system is required to prevent compromise of the network and data. In order to maintain system protection, the following protocols are required:

- a. Systems must have all security patches or hotfixes applied within 3 months of being made available.
- b. The contracted IT vendor or person responsible for maintaining the network will track security patches and hotfixes and document required timeframes and subsequent installations.
- c. Systems shall have an Anti-Malware application, if available, installed.
- d. Anti-Malware software shall be kept up to date. The product, its anti-virus engine, and any malware database the system uses, will be no more than one update behind the current.

### **5. Data Segregation**

- a. PacMtn provides services to multiple programs representing a variety of state and federal funders. These programs have unique MIS databases in order to track and secure participant data. These databases are separate from the general network storage. Only program and participant information applicable to each shall be maintained in the respective databases.
- b. If for any reason data from multiple programs is in the same database or is available within the same network outside of a database, every attempt should be made to segregate to the highest extent possible. This includes unique identifiers within the records of a database. Security requirements of the most restrictive program will be maintained in such event.
- c. When documents are stored as physical paper documents, data will also be physically segregated by means of separate drawers, files, or other containers.

### **6. Data Disposition**

When the contracted work has been completed or when the data is no longer needed, data shall be returned to the applicable agency or destroyed. Media on which data may be stored and associated acceptable methods of destruction are as follows

<b>Data stored on</b>	<b>Will be destroyed by</b>
Server or workstation hard disks, or Removable media (e.g., floppies, USB flash drives, portable harddisks) excluding optical discs	Using a "wipe" utility which will overwrite the Data at least three (3) times using either random or single character data, or Degaussing sufficiently to ensure that the Data cannot be reconstructed, or Physically destroying the disk
Paper documents with sensitive or Confidential Information	Recycling through a contracted firm, provided the contract with the recycler assures that the confidentiality of Data will be protected
Paper documents containing Confidential Information requiring special handling (e.g. protected health information)	On-site shredding, pulping, or incineration
Optical discs (e.g., CDs or DVDs)	Incineration, shredding, or completely defacing the readable surface with a coarse abrasive; Magnetic tape; Degaussing, incinerating or crosscut shredding

## **7. Data shared with or by a Contract holder or Subcontractors**

- A. The service provider will only share data with organizations who have an active grant or contract with the service provider, for whom the service provider is a grantee, or where a valid data sharing agreement exists between all parties.
- B. Only data necessary for the purposes of carrying out a grant or contract will be shared with grantors, grantees, contractors, or partners.
- C. All data created or obtained by a service provider for the purposes of carrying out a grant or contract awarded by PacMtn must be stored securely within a system that meets the security requirements of this policy. Data stored on a shared network that is considered category 3 or 4 and that may not be accessed by any user who isn't explicitly authorized to access it, must be stored in a secure fashion by password protecting the document containing the information. Sharing data owned by the subrecipient or obtained from the PacMtn must only be done so with individuals authorized to access the data.
- D. If program, program applicant and/or program participant data is to be shared by a Contract Holder or with a Subcontractor, the specific Contract must include or refer to and follow the data security provisions of this policy. As applicable, the data security provisions held by the Contract Holder will be included within the Contract and adhered as allowable and or required by local, state, or federal requirements. This would also apply to any amendments, attachments, or exhibits within or as part of the Contract. If the Contractor cannot protect the data as articulated within this policy and as written within the Contract, then the contract must be submitted to the applicable head agency Contact specified for the contract for review and approval.

## **8. Security awareness (ESD WorkSource Policy 1026)**

- A. Notification of access to confidential information
  1. Service provider employees who have access, or are expected to have access in the future, to sensitive, confidential, proprietary, or private data, must be advised of the following:
    - a. The confidential nature of the information,
    - b. The safeguards required to protect the information,

- c. The expectation that the employee only access or store information that is necessary for their official duties, and
  - d. There are civil and criminal sanctions for noncompliance that are contained in the Privacy Act of 1974 and other Federal and state laws.
2. Employees, before being granted access to confidential information, must acknowledge their understanding of the confidential nature of the data and the safeguards with which they must comply as well as the fact that they may be liable to civil and criminal sanctions for improper disclosure.
- B. Security awareness training - all service provider staff must receive security awareness training upon hire and annually. New hire training must include the risks of data compromise, an employee's role in prevention, and how to respond in the event of an incident.

## **9. Notification of Compromise or Potential Compromise**

In the event of unauthorized data acquisition or disclosure that compromise or potentially compromises the security, confidentiality, or integrity of confidential information maintained, shared with or by PacMtn WDC, PacMtn staff, a Contract Holder, or a Subcontractor, PacMtn WDC will report to the applicable program/agency contact designated in the contract within one (1) business day of discovery.

### Employment Security Department (ESD)

As required in Washington State WorkSource Policy 1026 - Safeguarding Personally Identifiable Information (PII), any breach or suspected breach of PII must immediately be reported to the Employment Security Department (ESD) at SystemPolicy@esd.wa.gov using "PII Incident" in the subject line. For grants managed by ESD, such as WIOA Title III, service providers must also follow ESD HR Policy 0031-1. This notification must include the following content:

- Workforce Development Area (WDA)
- Reporting Entity-LWDB, subrecipient, contractor, other and contact information
- Date of Incident
- Date of Discovery (if different)
- Number of files breached or affected
- Type of Issue:
  - o Hard copy files or information
  - o Electronic files or information
- Description of the incident
- Initial Determination of level of incident:
  - o Carelessness
  - o Negligence
  - o Fraud
  - o Theft
  - o Other
- Any other relevant information
- If staff member is also an ESD employee, please refer to ESD HR Policy 0031-1-Security Breach Notification;
- If a Social Security Administration (SSA) related data breach/security incident, include **"SSA"** in the title;
- If ESD equipment loss or theft is involved, ESD staff must complete a Security Incident Report

Department of Social and Health Services (DSHS) data, if no contact is designated in the contract, then the notification must be reported to the DSHS Privacy Officer at

dshsprivacyofficer@dshs.wa.gov. Contractor must also take actions to mitigate the risk of loss and comply with any notification or other requirements imposed by law or DSHS.

### **9.1 PacMtn WDC will promptly address and respond as follows:**

1. Any PacMtn WDC, Contract Holder, or a Subcontractor staff member who discovers or is otherwise notified of the security breach will immediately inform PacMtn's Chief Financial and Administrative Services Officer.
2. A risk assessment will be conducted immediately following discovery of the data breach in order to identify the root cause(s). Results of the risk assessment will be used to strengthen security protocols to ensure future data breaches do not occur.
3. In the event of a security breach where any personal information was, or is reasonably believed to have been, acquired by an unauthorized person and the personal information was not secured, PacMtn WDC shall notify the owner of the information of the potential or confirmed breach of the system immediately following discovery.
4. This notification must be made in the most expedient time possible, without unreasonable delay, and no more than thirty calendar days after discovery of the breach. If necessary, notification may be delayed only long enough for PacMtn WDC to determine the scope of the breach and restore the reasonable integrity of the data system.
5. Delay may also occur if PacMtn WDC deems it necessary to contact the applicable law enforcement agency after discovery of a breach of the security of the system and a law enforcement agency determines that the notification will impede a criminal investigation.
6. Notification may be provided by written or electronic notice. Electronic notice must be consistent with provisions regarding electronic records and signatures set forth in 15 U.S.C. Sec 7001.

Both written and electronic notices must meet the following requirements:

- a. Written in plain language;
  - b. Identify the PacMtn WDC as the reporting agency and include contact information;
  - c. Include a list of the types of personal information that were or are reasonably believed to have been the subject of the breach;
  - d. Include a time frame of exposure, if known, including the date of the breach and the date of the discovery of the breach; and
  - e. Include toll-free telephone numbers and addresses of major credit reporting agencies.
7. As recommended in Training and Employment Guidance Letter (TEGL) 39-11, any breach or suspected breach of confidential personal information associated with an ETA funded grant must immediately be reported to the Federal Project Officer responsible for the grant and to ETA Information Security at [ETA.CSIRT@dol.gov](mailto:ETA.CSIRT@dol.gov), (202) 693-3444, and follow any instructions received from officials of the Department of Labor.
  8. As required in RCW 19.255.010, any incident involving more than five hundred Washington state residents as a result of a single breach requires that PacMtn WDC to notify the Washington state attorney general of the breach no more than thirty days after the breach was discovered.

This notification must include the following:

- a. The number of Washington state residents affected by the breach, or an estimate if the exact number is not known;
- b. A list of the types of personal information that were or are reasonably

- believed to have been the subject of the breach;
- c. A time frame of exposure, if known, including the date of the breach and the date of the discovery of the breach;
- d. A summary of steps taken to contain the breach; and
- e. A single sample copy of the security breach notification, excluding any personally identifiable information.

**Note:** the notice to the attorney general must be updated if any of the information identified above is unknown at the time notice is due.

**10. Security violation categories** – based on review of the investigation items above, PacMtn WDC will categorize a violation as follows:

1. **Category 1 violation** – actions which violate federal, state, or local laws and regulations, including but not limited to:
  - b. Unauthorized disclosure of protected health information or personal information in violation of privacy laws, including Washington state identity theft protection laws.
  - c. Use of data to threaten, harass, or intimidate others.
  - d. Engagement in illegal activities using data or information systems.
2. **Category 2 violation** – Category 2 violations involve breaches of this policy or related procedures but do not contravene federal, state, or local laws and regulations. Examples include, but are not limited to:
  - a. Excessive or improper use of service provider data or information systems for personal reasons, such as excessive personal email or internet use, or visiting potentially harmful websites.
  - b. Unauthorized attempts to bypass security controls, such as disabling anti-malware software or firewalls, sharing usernames and passwords, or delaying software updates.
  - c. Viewing, displaying, or storing offensive, threatening, sexually explicit, obscene, or otherwise inappropriate content that contravenes the service provider's harassment policy.

**11. Corrective action guidelines** – Corrective actions for violations will be determined based on the category assigned and are outlined as follows:

1. **Corrective Actions for Category 1 Violations** – Violations in this category may require:
  - a. Notification of relevant law enforcement agencies, regulatory bodies, and affected individuals.
  - b. Revocation of access to the service provider's network or other involved data systems.
  - c. Additional training on security and privacy practices.
  - d. Disciplinary measures or termination of employment
2. **Corrective Actions for Category 2 Violations** – Violations in this category may result in:
  - a. Issuance of a formal warning regarding the breach of policy or procedures.
  - b. Requirement for additional training on security and privacy practices.
  - c. Revocation of access to the service provider's network or other involved data systems.
  - d. Disciplinary action or termination of employment.

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## References

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Health Insurance Portability and Accountability Act (HIPAA),  
Pub. L. 104-191 as amended by the Health Information Technology for Economic and Clinical  
Health Act of 2009 (HITECH)  
45 CFR Parts 160 and 164;  
20 U.S.C. §1232g & 34 CFR Part 99 - The Family Educational Rights and Privacy Act (FERPA) Internal  
Revenue Service Publication 1075 (<https://www.irs.gov/pub/irs-pdf/p1075.pdf>);  
42 CFR Part 2 - Substance Abuse and Mental Health Services Administration regulations on  
Confidentiality of Alcohol and Drug Abuse Patient Records,  
28 CFR Part 20 - Criminal Justice Information Services  
within an organization or entity.  
20 CFR 683.220  
2 CFR 200.303  
ESD Policy 1027  
Guidance on the Protection of Personal Identifiable Information | U.S. Department of Labor (dol.gov)  
Training and Employment Guidance Letter (TEGL) 39-11 - Guidance on the Handling and Protection of  
Personally Identifiable Information (PII)  
RCW 19.255.010 - Personal information—Notice of security breaches  
WorkSource Information Notice (WIN) 0109R7 - WIOA Title I-B verbal self-attestation and remote  
eligibility documentation and registration requirements during the COVID-19 emergency.

**DATE APPROVED: February 14, 2020, 5/19/2021, 10/11/2021, 8/11/2022,**

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**Direct Inquiries to:**  
**201 5<sup>th</sup> Ave., SW., Suite 401**  
**Olympia, WA 98501**  
**Telephone: (360) 515-5134**  
**Email: [Info@pacmtn.org](mailto:Info@pacmtn.org)**

PacMtn is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. WA Relay 711



## MEMORANDUM

To: PacMtn Executive Finance Committee

Date: September 12, 2024

Subject: Board Member Nominations

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### **Background**

PacMtn's Workforce Board follows the requirements called out in the federal law. We have 26 members with a majority that are representatives of business in the local area. Each County Commission appoints 3 of those Members. Those business representatives are to:

- (i) be owners of businesses, chief executives or operating officers of businesses, or other business executives or employers with optimum policymaking or hiring authority;
- (ii) represent businesses, including small businesses, or organizations representing businesses described in this clause, that provide employment opportunities that, at a minimum, include high-quality, work-relevant training and development in in-demand industry sectors or occupations in the local area; and
- (iii) are appointed from among individuals nominated by local business organizations and business trade associations;

Additionally, there are members appointed that represent important agency stakeholders and content experts needed to conduct the work of a Council. Those are Members that represent Apprenticeship, Employment Security and mission-aligned community based organizations, for example. Our By-laws detail that Board appointments are staggered for 2, 3 or 4 years. Once appointed, the subsequent appointments (for a maximum of 3 terms) are for three years. All terms begin on the first day of July and shall end on the last day of June.

**New Members** to be appointed to the PacMtn Board of Directors have been nominated by either the relevant County, known recommending entity or the agency director. Those nominees include:

- Stacie Vaughan, Vaughan Co. Inc, Vice-President, Grays Harbor County Representative, 3 year term - Expiring June 30, 2027
- Kevin Shutty, Economic Development Council of Mason County, Executive Director, Mason County Representative, 3 year term - Expiring June 30, 2027

### **Recommendation and/or Recommended Motion**

Move to Approve Appointment to Board of Directors as presented and Recommend Do Pass to the full WDC Board and Consortium

***\*\* Page Numbers will populate starting on the second page***



## MEMORANDUM

To: PacMtn Executive Finance Committee Members

From: William Westmoreland, CEO  
Wil Yeager, CFO

Date: September 12, 2024

Subject: Update to Umpqua Bank Signers

At times, PacMtn will need to update bank signers due to staff changes. PacMtn is requesting an update to the authorized bank signers at Umpqua Bank. We will be removing Megan Fiess as a signer due to her departure. To ensure there are adequate bank signers on these accounts, we are requesting approval to add Daniel Cooling, Chief Program Officer to the accounts indicated on the attached summary.

### **Recommending Motion to Approve**

We recommend a motion to Approve the Update to the Umpqua Bank Signers as presented with Recommendation of Do Pass the full WDC Board.



**09/2024**

**Current Umpqua Bank Signers**

**Acct ending 8396- Restricted Funds**

William Westmoreland  
Megan Fiess  
Arisa De Lima

**Acct ending 0137- Tumwater**

William Westmoreland  
Megan Fiess  
Arisa De Lima

**Acct ending 0129 - Sweep**

William Westmoreland  
Megan Fiess  
Arisa De Lima

**Board Action to Add Signers to Bank Account(s)**

**Acct ending 8396- Restricted Funds**

Daniel Cooling

**Acct ending 0137- Tumwater**

Daniel Cooling

**Acct ending 0129 - Sweep**

Daniel Cooling

**Board Action to Remove Employee from Bank Account(s)**

**Acct ending 8396- Restricted Funds**

Megan Fiess

**Acct ending 0137- Tumwater**

Megan Fiess

**Acct ending 0129 - Sweep**

Megan Fiess

PacMtn's mission is to lead dynamic regional workforce development that enhances economic success.

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**Final Bank Accounts after all activity**

**Acct ending 8396- Restricted Funds**

William Westmoreland  
Arisa De Lima  
Daniel Cooling

**Acct ending 0137- Tumwater**

William Westmoreland  
Arisa De Lima  
Daniel Cooling

**Acct ending 0129 - Sweep**

William Westmoreland  
Arisa De Lima  
Daniel Cooling

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