



## Executive Finance Committee Agenda

04/10/2025 ▪ 2:30-4:00p

Join online via Microsoft Teams

Meeting ID: 259 451 157 627

Passcode: BT6dH9Aw

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

- A. Introductions & Establish Quorum
- B. **Action Item:** Motion to Approve February 13, 2025 EFC Minutes ([Attachment #1](#))
- C. Board Chair Comments
- D. [CEO Report](#)

### II. **Discussion Items:**

- A. **Discussion & Action Item:** Update of Administrative Policy #1.7.1-v1 and Adoption of Policies #1.4.7 and #1.4.8 ([Attachment 2](#))
  - i. **Action Item:** Motion to Approve Update of Administrative Policy #1.7.1-v1 and Adoption of Policies #1.4.7 and #1.4.8 and Recommend Do Pass to the full WDC Board
- B. **Discussion & Action Item:** Update of WIOA Title IB Adult, Dislocated Worker, and Youth Policies ([Attachment #3](#))
  - i. **Action Item:** Motion to Approve Update to WIOA Title IB Adult, Dislocated Worker and Youth Policies as presented and Recommend Do Pass to the full WDC Board
- C. **Discussion & Action Item:** Approval of WIOA Title I-B Award ([Attachment 4](#))
  - i. **Action Item:** Motion to Approve the Award of WIOA Title I-B Youth Services Contracts for PY25 to Community Youth Services, Gravity Learning Center, and Morningside, and Recommend a Do Pass to the full WDC Board

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

- A. **Discussion Item:** Annual Audit Summary ([Attachment #5](#))

### IV. **Executive Session**

*The Board can move to close the meeting for select and appropriately limited conversation on specified purposes, which are identified in RCW 42.30.110. Any specific action requiring a vote will be taken in the public portion of the meeting.*

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

- A. One Stop Operations Committee
- B. Priority Populations Committee
- C. 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. Kevin Shutty	Economic Development Council of Mason County	Mason	Incoming Chair
5. Cheryl Heywood	Timberland Regional Library	Regional	One Stop Committee Lead
6. Jonathan Pleger	Morningside	Regional	Priority Populations Committee Co-Lead
<b>7. Vacant</b>			ABEL Committee Lead
8. Derek Epps	Seattle Shellfish	Mason	Business At-Large
9. David Schaffert	Thurston County Chamber of Commerce	Thurston	BaSE Lead
10. Sharon Trask	Mason County Commissioner	Mason	Consortium Chair, Ex Officio

### **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>OBH</b>	Opportunity Begins Here
<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>ETO</b>	Efforts to Outcome	<b>WTECB</b>	Workforce Training & Education Coordinating Board
<b>ETPL</b>	Eligibility Training Provider List		



### **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

02/13/25 ▪ 2:30 - 4:00p

PacMtn Offices & Online Via Microsoft Teams

**Attendees:** Michael Cade, David Schaffert, Jonathan Pleger, Dr. Lorie Thompson, Cheryl Heywood, Dereke Epps, Sharon Trask

**Staff:** William Westmoreland, Arissa De Lima, Dan Cooling, Marco Hernandez, Wes Smith, Christina Gorman, Wil Yeager, Kellie Hale

### I. Welcome & Check-In Items

#### A. Introductions & Establish Quorum

Michael Cade called the meeting to order at 2:31 pm. Quorum was established.

#### B. Action Item: Motion to Approve January 9, 2025, EFC Minutes

*Jonathan Pleger motioned to Approve the January 9, 2025 EFC Minutes as presented. Cheryl Heywood seconded. **Motion carries.***

#### C. Board Chair Comments

Michael had no comments at the time.

#### 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 Items:

#### A. **Discussion & Action Item:** Update of Procurement Policy #1.4.2-v4

##### i. **Action Item:** Motion to Approve Updates to Procurement Policy #1.4.2-v4 and Recommend Do Pass to the full WDC Board

Wil reviews the updates to the Procurement Policy #1.4.2-v4 and added that the update aligns the policy with the CFRs. He highlighted key updates including adjustment to micro-purchases, simplified acquisition thresholds, enhancement of documentation standards for procurement decisions, aligning noncompetitive procurement procedures with the revised conditions and strengthening compliance with conflict-of-interest provisions. These updates allow for operational flexibility with the same level of monitoring, and is in line with the rising costs.

Cheryl queries if there is anything in the policy that refers to the state contract and if it is required to reiterate the contract within the policy.

Wil stated that although it is not a requirement, that can be added to the policy.

*Cheryl Heywood motioned to approve Updates to Procurement Policy #1.4.2-v4 with suggested edits and Recommend Do Pass to the full WDC Board. Sharon Trask seconded. **Motion Carries.***

Michael shares that next Thursday the Chamber and Apex Accelerator Program is putting on a procurement program at SPSCC in Lacey. He also states Apex Accelerators provide counseling and guidance to public agencies as they develop their procurement process, he adds Alliance Northwest is hosting a conference March 20<sup>th</sup>. It is the largest procurement conference in the northwest with several training courses provided, this will be held in Tacoma.

**B. Discussion Item: Community Reinvestment Project (CRP) Incentive Policy Update**

Marco reviewed the Community Reinvestment Program (CRP) Incentive Policy Update, highlighting key update requests, including time restraints with a recommendation of 6 months and language to include expectation and monthly engagement for participants and their case manager or talent recruiter.

Dan share examples of how lack of time restraints can hold some participants back from reaching their goals.

William reviewed that this is open for conversation and that board members will be asked for feedback and will be added as a discussion item to the February Board meeting.

**III. Fiscal Items:**

**A. Discussion Item: PacMtn Financial Position**

Wil reviewed PacMtn Financial Position and highlighted that this will not impact on any of the funding that we currently have and could impact future funding that will begin next program year.

There were no questions from the committee.

**B. Discussion Item: PY24 Financial Statement (Attachment #5)**

Wil reviewed the PY24 Financial Statement and points out that program costs are over 50% spent so that no funds were at risk of being taken back, mentioning that we are on target for what was estimated.

There were no questions from the committee.

**IV. Executive Session**

There was no Executive Session requested at this time

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

- A. One Stop Operations Committee- Cheryl reported out that the committee meets monthly and is continuing to have a reset, they have hired a consultant and are working on roles and responsibilities.
- B. Priority Populations Committee- Jonathan reported out that they are working on items for the board retreat and there will be more discussion at that time.
- C. Business and Sector Engagement (BaSE) - David reported that last month the committee visited TrueFab and discussed their needs and demands. The committee reviews the high

demand occupation list routinely and adjusts adding new in demand occupations and removing occupations that are no longer in demand.

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

Dan provides RFP Updates - One-Stop Operator RFP deadline was met and collected a few proposals that are now being reviewed. The Youth RFP has proposals in progress with a deadline of February 24<sup>th</sup>, after this meeting an email will go out to the board for input. Adult Dislocated Worker (DW) RFP estimated release will be March 4<sup>th</sup> and WIOA Business Service Solutions on March 18<sup>th</sup>.

Michael provided national rankings for the most robust economy in the country last year ranking Thurston County at #9, and this year ranked at #8. Thurston wage growth being the 7<sup>th</sup> best in the nation and ranked as 4<sup>th</sup> most equitable income in the nation. Micheal gives thanks to everyone for the work that has been going on in Thurston County. He also updates the board with the Economic Development District and has hired an executive director, Annette Roth, for the emerging Pacific Salish Economic Development District.

Cheryl shares that the Tumwater library is going through its first refresh in 25-30 years and will be closed until end of May and all services are being held at the TRL Headquarters. TRL just introduced new technology, they are the first in the state to use IMMS (Intelligent Materials Management Software) it allows for collection in 29 libraries to be intelligently moved around. The collections in the library will reflect the community better than it does now. For two years in a row TRL has received a business award in Pacific County, the first was from the EDC and the second from the Willapa Chamber of Commerce. TRLs Strategic Planning 2025-2029 will be focusing on school aged youth and digital literacy. Cheryl adds that not only are things paused at the federal level but also in the state, there are 24 timber sales that are paused right now by DNR Lands Commissioner 7 of which are in our region. This adds up to millions in timber sales and affects their beneficiaries.

Lori shares that ESD notified her that Big Brothers Big Sisters was fully funded for a Program Builder Grant. The very first in the region to receive a completely funded proposal and the first in that sector to have a builder's program.

Sharon Trask adds that if anyone would like to comment or testify at DNR please get ahold of her and she can sign you up or you can sign up on your own at the DNR website. She states this is crucial we continue timber sales.

Michael shares that on Childcare Advocacy Day several PacMtn staff and individuals attended the roundtable and everything went well. The Board of the Childcare Advocacy Group would like to have a series of round-table discussions in the PacMtn Region. He thanks the PacMtn participants.

Meeting adjourned at 4:00p

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



To: Executive Finance Committee  
Date: April 10, 2025  
Subject: Proposed Update to Funding Statement (Stevens Amendment) Policy and Adoption of Two New Administrative Policies

---

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

Recommend Approval for Update to Administrative Policy #1.7.1-v1 and Adoption of Policies #1.4.7 and #1.4.8 as presented and Recommend a Do Pass to the full Workforce Development Council Board.

**Overview:** The purpose of this memorandum is to inform the Executive Finance Committee and Board of a proposed update to the **Stevens Amendment Policy** and the adoption of two new administrative policies to enhance fiscal oversight and ensure compliance with state and federal regulations.

### **Impact on Current Policy:**

The proposed updates and additions have the following impacts on current policy and practice:

- **Policy #1.7.1-v1 - Funding Statements (Stevens Amendment Policy):**  
This revised policy aligns with the most recent WorkSource System Policy guidance and now includes a clearly defined policy statement and policy guidelines—elements that were not present in the original version. These enhancements improve clarity, strengthen compliance, and ensure consistency with federal and state expectations for funding disclosures.
- **Policy #1.4.7 - Credit Card Policy:**  
Based on auditor recommendations, this policy has been developed in alignment with **RCW 43.09.2855** to govern the use of credit cards. It establishes detailed procedures for card authorization, usage, and documentation. The policy also incorporates strengthened internal controls to ensure all credit card transactions are appropriately reviewed and approved.
- **Policy #1.4.8 - Electronic Funds Transfer (EFT) Policy:**  
Also recommended by our auditors, this policy ensures proper governance of EFTs in accordance with the **BARS Manual 3.8.11** and **RCW 39.58.750**. It establishes the



*building community prosperity*

necessary framework and internal controls for managing electronic fund transfers in a secure and compliant manner.

These policy changes support improved transparency, stronger internal controls, and increased compliance with applicable legal and regulatory standards.



## TITLE: Funding Statements in Publicly Distributed Outreach and Marketing Materials Policy #1.7.1-v1

---

**Type:** Administrative Policy

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

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

**Date Posted to Website:** NA

**Status:** Draft

**Supersedes:** Policy #1.7.1-v1

---

### Purpose

The purpose of this policy is to ensure compliance with the Stevens Amendment by requiring all public communications that describe federally funded programs to include specific funding disclosure statements. This ensures transparency, accountability, and public awareness regarding the sources of financial support for PacMtn programs and activities.

This policy applies to PacMtn staff, subrecipient program operators, and managers when issuing statements, press releases, bid solicitations, requests for proposals (RFPs), and other documents and publications describing projects or programs funded in whole or in part with federal funds.

---

### Policy

PacMtn is committed to **full compliance** with the **Stevens Amendment (P.L. 117-328, Division H, Title V, Section 505)**, which requires disclosure of federal funding sources in public communications. This policy ensures **transparency and accountability** in financial reporting for programs and projects funded in whole or in part by the **Departments of Labor (DOL), Health and Human Services (HHS), and Education**.

PacMtn staff, subrecipients, and program operators must **clearly disclose funding details** in all relevant public statements and documents, including:

1. **The dollar amount of Federal funds** used for the project, program, or activity.
2. **The Federal funding entity** (e.g., grant, fund allocation, or program name).
3. **The funding period** covered by federal support.
4. **The dollar amount of non-federal sources** supporting the project, program, or activity.

This policy is **separate from the requirements of 2 CFR 200**, and both must be followed where applicable.

---

### Policy Guidelines

#### Applicability

This policy applies to **all PacMtn staff, subrecipient program operators, and managers** when issuing public communications related to federally funded programs. Documents subject to this policy include, but

are not limited to:

- **Press releases**
- **Requests for Proposals (RFPs)** and bid solicitations
- **Brochures, flyers, promotional materials**
- **Social media posts and website content**
- **Newsletters and email blasts**
- **Resource guides and toolkits**
- **Reports and publications describing program funding**

This policy **does not apply** to contracts such as **WEX and OJT contracts** or **Unemployment Insurance-specific communications**.

---

## **Compliance Requirements**

1. **Mandatory Disclosure:** The Stevens Amendment disclosure must be included in **all applicable materials** describing federally funded projects.
2. **Website Disclosure:** A **dedicated funding page** on the PacMtn website must provide up-to-date federal funding details, linked in relevant public communications.
3. **Use of Hyperlinks & QR Codes:** When space constraints exist, a **shortened compliance statement** with a **hyperlink or QR code** directing viewers to full funding details is acceptable.
4. **Monitoring & Enforcement:** PacMtn will **annually review** public communications and materials to ensure compliance, including those of its **subrecipients, service providers, and contractors**.
5. **Corrective Actions:** Non-compliance may result in:
  - Requests for immediate correction and re-publication.
  - Ineligibility for future funding opportunities.
  - Disallowance of costs associated with non-compliant materials.

---

## **A. Required Disclosures**

All public communications describing federally funded programs must include:

- A **full disclosure statement** containing all required elements **OR** a **shortened statement** with a **hyperlink/QR code** to the funding details.

## B. Document and Media Types Subject to Compliance

- **Printed Materials:** Press releases, brochures, flyers, and manuals.
- **Digital Content:** Websites, social media posts, blogs, vlogs, and email blasts.
- **Multimedia Presentations:** PowerPoint presentations, toolkits, and webinars.
- **Procurement Communications:** RFPs, bid solicitations, and funding announcements.

## C. Exempt Documents

The Stevens Amendment disclosure **is not required** for:

- **Contracts** such as WEX and OJT agreements.
- **Unemployment Insurance (UI) claim-specific communications.**
- **Internal administrative documents** that do not describe public-facing programs.

## D. Implementation of Hyperlinks & QR Codes

- If including **all four required elements** in the body of a document is impractical, a **shortened statement** with a **link to PacMtn's funding page** is allowed.
- **QR codes** may be used in social media, digital content, or printed materials to direct readers to the funding disclosure page.

## E. Monitoring & Enforcement

- PacMtn will **conduct annual compliance reviews** of marketing and public materials.
- Subrecipients, service providers, and contractors **must comply with this policy** as part of their contractual obligations.
- If deficiencies are identified, PacMtn may require **immediate corrective action**.

---

## Attachment

---

None

---

## References

---

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

ESD System Policy 1027 (Rev1)

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

**DATE APPROVED: 9/26/2024**

---

**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.



## TITLE: **Company Credit Card** **(Internal and Business)** **POLICY #1.4.7**

---

**Type:** Administrative Policy

**Date Established:** 02/26/2025

**Date Last Revised:** NA

**Date Posted to Website:**

**Status:** Draft

**Supersedes:** NA

---

### **Purpose**

The purpose of this policy is to establish guidelines for the appropriate use, management, and accountability of company-issued credit cards. This policy applies to all employees who are issued a company credit card and ensures responsible financial management and compliance with business regulations.

---

### **Policy**

The Company Credit Card Policy establishes clear guidelines for the appropriate use, management, and accountability of company-issued credit cards. This policy ensures responsible financial practices, prevents misuse, and promotes compliance with company regulations. All employees and business entities using company credit cards must adhere to the outlined procedures, limitations, and responsibilities. Violations of this policy may result in disciplinary action, including revocation of card privileges and legal consequences.

---

### **Policy Guidelines**

#### **1. Eligibility for Company Credit Cards**

##### **Internal Employees**

Company credit cards may be issued to employees who require them for business-related expenses. Eligible employees include:

- Executive leadership (CEO, CFO, Directors)
- Employees with purchasing responsibilities (e.g., procurement, finance, operations)
- Employees who frequently travel for business purposes
- Other employees as determined by the Chief Financial Officer (CFO) or Chief Executive Officer.

All employees receiving a company credit card must sign a Credit Card Agreement Form, acknowledging their responsibilities and compliance with this policy.

## Business Use

Company credit cards may be used for:

- Business-related purchases, including office supplies, equipment, and technology
- Travel expenses (airfare, hotels, transportation, meals) per PacMtn's Expense Reimbursement Policy #1.4.1-v2.
- Professional development, including conference fees and training materials
- Event-related expenses
- Emergency business-related purchases with prior authorization

Note: Travel must be booked through PacMtn's Human Resources.

## 2. Responsibilities of Cardholders

Employees who are issued a company credit card are responsible for:

- Using the card exclusively for business-related expenses
- Keeping the card secure and reporting any lost or stolen cards immediately to the Finance Department
- Collecting and submitting itemized receipts for all transactions
- Submitting expense reports in a timely manner
- Complying with spending limits and obtaining pre-approvals for specific purchases
- Ensuring the card is not shared or used by unauthorized individuals

Failure to comply with these responsibilities may result in revocation of the card and disciplinary action.

## 3. Limits and Limitations on Credit Cards

### Spending Limits

- Each cardholder will be assigned a **monthly credit limit**, determined by their role and business needs.
- Single transactions above **\$2,500** require **pre-approval** from PacMtn's Chief Executive Officer or Chief Financial Officer.

### Prohibited Transactions

Company credit cards may **not** be used for:

- Personal expenses (even if the employee intends to reimburse the company later)
- Cash advances or ATM withdrawals
- Alcohol (unless part of an approved business meal)
- Gift cards or prepaid cards
- Fuel for personal vehicles (unless required for business travel)
- Non-business-related services, subscriptions, or memberships

Any purchases outside of these limits require **written justification** and **prior approval** before processing.

#### **4. Process for Submitting Expenses**

1. Receipt Collection: Employees must collect itemized receipts for all purchases.
2. Expense Report Submission:
  - Deadline: Expense reports must be submitted to the Finance Department within 5 business days of purchase.
  - Format: Employees must submit receipts along with an expense report form detailing the business purpose of each expense.
  - Missing Receipts: If a receipt is lost, the staff member's supervisor must sign a Lost Receipt Form, which must then be submitted to and approved by the CFO.
3. Approval Process: Supervisors must review and approve all expense reports.
4. CEO expenses are approved by the Board Chair.
5. The Finance Department will provide final review and approval of expenses. Any discrepancies will be flagged for review.
6. Reconciliation: Monthly credit card statements will be audited to ensure compliance with policy.

#### **5. Fraud Prevention and Security Measures**

- Two-factor authentication must be enabled for online transactions whenever possible.
- Employees must not save credit card details on unsecured platforms.
- The Finance Department will conduct quarterly audits to ensure compliance.

Any suspicious or unauthorized transactions must be reported immediately

#### **6. Credit Card Payment and Reconciliation:**

PacMtn processes credit card payments monthly via electronic transfer. Payment reconciliation is also conducted on a monthly basis.

By using a company credit card, employees agree to comply with this policy. Failure to adhere to these guidelines may result in disciplinary action, including termination.

---

### **References**

---

**RCW 43.09.2855**  
**2 CFR 200**  
**PacMtn Policy # 1.4.1-v2**

---

### **Attachment**

---

**Attachment A: Travel and Reimbursement Form**  
**Attachment B: Lost Receipt Form**

**DATE APPROVED:**

---

**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.



**Attachment B  
Lost Receipt Form**



**PacMtn Lost Receipt Form - T003**

**Name:** \_\_\_\_\_

**Application for Payment of Lost/Unavailable Receipts**

**Requirements Before Reimbursement of Lost/Unavailable Receipts**

- Complete the Expense Reimbursement Form to detail your dates of travel, location and purpose or reason for the trip.
- Highlight all requests for reimbursement of expenses where receipts are required but not available.
- Complete the remainder of the form and send with your standard request for travel reimbursement.

Total of all highlighted expenses      \$ \_\_\_\_\_

Description of expenses:

\_\_\_\_\_

Brief reason receipts were not available:

\_\_\_\_\_

Signed \_\_\_\_\_

Claim Certified as Correct \_\_\_\_\_

*Supervisor*

Approved by Chief Financial Officer \_\_\_\_\_

*CFO*



## TITLE: **Electronic Funds Transfer (EFT)** **POLICY #1.4.8**

---

**Type:** Administrative Policy

**Date Established:** 02/27/2025

**Date Last Revised:** NA

**Date Posted to Website:** NA

**Status:** Draft

**Supersedes:** NA

---

### **Purpose**

The purpose of this policy is to prevent unauthorized transactions, ensure proper internal controls, and protect the financial integrity of the organization.

---

### **Policy**

This policy establishes the framework for securely managing Electronic Funds Transfers (EFTs) to ensure financial integrity, regulatory compliance, and prevention of unauthorized transactions. The organization is committed to implementing strong internal controls, user access restrictions, and transaction monitoring procedures in accordance with BARS Manual 3.8.11 and RCW 39.58.750. All EFT transactions must adhere to the guidelines outlined in this policy to mitigate financial risks and protect company assets.

---

### **Policy Guidelines**

#### **1. Authorization and Oversight**

A record must be maintained for all authorizations from payees who have agreed to receive payments electronically via EFT. This documentation serves as confirmation that the payee has consented to have funds deposited directly into their designated account.

#### **Accounts Payable (AP) Customer Setup**

As part of the AP customer onboarding process, all vendors must complete and submit our Vendor Information Form. This form includes authorization for EFT payments and must be retained on file to support the initiation and continuation of electronic disbursements.

#### **Approved Users**

The following roles are authorized to initiate, approve, and oversee EFT transactions:

- Finance Director – Responsible for approving EFT transactions and ensuring compliance with financial policies.
- Chief Financial Officer (CFO) – Oversees financial controls and authorization of high-value transfers.
- Accounts Payable Manager – Initiates and processes EFT transactions, subject to approval.

### **User Access Controls**

- Only approved personnel are granted access to EFT processing systems.
- Each authorized user must have a unique banking user ID with role-specific permissions.
- System access is regularly reviewed, with user credentials updated as needed to ensure compliance and security.
- Dual authorization is required for transactions above a designated threshold, ensuring a separation of duties.

## **2. Security Measures**

To protect against unauthorized transactions, the following security measures are implemented:

- Multi-Factor Authentication (MFA) – All authorized users must authenticate transactions using at least two factors.
- Encryption and Secure Communication – EFT transactions are conducted over encrypted channels to prevent interception.
- IP Restrictions – Access to banking systems is limited to pre-approved locations or devices.
- Regular System Audits – Monthly audits are conducted to review EFT transactions for any irregularities.
- Transaction Limits – Pre-set transaction limits are assigned to individual users based on their role.

## **3. Initiation and Approval Process**

### **EFT Initiation**

- An EFT request is submitted by an authorized user in the finance department.
- The request must include supporting documentation (invoice, contract, or written approval).
- Transactions are logged in the financial system for tracking and auditing purposes.

### **Approval Process**

- EFT transactions must be approved by a higher-level authority (e.g., Finance Director or CFO) before processing.
- Any transaction exceeding a designated threshold requires dual approval.

- Approved transactions are processed through the designated banking system, and confirmation is documented.

#### **4. Monitoring and Reconciliation**

- Daily reconciliation of EFT transactions is conducted by the finance team.
- All EFT transactions are reviewed as part of the monthly financial audit.
- Any discrepancies or unauthorized transactions must be reported immediately to the CFO and investigated.

#### **5. Compliance and Training**

- All employees involved in EFT processing must complete annual training on security protocols and compliance requirements.
- The policy is reviewed annually to ensure alignment with current regulations and industry best practices.
- Non-compliance with this policy may result in disciplinary action, including revocation of system access or termination.

**By implementing this policy, the organization ensures secure, compliant, and efficient management of Electronic Funds Transfers.**

---

#### **References**

---

2 CFR 200  
BARS Manual 3.8.11

---

#### **Attachment**

---

**Attachment A: Vendor Form**

---

#### **DATE APPROVED:**

---

**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.

# Attachment A Vendor Form



PacMtn Financial Services

## Vendor Form

Contact Information  
201 5th Ave SW, Ste 401  
Olympia, WA 98501

360-515-5134  
FAX 360-252-6730  
fiscal@pacmtn.org

360-515-5134		
FAX 360-252-6730		
fiscal@pacmtn.org		
1. Complete this form to establish an account, ACH payments or to change existing information.		
2. Vendor name must <b>MUST</b> match the name on the bank account.		
3. <b>If setting up a bank account : Please email, mail or fax this completed form with a voided check (checking account), voided deposit slip (savings account), or a bank letter on their letterhead certifying the account name and</b>		
4. With your next payment, a prenote will be sent to your bank to confirm the banking information is correct. This confirmation process takes approximately 7 days. All payments prior to this time will be paid by check.		
Are you making changes to an existing account? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Bank Change <input type="checkbox"/> Business Name		
<input type="checkbox"/> CANCEL ACH Payments <input type="checkbox"/> Address Change		
<b>PLEASE PRINT CLEARLY OR TYPE. BE SURE ALL INFORMATION IS CORRECT.</b>		
<b>Vendor Information:</b>		
<b>Vendor Name:</b>		
<b>TIN/SS #:</b>		
<b>Payment (Remit) Address:</b> <small>Street Number, Apt. Number, Mail-Stop, City, State, Zip</small>		
<b>Contact Name:</b>		
<b>Email Address:</b> <small>(ACH Deposit notifications will be sent to this email address)</small>		
<b>If making change to payment address put old payment address here.</b>		
<b>Print Name</b>	<b>Title</b>	<b>Phone No.</b>
<b>Authorized Signature</b>	<b>Date</b>	
<b>Banking Information</b>		
<b>Bank Address:</b> <small>Street Number, City, State, Zip</small>		
<b>Bank Contact Name:</b>		
<b>Phone #:</b> <small>(Include Area Code)</small>		
<b>ABA Routing #:</b>		
<b>Account #:</b>		
<b>Account Type:</b> <small>(Please check only one)</small>	<input type="checkbox"/> Checking <input type="checkbox"/> Savings	
<b>Vendor's Authorization:</b>		
<i>By signing below, I (we) hereby authorize PacMtn to initiate credit entries and, if necessary, debit entries and adjustments for any credit entries in error to my (our) checking or savings account as indicated and the depository named to credit and/or debit the same to such account.</i>		
<b>Print Name</b>	<b>Title</b>	<b>Phone No.</b>
<b>Authorized Signature</b>	<b>Date</b>	
<b>(For Financial Use Only)</b>		<b>Vendor #</b>
<b>Data Entry Done By</b>	<b>Date</b>	<b>COMMENTS</b>



To: Executive Finance Committee  
Date: April 10, 2025  
Subject: Update of PacMtn's Program Policies

---

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

Recommended Motion to Approve Updates to WIOA Title 1B - Adult, Dislocated Worker, and Youth Policies as presented and Recommend Do Pass to the full WDC Board.

**Overview:** The purpose of this memorandum is to notify the Executive Finance Committee and Board of the necessary updates to our WIOA Title 1B - Adult, Dislocated Worker, and Youth program policies. These revisions are required to ensure alignment with current state and federal directives, as recommended by the Employment Security Department (ESD) Monitoring Unit. The policies to be incorporated include:

- **WSS Policy 1019-11 - Eligibility Policy and Handbook**
  - Clarified eligibility criteria for WIOA Adult, Dislocated Worker, and Youth participants; updated documentation and verification standards; and incorporated state-level guidance on income calculations, public assistance recipients, and Selective Service compliance.
- **WIOA Title I-B Policy 5602-5 - Supportive Services and Needs-Related Payments**
  - Strengthened definitions of urgent needs, clearer coordination expectations with other funding sources, and clarified allowable and unallowable costs. Reinforces documentation and waiver protocol standards.
- **WIOA Title I-B Policy 5620-1 - Follow-Up Services for Adults and Dislocated Workers**
  - Expanded guidance on the provision of follow-up services for up to 12 months post-exit, including eligibility for supportive services during this period. Emphasizes service tracking, documentation, and alignment with TEGL guidance.

**Impact on Current Policy:** The proposed changes reflect enhanced federal alignment and strengthened operational guidance across multiple policy areas:

1. **2.1.1v-1 - Adult & Dislocated Worker Eligibility**

*Clarified formatting for Adult & DW Eligibility, aligned with WSS 1019-11*



*building community prosperity*

2. **2.2.1-v1 - Career Services**

*Clarifies career services may occur out of sequence with justification; references 20 CFR 680.220 and TEGL 19-16; adds documentation requirements.*

3. **2.2.2-v1 - Assessment**

*Requires assessments to determine eligibility and support IEPs; adds federal citations; elevates importance of compliance.*

4. **2.2.3-v1 - Training Services**

*Training must be in-demand, documented in IEP, and justified; no sequence required; aligns to 20 CFR 680.220.*

5. **2.2.4-v1 - Self-Sufficiency**

*Adds training justification, IEP linkage, and federal references; clarifies underemployment service eligibility.*

6. **2.3.1-v1 - Individual Training Accounts (ITA)**

*Adds ITA funding limits, waiver use, alignment with demand lists and career goals; strengthens guidance for use and approval.*

7. **2.3.2-v1 - Customized Training**

*Adds employer contribution thresholds, sector strategies, and group size expectations; clarifies eligibility and employer commitment.*

8. **2.3.3-v1 - Work Experience (WorkEx)**

*Emphasizes employer/employee relationship, labor standards, and monitoring; adds compliance and documentation detail.*

9. **2.3.4-v1 - On-the-Job Training (OJT)**

*Adds reverse referral guidance, pre-award review, and required training plans; expands employer eligibility and cost sharing.*

10. **2.3.5-v1 - Transitional Jobs**

*Adds max duration, funding limits, TRJ Agreement form, and documentation expectations; formalizes training guidance.*

11. **2.4.1-v1 - Supportive Services**

*Expanded guidance for urgent needs, follow-up services, and waiver forms; stronger coordination and documentation required.*



*building community prosperity*

12. **2.4.2-v1 - Tools & Equipment**

*Clarifies ownership transfer, cost tracking, and integration with follow-up services; ties costs to supportive service policy.*

13. **2.5.1-v1 - Incumbent Worker Training (IWT)**

*Adds prioritization for layoff aversion, expanded employer eligibility, documentation standards, and sector strategies.*

14. **2.5.2-v1 - Co-Enrollment TAA/Dislocated Worker**

*Specifies assessment transfer, outreach timelines, shared documentation, and case management compliance.*

15. **2.6.1-v1 - WIOA Participant Follow-Up**

*Clarifies allowable follow-up services including supportive assistance; reinforces alignment with TEGL guidance and adds new service code.*

16. **2.6.2-v1 - WIOA Incentive Payment (Adult, DW, Youth, SWA)**

*Clarifies eligibility by funding stream, allowable activities, annual caps, required documentation, and disallowed activities.*

17. **3.1.1-v1 - WIOA Incentive Payment (Youth)**

*Specifies eligible youth achievements, documentation, and caps; aligns with TEGL/CFR and disallows incentives for non-performance.*

18. **3.1.2-v1 - Youth Eligibility & Selection**

*Strengthens documentation requirements, adds federal/state citations, and clarifies family size and eligibility categories.*

19. **3.2.1-v1 - Youth Assessment**

*Clarifies CASAS pre-test and appraisal use, security, and allowable forms; expands documentation expectations.*

20. **3.2.2-v1 - Individual Service Strategy (ISS)**

*Reinforces alignment to WIOA elements, spending rules, and performance goals; adds justification requirements.*

21. **3.3.1-v1 - Additional Assistance (Youth Eligibility)**

*Clarifies criteria for "requires additional assistance," outlines documentation and waiver process.*



*building community prosperity*

22. **3.3.2-v1 - WIOA 14 Required Elements**

*Reinforces documentation of referrals, MIS expectations, and follow-up requirements.*

23. **3.3.3-v1 - Youth Individual Training Accounts (ITAs)**

*Specifies prerequisites, waiver use, \$7,000 cap, and documentation; aligns with demand occupation list.*

24. **3.3.4-v1 - Youth Support Services**

*Adds follow-up use, fiscal guardrails, waiver protocol, and stricter documentation standards.*

To support the Committee's review and understanding of these updates, a Combined Policy Statement Comparison Table has been prepared. This document outlines each policy by number and title, providing a side-by-side comparison of current (final) and proposed (draft) statements, along with key updates introduced in the draft versions. The table serves to highlight:

- Policies with minor formatting updates versus those with substantive content revisions.
- New federal citations and TEGL references incorporated for compliance.
- Expanded operational guidance for documentation, eligibility, assessment, and incentive structures.

Committee members are encouraged to review the table in detail to better understand the scope and intent of the proposed revisions. Feedback or questions prior to formal adoption are welcome.

# Combined Policy Statement Comparison Table

Policy #	Title	Final Policy Statement	Draft Policy Statement	Key Updates in Draft
2.1.1	Adult & DW Eligibility	Eligibility per WSS Policy 1019-11 with standard requirements.	Same content; clarified formatting and changed status to Draft.	No substantive changes.
2.2.1	Career Services	Career services offered without strict sequence. Three types: basic, individualized, follow-up.	Clarifies that career services may precede or be bypassed with justification per 20 CFR 680.220 and TEGL 19-16.	Adds federal references and documentation requirements.
2.2.2	Assessment	Assessment types defined; CASAS required for basic skills.	Adds policy requirement to conduct assessments for eligibility and IEP support; stronger compliance framing.	Elevates role of assessments, adds TEGL/Federal citation.
2.2.3	Training Services	Training for those unable to obtain/retain employment via career services; no sequence required.	Training must be in-demand, documented in IEP, and justified; aligns with 20 CFR 680.220.	Adds justification, compliance language, IEP alignment.
2.2.4	Self-Sufficiency	Adults: 225% poverty; DWs: 80% prior wage; allows service to underemployed.	Adds training justification, IEP linkage, and federal compliance references.	Clarifies requirements and connects to career planning and IEP.
2.3.1	Individual Training Accounts (ITA)	Training services provided via ITAs; customer chooses provider from ETPL.	Adds detail on ITA funding limits, waiver use, and alignment with demand lists and career goals.	Expanded structure and guidance for ITA use and approval.
2.3.2	Customized Training	Training provided to meet specific employer needs with employer cost share.	Adds thresholds for employer contributions, group size expectations, and sector strategies.	Clarifies eligibility, employer commitment, and alignment with in-demand occupations.

2.3.3	Work Experience (WorkEx)	Structured, time-limited learning experience in public/private/nonprofit sectors.	Adds emphasis on employer/employee relationship, labor standards, and monitoring.	Expanded compliance, documentation, and audit readiness guidance.
2.3.4	On-the-Job Training (OJT)	Contract-based training with up to 75% wage reimbursement; employer must retain participant.	Adds rules for reverse referrals, in-demand jobs, pre-award review, and training plan requirements.	Expanded eligibility, employer compliance, and cost guidelines.
2.3.5	Transitional Jobs	Time-limited subsidized employment for individuals with barriers to work.	Adds max duration, funding limits, detailed participant documentation, and TRJ Agreement form.	Clarifies implementation, wage rules, and formalizes training expectations.
2.4.1	Supportive Services	Supportive services may be provided to enrolled WIOA participants unable to access other resources; must be documented.	Expanded guidance on urgent situations, follow-up services, and use of waiver forms. Reinforces coordination and documentation.	Clarifies urgent needs provision, follow-up allowance, and adds stricter documentation rules.
2.4.2	Tools & Equipment	Tools/equipment may be provided as supportive services tied to training, OJT, or employment requirements.	Clarifies ownership of tools, use during follow-up, and ties cost tracking to Supportive Services policy.	Clarifies transfer of ownership, integration with follow-up services, and ties costs to support policies.
2.5.1	Incumbent Worker Training (IWT)	IWT may use up to 20% of Adult/DW funds for upskilling existing workers; must meet cost share and eligibility rules.	Adds prioritization for layoffs averted and sector strategies. Expands employer eligibility detail.	Adds employer evaluation criteria and expanded documentation and prioritization language.
2.5.2	Co-Enrollment TAA/Dislocated Worker	Requires co-enrollment of TAA participants into DW program unless declined; must be documented within 10 days.	Adds specifics on assessment transferability, timelines for outreach, shared documentation, and continuous case management.	Expands compliance guidance, timelines, and cross-program documentation expectations.
2.6.1	WIOA Participant Follow-Up	Follow-up services help WIOA Adult/DW participants retain	Clarifies follow-up services may include supportive	Reinforces DOL TEGL guidance, adds new service

		unsubsidized employment for up to 12 months post-exit.	services (without extending participation); must be documented.	code for supportive assistance in follow-up.
2.6.2	WIOA Incentive Payment (Adult, DW, Youth, SWA)	Outlines incentive payments for WIOA participants tied to milestone achievements in education, work experience, or training.	Clarifies incentive eligibility by funding stream (Adult, DW, Youth), allowable activities, documentation, and funding approval process.	Adds detailed eligibility criteria by group, annual caps, required documentation, and disallows incentives for non-performance activities.
3.1.1	WIOA Incentive Payment (Youth)	Incentives allowed for Youth participants. For Adults/DWs, milestone incentives allowed if tied to training/work experience. Requires approval and documentation.	Clarifies allowable achievements by program type (youth vs. adult/DW), adds documentation, caps, and ineligible activities.	Adds program-specific caps, expands incentive criteria, clarifies documentation, and aligns with CFR/TEGL guidance.
3.1.2	Youth Eligibility & Selection	Outlines eligibility criteria for In-School and Out-of-School Youth.	Strengthens guidance on documentation, adds federal/state citations, clarifies categories and family size definitions.	Reinforces documentation standards and adds compliance citations.
3.2.1	Youth Assessment	Requires use of CASAS to determine Basic Skills Deficiency (BSD).	Adds pre-test and appraisal clarification, expanded allowable forms, emphasizes test security.	Expanded guidance on CASAS testing protocols and documentation.
3.2.2	Individual Service Strategy (ISS)	ISS required for youth participants. Must link to WIOA Youth Elements.	Adds stronger language on justification, aligns to WSS Policy 1019-11.	Reinforces alignment to performance goals and spending rules.
3.3.1	Additional Assistance (Youth Eligibility)	Defines youth who may qualify under the 'requires additional assistance' criterion.	Clarifies acceptable documentation, outlines criteria and waiver process.	Stronger documentation requirements and structured eligibility examples.
3.3.2	WIOA 14 Required Elements	All 14 youth elements must be available as needed.	Clarifies documentation of referrals, MIS	Enhances documentation and

			expectations, and follow-up standards.	timeliness guidance.
3.3.3	Youth Individual Training Accounts (ITAs)	Training services for eligible OSY through ITAs with ETPL providers. \$7,000 max.	Clarifies prerequisites, waiver use, and required documentation.	Expanded guidance on funding use and alignment with demand occupations.
3.3.4	Youth Support Services	Supportive services may be issued if linked to ISS and necessary for participation.	Adds requirement for follow-up use, stricter documentation, disallowable costs.	Expanded fiscal guardrails, waiver protocols, and link to performance.

## TITLE: WIOA Adult & Dislocated Worker Program Eligibility Policy Policy #2.1.1-v1

---

**Type:** Program Policy

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

**Date Last Revised:** 09/22/2022

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

**Status:** Draft

**Supersedes:** WIA Policies #s 500, 501, 510, 515, 590  
and PacMtn Policy #2.1.1

---

### Purpose

**WIOA provides for a workforce system that is universally accessible, customer centered, and training that is job driven.**

This policy provides guidance for determining the eligibility of individuals to be enrolled and provides 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.

---

### Policy

WIOA Program Staff must ensure that individuals interested in and eligible for WIOA Adult or Dislocated Worker services are determined eligible using the criteria outlined in the WorkSource System Policy 1019-11 Eligibility Policy Handbook. This includes, but is not limited to, verification of age, work authorization, selective service compliance (if applicable), and dislocation event (for DW). Priority of service for veterans and eligible low-income individuals must also be applied as outlined in Section 3.2 of the handbook. All eligibility documentation must be retained in accordance with WIOA Title I-B Policy 5403, Revision 2 (Records Retention).

---

### Policy Guidelines

Enrollment into a WIOA funded program occurs at the point where there is significant staff involvement. Significant staff involvement includes staff's assessment of a participant's skills, education, or career objectives to assist the participant in making a decision or accessing information, compared to staff providing a participant with readily available information that does not require an assessment.

WIOA requires that local workforce councils set the criteria for determining whether employed applicants who are not earning a self-sufficient wage are allowed enrollment into a WIOA Title 1 funded adult or dislocated worker program to receive services necessary to obtain or retain employment which will lead to self-sufficiency.

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.

## 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 (males who are 18 or older and born on or after January 1, 1960), unless an exception is justified (see Section 5.2 for guidance on Selective Service Registration).

### 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 6010 – Priority of Service for Veterans and Eligible Spouses apply within the mandatory priority criteria of low-income/public assistance recipient.
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 Systems Policy Revision 3 – 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	Guidelines and procedures for serving additional priority groups as set forth in PacMtn’s Adult Eligibility Procedures

	adult eligibility – WorkSource Policy 1019, Revision 11 – Section 3.C, III – Local Responsibilities, Adult Program.	
--	---	--

**NOTE:** An adult with disability can be considered a family of one for low-income determinations (refer to Section 5.6.2) of WorkSource System Policy 1019, Revision 11 Eligibility Policy Handbook (February 28, 2025).

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).

According to proposed 20 CFR 680.120, 680.130, and 680.210, the above priority requirements do not necessarily mean that only the recipients of public assistance and other low-income individuals can receive WIOA adult funded career and training services.

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

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 Matrix.

**NOTE:** Up to twenty percent (20%) of the total number of participants enrolled in any program year may be enrolled using these 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

**Priority Selection for Career Services and Training Services Funded with WIOA Statewide (10%) Discretionary Grants/Contracts**

For purposes of WIOA statewide (15%) discretionary funds, the Governor has determined that these 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 10% discretionary grants and contracts will continue to provide priority selection of veterans for career and training service in alignment with WorkSource System Policy 1009 Revision 3. In applying this policy to 10% funded projects, veterans who are unemployed and/or low-income, have priority over all other individuals served under these projects.

***For complete WIOA Adult eligibility criteria and documentation requirements see Section 3 and Section 6 of the Eligibility Handbook***

**Dislocated Worker Program**

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

- U.S. citizen or otherwise legally entitled to work in the U.S.;
- Selective Service Registration (males who are 18 or older and born on or after January 1, 1960), unless an exception is justified (see Section 5.2 for guidance on Selective Service registration); and
- 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 5.7 of the Eligibility Handbook for guidance related to the impact of Washington’s Marriage Equality Act.

Dislocated Worker Eligibility Criteria	
Category	Criteria
<b>1. General Dislocation</b>	<input type="checkbox"/> <b>1.1</b> An individual who was terminated, laid off, or received a notice of termination or layoff. <b>AND</b>
	<input type="checkbox"/> <b>1.2</b> Is determined unlikely to return to previous industry or occupation (defined by LW DBs); <b>AND</b>
	<input type="checkbox"/> <b>1.3.1</b> Is eligible for or has exhausted entitlement to unemployment compensation; <b>OR</b> <input type="checkbox"/> <b>1.3.2</b> Is not eligible for unemployment compensation but can show attachment to the workforce of sufficient duration.

<p><b>2. Dislocation from Facility Closure / Substantial Layoff</b></p>	<input type="checkbox"/>  <input type="checkbox"/>	<p><b>2.1</b> An individual who was terminated, laid off, or received a notice of layoff from employment at a plant, facility, or enterprise as a result of: Permanent closure; or Substantial layoff; <b>OR</b></p> <p><b>2.2</b> An individual employed at a facility at which the employer has made a general announcement that the facility will close within 180 days.</p>
<p><b>3. Self-employed Dislocation</b></p>	<input type="checkbox"/>	<p>Was self-employed (including employment as a farmer, rancher or a fisherman), but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters.</p>
<p><b>4. Displaced Homemaker *</b></p> <p>* Per TEGL 26-13, individuals cannot cite long-term partners to whom they were not married as family members. Individuals can cite adult children upon whom they were financially dependent as family members so long as it is appropriately documented.</p>	<input type="checkbox"/>  <input type="checkbox"/>	<p><b>4.1</b> An individual who was dependent on the income of another family member and is no longer supported by the income of that family member;</p> <p><b>OR</b></p> <p>Is the dependent spouse of a member of the armed forces on active duty and whose family income is significantly reduced because of a deployment, a call or order to active duty, or a service connected death or disability of the member</p> <p><b>AND</b></p> <p><b>4.2</b> Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.</p>
<p><b>5. Dislocated/ Separating Military Service Members</b></p>	<input type="checkbox"/>	<p><b>5.1</b> A non-retiree military service member who was discharged or released from service under <u>other than dishonorable</u> or has received a notice of military separation (defined by LWDB (see Section 4.2.1). Per proposed 20 CFR 680.660, separating military service members automatically qualify as unlikely to return to a previous industry or occupation and as eligible for or exhausted entitlement to Unemployment Insurance.</p> <p><b>Note:</b> Dislocated military service members, veterans and other covered persons are eligible for Priority of Service (POS) as described in POS Policy 1009, Revision 2.</p>
<p><b>6. Spouses of Military Service Members</b></p>	<input type="checkbox"/>  <input type="checkbox"/>	<p><b>6.1</b> The spouse of a member of the armed forces on active duty, and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member;</p> <p><b>OR</b></p> <p><b>6.2</b> The spouse of a member of the armed forces on active duty and who is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.</p> <p><b>Note:</b> a military spouse may also qualify as a displaced homemaker (Category 4).</p>

**For complete WIOA Dislocated Worker eligibility criteria and documentation requirements; to include each of the following, please refer to Sections 4, 5 and 6 of the Eligibility Handbook.**

- 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)
- Eligibility for Employed Individuals
- Stop Gap Employment

**For additional program guidance for each of the following, please refer to Sections 5 and 6 of the Eligibility Handbook.**

- 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 #2.1.1-P**

*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.*

---

## **Definitions**

---

NA

---

## **References**

---

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 6010 – Priority of Service for Veterans and Spouses  
WorkSource System Policy 1003 (Rev6) – Data Element Validation  
WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs  
WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services  
WIOA Title I-B Policy 5403 (Rev2) – Records Retention and Public Access

PacMtn Procedures #2.1.1-P Adult Eligibility  
PacMtn Procedures #2.1.1-P Dislocated Worker Eligibility  
PacMtn Self-Sufficiency Policy #2.3.2  
PacMtn Self-Sufficiency Procedures #2.3.2-P

**DATE APPROVED: 06/04/2016, 06/13/2019**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: Career Services Policy #2.2.1-v1

---

**Type:** Program Policy

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

**Date Last Revised:** 06/07/2019

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

**Status:** Draft

**Supersedes:** WIA Procedures in Policies #500R6, 505R2, 515R2, 520R2, & 550R2 and PacMtn Policy # 2.2.1

---

### Purpose

This policy provides guidance regarding the eligibility of Adult and Dislocated Workers for Career Services. The WIOA Adult and Dislocated Worker formula programs, in coordination with the Wagner-Peyser (WP) Employment Services (ES), are pivotal pieces of the one-stop delivery system, which is the foundation of the workforce system. The system provides universal access to career services to meet the diverse needs of Adults and Dislocated Workers.

---

### Policy

Adults and Dislocated Workers are eligible to receive career services if the individual is at least 18 years of age and is enrolled in either the WIOA Adult or Dislocated Worker formula programs. There are three types of career services: basic, individualized, and follow-up. Basic and individualized career services may be provided in any order to meet the individual needs of participants.

Training services are also available when a participant is determined eligible and in need of services beyond career services to obtain or retain employment. If career services are not provided before training, staff must document the justification in accordance with 20 CFR 680.220 and TEGL 19-16.

Follow-up services may only begin after exit and must be offered for up to 12 months unless declined or the individual is unreachable. These services must not extend participation. Refer to WSS Policy 5620-1 and TEGL 10-16, Change 3 for follow-up guidance.

---

### Policy Guidelines

#### Basic Career Services

Basic career services are available to individuals determined eligible for and enrolled in an Adult or Dislocated Worker program.

#### Individualized Career Services

Individualized career services are available to individuals once qualified staff has determined the service is needed for the individual to obtain or retain employment.

## Follow-up Services

Follow-up services can only be provided to WIOA Title I Adult and Dislocated Worker program participants who are placed in unsubsidized employment and have system exited.

Follow-up services, if requested by exited individuals and determined by staff to be appropriate for those individuals, must be provided for a period of up to 12 months (i.e., not more than 12 months).

*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.*

---

## Definitions

---

NA

---

## References

---

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

Training and Employment Guidance Letter (TEGL) 17-05, 19-16, and 10-16, Change 3

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook

WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs

WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

PacMtn Policy #2.2.3 - Training Services

PacMtn Procedure #2.2.-P - Career Services

*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: 06/04/2016, 06/13/2019**

---

### Direct Inquiries to:

**Pacific Mountain Workforce Development Council**

**201 5<sup>th</sup> Ave SW Se. 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.

---

**Type:** Program Policy

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

**Date Last Revised:** 06/07/2019

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

**Status:** Draft

**Supersedes:** WIA Policy 550R2 and  
PacMtn Policy # 2.2.2

---

## **Purpose**

Assessments play a key role in the decision-making processes of both participant and WIOA staff. Results from assessments form the basis for measuring and/or identifying financial situation, work readiness, skills, abilities, interest and attitudes relating to vocational training, basic skills education, and may be used for career discovery and/or specific job applications. Assessments also serve as a foundation for determination of the need to provide career services.

---

## **Policy**

WIOA Adult and Dislocated Worker program staff must conduct appropriate assessments to determine service needs, eligibility, and to support the Individual Employment Plan (IEP). Assessments must follow 20 CFR 680.220, TEGLs 10-16, Change 3 & 19-16, and WorkSource System Policy 1019-11.

### **Assessment Types**

1. **Initial Assessment** – Identifies basic skills, career interests, and support needs; informs eligibility and services.
2. **Comprehensive/Specialized Assessment** – In-depth review of barriers, occupational skills, and education needs; informs the IEP.
3. **Pre-Employment Assessment** – Measures job readiness and soft skills prior to training or placement.

### **Integration & Documentation**

- Results must be documented in MIS and used to guide services.
- Assessments may justify supportive services (per Policy 5602-5) or inform follow-up (per Policy 5620-1).
- Assessments may be used for self-service customers if barriers are identified.

This policy ensures consistent and compliant assessment practices to support successful participant outcomes.

---

## **Policy Guidelines**

---

Depending upon customer or participant need and status while engaged in WIOA formula funded programs; there are three different types of assessment which are to be provided as needed: 1) initial assessment; 2) comprehensive assessment; and 3) pre-employment assessment.

*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*

---

## Definitions

---

NA

---

## References

---

Workforce Innovation and Opportunity Act of 2014

WIOA 134(c)(2)

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

WorkSource System Policy 1011 (Rev6) - CASAS for Basic Skills Assessments

State WorkSource System Policy 1016 (Rev1) - One-Stop Assessment and Certification

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook

WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs

WIOA Title I-B Policy 5620 (Rev1) - Follow-Up Services

TEGL 19-16

TEGL 21-16

TEGL 10-16, Change 3

**DATE APPROVED: 06/04/2016, 06/13/2019**

---

---

**Direct Inquiries to:**

**Pacific Mountain Workforce Development Council**

**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: Training Services Policy #2.2.3-v1

---

**Type:** Program Policy

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

**Date Last Revised:** 03/03/2022

**Date Posted to Website:** 04/18/2022

**Status:** Draft

**Supersedes:** WIA Policy #550R2 & 590R6  
and PacMtn Policy #2.2.3

---

### Purpose

This policy provides guidance regarding Training Services for eligible Adult and Dislocated Workers.

Training services can be critical to the employment success of many Adults and Dislocated Workers.

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. WIOA provides for a workforce system that is universally accessible, customer centered, and training that is job driven.

---

### Policy

Adults and Dislocated Workers enrolled in WIOA programs may receive training services if, after an interview, evaluation or assessment, and career planning, the participant is determined to:

- Be unlikely or unable to obtain or retain employment through career services alone;
- Require training to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than previous employment; and
- Possess the skills and qualifications to successfully participate in the selected training program.

There is no sequence requirement between career and training services. Training may be provided first when justified and documented in alignment with 20 CFR 680.220 and TEGL 19-16.

---

### Policy Guidelines

Individuals provided training services funded by WIOA Title I must be determined in need of additional service beyond career services to obtain or retain employment. There is no requirement that career services first be provided as a condition of receiving training services.

Program staff must determine that the training the individual receives would result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment. Program staff must also determine that the individual has the skills and qualifications to

successfully participate in and complete the training. Upon a determination that career services are unlikely to obtain these employment outcomes, the individual may be enrolled in training services.

Individuals for whom training has been deemed appropriate must select a training program linked to employment opportunities in the local area or in an area to which the individual is willing to commute or relocate.

The selection of this training program should be fully informed by the performance of relevant training providers, and individuals must be provided with the performance reports for all training providers who provide a relevant program.

WIOA training services must be provided when other sources of grant assistance are unavailable to the individual.

Training services provided under the WIOA adult formula funding must be provided in accordance with PacMtn's priority system.

### **Significant Staff Involvement**

Enrollment into a WIOA funded program occurs at the point where there is significant staff involvement. Significant staff involvement includes staff's assessment of a participant's skills, education or career objectives to assist the participant in making a decision or accessing information, compared to staff providing a participant with readily available information that does not require an assessment.

*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.*

---

### **Definitions**

---

NA

---

### **References**

---

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 sec. 134(c)(3)

WIOA Section 134(c)(3)(A)(iii)

WIOA sec.129(c)(2)

Training and Employment Guidance Letter (TEGL) 17-05 & 19-16

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs  
WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

PacMtn Procedures Document #2.2.3-P - Training Service  
PacMtn Policy #2.3.1 - Individual Training Account (ITA)

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: 06/04/2016, 06/30/2019, 03/03/2022**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Se. 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.

## TITLE: Self-Sufficiency Policy #2.2.4-v1

---

**Type:** Program Policy

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

**Date Last Revised:** 06/07/2019

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

**Status:** Draft

**Supersedes:** WIA Self-Sufficiency Policy 505R2  
and PacMtn Policy #2.2.4

---

### Purpose

In addition to providing career and training services to individuals who are unemployed, there remains a significant population of job seekers who are underemployed. Individuals who are underemployed may include:

- Individuals employed less than full-time who are seeking full-time employment;
- Individuals who are employed in a position that is inadequate with respect to their skills and training;
- Individuals who are employed who meet the definition of a low-income individual
- Individuals who are employed, but whose current job's earnings are not sufficient compared to their previous job's earnings from their previous employment, per State and/or local policy.

---

### Policy

Under WIOA regulations, training services may be made available to employed and unemployed adults and dislocated workers who, based on an interview, evaluation, or assessment and career planning, meet the following conditions:

- Are unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than previous employment through career services alone;
- Are in need of training services to secure or retain employment leading to economic self-sufficiency; and
- Have the skills and qualifications to successfully participate in the selected training program.

There is no sequence of service requirement between career and training services (per 20 CFR 680.220 and TEGL 19-16). However, justification for training services without prior career services must be documented in the participant file.

Training services must be:

- Linked to in-demand industry sectors or occupations in the local or regional area.
- Provided through Individual Training Accounts (ITAs) unless another training contract mechanism is justified per 20 CFR 680.320.
- Supported by documentation in the participant's Individual Employment Plan (IEP).

All training services must comply with WorkSource System Policy 1019-11, WIOA Title I-B Policy 5602-5, and TEGL 19-16.

---

## **Policy Guidelines**

---

WIOA program staff may enroll employed adults and dislocated workers when:

1. An applicant's current wage/income does not provide for self-sufficiency as defined by PacMtn ; and,
2. WIOA program staff determines that WIOA services may assist the applicant in obtaining/progressing to a self-sufficient wage.

The Workforce Investment and Opportunity Act allows enrollment of employed adults and dislocated workers who are not earning a self-sufficient wage. WIOA requires that local workforce councils set the criteria for determining whether an employed applicant needs WIOA Title 1 funded adult or dislocated worker services to obtain or retain employment leading to self-sufficiency.

The regulation provides maximum flexibility, requiring only that self-sufficiency mean employment that pays at least the Lower Living Standard Income Level. The regulation allows self-sufficiency for a dislocated worker to be defined in relation to a percentage of the lay-off wage.

### **PacMtn - DEFINITIONS OF SELF-SUFFICIENCY**

**Employed Adults** □ Shall be defined as family wages before deductions (gross wages) that total 225% or more of the OMB Poverty Guidelines in the six months previous to application for WIOA Adult funded services.

Note:

- The 225% guideline can be found in Priority 4 – Self-Sufficiency for Employed Adults on the Adult Income Guidelines which is updated once a year and viewable on the PacMtn website.
- If an employed adult applicant meets Priority 1 or 2, count them in that appropriate priority
- Priority 4 – Self-sufficiency for Employed Adults is to be used when the employed adult is not low income and is not a veteran (use Priority 3 for non-low income veterans whether they are unemployed or employed).

Limitation for enrollment of Employed WIOA Adults using Priority 4:

- In a program year (July 1 through June 30), up to 20% of the total number of adults enrolled may be enrolled using the self-sufficiency criteria (Priority 4 on the Adult Income Guidelines).

**For Employed Dislocated Workers** □ Shall be defined as employment which provides the worker a wage that is equal to or greater than 80% of his or her wage at the time of dislocation.

Methods to determine wage and/or income for dislocated workers:

The word “wage” and “income” are interchangeable for this policy. Therefore, you could calculate the wage/income to meet the 80% criteria by either:

- Comparing the hourly wage at time of dislocation to the current hourly wage.
- Comparing the monthly income (total earnings for the month) to the current monthly earnings.

Note:

- An applicant must have been dislocated from a job as their eligibility will be based upon the job of dislocation.
- If the applicant, after being dislocated, took a job for income maintenance, whether a permanent, temporary or as a Stop-Gap job, the 80% rule still applies.

Employment that does not provide a self-sufficient wage is considered by PacMtn to be stop-gap as it is reasonable to expect that the dislocated worker will leave for a job that provides a self-sufficient wage or opportunity to advance to a self-sufficient wage upon finding a job that requires their training and experience.

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

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

This policy is supplemental to PacMtn’s WIOA Policy # 2.1.1-P for Adult and Dislocated Worker Eligibility for the purpose of addressing the enrollment of employed adults and dislocated workers.

*Any discrepancies arising between PacMtn policy 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 may set forth stricter requirements than provided by federal and state guidance, but in no case will PacMtn policy not meet minimum federal and state policy.*

---

## Definitions

---

NA

---

## References

---

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 sec. 3(36)  
WIOA sec. 3(24)  
WIOA sec. 134(c)(3)(A)  
Training and Employment Guidance Letter (TEGL) 19-16, 10-09, 22-04 Change 1

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs  
WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

PacMtn Procedures Document #2.2.4-P - Self-Sufficiency  
PacMtn Policy #2.3.1 - Adult & Dislocated Worker Program Eligibility

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: 06/04/2016, 06/13/2019**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: Individual Training Accounts Policy #2.3.1-v1

---

**Type:** Program Policy

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

**Date Last Revised:** 03/03/2022

**Date Posted to Website:** 04/18/2022

**Status:** Draft

**Supersedes:** WIA Policy #520R2 and PacMtn Policy # 2.3.1

---

### Purpose

This policy provides guidance on Individual Training Accounts (ITAs) for training services. Customer choice is a guiding principle of WIOA. Participants are expected to make a self-informed choice about their own employment future and the training services needed.

---

### Policy

Training services must be made available to WIOA-enrolled Adults and Dislocated Workers who have been determined eligible and in need of training to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than previous employment. When appropriate, training services should be provided through an Individual Training Account (ITA).

Participants may select an Eligible Training Provider (ETP) from the Washington State Eligible Training Provider List (ETPL) in consultation with program staff. The selection must be informed by labor market information, skills assessments, career planning, and training provider performance data. Program staff must ensure the selected training aligns with in-demand industry sectors or occupations identified in PacMtn's regional plan.

There is no requirement that basic or individualized career services be provided prior to training services. However, staff must document that the participant:

- Is unlikely or unable to obtain or retain employment through career services alone;
- Requires training services to gain or maintain employment leading to self-sufficiency; and
- Has the skills and qualifications to successfully participate in the training program.

---

### Policy Guidelines

#### Need for Training

The award of an ITA is not an entitlement, therefore, even though an Adult or Dislocated Worker may be eligible (and meet priority of service) for enrollment into a WIOA Title 1 funded program, the provision of training must be needed for the participant to obtain employment that leads to economic self-sufficiency.

### **Use of Previous Assessments**

If program staff determines it is appropriate to use a recent interview, evaluation, or assessment of the participant conducted for another education or training program, then a new assessment is not required.

### **Time Limits**

An ITA is limited to six (6) quarters of school. A waiver may be submitted to request additional time to complete the program of training. If a participant already has an associate degree, they may use an ITA to complete a bachelor's degree if their occupational goal requires a bachelor's degree or will make them more employable. Participants who need to prepare for college level classes by taking reading, writing, math or prerequisite classes are not to be considered as having started their ITA until they begin to take college level classes toward their degree. However, an ITA award could fund prerequisite training to a vocational training program if it is required by the educational institution.

### **Funding Limits**

WIOA Title 1 ITA funding for tuition and fees, is limited to a maximum of \$7,000 for up to six (6) quarters of training. The amount and duration of an ITA award shall be determined on an individual basis. Funding amounts will take into account any other financial assistance available to the participant and also the federal funding available to the Adult or Dislocated Worker program operator. Other costs associated with training such as parking fees, school supplies, parking passes, licenses, books, uniforms, inoculations, background checks, driving abstracts, etc. may be considered a training cost and would not be included in the \$7,000 maximum for tuition and fees.

### **Participants Must Apply for Financial Aid**

Participants need to apply for financial aid each year and a copy of the award or denial notification must be placed in the file. If the participant will be using financial aid for their living expenses, the participant's personal budget must include the financial aid funds that will be used for living expenses.

Individuals may select training that costs more than the maximum amount available for ITA's when other sources of funds (e.g., Pell Grants, scholarships, severance pay, etc.) are available to supplement the ITA

### **How ITAs are Authorized**

Before any WIOA Title 1 training funds are expended, an ITA request must be approved by WIOA program staff. The ITA request (form and process) includes career exploration activities designed for a participant to gather the information he or she needs to make an informed decision about the occupation and training provider they choose.

### **Demand Occupation Requirement**

The ITA program of training must be for a demand occupation as designated on the Washington State Demand/Decline List. A waiver may be submitted to provide training in an occupation showing as "Balanced, or In-Decline" on the demand list. The training may be approved if it is on a demand list for another WA Workforce Development Area and the participant is able and willing to commute or relocate.

### **Eligible Training Provider List (ETPL) Requirement**

The ITA program of training *and* training provider must be on the Washington State ETPL for the local WDA or another WA State WDA (if the participant is able and willing to commute or relocate), or it may be on another state's list at the time of the ITA approval.

### **Training Programs Removed from an ETPL**

When a program of training is removed from the Eligible Training Provider list, a participant may continue and complete their program of training, as originally approved; however, the ITA may not be modified or extended.

### **Time Limit to Enroll**

A participant must be enrolled in school within 90 days of the approval of their ITA. (See - Approval of an ITA request). It is recommended for participants who need to attend basic skills or prerequisite classes that their ITA is not finalized for approval until they are ready to begin college level classes.

### **Modifying an ITA**

WIOA program staff may approve a change of the participant's occupational goal to a related occupational goal when a participant decides after attending one quarter of school (maximum of fifteen (15) quarter credits) the occupation chosen is not suitable for the participant.

WIOA program operator may choose to write an internal policy that specifies if there is a specific amount of time that must pass before the program will accept a request for additional training through an ITA.

### **Using Purchase Orders**

After a participant has approval for an ITA, WIOA program staff may write a purchase order to the training institution for tuition. WIOA program staff must follow its own organization's procedure for obligating and de-obligating funds.

### **Coordination of WIOA Training Funds and other Federal Assistance**

WIOA program operators are to consider other sources of funding for training (excluding loans) to pay for training costs so that WIOA funds are used to supplement but not supplant other sources.

An exception to this is educational funding for Veterans. According to TEGL 10-09, the GI Bill and other education and training benefits administered by the Department of Veterans Affairs are not required to be coordinated with WIOA training (i.e., veterans and eligible spouses cannot be required to exhaust their VA benefits prior to gaining access to WIOA Training).

### **Training and Satisfactory Progress**

Participants are required to demonstrate satisfactory progress in training, except for good cause, to access payments through their ITAs.

“Good cause” failure to make satisfactory progress in training includes specific factors that would cause a reasonably prudent person in similar circumstances to fail to make satisfactory progress.

Those factors may include but are not limited to:

- Illness, injury or disability of the participant or a member of the participant's immediate family;
- Severe weather conditions or natural disaster precluding safe travel;
- Destruction of the participant's school records due to a natural disaster or other catastrophe not caused by the participant;
- Acting on advice received from an authority, such as the training provider, instructor, or case manager;
- Training is delayed or cancelled;
- Accepting stop-gap employment with hours or other work conditions that conflict with the training; or
- Accepting goal-related employment prior to completion of training.

**ITA Exceptions:** In situations covered by the following exceptions, a contract for services may be used to provide for training.

- On-the-job training When PacMtn's local policy administrators determine there are an insufficient number of eligible providers in the local area to accomplish the purpose of a system of ITAs.
- When PacMtn's local policy administrators determine a community-based organization (CBO) or other private organization can provide effective training services to individuals with barriers to employment. The criterion for determining effectiveness includes:
  - Financial stability of the organization;
  - Demonstrated performance measures appropriate to the program, including program completion rate; attainment of the skills, certificates or degrees the program is designed to provide; placement after training in unsubsidized employment and retention in employment; and
  - How the specific program relates to the workforce investment needs identified in the local plan.
- Providing training for multiple individuals for in-demand industry sectors or occupations, (as long as the contract does not limit the individual's consumer choice.)
- Circumstances in which a pay-for-performance contract is appropriate, consistent with 683.510.

An ITA is not required for intensive and short-term prevocational services. These are training services lasting thirty-nine (39) hours or less or at a cost of 600 dollars or less. Intensive services may include literacy, internship, work experience and other training activities that may not provide formal occupational skills training or be appropriate for an ITA. Similarly, short-term prevocational services are designed to prepare a participant for work, but do not provide formal occupational skills training. As such, they generally are not appropriate for an ITA.

*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.*

---

## Definitions

---

NA

---

## References

---

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

Training and Employment Guidance Letter (TEGL) 10-09

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook

WIOA Title I-B Policy 5611 (Rev3) - Governor's Procedures for Determining Training

WIOA Title I-B Policy 5601 (Rev2) - Individual Training Accounts

WIOA Title I-B Policy (Rev5) – Supportive Services & NRPs

WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

PacMtn Procedures Document #2.3.1-P – Individual Training Accounts (ITA)

PacMtn Policy #2.3.4 – On-the-Job Training

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: 06/04/2016, 06/07/2019, 03/03/2022**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: Customized Training Policy #2.3.2-v1

---

**Type:** Program Policy

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

**Date Last Revised:** 06/07/2019

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

**Status:** Draft

**Supersedes:** PacMtn Policy # 2.3.2

---

### Purpose

This policy provides guidance regarding Customized Training for eligible Adult and Dislocated Workers. Customized training services can be critical to the employment success of many Adults and Dislocated Workers while also serving the unique needs of an employer. 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. WIOA provides for a workforce system that is universally accessible, customer centered, and training that is job driven. Customized training opportunities provide structured training for participants to gain the knowledge and skills to be competent in the job for which they are hired and lead to stable employment.

---

### Policy

Customized training is a WIOA-authorized training model designed to meet the specific skill requirements of an employer or group of employers, particularly when existing training programs or curricula do not address their needs. Customized training is an alternative to Individual Training Accounts (ITAs) and is typically delivered through a group model. The training is conducted with a commitment from the employer(s) to hire or retain individuals upon successful completion and includes a required employer cost share.

Adults and Dislocated Workers enrolled in WIOA programs may participate in customized training when:

- The training is tailored to the unique requirements of an employer or industry;
- The employer provides a written commitment to hire or retain participants who successfully complete the training; and
- The employer agrees to pay a significant portion of the training cost, as defined by PacMtn's cost-sharing policy and consistent with 20 CFR 680.730–680.740.

Employed individuals may qualify for customized training if all of the following are true:

- The individual is not earning a self-sufficient wage, as defined by PacMtn's local policy;
- The individual meets Fair Labor Standards Act requirements for employee status;

- The training is necessary for job retention, wage advancement, or promotion and includes one or more of the following:
- New technologies or processes;
- Skills upgrades or retooling;
- Workplace literacy or foundational skills;
- Transition to new roles or responsibilities within the company.

---

## **Policy Guidelines**

---

Customized training is designed to provide the PacMtn region with flexibility to ensure that training meets the unique needs of the job seekers and employers or groups of employers. There are several factors that must be considered when customized training is used.

- Groups of individuals that receive training would otherwise lack the necessary requirements of the industry to obtain employment, retain employment or be eligible for advancement in the industry to earn self-sufficient wages.
- The training should provide an industry-recognized credential or certificate that demonstrates the quality of work or advanced ability necessary to obtain, retain or advance in employment in the industry. Other certificates or credentials may be agreed upon with PacMtn approval.
- The number of participants provided training through the employer should be a minimum of five (5) and substantiates the overall cost of the training program. The training should not result in payments per individual higher than \$5,000. Waivers may be obtained for fewer participants or a higher per individual costs with adequate justification.
- The wage and benefit levels of participants should not be reduced after training has occurred. Successful completion of the training should allow for increased wage obtainment or advancement opportunities.
- The occupation for which customized training is being provided must be in demand within the PacMtn region. Priority will be given to those industries identified in the industry cluster study and aligns with current sector strategies.

In order for the employers to be eligible to receive customized training funding:

**The employer's industry sector must be:**

- In demand as defined by WIOA Section 3(23) and determined by ESD labor market information; or
- In balance as determined by ESD labor market information; or

- Declining, but there are compelling reasons justifying investment in customized training.

**The employer must:**

- Be current in unemployment insurance and workers’ compensation taxes, penalties, and/or interest or related payment plan;
- Be located in Washington State;
- Be currently liable for Washington State Business and Occupation tax;
- Be in need of assistance in training future and current employees;
- Be able to contract for customized, short-term, training services (typically less than 6-9 months); and
- Not have laid-off workers within 120 days to relocate.

Employers must contribute a significant portion of the cost of the training program. Contributions to the cost of the training are based upon the size of the current workforce of the employer. Employer share should be:

- At least 10% of the cost if 50 or fewer employees
- At least 25% of the cost if between 51 and 100 employees
- At least 50% of the cost if more than 100 employees

These rates also apply to employers located in multiple areas in Washington State.

*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.*

---

**Definitions**

---

NA

---

**References**

---

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

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
 WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs  
 WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

WIOA Title I-B Policy 5611 (Rev3) - Governor's Procedures for Determining Training Provider Eligibility

PacMtn Procedures Document #2.3.2-P – Customized Training  
PacMtn Policy #2.3.1 - Individual Training Account (ITA)

**DATE APPROVED: 06/04/2016, 06/13/2019**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: Work Experience (WorkEx) Policy #2.3.3-v1

---

**Type:** Program Policy

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

**Date Last Revised:** 06/07/2019

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

**Status:** Draft

**Supersedes:** WIA Policy #570R1 & PacMtn Policy #2.3.3

---

### Purpose

To provide policy direction and guidance for the implementation of Work Experiences (WEXs) for WIOA eligible Adults and Dislocated Workers as an individualized career service within Career Services. WIOA provides for a workforce system that is job driven. The WEX program provides work experience to assist individuals in establishing a work history, demonstrate success in the workplace, and develop skills that lead to stable employment.

---

### Policy

A Work Experience (WEX) opportunity may be provided as an individualized career service to enrolled Adults and Dislocated Workers who have met the priority of service requirements, in alignment with WIOA Sec. 134(c)(2)(A)(xii), 20 CFR 680.180, and TEGL 19-16. Work experience is defined as a planned, structured learning experience in the workplace for a limited duration, contributing to the participant's employment goal(s). Work experience placements may be in the private-for-profit, non-profit, or public sector and may be paid or unpaid, as appropriate. A WEX is not designed to replace an existing employee or position.

Wages are provided by the WIOA service provider and paid directly to the participant, establishing an employer/employee relationship between the service provider and the WEX participant. All labor standards apply in any WEX where an employer/employee relationship exists, as defined by the Fair Labor Standards Act (FLSA).

Employers are not monetarily compensated for hosting WEX participants. Work experience participants may be eligible for supportive services (e.g., transportation, tools, uniforms, and childcare) per WIOA Title I-B Policy 5602-5 and WorkSource System Policy 1020 (Rev2). Additionally, follow-up services must be available for up to 12 months post-exit to support job retention and career advancement per WIOA Title I-B Policy 5620-1 and TEGL 10-16, Change 3.

---

### Policy Guidelines

**A Work Experience (WEX) may consist of:**

- WEXs must provide a planned and structured learning experience that will contribute to the achievement of the participant's employment goals through a measurable training component

- Are designed to assist individuals to establish a work history, demonstrate success in the workplace, and develop the skills that lead to entry into and retention in unsubsidized employment.
- WEX agreements must be signed by all parties prior to the start of the WEX.
- A single WEX Agreement may be written for group training with a single training site provided the working conditions, job description, training plan, wage rates and terms of the Agreement are the same for all participants covered by the Agreement.
- WEX agreements may be modified. All modifications must be in writing and signed by all parties prior to the effective date of the modification. Verbal modifications of WEX agreements are not valid.

#### **WEX Funding/Duration Limits:**

- WEXs are subject to a maximum duration of 6 months with the same (\$7,000) maximum funding limit as stipulated for training in the PacMtn's Individual Training Account Policy #2.3.1.

#### **WEX Monitoring:**

- WIOA program staff must ensure regular and on-going monitoring and oversight of the WEX. Monitoring may include on-site visits and phone/email communication with the employer/trainer and participant to review the participant's progress in meeting training plan objectives. Any deviations from the WEX agreement should be dealt with promptly.
- The WIOA program operator's oversight of the WEX participant's training and payroll records may be reviewed by Federal, State and local fiscal and program monitors. These entities will have the right to access, examine and inspect any site where any phase of the WEX program is being conducted. The service provider will maintain its records and accounts in such a way as to facilitate the audit. Records must be maintained for three (3) years after the conclusion of the WEX.

#### **Transitional Jobs:**

- WIOA permits local areas to offer transitional jobs which are limited work experiences, that are subsidized and for those individuals with barriers to employment because of chronic unemployment or inconsistent work history. There are limits on the amount of funds local areas may use. Refer to PacMtn Policy #2.3.5 - Transitional Jobs and TRJ Agreement.

*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.*

---

## Definitions

---

NA

---

## References

---

WIOA 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

Training and Employment Guidance Letter (TEGL) 19-16 & 10-16, Change 3

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook

WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs

WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

US DOL Wage and Hour Division [www.dol.gov](http://www.dol.gov)

PacMtn Policy #2.3.5 - Transitional Jobs

**DATE APPROVED: 06/04/2016, 06/13/2019**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: On-the-Job Training (OJT) Policy #2.3.4-v1

---

**Type:** Program Policy

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

**Date Last Revised:** 06/07/2019

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

**Status:** Draft

**Supersedes:** WIA OJT Policy #580-Rev3 and  
PacMtn Policy # 2.3.4

---

### Purpose

This policy provides guidance regarding the limitations and eligibility of individuals to participate in On-the-Job Training (OJT) opportunities. WIOA provides for a workforce system that is job-driven. OJT opportunities provide structured training for participants to gain the knowledge and skills to be competent in the job for which they are hired and lead to stable employment.

---

### Policy

On-the-Job Training (OJT) must be provided through a formal contract that establishes a structured training opportunity for the OJT employee to acquire the knowledge and skills necessary to become competent in the job for which they were hired. An OJT employer may be reimbursed fifty (50) percent of the OJT employee's gross wage rate, with the potential for up to seventy-five (75) percent reimbursement (with WDC program operator approval) to offset the extraordinary costs associated with training. Employer reimbursement must not exceed the WA State OJT Wage Cap and must comply with WIOA Sec. 134(c)(3)(h), 20 CFR 680.700-710, and TEGL 19-16. The OJT contract must be limited in duration based on the occupation, training content, participant's prior work experience, and service strategy. The contract must be completed and signed by all parties before the OJT participant can begin training.

OJT may be sequenced with other WIOA program services, including work experience, supportive services, and training, as part of an integrated service strategy. Supportive services and needs-related payments (NRPs) may be provided to assist OJT participants with job-related expenses per WIOA Title I-B Policy 5602-5 and WorkSource System Policy 1020 (Rev2). Additionally, follow-up services must be available for up to 12 months post-exit to support job retention and wage progression per WIOA Title I-B Policy 5620-1 and TEGL 10-16, Change 3.

---

### Policy Guidelines

#### Participant Eligibility

- OJT employees must meet program eligibility requirements for each funding source, i.e., WIOA Adult, Dislocated Worker or Youth formula funded programs.
- Participants who have received funding through an ITA, cohort or other WIOA funded training are also eligible for an OJT.

- WIOA Program Operators must not contract with an employer who has previously exhibited a pattern of failing to provide OJT Employees with continued long-term employment.
- OJT may be provided for enrolled participants who are either employed or unemployed.

OJT requirements for employed participants include:

- The employed participant must be currently earning less than eighty (80) percent or more of the participant's gross wage or income at the time of dislocation; and
- The OJT must provide training for the introduction of new technologies, new production or new service procedures; upgrading to new jobs that require additional skills; or other appropriate purposes; and
- The OJT position must provide an increase in wage, hours and/or benefits to make the participant self-sufficient.

OJT contracts may be written with employers in another area when a participant must relocate or commute in order to obtain employment. However, the WIOA Program Operator may set limitations as to what is reasonable in setting up and monitoring an out of area OJT. If an OJT will be located in another workforce development area, contact the nearest WorkSource as a courtesy.

### **Employer Eligibility**

- The OJT employer must be registered with the Internal Revenue Service (IRS) and have an account with the Washington State Employment Security Department for Unemployment Insurance and carry Workman's Compensation Insurance.
- The employer must be financially solvent and have an adequate payroll record keeping systems that tracks hours worked, gross pay, deductions and net pay.
- An OJT agreement will not displace any currently employed worker or alter current workers' promotional opportunities. Nor will an OJT agreement be made with an employer who has terminated any regular employee or otherwise reduced the workforce in order to hire OJT employees.
- No OJT agreement may be written with a company that has relocated (for the first 120 days after commencing operations), if the relocation has resulted in any employee job losses at the original location. To verify the relocation has not resulted in a loss of employment, WIOA program staff and the OJT employer must complete a Standardized Pre-Award Review.
- The employer must not have workers currently in layoff status or be involved in a labor dispute.

- The OJT agreement must not impair existing contracts for services or collective bargaining agreements. When an OJT agreement would be inconsistent with a collective bargain, the appropriate labor organization and OJT employer must provide written concurrence before the OJT can begin. Additionally, the OJT agreement may not assist, promote nor deter union organizing.
- When an employer refers one of their employees (a reverse referral) to a WIOA program for On-the-Job Training, an OJT contract cannot be written until all of the program enrollment requirements are met.
- OJT employees may not work on the construction, maintenance or operation of any facility that is used for sectarian activities.
- The prospective OJT employer must meet the existing “pattern of failure” requirements.
- The Employer must not illegally discriminate in training or hiring practices because of race, color, sex, national origin, religion, disability, political beliefs or affiliations, or age.

### **Demand for Occupation in Labor Market**

- OJT positions must be for jobs that are in demand in the local labor market.
- Supporting In-Demand verifying documentation must be included in the participant file with OJT contract.

The following should not be considered for OJT: (See waiver information for exceptions.)

- Jobs that are entry-level and require minimal training;
- Jobs where the principle source of income is tips, commissions or piecework;
- Jobs that are intermittent or seasonal in nature;
- Jobs shown as in decline on the Demand/Decline List.

### **Guidance on Providing OJT in Religious Organizations**

The state and DOL have interpreted TEGL 1-05 – “...Changes to Religion-Related Regulations Governing Recipients of DOL Support...” to allow OJT in religious organizations when the participant is offered at least one option to which the participant has no religious objection (genuine and independent private choice). As with any OJT, the religious organization must adhere to all provisions of this policy including being able to effectively train the participant and have the ability to hire the participant upon successful completion of the OJT. Programs must document that the participant has been offered at least one option to which he/she has no religious objection and that the participant is making a genuine and independent private choice to accept the OJT. The one page justification is then filed with the OJT Contract and a case note is entered to acknowledge this issue and filing of the justification.

## **The OJT Contract**

Every OJT opportunity will include a contract (agreement) with the OJT employer and a Training Plan for the employee. The contract must include the requirements of WIOA rules and regulations; the occupation, skills and competencies to be learned; and the length of time the training will be provided.

Refer to OJT Procedure Document #2.3.6-P - for the approved sample OJT contract/agreement, including all necessary training and evaluation forms referenced in this policy

## **Cost Per Participant**

OJT Contracts may not exceed a total reimbursement amount of fifty (50) percent and up to seventy-five (75) percent (with pre-approval) of the maximum gross wage rate of \$29.85 (WA State OJT Wage Cap). The OJT duration may not exceed twenty-six (26) weeks or 1,040 hours. PacMtn may increase the amount of the reimbursement to an amount of up to seventy-five (75) percent of the wage rate after taking into account the following factors:

- The characteristics of the participant(s) with an emphasis on barriers to employment.
- The size of the employer with an emphasis on small businesses (i.e., employers with fewer than 250 employees);
- The quality of employer-provided training (e.g., an industry-recognized credential, advancement opportunity);
- The number of participants the employer agrees to sponsor;
- The wage and benefit level of the participant (both during and after completion of the OJT);
- The OJT position is an in-demand occupation as determined by ESD labor market information;
- The OJT employer is:
  - in an “in-demand” industry as defined by WIOA Section 3(23) and determined by ESD labor market information; or
  - in a “balanced” industry as determined by ESD labor market information; or
  - in a “declining” industry, but there are compelling reasons (e.g., evidence of long-term viability of the employer) justifying reimbursement above 50 percent.
- The employer is currently in unemployment insurance and workers’ compensation taxes, penalties, and/or interest or related payment plan.

The specific factors used when deciding to increase the wage reimbursement levels above 50 percent up to 75 percent must be documented.

WIOA participants who have utilized the maximum allowed under the most current ITA Policy may, also, qualify for up to \$4,000.00 for an OJT.

### **Determining Training Duration-Specific Vocational Preparation (SVP)**

Training will be limited to the period of time required for an OJT employee to become proficient in the position related to the training plan. PacMtn limits the training duration to not less than four (4) weeks and not more than twenty-six (26) weeks or 1,040 hours.

An upper limit for training duration is established using the Specific Vocational Preparation (SVP) estimates for occupations by the U.S. Department of Labor.

Training duration is negotiated with the employer on the basis of the skills that need to be learned to perform the job at a level comparable to an employee who would be hired without the need for OJT. The rationale for the training may also take into account:

- a participant’s disability, including the need for accommodations; and
- the program’s available funding.

*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.*

---

## **Definitions**

---

NA

---

## **References**

---

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

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
WorkSource System Policy 1020 (Rev2) – Data Integrity and Performance Policy and Handbook  
WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs  
WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

TEGL 10-16, Change 3

PacMtn Procedures Document #2.3.6-P - On the Job (OJT)

PacMtn Policy #2.3.3 - Individual Training Account (ITA)

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: 06/04/2016, 06/13/2019**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: Transitional Jobs and TRJ Agreement Policy #2.3.5-v1

---

**Type:** Program Policy

**Date Established:** 08/02/2019

**Date Last Revised:** 11/19/2021

**Date Posted to Website:** 12/27/2019

**Status:** Draft

**Supersedes:** PacMtn Policy # 2.3.5

---

### Purpose

Under WIOA, Transitional Jobs are a type of work-experience local workforce development boards can offer as an individualized career service. Transitional jobs are time-limited, wage-paid work experiences that are subsidized up to 100 percent. These jobs can be in the public, private, or nonprofit sectors and are only available for individuals with barriers to employment who are chronically unemployed or who have an inconsistent work history, as determined by the local board.

Transitional jobs provide individuals with work experience and an opportunity to develop important workplace skills within the context of an employee-employer relationship, in which the TRJ Training Provider/Company most often is the Employer of Record and with an opportunity to develop important workplace skills.

PacMtn has established local policy and procedures to provide direction and guidance for the implementation of Transitional Jobs to serve qualified program participants and employers of the WorkSource System within the PacMtn WDA.

---

### Policy

Transitional Jobs (TJs) are an individualized career service designed to provide work experience opportunities for individuals with barriers to employment in accordance with WIOA Sec. 134(d)(5), 20 CFR 680.190-195, and TEGL 19-16. TJs must be combined with comprehensive career services and supportive services to help participants establish a work history, demonstrate success in the workplace, and develop skills that lead to entry into and retention in unsubsidized employment. Unlike On-the-Job Training (OJT), in Transitional Jobs, the TRJ Training Provider/Company is most often the Employer of Record, and there is no requirement that the employer retain the participant after job completion. However, job retention is an ideal outcome.

### Funding and Allowances for Transitional Jobs

In alignment with PacMtn policy and as approved by the Local Workforce Development Board (LWDB):

1. Up to 10 percent of the combined total allocation of adult and dislocated worker funds may be used to support Transitional Jobs for WIOA participants.
2. Additional funding from federal, state, or private sources may be approved for use at the discretion of the LWDB. Any funding caps or restrictions will be determined based on the

source and total available allocation. Participants in Transitional Jobs may be eligible for supportive services (e.g., transportation, childcare, work-related tools, and uniforms) per WIOA Title I-B Policy 5602-5 and WorkSource System Policy 1020 (Rev2).

Additionally, follow-up services must be available for up to 12 months post-exit to support job retention and career progression per WIOA Title I-B Policy 5620-1 and TEGL 10-16, Change 3.

---

## **Policy Guidelines**

---

Transitional Jobs must be combined with comprehensive employment and allowable supportive services. Comprehensive Employment and Supportive Services must be documented in the program participant's service plan and case notes.

A Transitional Job will be subsidized up to 100% of wages in a qualifying public, private, or nonprofit sector. Transitional Job opportunities are provided to program participants with barriers to employment who have barriers to employment who are chronically unemployed or who have an inconsistent work history, as established by local policy. PacMtn has identified the following:

### **An inconsistent work history**

Consisting of relatively short-term attachment to past jobs (approximately 1 year or less) and gaps in work history that cannot be explained by recent economic conditions.

### **Chronic unemployment**

Typified by unemployment for a period equal to what would be required for exhaustion of Unemployment Insurance benefits, a work history with frequent episodes of unemployment, despite being able and willing to work.

Program staff must document how the transitional job will help the program participant establish a work history, demonstrate success in the workplace, and develop the skills that lead to entry into and retention in unsubsidized employment.

The wages and benefits paid for the transitional job must be similar to those paid for other employees performing similar work. Wages must be based on hours worked as recorded on the trainee's time sheet.

### **Program staff must refer to and follow the fully detailed "Terms and Conditions" requirements as outlined in the attached TRJ Transitional Jobs Agreement.**

Program staff must ensure a Transitional Job agreement (attached), has been completed containing all signatures necessary to include that of the program participant (**TRJ Trainee**), training provider (**TRJ Training Provider/Company**) and program practitioner (**Trainee Provider**). The agreement must clearly state all of the expectations of all parties. The agreement should clarify the rate of pay and the duration of the experience along with the learning objectives for the program participant.

A program or program staff member (**Trainee Provider**) may not spend more than the amount of funds budgeted for transitional jobs in their PacMtn service contracts as allocated in the relative program year.

The total transitional job reimbursement should be based on the wages of others doing similar work, the length of the placement, and whether other resources are available to offset the cost of the wages.

A Transitional Job relationship may be established for a duration of up to and not to exceed one year as determined applicable to the degree of barriers to employment, and additional factor's which should play a part in the decision-making process, as relevant to include:

- The type of employers to be served as TJ sites, their needs and the time needed to establish an applicable work history
- Level of current Job skills upon entry and the level needed to generate a positive outcome
- The need and type of program support and or access to career and supportive services that will be needed during the TJ relationship.
- Program staff may provide eligible Transitional Jobs program participants Support Services as identified allowable within PacMtn's local Support Services Policy #2.4.1 and Support Services Procedure document 2.4.1-P.

---

## Definitions

---

- Program Participant – TRJ Trainee
- Program or Program Staff – TRJ Trainee Provider
- Training Provider - TRJ Training Provider/Company and/or Employer of Record

---

## References

---

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

Training and Employment Guidance Letter (TEGL) 19-16 and 10-16, Change 3

WorkSource System Policy 1020 (Rev2) – Data Integrity and Performance Policy and Handbook

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook

WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs

WIOA Title I-B Policy 5602 (Rev1) – Follow-Up Services

---

## Attachment

---

Transitional Job (TRJ) Agreement with Training Plan

**DATE APPROVED: 08/13/2019, 04/09/2020, 11/19/2021**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

**Transitional Job (TRJ) Agreement with Training Plan**

The training provider named below agrees to provide a TRJ training opportunity, in accordance with the terms and conditions, both of which are incorporated by reference.

**Section 1: Contact Information**

**TRJ Agreement#** \_\_\_\_\_

*Complete information for the Transitional Job (TRJ) Training Provider/Company "Employer of Record" and the Training Provider*

TRJ Trainee Provider:	Contact Person:	Main Telephone #:
TRJ Trainee Provider Address:	Email:	Fax:
TRJ Training Provider/Company Name:	F.E.I.N. #	U.B.I. #
TRJ Training Provider/Company Address:	Contact Person:	Email:
	Telephone #:	Fax:

**Section 2: Trainee and TJ Information** *Complete the contact information for Trainee and reimbursement rates.*

TRJ Trainee Name:	ETO#	Telephone #:
Beginning Date:	End Date:	Total Training Hours:
Job Title:	Economic Development Sector:	
Job Description:		
Hourly Wage Rate:	TRJ maximum	Labor Market Outlook:

**Section 3: Training Plan** *List the skills to be learned by the Trainee and estimated training hours.*

Skills To Be Learned:	Estimated Training Hours:	Start Date	Completion Date
1.			
2.			
3.			
4.			
5.			
Tools, Uniforms, Supplies Needed for Training:			

**Section 4: Transitional Job (TRJ) Agreement – Terms and Conditions**

1. The purpose of this agreement is to establish the general terms and conditions under which TRJ Trainee Provider **identified below** may refer a Workforce Innovation and Opportunity Act (WIOA) Transitional Job (TRJ) Trainee to the TRJ Training Provider/Company to enable the TRJ Trainee to take part in a TRJ as defined under the Workforce Innovation and Opportunities Act. The TRJ Training Provider/Company **identified below** acts as the employer of record.
2. Individuals employed in activities under title I of WIOA must be compensated at the same rates, including periodic increases, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills. Such rates must be in accordance with applicable law but may not be less than the higher of the rate specified in sec. 6(a)(1) of the Fair Labor Standards Act of 1938 (29 U.S.C. 206(a)(1)) or the applicable State or local minimum wage law.
3. The TRJ Provider/Company shall provide worker's compensation coverage for the TRJ employee and assures that the training shall be provided in accordance with WIOA Sec. 181 (a)(1)(A) and 20 CFR 667.272.
4. The Training Provider/Company verifies that the TRJ will relate to the skills to be learned in **Section 3**.
5. The Training Provider/Company certifies that the company is financially solvent on the date of this contract, and, by the best projection, will remain financially able to meet agreement obligations.
6. The Training Provider/Company will be in full accordance with all applicable federal, state, and local laws and ordinances (including but not limited to anti-discrimination, labor and employment laws, environmental laws or health and safety laws) while the Trainee is participating in the Transitional Job (TRJ)
7. The Training Provider/Company certifies that the TRJ will not impair existing agreements for services or collective bargaining agreements and that either it has the concurrence of the appropriate labor organization as to the design and conduct of a TRJ, or it has no collective bargaining agreement with a labor organization that covers the TRJ position.
8. The Training Provider/Company certifies that they have not been debarred or suspended in regard to federal funding. The Training Provider/Company further assures that TRJ funds will not be used to assist, promote, or deter union organizing.
9. The Training Provider/Company certifies that no member of the TRJ Trainees immediate family is engaged in an administrative capacity for the Training Provider/Company or will directly supervise the TRJ

Trainee. For the purpose of this agreement, immediate family is defined as spouse, children, parents, grandparents, grandchildren, brothers, sisters, or person bearing the same relationship to the TRJ Trainee's spouse.

10. The Training Provider/Company certifies that the TRJ Trainee will not be employed to conduct the construction, operation, or maintenance of any part of a facility that is used or to be used for sectarian instruction or as a place for religious worship.

11. The Training Provider/Company assures that the TRJ Trainee has not been hired into or will remain working in any position when any other person is on layoff from the same or a substantially equivalent job within the same organizational unit or has been bumped and has recall rights to that position, nor if the TRJ position is created in a promotional line that infringes on opportunities of current employees.

12. TRJ agreement is subject to modification or termination due to actions taken by the Federal, State, or Local governments that result in a frustration of contract purpose. Such actions include but are not limited to withdrawal of funding.

13. The nondiscrimination assurances at 29 CFR Part 38.25 apply to this TRJ Agreement.

This Transitional Job (TRJ) Agreement is between \_\_\_\_\_ the TRJ Trainee Provider, the Training Provider/Company \_\_\_\_\_ and the TRJ Trainee \_\_\_\_\_.

Both parties agree to the terms and conditions set forth within this agreement. The agreement term commences on:

**(INSERT START DATE)** \_\_\_\_\_ and terminates on **(INSERT END DATE)** \_\_\_\_\_.

**Section 5: FISCAL – Terms and Conditions**

1. Training Provider/Company (Employer of Record) shall pay the Trainee on a schedule concurrent with current employees of the organization in an amount not to exceed total reimbursement for hours worked by Trainee in accordance with this Agreement or any executed modifications.
2. Training Provider/Company agrees to complete and report on a monthly basis progress of Trainee, to insure Trainee's progress. To submit to the TRJ Provider by the time/date provided on a schedule to allow adequate time to process reimbursements to Training Provider/Company, no less than monthly.
3. Training Provider/Company agrees that records which are related to the TRJ agreement are subject to review, monitoring, and audit by the TRJ Provider, the State and/or the federal government, at any time and without prior notice to the Training Provider/Company Name.
4. Training Provider/Company shall provide adequate insurance coverage to protect against legal liability arising out of TRJ activity.

**Section 5: Signatures**

**a) I certify that I am legally authorized to enter into this Agreement on behalf of the Training Provider/Company and that I agree to all the terms and conditions stated above.**

---

Signature of TRJ Provider/Company

Title

Date

***b) I certify I am legally authorized to enter into this Agreement on behalf of the TRJ provider and that I agree to all the terms and conditions stated above.***

---

Signature

Title

Date

---

Signature TRJ Trainee Provider

Title

Date

***c) I certify I agree to participate in the Transitional Job Opportunity listed above.***

---

Signature of TRJ Trainee

Date

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

## TITLE: Supportive Services Policy #2.4.1-v1

---

**Type:** Program Policy

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

**Date Last Revised:** 03/03/2022

**Date Posted to Website:** 04/18/2022

**Status:** Draft

**Supersedes:** WIA Policy #530R4 and  
PacMtn Policy # 2.4.1

---

### Purpose

The purpose of this policy is to establish guidelines for providing supportive services for Adults and Dislocated Workers. WIOA requires coordination with other resources in a community to ensure that support services are provided only when they are not otherwise available.

---

### Policy

Supportive services enable individuals to participate in WIOA-funded programs and activities to achieve employment and job retention in accordance with WIOA Sec. 134(d)(2) & (3), 20 CFR 680.900-970, and TEGL 19-16. Supportive services may be provided to WIOA-enrolled participants who meet the following criteria:

1. Are enrolled in WIOA Adult or Dislocated Worker programs.
2. Are enrolled in WIOA Out-of-School or In-School Youth programs (See Youth Support Service Policy #3.3.4 for youth-specific provisions).
3. Are unable to obtain supportive services through other community resources or programs providing such services.
4. Have been provided with community resource information on low-cost or free services available locally, which should be utilized prior to program-funded support whenever possible.
5. In urgent or potentially unsafe situations, immediate assistance may be provided without prior resource referral, as allowed by WorkSource System Policy 1020 (Rev2).

Supportive services must be documented in case notes and participant records, in compliance with WIOA Title I-B Policy 5602-5 and WorkSource System Policy 1020 (Rev2). Additionally, follow-up services must be available for up to 12 months post-exit to support employment stability and career progression, per WIOA Title I-B Policy 5620-1 and TEGL 10-16, Change 3.

---

### Policy Guidelines

Supportive services for participants must be viewed in a manner that underscores collaboration. WIOA resources are limited and must be administered with the knowledge that some supportive service needs may be met through linkages with other WorkSource and community partners.

Every effort must be made on the part of program staff to ensure participants have been provided Community Resource information on low cost and/or free services available locally. These services should be utilized prior to program support whenever possible.

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

- Supportive services may be provided to participants to enable them to engage in career or training services or in effort to obtain employment or self-sufficiency upon completion of a career or training program.
- When providing support services to a program participant, practitioners must case note the participant's progression in obtaining the outcome desired.
- Supportive services are also allowed for adults and dislocated workers during follow-up who are placed in unsubsidized employment and have a program completion.

Supportive Services neither trigger participation nor extend the date of participation (i.e., extend exit).

Every instance of granting supportive service must be adequately documented in the participant file.

The Support Service Request Form (included with the Support Services Procedures #2.4.1-P), is necessary to ensure that all documentation requirements are addressed.

For any instance where the total support services to be provided exceed the locally established limit, a Waiver Request form must be completed and signed by approved Program and PacMtn Representatives.

Please refer to Support Services Procedure #2.4.1-P for specific details on allowable and non-allowable services payable through Supportive Service dollars:

1. For eligible program participants to include those individuals who are in follow up and have been placed in unsubsidized employment, with a program completion recorded in MIS
2. For allowable training expenses affiliated with training paid by programs other than WIOA Title I

*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.*

---

## **Definitions**

---

NA

---

## **References**

---

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 Sections 3(59)  
WIOA Section 134(d)(2) and (3) and 134(c)(2)(A)(ix)(I) and (II) WIOA  
129(c)(2)(G)

Training and Employment Guidance Letters (TEGL) 19-16, 10-16, Change 3

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
WorkSource System Policy 1020 (Rev2) - Data Integrity and Performance Policy and Handbook  
WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs  
WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

PacMtn Procedures Document #2.4.1-P - Support Services  
PacMtn Policy #3.3.4 - Youth Support Services

**DATE APPROVED: 06/04/2016, 04/21/2017, 06/30/2019, 02/21/2020, 07/07/2021,  
03/03/2022**

---

**Direct Inquiries to:  
Pacific Mountain Workforce Development Council  
201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: Tools & Equipment Policy # 2.4.2-v1

**Type:** Program Policy

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

**Date Last Revised:** 06/07/2019

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

**Status:** Draft

**Supersedes:** WIOA Policy #530R4 and  
PacMtn Policy # 2.4.2

---

### Purpose

To provide tools and equipment\* as a supportive service to participants receiving services through WIOA Adult and Dislocated Worker programs, when necessary to support short-term pre-employment/vocational services, on-the-job training, occupational skills training or when the tools are required to obtain or enhance an unsubsidized employment relationship.

---

### Policy

Tools and/or equipment may be purchased as a supportive service for participants actively enrolled in a WIOA-funded program and receiving Career or Training Services, or while in Follow-Up Services, in alignment with WIOA Sec. 134(d)(2), 20 CFR 680.900-920, TEGL 19-16, and WorkSource System Policy 1019-11 (Effective 2/28/2025).

Participants may receive tools and/or equipment if they:

1. Participate in a WIOA-approved training service (training is not an allowable follow-up service).
2. Engage in short-term pre-employment or vocational services.
3. Accept a bona fide offer of employment where the employer requires employees to furnish their own tools and/or equipment.
4. Receive an employment upgrade where tools/equipment are required by the employer.

### Funding and Ownership of Tools & Equipment

- The cost per participant may not exceed the maximum allowed for any supportive service, per PacMtn Supportive Services Policy (#2.4.1).
- Tools and/or equipment purchased shall become the property of the participant:
- Upon successful completion of a training program.
- When the participant begins employment in the job for which the tools or equipment were required.
- If specified in a WIOA contract, as documented in the participant file.

### Compliance & Documentation

**All tools and/or equipment must be** documented in participant files and in the WorkSource MIS system to prevent duplication of funding and ensure compliance with WIOA Title I-B Policy 5602-5 and WorkSource System Policy 1020 (Rev2). Tools and equipment may be provided during follow-up services if necessary for job retention, but cannot extend participation or delay exit, per WIOA Title I-B Policy 5620-1 and TEGL 10-16, Change 3.

---

## **Policy Guidelines**

---

WIOA program staffs should focus on providing only the essential tools needed by the participant to complete a vocational program or to accept unsubsidized employment.

Tools and/or equipment may only be provided when there is no other resource available. A tool and or equipment purchase may not exceed the maximum amount allowed for any support service.

\*As with any support service, all tools and or equipment must be allowable, reasonable, and justifiable and the participant must have no other resource available.

If the participant will need additional tools and/or equipment beyond the basic requirements of the vocational program or job, WIOA program staff should counsel the participant about developing a plan of how he or she can acquire additional tools using resources other than WIOA funds.

Employment must be verified with the employer and documented in the participant file, case notes and as appropriate in the current WorkSource Integrated Technology System (WIT), or other current MIS system.

WIOA program staffs, for budgetary purposes, may choose to categorize the provision of tools and equipment as a training expense or as a support service. For example, if tools or equipment are provided for a training service such as occupational skills training, training paid by other and/or on- the-job training, WIOA program staff may choose to account for these as a training cost in their budget.

If tools are required for pre-employment/vocational service or if they are required to accept unsubsidized employment, they would be counted as a support cost.

*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.*

---

## **Definitions**

---

NA

---

## **References**

---

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

TEGL 10-16, Change 3

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
WorkSource System Policy 1020 (Rev2) - Data Integrity and Performance Policy and Handbook

WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs  
WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

PacMtn Procedures Document # 2.4.2-P – Adult and Dislocated Worker Tools and Equipment  
PacMtn Policy # 2.4.1 - Support Service  
PacMtn Policy # 2.4.1-P - Support Service Procedures

**DATE APPROVED: 06/04/2016, 06/13/2019**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: Incumbent Worker Training Policy #2.5.1-v1

---

**Type:** Program Policy

**Date Established:** 09/08/2017

**Date Last Revised:** 06/07/2019

**Date Posted to Website:** 09/11/2017

**Status:** Draft

**Supersedes:** PacMtn Policy # 2.5.1

---

### Purpose

Incumbent Worker Training (IWT) provides both workers and employers with the opportunity to build and maintain a quality workforce and is governed by sections 20 CFR 680.780 through .820 of the Final Rule.

Incumbent worker training is designed to meet the special requirements of an employer (including a group of employers) to retain a skilled workforce or avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment and conducted with a commitment by the employer to retain or avert the layoff of the incumbent worker.

An ideal incumbent worker training would be one where a participant acquires new skills allowing him or her to move into a higher skilled and higher paid job within the company, thus allowing the company to hire a job seeker to backfill the incumbent worker's position. Incumbent Worker training must increase both a participant's and a company's competitiveness.

This following policy outlines the allowance for and criteria to determine which workers, or groups of workers, are eligible for incumbent worker training services and the cost sharing required for incumbent worker training projects. (WIOA Section 134(d)(4)).

---

### Policy

PacMtn may allocate up to twenty (20) percent of its WIOA Adult and Dislocated Worker funds to provide the federal share of the cost for Incumbent Worker Training (IWT), in accordance with WIOA Section 134(d)(4) and 20 CFR 680.790. These funds must be used for IWT programmatic activities, as administrative activities must be covered under Board administrative funds. PacMtn follows the Incumbent Worker Eligibility Criteria outlined in WorkSource System Policy 1019-11 (Effective 2/28/2025), WIOA Title I-B Policy 5607 Revision 3, and TEGL 19-16. Employers must meet the cost-share requirements of IWT per 20 CFR 680.820, which requires an employer contribution of 10%, 25%, or 50% based on workforce size.

#### Employer Eligibility & Training Prioritization

PacMtn will adhere to Employer Eligibility Criteria as outlined in WIOA Title I-B Policy 5607-3. Additionally, PacMtn will:

1. Assess the potential for layoffs averted as a result of training.

2. Evaluate training utilization within a larger sector and career pathway strategy aligned with regional priority industry clusters.
3. Prioritize training funds based on regional workforce needs if funding is limited.

### **Funding and Compliance**

IWT is only available if all eligibility criteria are met, and the employer can meet the required cost share. Supportive services are NOT available for IWT participants unless they are co-enrolled in WIOA Adult or Dislocated Worker programs, per TEGL 10-16, Change 3. Follow-up services do NOT apply to IWT participants unless they are co-enrolled in WIOA Adult/Dislocated Worker programs per WIOA Title I-B Policy 5620-1. Rapid Response funds may be used for layoff aversion, and WIOA Governor's discretionary funds may be used for IWT per WIOA Section 134(a)(3)(A)(i) if funding opportunities are available.

All IWT activities must be documented in participant files and the WorkSource MIS system to ensure compliance with WIOA Title I-B Policy 5602-5 and WorkSource System Policy 1020 (Rev2).

---

### **Policy Guidelines**

---

#### **Incumbent Worker Eligibility Criteria:**

An incumbent worker must be:

1. Employed;
2. Meet the Fair Standards Act requirements for an employer-employee relationship <http://www.dol.gov/> and
3. Have an established employment history with the employer for six (6) months or more.

An incumbent worker does not have to meet the eligibility requirements for career and training services for adults and dislocated workers under WIOA, unless also enrolled as a participant in the WIOA adult or dislocated worker program.

If incumbent worker training is provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for six months or more as long as a majority (51 percent or more) of the employees being trained meet the employment history requirement.

**IWT is not permitted to be used to provide the occupational training a new hire needs.**

#### **Employer Eligibility Criteria:**

PacMtn must determine an employer's eligibility for participating in IWT based on the following factors which help to evaluate whether training would increase the competitiveness of the employees or both the employees and the employer:

1. The characteristics of the incumbent workers to be trained and how historically they represent individuals with barriers and how such individuals would benefit from retention or advancement. Consideration should be given to employers who propose to

put forth extra effort to train individuals with barriers to employment as defined in WIOA Section 3(24). (See Attachment A);

2. Provide a quality of training which would, whenever possible, allow the participant to gain industry-recognized training experience and/or lead to industry-recognized credentials and/ or an increase in wages;
3. The number of participants the employer plans to train or retrain;
4. The wage and benefit levels of participants (before and after training);
5. The occupation(s) for which incumbent worker training is being provided must be in demand;
6. The employer is:
  - a. In an in-demand industry as determined by ESD labor market information; or
  - b. In an in-balance industry as determined by ESD labor market information; or
  - c. In a declining industry, but there are compelling reasons (e.g., evidence of long-term viability of the employer) justifying investment in incumbent worker training.
7. The employer must not have laid off workers within 120 days to relocate to Washington from another state;
8. The employer is currently in unemployment insurance and workers' compensation taxes, penalties, and/or interest or related payment plan.

PacMtn will also evaluate the potential number of layoffs averted as a result of this training and utilization as part of a larger sector and career pathway strategy that aligns with our identified industry clusters in the region to prioritize training funds if needed. PacMtn may also prioritize employers based on their overall efforts to develop a more competitive workforce within the region and those that show ongoing apprenticeship training models. Additionally, employers that show continued opportunities for incumbent workers to advance and increase wages within their company may be prioritized.

Each of the above factors leading to the approval of an incumbent worker training project with an employer must be documented and placed in the contract file.

Generally, IWT should be provided to private sector employers; however, there may be instances where non-profit and local government entities may be the recipients of IWT funds. For example, IWT may be used in the health care industry where hospitals are operated by non-profit or local government entities and a nursing upskilling opportunity is available.

### **Employer Share of Training Costs:**

Employers participating in incumbent worker training are required to pay the non-WIOA (non-federal) share of the cost of providing training to their incumbent workers. (WIOA Sections 134(d)(4)(C) and 134(d)(4)(D) and proposed 20 CFR 680.820).

The employer share is based on the size of the workforce (wages paid to the participant while in training can be included as part of that share and the share can be provided as cash or in-kind that is fairly evaluated) as follows:

- At least 10 percent of the cost for employers with 50 or fewer employees
- At least 25 percent of the cost for employers with 51 to 100 employees
- At least 50 percent of the cost for employers with more than 100 employees

Employer cost share contributions must be tracked and documented in the contract file. In addition, the methodologies for determining the value of in-kind contributions must be documented in the contract file and conform to cost sharing requirements at 2 CFR 200.306.

### **Incumbent Worker Training Data Entry:**

Incumbent workers who are served through WIOA Title I (i.e., Adult Formula, Dislocated Worker Formula, National Dislocated Worker Grant, Governor’s 15% Discretionary, Statewide Rapid Response) grant funds must be affiliated with an employer, training start date, and fund source in order to satisfy requirements of the U.S. Department of Labor’s WIOA-affiliated Participant Individual Record Layout (PIRL).

*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.*

---

## **Definitions**

---

NA

---

## **References**

---

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 3(23)  
WIOA Section 134(d)(4)

Training and Employment Guidance Letter (TEGL), 19-16 and 10-16, Change 3

WIOA Title I-B Policy 5602 – Supportive Services & NRPs  
WIOA Title I-B Policy 5607 (Rev3) – Incumbent Worker Training  
WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
WorkSource System Policy 1020 (Rev2) - Data Integrity and Performance Policy and Handbook

**DATE APPROVED: 09/08/2017, 06/13/2019**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: Co-Enrollment TAA/Dislocated Worker Policy #2.5.2-v1

**Type:** Program Policy

**Date Established:** 06/21/2021

**Date Last Revised:** 04/13/2022

**Date Posted to Website:** 04/18/2022

**Status:** Draft

**Supersedes:** PacMtn Policy #2.5.2

---

### Purpose

The U.S. Department of Labor (DOL) published the updated and consolidated Trade Adjustment Assistance (TAA) Final Rule on August 21, 2020. 20 CFR 618.325 requires co-enrollment of all TAA participants into the WIOA Title I- B Dislocated Worker (DW) program, subject to eligibility, unless they decline.

Although there is no equivalent WIOA Final Rule or WIOA-operating guidance, DOL commented on page 51913 of the TAA Final Rule that States, under their Governor- Secretary Agreements, are required to implement the Final Rule. The Agreements bind state governments to the terms and conditions of the Agreement and implementation of the TAA program, including the co-enrollment requirement, and the ability to enforce the co-enrollment requirement at the state and local level.

---

### Policy

Trade Adjustment Assistance (TAA) participants must be co-enrolled in the WIOA Title I-B Dislocated Worker (DW) program if they meet eligibility requirements, unless they decline enrollment. Co-enrollment is required per 20 CFR 618.325, ensuring that TAA participants receive integrated workforce services to support reemployment efforts. Under TAA Reversion 2021, Adversely Affected Incumbent Workers (AAIW) do not qualify for WIOA DW co-enrollment. This change does not impact workers certified under petitions filed on or before June 30, 2021. The TAA Final Rule, codified at 20 CFR 618, applies to all TAA cases processed under Reversion 2021.

### Referral & Enrollment Process

WIOA Title I-B DW programs must accept referrals of eligible TAA participants from the TAA program within their Workforce Development Area and have an established standardized referral process. Eligible TAA participants who opt for co-enrollment must be assessed and enrolled promptly (within a maximum number of days following referral). The TAA program conducts three assessments (initial, comprehensive, and specialized) at the time of enrollment, which may meet WIOA Title I-B DW program assessment requirements per TEGL 04-20. The WIOA Title I-B DW program must inform the TAA program of the participant's enrollment status or declination within 10 days of referral.

### Case Management & Compliance

The TAA Final Rule (20 CFR 618.350) requires TAA case managers to use a worker's initial assessment results to develop an Individual Employment Plan (IEP). All co-enrollment decisions must be documented in participant case files and the WorkSource MIS system, ensuring compliance with WorkSource System Policy 1020 (Rev2). Supportive services and follow-up services must be provided per WIOA Title I-B Policy 5602-5 and 5620-1 for co-enrolled participants to support reemployment and retention.

This policy ensures alignment with TAA and WIOA regulations and strengthens coordination between programs to optimize services for dislocated workers.

---

## **Policy Guidelines**

---

### **TAA Participants and Documenting Declination**

TAA case managers will inform TAA participants about the benefit and option of co-enrolling into the WIOA DW program and the services available informing them that declining to co-enroll in WIOA DW will have no adverse impact on their services from TAA.

TAA case managers should inform their participants that co-enrollment into WIOA DW is dependent upon meeting DW program eligibility requirements.

If the TAA participant declines to follow through on the referral, TAA case managers will enter a case note into the MIS system stating that the individual declined the referral.

However, if a TAA participant declines co-enrollment and then changes their mind, they may later request referral to the WIOA DW program.

### **Referral Process**

TAA Case Managers and WIOA DW Staff must do the following:

- A. TAA Case Managers and WIOA DW staff will become familiar with eligibility requirements for both programs.
- B. Referrals will be submitted by TAA to DW within 10 working days of the enrollment into TAA. If the trade-affected worker declines the referral or the enrollment into multiple programs, a TAA case note must be added noting referral was attempted and declined or not eligible.
- C. If co-enrollment is accepted by trade affected worker, WIOA DW staff must follow up and confirm referral and determine eligibility and enroll within 10 working days of the referral. Again, documenting in case notes the attempts, determination, and enrollment. In addition, making sure TAA case manager is aware of co-enrollment and begin to coordinate service delivery.
- D. TAA case manager as part of the enrollment process, documents the initial, comprehensive, and specialized assessments in ETO. DW may use these same assessments for DW enrollment if done within the timeframe specified above.

### **Enrollment into the WIOA DW Individualized Career, Training, and Support Services**

WIOA DW staff will begin conducting outreach to the participant for an eligibility determination within **10 business days** of receiving the referral. WIOA DW staff will enter a case note in the MIS system if multiple attempts to connection with the TAA are unsuccessful.

WIOA DW staff will also enter a case note into the shared MIS system if the TAA participant declined services at the time of eligibility determination. This should not be construed as an ongoing decline of

services. The individual may be enrolled at a later date when the person is ready to engage in WIOA DW services.

In the event that the TAA participant informs the DW staff prior to enrollment into the DW program that they have no interest in the WIOA DW program, the DW staff will case note the declination in the MIS system. They will also case note that they have informed the TAA participant that they may, if determined still eligible, enroll at another time during or after their current period of TAA Program participation.

Enrollment should occur within **10 business days** of a completed eligibility determination. In addition to the TAA developed IEP, DW staff must complete an Individual Participation Plan (IPP) to identify barriers and determine prospective service needs as the service that triggers participation.

In addition to the required co-enrollment with the WIOA DW program, and dependent upon the needs of the trade-affected worker, a broad range of other available workforce services may enhance and further support a participant's successful outcome. Such programs may include, but are not limited to, WagnerPeysner Act Employment Service (ES) activities, WIOA Adult program, WIOA DWGs, Unemployment Insurance (UI), other WIOA partner programs, faith-based and community-based programs, vocational rehabilitation services, and services for veterans.

Additionally, it should be a standard practice between the TAA and DW case managers to have continuous communication/co-case management throughout the co-enrollment relationship to ensure alignment of services and goals for the participant and minimize the potential for duplication of services.

---

## Definitions

---

### Adversely Affected Incumbent Workers

(AAIW) A worker who:

- (1) Is a member of a worker group certified as eligible to apply for the TAA program under subpart B of the TAA Final Rule;
- (2) has not been totally or partially separated from adversely affected employment; and
- (3) DOL determines, on an individual basis, is threatened with total or partial separation.

---

## References

---

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

20 CFR 618.25 - Integrated service strategies and Workforce Innovation and Opportunity Act co-enrollment, Trade Adjustment Assistance Final Rule, Federal Register, Volume 85, No. 163, August 21, 2020, page 51987.

Training and Employment Guidance Letter (TEGL).

- TEGL 04-20 - Guidance on Integrating Services for Trade-Affected Workers under the TAA Program with the WIOA Title I DW Program, October 29, 2020

- TEGL 24-20 - Operating Instructions for Implementing the Reversion Provisions of the Amendments to the Trade Act of 1974 Enacted by the Trade Adjustment Assistance Reauthorization Act of 2015.

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook

WorkSource System Policy 1020 (Rev2) - Data Integrity and Performance Policy and Handbook

WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs

WIOA Title I-B Policy 5617 (Rev3) - Co-enrollment of Trade Adjustment Assistance participants into the WIOA Title I-B Dislocated Worker program

WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

PacMtn Policy # 2.1.1 – Adult and Dislocated Worker Program Eligibility

PacMtn Policy # 2.1.1-P DW – Dislocated Worker

PacMtn Policy # 2.4.1 - Support Service

PacMtn Procedure # 2.4.1-P - Support Service

PacMtn Policy # 2.3.1 Adult/DW Individual Training Accounts (ITA's)

## **DATE APPROVED: TBD**

---

**Direct Inquiries to:**

**Pacific Mountain Workforce Development Council**

**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: WIOA Participant Follow-Up Policy #2.6.1-v1

---

**Type:** Program Policy

**Date Established:** 10/10/2017

**Date Last Revised:** 07/07/2021

**Date Posted to Website:** 06/25/2018

**Status:** Draft

**Supersedes:** PacMtn Policy # 2.6.1

---

### Purpose

The purpose of this policy is to communicate local policy regarding activities that constitute follow-up services for Workforce Innovation and Opportunity Act (WIOA) Title I Adult and Dislocated Workers.

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

---

### Policy

Follow-up services may only be provided to WIOA Title I Adult and Dislocated Worker program participants who are placed in unsubsidized employment and have a Program Completion recorded in the Management Information System (MIS), in accordance with WIOA Sec. 134(c)(2)(A)(xiii), 20 CFR 678.430(c), 680.150(c), and TEGL 10-16 Change 3.

#### Guidance on Follow-Up Services

Follow-up services are classified as a career service and, per U.S. Department of Labor (DOL) guidance, may only be provided after program completion. Follow-up services must be offered for up to 12 months post-program completion if requested by the participant and determined appropriate by staff. Per TEGL 19-16, follow-up services must be made available but are not required for all participants and must not exceed 12 months. Supportive services may be provided during follow-up if necessary to assist with job retention but cannot extend participation or delay exit (TEGL 19-16).

#### Compliance & Documentation

All follow-up services must be documented in case notes and participant files per WorkSource System Policy 1020 (Rev2). Follow-up services do not extend program participation and must be distinguished from active services. Case managers must ensure that follow-up services are aligned with WIOA-defined participant outcome measures and local workforce area service plans.

This policy ensures full compliance with TEGL 10-16 Change 3, TEGL 19-16, WIOA Title I-B Policy 5620-1, and WorkSource System Policy 1020 (Rev2) while maintaining alignment with DOL and state-issued guidance.

---

### Policy Guidelines

---

Follow-up services do not trigger the exit date to change, or delay exit for performance reporting as per guidance issued by DOL in TEGGL 10-16 Change 3.

As such, each exit of a participant during a program year must be counted as a separate period of participation if a participant has more than one exit in that program year.

Follow-up services for WIOA Title I Adult and Dislocated Worker program participants can include, but are not limited to, two-way exchanges between the service provider or case manager and either the individual (or his/her advocate) or the individual's employer as follows:

- Counseling individuals about the workplace
- Contacting individuals or employers to verify employment
- Contacting individuals or employers to help secure better paying jobs, additional career planning, and counseling for the individual
- Assisting individuals and employers in resolving work-related problems
- Connecting individuals to peer support groups
- Providing individuals with information about additional educational or employment opportunities
- Providing individuals with referrals to other community services

Supportive Services during follow-up are allowable for Adult and Dislocated Workers that have completed the program to help them retain unsubsidized employment.

**NOTE:**

A follow-up service has been added to the WorkSource Services Catalog through WorkSource Information Notice 0077 Change 16 to enable the recording of supportive services to Adult and Dislocated Workers that have program completions:

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

Please refer to PacMtn Support Service Procedure 2.4.1-P for allowable Support Services.

*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.*

---

**Definitions**

---

NA

---

## References

---

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

Training and Employment Guidance Letter (TEGL) 19-16, 10-16 Change 3

Public Law 113-128, Workforce Innovation and Opportunity Act of 2014, Section 134(c)(2)(A)(xiii)

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook

WorkSource System Policy 1020 (Rev2) - Data Integrity and Performance Policy and Handbook

WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs

WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

PacMtn Procedures Document # 2.4.1-P - Support Services

PacMtn Policy # 3.3.4 - Youth Support Service

**DATE APPROVED: 01/12/2018, 07/07/2021**

---

**Direct Inquiries to:**

**Pacific Mountain Workforce Development Council**

**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: WIOA Adult, DW, Youth and Statewide Activity Incentive Payment Policy # 2.6.2-v1

**Type:** Program Policy

**Date Established:** 07/01/2022

**Date Last Revised:** 09/22/2022

**Date Posted to Website:** 09/28/2022

**Status:** Draft

**Supersedes:** Alternative Compensation Policy &  
PacMtn Policy #2.6.2

---

### Purpose

This policy provides guidance and direction around Incentive Payments provided to individuals determined eligible and enrolled as participants in a WIOA Title I-B Adult, Dislocated Work, Youth and/or Statewide Activity funded programs as allowable under Title I-B of the Workforce Innovation and Opportunity Act (WIOA).

Although there is specific reference in the WIOA final rules regarding incentive payments to youth at 20 CFR 681.640, there is no similar reference to incentive payments or stipends to adults and dislocated workers. Further, although the WIOA final rules and WIOA operating guidance state that guidance in this area is forthcoming, the one-stop system is still awaiting such guidance. Therefore, to provide needed clarification to Washington's WorkSource (One-Stop) system, PacMtn WDC has updated this policy to eliminate confusion and support comprehensive service delivery. If and when federal guidance is issued, ESD will review the state policy and make necessary and appropriate revisions and the WDC will update this policy.

---

### Policy

PacMtn WDC contractors may provide incentive payments to WIOA Title I Adult, Dislocated Worker, Youth, and/or Statewide Activity participants when such payments are tied to completion of specific milestones directly related to training, work experience, or education goals as outlined in the participant's Individual Service Strategy (ISS) or employment plan. Incentive payments are **not entitlements** and are subject to availability of funds, prior written approval by the awarding agency (per 2 CFR 200.407[t]), and compliance with **federal cost principles** (2 CFR 200.75 and 2 CFR 200.456). All incentives must be documented in the participant's file and entered into the MIS, following the same internal control standards as supportive services.

---

### Policy Guidelines

#### Incentive payments:

To be eligible to earn and incentive payments, individuals must:

- Have a program enrollment entered into the MIS system in a WIOA Title I-B Adult, Dislocated Worker, Youth, and/or Statewide Activity funded Program and provided incentives in the manner outlined in this policy.

- Be actively engaged in services offered through a WIOA Adult, Dislocated Worker, Youth or Statewide Activity funded program, in accordance with their individual participation plan and or Individual Service Strategy.

All incentives must be in compliance with 2 CFR part 200 (e.g., federal funds must not be spent on entertainment costs, such as movie or sporting event tickets, gift cards to movie theaters, or other venues whose sole purpose is entertainment).

Providers must also internally maintain appropriate and identifiable expenditure records of incentive payments for the purposes of local, state, and federal monitoring/audits.

Provider agencies must safeguard cash and other similar items (e.g., gift cards) with internal controls.

**The total amount of incentive payments in a program year (July 1 through June 30) for WIOA Title I-B Adult, Dislocated Worker, and Youth participants will be stipulated in the PacMtn Incentive Payment Procedure #2.6.2-P.**

**However, as stated in State Policy 5621-5 Incentive Payments, the allowance for and limits on incentive payments to WIOA Title I youth participants in projects funded by WIOA Title I statewide activities discretionary funds will be set by PacMtn as outlined by the State in the contracts' special terms and conditions. Program contractors will be notified accordingly.**

#### **A. WIOA Youth**

1. Incentive payments to WIOA Title 1 youth participants are permitted for recognition and achievement of milestones tied to work experience, education, and/or training. To that end, the allowable WIOA Title 1 youth program elements to which incentives may be tied can be found in **Attachment A**.
2. Incentive payments not supported through the WIOA Youth Individual Service Strategy (ISS) are not allowable.
3. Incentive payments are allowed to additionally include incentive payments for attainment of unsubsidized employment and /or employment retention resulting from participation in one or more program elements (outlined in Attachment A) for which incentive payments are allowed. See Attachment B for Eligible Program Elements and Incentive Payments.
4. Incentive structures and policies, which detail incentives tied to non-performance related activity or achievement, are not allowable.
5. Incentive payment outlines as designed, determined allowable and implemented during any program period (PY), are applicable to each individual PY specifically and must be applied equally for all eligible participants who have earned the incentive, per policy.

6. Changes to the nature and incentives to be awarded during each individual PY must remain in effect throughout the PY and are not subject to change without PacMtn approval.
7. Contractors can issue incentive payments only when in accordance and fully compliant with PacMtn's Incentive Policy #3.1.1 and Incentive Payments Procedure #3.1.1-P.

The following is the exclusive list of allowable incentive achievements allowed for Youth:

- Progress tied to the allowable Youth Program Elements as outlined in **Attachment A**.
- Youth Program Incentive Payment Guidelines are outlined in **Attachment B**.
- WEX, Employment, and Training Progress based upon achievements and milestones in the program tied to education, work experience, or training marked by credential attainment or other successful outcomes related to a training service.
- Progress or completion of work experience or training services including obtainment of job skills as specified in the training plan, or specific training, or WEX attendance or task completion as documented on ISS or WEX contracts.
- Successful Measurable Skills Gain or Credential Attainment
- Unsubsidized Employment Attainment during active participation in alignment with youth program elements outlined in **Attachment A**.

Prior state approval is not required for incentive payments to WIOA Title I youth participants so long as the criteria outlined in this policy and the guidance within is adhered.

**Documentation requirements are detailed in the Incentive Payments Procedure #3.1.1-P**

## **B. WIOA Adult/DW**

1. Incentive payments to WIOA Title I adult and dislocated worker participants are limited to achievement milestones directly tied to work experiences and the following WIOA-recognized training services – occupational skills training, registered apprenticeship, on-the-job training, increased capacity training, customized training, and entrepreneurial training.
2. Unlike Title I youth, this excludes incentive payments for attainment and retention of unsubsidized employment for adults and dislocated workers who complete work experience or training services.

The following is the exclusive list of allowable incentive achievements allowed for Adult & Dislocated Workers:

- Progress or completion of work experience including obtainment of job skills as specified in the training plan, or WEX attendance or task completion as documented on IPP or WEX contracts.

- Successful Measurable Skills Gain or Credential Attainment directly tied to the following WIOA recognized training services – occupational skill training, registered apprenticeship, on-the-job training, increased capacity training, customized training, and entrepreneurial training.

PacMtn must request and receive approval from the state annually prior to expending any new WIOA Title I-B formula grants or statewide activities funds on incentives to WIOA Title I-B Adult, Dislocated Worker, or Statewide Activity funded program participants.

- Refer to Incentive Payments Procedure #3.1.1-P to access Exhibit 3-700A WIOA Title 1-B Adult and Dislocated Worker Incentive Approval forms as required to request approval to pay WIOA Title 1-B Incentives to Adults and Dislocated Workers.
- Once approved, the state approvals are good for the life of those particular funds.

**Documentation requirements are detailed in the Incentive Payments Procedure #3.1.1-P**

**C. Statewide Activities**

Incentive Payments are allowable in accordance with the applicable grant guidelines for statewide activities under WIOA Title 1B. Incentive payments will be subject to availability of funding and in accordance with allowable cost principles under the applicable grant.

*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.*

---

**Definitions**

---

NA

---

**References**

---

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

OMB Uniform Guidance, 2 CFR 200.456 – Participant Support Costs

OMB Uniform Guidance, 2 CFR 200.75 – Participant Support Costs

OMB Uniform Guidance, 2 CFR 200.407(t) – Prior Written Approval

Training and Employment Guidance Letter’s (TEGL 19-16 & 21-16)

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook

WIOA Title I-B Policy 5602 (Rev5) - Supportive Services & NRPs

WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

WorkSource System Policy 5621 (Rev5) - Incentive Payments to WIOA Title I Participants

PacMtn Incentive Payment Procedures # 2.6.2-P

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

**DATE APPROVED: 09/22/2022**

---

**Direct Inquiries to:  
Pacific Mountain Workforce Development Council  
201 5<sup>th</sup> Ave SW Ste. 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.

## Attachment A

### Youth Program Elements for which incentive payments are or are not allowed

No.	Program Element	Allowable
1	Tutoring, study skills training, instruction, and dropout prevention	<b>Yes</b>
2	Alternative secondary school services or dropout recovery services	<b>Yes</b>
3	Paid and unpaid work experience	<b>Yes</b>
4	Occupational skills training	<b>Yes</b>
5	Education offered concurrently with workforce preparation and training for a specific occupation	<b>Yes</b>
6	Leadership development opportunities	No
7	Supportive services	No
8	Adult mentoring	No
9	Follow-up services	No
10	Comprehensive guidance and counseling	No
11	Financial literacy education	<b>Yes</b>
12	Entrepreneurial skills training	<b>Yes</b>
13	Services that provide labor market information	No
14	Post-secondary preparation and transition activities	<b>Yes</b>

Note: Youth incentive payments are also allowed for attainment of unsubsidized employment and/or employment retention resulting from participation in one or more program elements for which incentive payments qualify.

## Attachment B

### Youth Program Incentive Payment Guidelines

**Purpose:**

To encourage and reward youth participants for successfully engaging in and completing specific program elements, as well as for attaining unsubsidized employment or employment retention.

---

#### Eligible Program Elements and Incentive Payments

1. **Tutoring, Study Skills Training, Instruction, and Dropout Prevention**
  - **Incentive:** \$50 upon completion of a tutoring program with 90% attendance and demonstrable progress.
2. **Alternative Secondary School Services or Dropout Recovery Services**
  - **Incentive:** \$75 for re-enrollment in an alternative school program and consistent attendance for 60 days.
3. **Paid and Unpaid Work Experience**
  - **Incentive:** \$100 upon completion of a work experience program with a satisfactory performance evaluation.
4. **Occupational Skills Training**
  - **Incentive:** \$75 upon earning an industry-recognized certificate or credential.
5. **Education Offered Concurrently with Workforce Preparation and Training for a Specific Occupation**
  - **Incentive:** \$75 for successful completion of both education and training components with a passing grade.
6. **Financial Literacy Education**
  - **Incentive:** \$50 for completing a financial literacy course and submitting a personal budget plan.
7. **Entrepreneurial Skills Training**
  - **Incentive:** \$75 upon completion of entrepreneurial training and presentation of a basic business plan.
8. **Post-Secondary Preparation and Transition Activities**
  - **Incentive:** \$100 for completing all required post-secondary preparation activities, such as FAFSA submission, college application, or apprenticeship enrollment.

No.	Program Element	Allowable for Incentives?	Incentive Amount
1	Tutoring, study skills training, instruction, and dropout prevention	Yes	\$50
2	Alternative secondary school services or dropout recovery services	Yes	\$75
3	Paid and unpaid work experience	Yes	\$100
4	Occupational skills training	Yes	\$75
5	Education offered concurrently with workforce preparation and training for a specific occupation	Yes	\$75
11	Financial literacy education	Yes	\$50
12	Entrepreneurial skills training	Yes	\$75
14	Post-secondary preparation and transition activities	Yes	\$100

**Additional Guidelines:**

1. **Annual Cap:** Youth participants are limited to a maximum of **\$800 per year** in total incentive payments.
2. **Retention Incentive:** Consider offering an additional **\$100 incentive** for job retention for three or six months after placement if the budget allows.
3. **Review and Documentation:** Incentive payments should be tied directly to participant achievements. Proper documentation (e.g., proof of completion or certificates) is required for each incentive disbursement.

## TITLE: WIOA Adult, Dislocated Worker, and Youth Incentive Payment Policy Policy # 3.1.1-v1

**Type:** Program Policy

**Date Established:** 07/01/2022

**Date Last Revised:** 09/22/2022

**Date Posted to Website:** 09/28/2022

**Status:** Draft

**Supersedes:** PacMtn Policy #3.1.1

---

### Purpose

This policy provides guidance and direction around Incentive Payments provided to individuals determined eligible and enrolled as participants in a WIOA Title I-B Adult, Dislocated Worker, Youth and/or Statewide Activity funded programs as allowable under Title I-B of the Workforce Innovation and Opportunity Act (WIOA).

Although there is specific reference in the WIOA final rules regarding incentive payments to youth at 20 CFR 681.640, there is no similar reference to incentive payments or stipends to adults and dislocated workers. Further, although the WIOA final rules and WIOA operating guidance state that guidance in this area is forthcoming, the one-stop system is still awaiting such guidance. Therefore, to provide needed clarification to Washington's WorkSource (One-Stop) system, PacMtn WDC has updated this policy to eliminate confusion and support comprehensive service delivery. If and when federal guidance is issued, ESD will review the state policy and make necessary and appropriate revisions and the WDC will update this policy.

---

### Policy

PacMtn WDC contractors may provide incentive payments to WIOA Title I Adult, Dislocated Worker, Youth, and/or Statewide Activity participants when such payments are tied to completion of specific milestones directly related to training, work experience, or education goals as outlined in the participant's Individual Service Strategy (ISS) or employment plan. Incentive payments are **not entitlements** and are subject to availability of funds, prior written approval by the awarding agency (per 2 CFR 200.407[t]), and compliance with **federal cost principles** (2 CFR 200.75 and 2 CFR 200.456). All incentives must be documented in the participant's file and entered into the MIS, following the same internal control standards as supportive services.

---

### Policy Guidelines

Incentive payments:

To be eligible to earn and incentive payments, individuals must:

- Have a program enrollment entered into the MIS system in a WIOA Title I-B Adult, Dislocated Worker, Youth, and/or Statewide Activity funded Program and provided incentives in the manner outlined in this policy.

- Be actively engaged in services offered through a WIOA Adult, Dislocated Worker, Youth or Statewide Activity funded program, in accordance with their individual participation plan and or Individual Service Strategy.

All incentives must be in compliance with 2 CFR part 200 (e.g., federal funds must not be spent on entertainment costs, such as movie or sporting event tickets, gift cards to movie theaters, or other venues whose sole purpose is entertainment).

Providers must also internally maintain appropriate and identifiable expenditure records of incentive payments for the purposes of local, state, and federal monitoring/audits.

Provider agencies must safeguard cash and other similar items (e.g., gift cards) with internal controls.

**The total amount of incentive payments in a program year (July 1 through June 30) for WIOA Title I-B Adult, Dislocated Worker, and Youth participants will be stipulated in the PacMtn Incentive Payment Procedure #3.1.1-P.**

**However, as stated in State Policy 5621 (Rev5) Incentive Payments, the allowance for and limits on incentive payments to WIOA Title I youth participants in projects funded by WIOA Title I statewide activities discretionary funds will be set by PacMtn as outlined by the State in the contracts' special terms and conditions. Program contractors will be notified accordingly.**

#### **A. WIOA Youth**

1. Incentive payments to WIOA Title 1 youth participants are permitted for recognition and achievement of milestones tied to work experience, education, and/or training. To that end, the allowable WIOA Title 1 youth program elements to which incentives may be tied can be found in **Attachment A**.
2. Incentive payments not supported through the WIOA Youth Individual Service Strategy (ISS) are not allowable.
3. Incentive payments are allowed to additionally include incentive payments for attainment of unsubsidized employment and /or employment retention resulting from participation in one or more program elements (outlined in Attachment A) for which incentive payments are allowed. See Attachment B for Eligible Program Elements and Incentive Payments.
4. Incentive structures and policies, which detail incentives tied to non-performance related activity or achievement, are not allowable.
5. Incentive payment outlines as designed, determined allowable and implemented during any program period (PY), are applicable to each individual PY specifically and must be applied equally for all eligible participants who have earned the incentive per policy.

6. Changes to the nature and incentives to be awarded during each individual PY must remain in effect throughout the PY and are not subject to change without PacMtn approval.
7. Contractors can issue incentive payments only when in accordance and fully compliant with PacMtn's Incentive Policy #3.1.1 and Incentive Payments Procedure #3.1.1-P.

The following is the exclusive list of allowable incentive achievements allowed for Youth:

- Progress tied to the allowable Youth Program Elements as outlined in **Attachment A**.
- Youth Program Incentive Payment Guidelines are outlined in **Attachment B**.
- WEX, Employment, and Training Progress based upon achievements and milestones in the program tied to education, work experience, or training marked by credential attainment or other successful outcomes related to a training service.
- Progress or completion of work experience or training services including obtainment of job skills as specified in the training plan, or specific training, or WEX attendance or task completion as documented on ISS or WEX contracts.
- Successful Measurable Skills Gain or Credential Attainment
- Unsubsidized Employment Attainment during active participation in alignment with youth program elements outlined in **Attachment A**.

Prior state approval is not required for incentive payments to WIOA Title I youth participants so long as the criteria outlined in this policy and the guidance within is adhered.

**Documentation requirements are detailed in the Incentive Payments Procedure #3.1.1-P**

## **B. WIOA Adult/DW**

1. Incentive payments to WIOA Title I adult and dislocated worker participants are limited to achievement milestones directly tied to work experiences and the following WIOA-recognized training services – occupational skills training, registered apprenticeship, on-the-job training, increased capacity training, customized training, and entrepreneurial training.
2. Unlike Title I youth, this excludes incentive payments for attainment and retention of unsubsidized employment for adults and dislocated workers who complete work experience or training services.

The following is the exclusive list of allowable incentive achievements allowed for Adult & Dislocated Workers:

- Progress or completion of work experience including obtainment of job skills as specified in the training plan, or WEX attendance or task completion as documented on IPP or WEX contracts.

- Successful Measurable Skills Gain or Credential Attainment directly tied to the following WIOA recognized training services – occupational skill training, registered apprenticeship, on-the-job training, increased capacity training, customized training, and entrepreneurial training.

PacMtn must request and receive approval from the state annually prior to expending any new WIOA Title I-B formula grants or statewide activities funds on incentives to WIOA Title I-B Adult, Dislocated Worker, or Statewide Activity funded program participants.

- Refer to Incentive Payments Procedure #3.1.1-P to access Exhibit 3-700A WIOA Title 1-B Adult and Dislocated Worker Incentive Approval forms as required to request approval to pay WIOA Title 1-B Incentives to Adults and Dislocated Workers.
- Once approved, the state approvals are good for the life of those particular funds.

**Documentation requirements are detailed in the Incentive Payments Procedure #3.1.1-P**

**C. Statewide Activities**

Incentive Payments are allowable in accordance with the applicable grant guidelines for statewide activities under WIOA Title 1B. Incentive payments will be subject to availability of funding and in accordance with allowable cost principles under the applicable grant.

*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.*

---

**Definitions**

---

NA

---

**References**

---

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

20 CFR Part 680

OMB Uniform Guidance, 2 CFR 200.456 – Participant Support Costs  
OMB Uniform Guidance, 2 CFR 200.75 – Participant Support Costs  
OMB Uniform Guidance, 2 CFR 200.407(t) – Prior Written Approval

TEGL 19-16  
TEGL 21-16  
TEGL 12-23

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
WIOA Title I Policy 5401 (Rev3) - Fund Transfers Between Adult and Dislocated Worker  
WIOA Title I Policy 5602 (Rev5) - Supportive Services and Need Related Payments  
WIOA Title I Policy 5620 (Rev1) – Follow-Up Services  
WIOA Title I Policy 5621 (Rev5) - Incentive Payments to WIOA Title I Participants

PacMtn Incentive Payment Procedures #3.1.1-P

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

**DATE APPROVED: 09/22/2022**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

## Attachment A

### Youth Program Elements for which incentive payments are or are not allowed

No.	Program Element	Allowable
1	Tutoring, study skills training, instruction, and dropout prevention	<b>Yes</b>
2	Alternative secondary school services or dropout recovery services	<b>Yes</b>
3	Paid and unpaid work experience	<b>Yes</b>
4	Occupational skills training	<b>Yes</b>
5	Education offered concurrently with workforce preparation and training for a specific occupation	<b>Yes</b>
6	Leadership development opportunities	No
7	Supportive services	No
8	Adult mentoring	No
9	Follow-up services	No
10	Comprehensive guidance and counseling	No
11	Financial literacy education	<b>Yes</b>
12	Entrepreneurial skills training	<b>Yes</b>
13	Services that provide labor market information	No
14	Post-secondary preparation and transition activities	<b>Yes</b>

Note: Youth incentive payments are also allowed for attainment of unsubsidized employment and/or employment retention resulting from participation in one or more program elements for which incentive payments qualify.

## Attachment B

### Youth Program Incentive Payment Guidelines

**Purpose:**

To encourage and reward youth participants for successfully engaging in and completing specific program elements, as well as for attaining unsubsidized employment or employment retention.

---

#### Eligible Program Elements and Incentive Payments

1. **Tutoring, Study Skills Training, Instruction, and Dropout Prevention**
  - **Incentive:** \$50 upon completion of a tutoring program with 90% attendance and demonstrable progress.
2. **Alternative Secondary School Services or Dropout Recovery Services**
  - **Incentive:** \$75 for re-enrollment in an alternative school program and consistent attendance for 60 days.
3. **Paid and Unpaid Work Experience**
  - **Incentive:** \$100 upon completion of a work experience program with a satisfactory performance evaluation.
4. **Occupational Skills Training**
  - **Incentive:** \$75 upon earning an industry-recognized certificate or credential.
5. **Education Offered Concurrently with Workforce Preparation and Training for a Specific Occupation**
  - **Incentive:** \$75 for successful completion of both education and training components with a passing grade.
6. **Financial Literacy Education**
  - **Incentive:** \$50 for completing a financial literacy course and submitting a personal budget plan.
7. **Entrepreneurial Skills Training**
  - **Incentive:** \$75 upon completion of entrepreneurial training and presentation of a basic business plan.
8. **Post-Secondary Preparation and Transition Activities**
  - **Incentive:** \$100 for completing all required post-secondary preparation activities, such as FAFSA submission, college application, or apprenticeship enrollment.

No.	Program Element	Allowable for Incentives?	Incentive Amount
1	Tutoring, study skills training, instruction, and dropout prevention	Yes	\$50
2	Alternative secondary school services or dropout recovery services	Yes	\$75
3	Paid and unpaid work experience	Yes	\$100
4	Occupational skills training	Yes	\$75
5	Education offered concurrently with workforce preparation and training for a specific occupation	Yes	\$75
11	Financial literacy education	Yes	\$50
12	Entrepreneurial skills training	Yes	\$75
14	Post-secondary preparation and transition activities	Yes	\$100

**Additional Guidelines:**

1. **Annual Cap:** Youth participants are limited to a maximum of **\$800 per year** in total incentive payments.
2. **Retention Incentive:** Consider offering an additional **\$100 incentive** for job retention for three or six months after placement if the budget allows.
3. **Review and Documentation:** Incentive payments should be tied directly to participant achievements. Proper documentation (e.g., proof of completion or certificates) is required for each incentive disbursement.

## TITLE: Youth Eligibility & Selection Criteria Policy # 3.1.2-v1

**Type:** Program Policy

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

**Date Last Revised:** 03/03/2021

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

**Status:** Draft

**Supersedes:** PacMtn Policy #3.1.2

### Purpose

This policy provides guidance regarding Youth Eligibility under the Workforce Innovation and Opportunity Act (WIOA), as it applies to program recruitment and selection. Eligibility is required to be established prior to any service delivery and/or support expenditure.

### Policy

Prior to enrollment in the WIOA-funded Youth Program, program operators must ensure all applicants meet the eligibility requirements for either In-School or Out-of-School Youth as outlined under WIOA Section 129(a)(1) and per State Policy 1019-11. Program staff must document eligibility based on the appropriate category under which the youth qualifies, including required documentation for low-income status, age, and qualifying barriers or risk factors. Eligibility must be determined and documented prior to service enrollment in the Management Information System (MIS).

### Policy Guidelines

Youth program requirements are distinguished by In-School (IS) and Out-of-School (OS) youth, which have different eligibility requirements. Per WIOA requirements, a minimum of 75% of the budget must be expended on OS Youth, with no more than 25% being spent on IS. Further, PacMtn requires that enrollment numbers follow the same ratio, allowing for caseload to correlate with expenditure.

#### In-School Youth

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

- U.S. citizen, or otherwise legally entitled to work in the U.S.;
- Attending school, as defined by state law;
- Age 14-21;
- Selective Service Registration (males 18 or older, and born on or after January 1, 1960);
- Low-income individual (at 70% of the Lower Living Standard Income Level Guidelines for the current program year); and
- One or more of the following:

Category 1	Basic skills deficient
Category 2	An English language learner

Category 3	An offender
Category 4	A homeless individual (as defined in Section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), a homeless child or youth (as defined in Section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))), a runaway, in foster care or has aged out of foster care system, a child eligible for assistance under Section 477 of the Social Security Act (42 U.S.C. 677), or in an out of home placement
Category 5	An individual in foster care or has aged out of foster care system or who has attained the age of 16 years of age and left foster care for kinship guardianship or adoption; a child eligible for assistance under Section 477 of the Social Security Act (42 U.S.C. 677) or in an out of home placement
Category 6	Pregnant or parenting
Category 7	A youth who is an individual with a disability
Category 8	An individual who requires additional assistance to complete an educational program or to secure or hold employment <sup>4</sup>

<sup>1</sup> Per proposed 20 CFR 681.300, PacMtn has established a local policy to define criteria for “requires additional assistance” and documentation requirements.

### Out-of-School Youth

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

- U.S. citizen, or otherwise legally entitled to work in the U.S.;
- Not attending school, as defined by state law<sup>1</sup>;
- Age 16-24;
- Selective Service Registration (males 18 or older, and born on or after January 1, 1960); and
- One or more of the following:

Category 1	A school dropout <sup>2</sup>
Category 2	A youth who is within the age of compulsory school attendance <sup>3</sup> , but has not attended school for at least the most recent complete school year calendar quarter
Category 3	A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is basic skills deficient or an English language learner
Category 4	An individual who is subject to the juvenile or adult justice system
Category 5	A homeless individual (as defined in Section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), a homeless child or youth (as defined in Section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))), a runaway, in foster care or has aged out of foster care system, a child eligible for assistance under Section 477 of the Social Security Act (42 U.S.C. 677), or in an out of home placement
Category 6	Category 6 An individual in foster care or has aged out of foster care system or who has attained the age of 16 years of age and left foster care for kinship guardianship or adoption; a child eligible for assistance under Section 477 of the Social Security Act (42 U.S.C. 677) or in an out of home placement

Category 7	Pregnant or parenting
Category 8	A youth who is an individual with a disability
Category 9	A low-income (at 70% of the Lower Living Standard Income Level Guidelines for the current program year) individual who requires additional assistance to enter or complete an educational program, or to secure or hold employment <sup>4</sup>

<sup>1</sup> According to State guidance, all dropout reengagement programs authorized under RCW 28A.175.100 qualify as out of school, for the purpose of WIOA program eligibility.

<sup>2</sup> Per WIOA, the term “School Dropout” means an individual who is no longer attending any school and who has not received a secondary school diploma or its recognized equivalent.

<sup>3</sup> In Washington State, the age of compulsory school attendance in Washington is eight (8) years of age to under 18 years of age.

<sup>4</sup> PacMtn has established a local policy to define criteria for “requires additional assistance” and documentation requirements.

**Additional Definitions of Low Income:**

WIOA law states that low-income additionally includes youth living in high-poverty areas, with a poverty rate of at least 30 percent per the American Community Survey 5-year data. At this time, none of PacMtn’s five county area qualifies as high poverty.

*Please refer to PacMtn WIOA Youth Income Guidelines.*

**Family of One-Qualification**

Individuals who have a documented disability or are currently in foster care qualify as a Family of One. Only the income of that individual will be counted when establishing low-income status.

- Documentation of the disability is not required to validate eligibility
- If necessary to retain documentation of an individual’s disability, it must be secured and stored as a medical record and filed separately in a separate confidential file
- Verification of status in foster care must be provided in the participant file

**Family Size**

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

- A married couple, and dependent children;
- A parent or legal guardian and dependent children; or Page 23 of 36
- A married couple.

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

NOTE: Based on 20 CFR 681.280, even if the family of a disabled individual does not meet the income eligibility criteria, the disabled individual may be considered a low-income individual if their income meets the income criteria of WIOA section 3(36)(A) or 3(36)(B). Disabled individuals would be considered a family of one and only their income considered in determining low-income.

**Defining Dependent**

PacMtn has established the following criteria consistent with state and federal guidance to help staff

determine family size as or when necessary to determine WIOA Title 1 Youth and Adult Program eligibility.

1. An individual 18 years or older who resides in the family and who, within the last six months, has had any income totaling more than 30 percent of the identified annually Poverty Income Level guidelines for a family of one for 12 months may be considered a family of one.
2. Married or living with a dependent:

If a married individual's family (spouse and/or dependent), resides with the individual and are living within the household of other family members, they are determined a family living within a family. Therefore, the individuals married family would establish the family size.

For example – An individual and their spouse and the child are living with the individual's parents. In such, they would be considered a family of three for determining eligibility.

### **Exceptions to Youth Eligibility Requirements**

Exemption from low-income requirement. In any single program year, no more than 5 percent of a local area's total youth participants can be those who have a low-income eligibility requirement (in-school youth or out-of-school youth in Category 3 or 8) but are not low income.

Limitation on in-school youth requiring additional assistance. In any single program year, no more than 5 percent of a local area's total in-school youth participants can be those who require additional assistance to complete an educational program or to secure or hold employment (Category 7).

### **Excludable Income**

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

- Social Security Disability
- Public assistance payments (including TANF, SSI, RCA, GA, emergency assistance money payments, and general relief money payments)
- Foster childcare payments
- Financial assistance under Title IV of Higher Ed. Act (such as Pell, federal supplemental educational opportunity grants & federal work study. Stafford & Perkins loans, debt – not income. Needs-based scholarship assistance)
- Allowances, earnings, and payments (e.g. OJT) to individuals participating in WIOA.
- Capital gains
- Any assets drawn down as withdrawals from a bank, the sale of property, a house or a car. Tax refund, gifts, loans, lump-sum inheritance, one-time insurance payments, or compensation for injury (lump sum)
- Trade Readjustment Allowance (TRA)
- Workforce Training Assistance
- Job Corp
- Non-cash benefits such as employer fringe benefits, food or housing received in lieu of wages, Medicare, Medicaid, food stamps, school meals, and housing assistance.

- Military Related:
  - All pay and/or financial allowances earned while on active duty are exempt [ 38 U.S.C. 4213 items (1) and (3)]:
  - Disability pension benefits or lump-sum payments at time of separation for unused leave. TEGL 10-09 Q & A # 17
  - Financial benefits received by a covered person under the following Chapters of Title 38 of the U.S. Code: CH 11 – Compensation for service connected disability or death, CH 13 – Dependency and indemnity compensation for service-connected death, CH 30 – All-volunteer force education assistance, CH31 – Training and Rehabilitation for veterans with service-connected disabilities CH 35 – Survivors’ and dependents’ education assistance, CH 36 – Administration of educational benefits

### **Includable Income**

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

Money, wages, and salaries before any deductions

- Unemployment insurance, child support payments and old-age survivors insurance
- Net receipts from non-farm self-employment (recipients from a person’s own unincorporated business, professional enterprise, or partnership after deductions for business expense)

New receipts from farm self-employment (receipts from a farm which one operates as an owner, renter, or sharecropper, after deductions for farm operating expenses)

- Regular payments from railroad retirement, strike benefits from union funds, and worker’s compensation (not lump sum) training stipends
- Alimony
- Pensions whether private, government employee, law enforcement firefighters (LEF) disability income
- Regular insurance or annuity payment
- College or university grants, fellowships, and assistantships, state work-study, (not needs based scholarships): the key is whether or not the money is a loan to be paid back. If it is to be paid back, then it is a loan, and excludable income, if not, then it is includable
- Dividends, interest, net rental income, net royalties, and periodic receipts from estates or trusts
- Net gambling or lottery winnings
- L&I paid on a monthly basis
- Military Pensions:
  - Pension payments authorized by Title 10 U.S. Code as those received by military retirees whether or not their retirement was based on disability
  - Pension benefits paid under Chapter 15 of Title 38 U.S. Code

*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.*

---

## **Definitions**

---

NA

---

## **References**

---

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

Training and Employment Guidance Letters (TEGL's) 23-14 and 08-15

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook

WIOA Title I-B Policy 5602 (Rev5) – Supportive Services & NRPs

WIOA Title I-B Policy 5620 (Rev1) – Follow-Up Services

Procedure #3.2.1-P

PacMtn – WIOA Youth Income Guidelines

---

**DATE APPROVED: 06/04/2016, 06/13/2019, 03/03/2021**

---

**Direct Inquiries to:**

**Pacific Mountain Workforce Development Council**

**201 5<sup>th</sup> Ave SW Ste. 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.

---

**Type:** Program Policy

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

**Date Last Revised:** 11/01/2019

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

**Status:** Draft

**Supersedes:** PacMtn Policy #3.2.1

---

## **Purpose**

This policy provides guidance on providing youth program candidates and participants with proper assessment of skills and abilities. Appropriate assessments can assist youth in clarifying service needs, identify career goals, and equip staff to establish an effective Individual Service Strategy.

It outlines the requirements and guidelines to be followed when using the Comprehensive Adult Student Assessment System (CASAS) to determine Basic Skills Deficiency (BSD) for program enrollment in WIOA Title I programs.

This policy defines the allowable assessments, reporting requirements, training for test administrators, and accommodation requirements for assessing customers with disabilities.

It also clarifies which documents can be retained in a participant file.

---

## **Policy**

PacMtn requires all contractors of youth programs to develop and implement a standardized system for administering and interpreting objective assessments to inform the development of individualized Individual Service Strategies (ISS) for participants, in compliance with WIOA Sec. 129(c)(1)(A), TEGL 21-16, and WSS Policy 1019-11 (Effective 2/28/2025).

### **Assessment Standards**

PacMtn has approved the Comprehensive Adult Student Assessment Systems (CASAS) as the only standardized tool to determine Basic Skills Deficiency (BSD) for program enrollment purposes. CASAS must be used to assess BSD for the following:

i. WIOA Out-of-School Youth (OSY):

- Participants who have a high school diploma or equivalent, are low income, and are basic skills deficient or classified as English Language Learners (ELLs).

ii. WIOA In-School Youth (ISY):

- Participants who are basic skills deficient, regardless of other eligibility factors.

iii. WIOA Adult Program (Priority of Service Categories 1 & 2):

- Category 1: Covered persons (veterans and eligible spouses) who are low income, recipients of public assistance, or basic skills deficient.
- Category 2: Individuals (non-covered persons) who are low income, recipients of public assistance, or basic skills deficient.

## Compliance & Documentation

- All assessment results must be documented in the Management Information System (MIS) and incorporated into the participant's case file and ISS.
- Assessment tools and results must be interpreted in a culturally responsive and equitable manner.
- Youth contractors must ensure that assessments are conducted prior to enrollment and updated as needed during follow-up services, without extending participation.

This policy ensures alignment with WIOA Title I-B regulations, state assessment policy, and federal guidance, supporting accurate eligibility determination and effective service planning.

---

## Policy Guidelines

---

PacMtn requires all contractors of youth programs to develop and implement a system for providing and interpreting objective assessment results to build strong, individualized Individual Service Strategy (ISS) plans for participants.

In alignment with the State Policy, PacMtn has approved the CASAS tests as the only standard tools to determine Basic Skills Deficiency (BSD) used for program enrollment of:

- i. WIOA Out-of-School-Youth (OSY) who have a high school diploma or its equivalent, are low income and Basic Skills Deficient or an English Language Learner
- ii. WIOA In-School Youth (ISY) who are Basic Skills Deficient
- iii. WIOA Adult Priority of Service categories 1 & 2 (*priority must be implemented regardless of the amount of funds available to provide services in the local area*):
  1. Covered persons (veterans and eligible spouses) who are low income, recipients of public assistance, *or* basic skills deficient
  2. Individuals (non-covered persons) who are low-income, recipients of public assistance, *or* basic skills deficient

---

## Policy Guidelines

---

Youth program staff will utilize PacMtn approved assessments to clarify participant need, career goals, and skill gaps that can be addressed with program services through the WIOA 14 Required Elements.

Approved assessments are in accordance with the current legislative regulations for youth assessment and eligibility.

CASAS is a test to measure basic academic skills, but it does not measure vocational skills, nor does it measure advanced technical skills. Other tests are appropriate for such purposes, and this policy does not limit the appropriate use of other such assessments for those purposes.

### **Assessments Permitted**

- i. The following CASAS assessments may be used in Washington effective July 1, 2019. The National Reporting System (NRS) determines tests suitable for use and the period for which that use is approved.
  1. CASAS Reading Goals (replaces Life and Work Reading (forms 81-188)
  2. Life and Work Listening (forms 981-986)
  3. CASAS Math Goals (replaces Life Skills Math (forms 31-38)
  4. CASAS Appraisal (form 900)
- ii. These assessments meet the NRS requirements and:
  1. Are appropriate for measuring literacy and language development of adult students/job seekers,
  2. Have standardized administration and scoring procedures,
  3. Have alternate, equivalent forms for pre- and post-testing, and
  4. Have evidence linking them to the NRS Educational Functioning Levels.

Using the CASAS testing system, PacMtn contractors will also establish BSD prior to program enrollment. Contractors will complete the process for all applicable staff to be certified to administer the CASAS testing system. Contractors will provide during applicable program monitoring, verification of staff certifications completed.

Completing assessments to determine eligibility is not considered a service in youth programs and is an allowable activity prior to program enrollment. CASAS test results are valid as proof of eligibility for six months from the test date. CASAS tests administered by certified testing sites not related to WIOA can be accepted as documentation, given the test is still valid, was administered appropriately and is on the correct forms.

### **Appraisal Test**

The CASAS Appraisal Form is not a federally approved form to determine basic skills deficiency.

- i. The appraisal test must be given first (prior to the pre-test) to determine the appropriate level and form of the pre-test to be used.
- ii. The CASAS appraisal test cannot be used in lieu of the CASAS pre-test to determine BSD.

- iii. Note: If using the Locator (e-test), the appraisal and pre-test are combined into one computer-adaptive test.

### **Pre-test**

- i. Pre-tests determine BSD and Educational Functioning Level (EFL). ii. The proper pre-test form is indicated by the appraisal test results.
- iii. Basic Skills Deficient is denoted by a CASAS score of 238 or below in reading and 235 or below in math.

All test forms and assessment tools must comply with federal guidelines and standards and must be approved through PacMtn Youth Services staff. Staff must not upload into the case management system or retain in hard files any CASAS document(s) that contain test questions or other sensitive testing information. (See the CASAS test security policy at <https://www.casas.org>)

*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.*

---

### **Definitions**

---

NA

---

### **References**

---

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

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
WorkSource System Policy 1011 (Rev6) - CASAS for Basic Skills Assessment  
WIOA Title I Policy 5602 (Rev5) – Supportive Services & NRPs  
WIOA Title I Policy 5620 (Rev1) – Follow-Up Services

Training and Employment Guidance Letter (TEGL) 23-14 and 08-15

PacMtn Procedure #3.2.1-P, Youth Assessment

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: 06/04/2016, 06/13/2019, 11/08/2019**

---

**Direct Inquiries to:  
Pacific Mountain Workforce Development Council  
201 5<sup>th</sup> Ave SW Ste. 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.

---

**Type:** Program Policy

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

**Date Last Revised:** 06/07/2019

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

**Status:** Draft

**Supersedes:** PacMtn Policy # 3.2.2

---

## **Purpose**

This policy provides guidance for establishing the Individual Service Strategy (ISS) plan for program participants. ISS plans are a required element of service delivery and are foundational to successfully providing individualized training that effectively equips youth to enter the workforce.

---

## **Policy**

Each participant enrolled in the WIOA Youth Program must work with staff to develop an Individual Service Strategy (ISS) that identifies career, education, training, and support service needs. The ISS will be updated as participant circumstances or goals change and must link to at least one of the 14 WIOA Youth Program Elements. Costs for services not identified in the ISS are not allowable. All services, including supportive services, must be documented in alignment with WSS Policy 1019-11, WIOA Policy 5602-5, and recorded in the participant record and case notes per WorkSource System guidance.

---

## **Policy Guidelines**

Individual Service Strategy (ISS) plans are a collaboratively built document that details participant need for training, education and support service assistance. It details the goals that they have for their time in the program, and their anticipated need throughout, based on objective assessments completed. It should be updated when any changes occur, and reflect the dynamic needs of our youth as they meet the dynamic needs of the workforce.

The ISS will identify and document:

- The educational goal(s) of the participant
- The employment goal(s) of the participant including non-traditional employment goals, if applicable
- Appropriate achievement objectives for the participant
- Appropriate services to be delivered and justification for the services to be provided
- Any referral(s) to other services/programs and justification for such
- Services needed, but not available in the PacMtn service area

All services delivered to youth should be detailed in the ISS plan, along with justification and resources needed. All expenditures should be tied to goals in the ISS plan, demonstrate completion of performance metrics, and show the related participant level of need.

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.

---

## Definitions

---

NA

---

## References

---

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

TEGL 23-14

TEGL 08-15

TEGL 21-16, Change 1

TEGL 9-22

TEGL 03-04

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook

WIOA Title I Policy 5602 (Rev5) – Supportive Services & NRPs

WIOA Title I Policy 5620 (Rev1) – Follow-Up Services

PacMtn Procedure #3.2.2-P, Individual Service Strategy

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: 07/01/2016, 06/13/2019**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

---

**Type:** Program Policy

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

**Date Last Revised:** 06/07/2019

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

**Status:** Draft

**Supersedes:** PacMtn Policy # 3.3.1

---

## **Purpose**

---

This policy provides guidance on the criteria for youth qualifying for program services through the “requires additional assistance” eligibility category. Specific guidelines and requirements are left to local workforce boards to determine what qualifies as a need for additional assistance. This allows youth to be eligible based on their need for increased support to achieve their educational and career goals.

---

## **Policy**

---

Youth who do not meet the eligibility under Categories 1–6 for In-School Youth or Categories 1–8 for Out-of-School Youth may qualify under the “Requires Additional Assistance” criterion. PacMtn defines this as youth who face documented barriers to completing an educational program or securing/retaining employment, including but not limited to: homelessness, foster care history, chronic absenteeism, incarceration history, or lack of work readiness skills. Appropriate documentation is required to verify this barrier in accordance with WSS Policy 1019-11 and 20 CFR §681.300.

---

## **Policy Guidelines**

---

### **In-School**

Youth who are attending school, per State definition, can be eligible for program participation if they require additional assistance to complete an educational program, or to secure or hold employment.

### **Out-of-School**

Youth who are not attending school, per State definition, and are low-income based on WIOA criteria, can be eligible for program participation if they require additional assistance to complete an educational program, or to secure or hold employment.

### **Criteria**

PacMtn believes the following factors, along with documentation, are indicators of such need:

#### Educational Program

- Has missed 20 or more days of school in the most recent academic year
- Drug/Alcohol abuse treatment interfering with attendance in school
- More than four credits behind on diploma
- Has left educational program because of transportation or financial situation

#### Employment

- Has had two or more interviews without being hired in past 60 days
- Has lost employment placement in past 30 days

- Scores 60 or below on the Workplace Excellence Skills Assessment
- Has not completed WOIS career exploration

Contractors may submit an exception waiver for participants not qualifying under the established criteria for additional assistance needs.

Documentation standards, including acceptable forms of proof, can be found in the Additional Assistance Procedure #3.3.1-P.

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.

---

## Definitions

---

NA

---

## References

---

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 Regulations – 20 CFR § 681.300 and § 681.310

TEGL 23-14  
 TEGL 08-15  
 TEGL 21-16  
 TEGL 09-22

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
 WIOA Title I Policy 5602 (Rev5) – Supportive Services & NRPs  
 WIOA Title I Policy 5620 (Rev1) – Follow-Up Services

PacMtn Additional Assistance Procedure, 3.3.1-P

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: 06/04/2016, 06/13/2019**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: Required Elements Policy # 3.3.2-v1

---

**Type:** Program Policy

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

**Date Last Revised:** 06/07/2019

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

**Status:** Draft

**Supersedes:** PacMtn Policy # 3.3.2

---

### Purpose

This policy provides guidance on PacMtn's expectations for contractors to fulfill the fourteen (14) Required Elements, as detailed in WIOA.

---

### Policy

WIOA Youth Program providers must ensure that all enrolled youth are provided access to each of the 14 WIOA-required program elements, based on their individual assessment results and service needs documented in the Individual Service Strategy (ISS). Providers must deliver or ensure access to these elements directly or through referrals and maintain documentation of availability and delivery. Supportive services and follow-up services, as applicable under Program Elements 7 and 9, must also be available and coordinated to promote program retention and successful outcomes.

---

### Policy Guidelines

#### Service Delivery Guidelines

##### Direct or Referred Services

- When a provider does not have the organizational capacity to deliver a required element directly, it is **expected** that they maintain **formal, meaningful partnerships** with organizations that can deliver the needed services.
- Each partner relationship must:
  - Be governed by a formal MOU, contract, or data-sharing agreement when required.
  - Ensure that referred youth **receive information, specific contact names, and detailed instructions** for accessing services.
  - Be structured to **minimize the burden on the youth** and enable **efficient and individualized access** to needed resources.

##### Access & Documentation Requirements

- All required elements **must be accessible at the time the need is identified** through the ISS.
- Youth must not be denied services due to provider limitations; **referral options must be viable, timely, and documented.**

- Service provision or referral must be recorded in the **WorkSourceWA Management Information System (MIS)** with relevant case notes.
- Providers must document **both delivery and non-delivery of services**, noting reasons why a particular element was not provided if applicable.

## Follow-Up & Supportive Services

- **Supportive services (Element 7)** may be provided **during participation** to eliminate barriers.
- **Follow-up services (Element 9)** must be provided **for up to 12 months post-exit**, and may include supportive elements necessary for job retention, advancement, or education continuation.

---

## Definitions

---

---

## References

---

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

TEGL 23-14  
TEGL 08-15  
TEGL 21-16  
TEGL 09-22  
TEGL 10-16, Change 1

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
WIOA Title I Policy 5602 (Rev5) – Supportive Services & NRPs  
WIOA Title I Policy 5620 (Rev1) – Follow-Up Services

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: 06/04/2016, 06/13/2019**

---

**Direct Inquiries to:**  
**Pacific Mountain Workforce Development Council**  
**201 5<sup>th</sup> Ave SW Ste. 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.

# TITLE: Youth Individual Training Accounts (ITAs) Policy # 3.3.3-v1

---

**Type:** Program Policy

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

**Date Last Revised:** 06/07/2019

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

**Status:** Draft

**Supersedes:** PacMtn Policy # 3.3.3

---

## Purpose

This policy provides guidance on Individual Training Accounts (ITAs) for training services. Customer choice is a guiding principle of WIOA. Participants are expected to make a self-informed choice about their own employment future and the training services needed.

---

## Policy

WIOA-funded Individual Training Accounts (ITAs) are available for eligible Out-of-School Youth (OSY) ages 16-24 who have been assessed and determined to need training to obtain or retain employment leading to self-sufficiency. Training services must be aligned with in-demand industries and be provided by an eligible training provider listed on the State's Eligible Training Provider List (ETPL). Participants select training providers in consultation with case managers using labor market data, training performance, and personal goals. There is no sequence requirement between career and training services, but ITA eligibility must be based on a documented interview, evaluation, or assessment. Training-related costs not covered by the ITA may be funded as supportive services, subject to funding availability and coordination with other resources. Youth receiving ITA-funded training are eligible for up to 12 months of follow-up services after program exit to support job retention and career advancement.

---

## Policy Guidelines

### Need for Training

The award of an ITA is not an entitlement, therefore, even though a Youth may be eligible (and meet priority of service) for enrollment into a WIOA Title 1 funded program, the provision of training must be needed for the participant to obtain employment that leads to economic self-sufficiency.

### Use of Previous Assessments

If program staff determines it is appropriate to use a recent interview, evaluation, or assessment of the participant conducted for another education or training program, then a new assessment is not required.

### Time Limits

An ITA is limited to six (6) quarters of school. A waiver may be submitted to request additional time to complete the program of training. If a participant already has an associate degree, they may use an ITA to complete a bachelor's degree if their occupational goal requires a bachelor's degree

or will make them more employable. Participants who need to prepare for college level classes by taking reading, writing, math or prerequisite classes are not to be considered as having started their ITA until they begin to take college level classes toward their degree. However, an ITA award could fund prerequisite training to a vocational training program if it is required by the educational institution.

### **Funding Limits**

WIOA Title 1 ITA funding for tuition and fees, is limited to a maximum of \$7,000 for up to six (6) quarters of training. The amount and duration of an ITA award shall be determined on an individual basis. Funding amounts will take into account any other financial assistance available to the participant and also the federal funding available to the Youth program operator. Other costs associated with training such as parking fees, school supplies, parking passes, licenses, books, uniforms, inoculations, background checks, driving abstracts, etc. may be considered a training cost and would not be included in the \$7,000 maximum for tuition and fees.

### **Participants Must Apply for Financial Aid**

Participants need to apply for financial aid each year and a copy of the award or denial notification must be placed in the file. If the participant will be using financial aid for their living expenses, the participant's personal budget must include the financial aid funds that will be used for living expenses.

Individuals may select training that costs more than the maximum amount available for ITA's when other sources of funds (e.g., Pell Grants, scholarships, severance pay, etc.) are available to supplement the ITA

### **How ITAs are Authorized**

Before any WIOA Title 1 training funds are expended, an ITA request must be approved by WIOA program staff. The ITA request (form and process) includes career exploration activities designed for a participant to gather the information he or she needs to make an informed decision about the occupation and training provider they choose.

### **Demand Occupation Requirement**

The ITA program of training must be for a demand occupation as designated on the Washington State Demand/Decline List. A waiver may be submitted to provide training in an occupation showing as "Balanced, or In-Decline" on the demand list. The training may be approved if it is on a demand list for another WA Workforce Development Area and the participant is able and willing to commute or relocate.

### **Eligible Training Provider List (ETPL) Requirement**

The ITA program of training *and* training provider must be on the Washington State ETPL for the local WDA or another WA State WDA (if the participant is able and willing to commute or relocate), or it may be on another state's list at the time of the ITA approval.

### **Training Programs Removed from an ETPL**

When a program of training is removed from the Eligible Training Provider list, a participant may continue and complete their program of training, as originally approved; however, the ITA may not be modified or extended.

### **Time Limit to Enroll**

A participant must be enrolled in school within 90 days of the approval of their ITA. (See - Approval of an ITA request). It is recommended for participants who need to attend basic skills or prerequisite classes that their ITA is not finalized for approval until they are ready to begin college level classes.

### **Modifying an ITA**

WIOA program staff may approve a change of the participant's occupational goal to a related occupational goal when a participant decides after attending one quarter of school (maximum of fifteen (15) quarter credits) the occupation chosen is not suitable for the participant.

WIOA program operator may choose to write an internal policy that specifies if there is a specific amount of time that must pass before the program will accept a request for additional training through an ITA.

### **Using Purchase Orders**

After a participant has approval for an ITA, WIOA program staff may write a purchase order to the training institution for tuition. WIOA program staff must follow its own organization's procedure for obligating and de-obligating funds.

### **Coordination of WIOA Training Funds and other Federal Assistance**

WIOA program operators are to consider other sources of funding for training (excluding loans) to pay for training costs so that WIOA funds are used to supplement but not supplant other sources.

An exception to this is educational funding for Veterans. According to TEGL 10-09, the GI Bill and other education and training benefits administered by the Department of Veterans Affairs are not required to be coordinated with WIOA training (i.e., veterans and eligible spouses cannot be required to exhaust their VA benefits prior to gaining access to WIOA Training).

### **Training and Satisfactory Progress**

Participants are required to demonstrate satisfactory progress in training, except for good cause, to access payments through their ITAs.

“Good cause” failure to make satisfactory progress in training includes specific factors that would cause a reasonably prudent person in similar circumstances to fail to make satisfactory progress. These factors may include but are not limited to:

- Illness, injury or disability of the participant or a member of the participant's immediate family;
- Severe weather conditions or natural disaster precluding safe travel;
- Destruction of the participant's school records due to a natural disaster or other catastrophe not caused by the participant;
- Acting on advice received from an authority, such as the training provider, instructor, or case manager;
- Training is delayed or cancelled;

- Accepting stop-gap employment with hours or other work conditions that conflict with the training; or
- Accepting goal-related employment prior to completion of training.

**ITA Exceptions:** In situations covered by the following exceptions, a contract for services may be used to provide for training.

- On-the-job training When PacMtn’s local policy administrators determine there are an insufficient number of eligible providers in the local area to accomplish the purpose of a system of ITAs.
- When PacMtn’s local policy administrators determine a community-based organization (CBO) or other private organization can provide effective training services to individuals with barriers to employment. The criterion for determining effectiveness includes:
  - Financial stability of the organization;
  - Demonstrated performance measures appropriate to the program, including program completion rate; attainment of the skills, certificates or degrees the program is designed to provide; placement after training in unsubsidized employment and retention in employment; and
  - How the specific program relates to the workforce investment needs identified in the local plan.
- Providing training for multiple individuals for in-demand industry sectors or occupations, (as long as the contract does not limit the individual’s consumer choice.)
- Circumstances in which a pay-for-performance contract is appropriate, consistent with 683.510.

An ITA is not required for intensive and short-term prevocational services. These are training services lasting thirty-nine (39) hours or less or at a cost of 600 dollars or less. Intensive services may include literacy, internship, work experience and other training activities that may not provide formal occupational skills training or be appropriate for an ITA. Similarly, short-term prevocational services are designed to prepare a participant for work, but do not provide formal occupational skills training. As such, they generally are not appropriate for an ITA.

*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.*

---

## Definitions

---

NA

---

## References

---

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  
20 CFR Part 680 Subpart C

TEGL 10-09

TEGL 8-19

TEGL 21-22

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook

WIOA Title I Policy 5619 (Rev1) – Increased Capacity Training

WIOA Title I Policy 5611 (Rev3) – Governor’s Procedures for Determining  
Training Provider Eligibility

WIOA Title I Policy 5601 (Rev2) – Individual Training Accounts

WIOA Title I Policy 5602 (Rev5) – Supportive Services & NRPs

WIOA Title I Policy 5620 (Rev1) – Follow-Up Services

PacMtn Policy # 2.3.4 – On-the-Job Training

PacMtn Procedures Document # 2.3.3-P – Individual Training Accounts (ITA)

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: 06/04/2016, 06/13/2019**

---

**Direct Inquiries to:**

**Pacific Mountain Workforce Development Council**

**201 5<sup>th</sup> Ave SW Ste. 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.

## TITLE: Youth Support Services Policy # 3.3.4-v1

---

**Type:** Program Policy

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

**Date Last Revised:** 06/07/2019

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

**Status:** Draft

**Supersedes:** PacMtn Policy #3.3.4

---

### Purpose

This policy provides guidance for providing support service resources to program participants. Support services are resources that enable individuals to meet basic and emergent needs while participating in training, education and employment. Supportive services are intended to be one-time or time limited services and not on-going assistance.

---

### Policy

PacMtn contractors may provide supportive services to youth participants when those services are necessary to enable participation in WIOA-funded education, training, or employment-related activities.

- All supportive service expenditures must be included in the participant's Individual Service Strategy (ISS) and directly linked to a WIOA career or training service.
- Participants must first be assessed for other available community resources before program funds are used.
- Supportive services may be provided during active participation (Program Element 7) or after program exit as part of Follow-Up Services (Element 9).
- Supportive services must be allowable, reasonable, necessary, and properly documented in alignment with WIOA Section 3(59), 20 CFR 681.570, and TEGLs 19-16 and 21-16.
- Needs-Related Payments (NRPs) may only be issued to out-of-school youth aged 18–24 who are enrolled in training and have been determined to lack sufficient income from all other sources.
- Food purchases must be limited, reasonable, and only used when all other federal, state, and local food resources have been exhausted and documented per TEGL 9-22.
- All supportive service payments must be documented per WSS Policy 1019-11 Section 8.1 and in compliance with WorkSource System Policy 1020 (Rev2) – Data Integrity and Performance Policy and Handbook.

---

### Policy Guidelines

Contractors must have internal policies and procedures that detail their eligibility determination, expenditure approval and payment procedure process. Policies and procedures need to address documentation standards for the exhaustion of alternative resources and internal spending limits

to ensure equitable access to resources. Documentation of all support services must be maintained in contractor participant files and fiscal records.

Supportive services may not be used to pay for the purchase, improvement, or maintenance of any asset (e.g. car payments); to pay taxes; to pay past due fees, penalties, interest or other such expenses; to pay child support payments in arrears or otherwise; to pay for parking or moving violation tickets; to pay for bail or restitution; to settle an insurance claim; or to pay for consumer debt.

**Computer hardware and software are considered assets unless required by an educational entity as a requirement of the class.**

Additional category limitations, guidance and documentation requirements for all support service expenditures are listed in the Youth Support Services Procedure #3.3.2-P.

**Additional Limitations**

The maximum amount that may be spent on any one participant in a given program year is \$1,000. In exceptional circumstances, a request for waiver to the above policies must be made to the Pacific Mountain Administration writing prior to issuance of the service for which exception is being requested.

*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.*

---

**Definitions**

---

NA

---

**References**

---

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  
20 CFR Part 680 Subpart G

TEGL 23-14  
TEGL 08-15  
TEGL 21-16

WorkSource System Policy 1019 (Rev11) – Eligibility Policy Handbook  
WorkSource System Policy 1020 (Rev2) - Data Integrity and Performance Policy and Handbook  
WIOA Title I Policy 5602 (Rev5) – Supportive Services & NRPs  
WIOA Title I Policy 5620 (Rev1) – Follow-Up Services

Youth Support Services Procedure #3.3.2-P

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: 06/04/2016, 03/02/2018, 06/13/2019**

---

**Direct Inquiries to:  
Pacific Mountain Workforce Development Council  
201 5<sup>th</sup> Ave SW Ste. 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.



To: Executive Finance Committee  
Date: April 10, 2025  
Subject: WIOA Title I-B - Youth Services RFP - Procurement Process Summary and Award Recommendations

---

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

**Recommended Motion:** Move to Approve the Award of WIOA Title I-B Youth Services Contracts for PY25 to Community Youth Services, Gravity Learning Center, and Morningside, and Recommend Do Pass to the full WDC Board.

**Overview:** On January 24, 2025, PacMtn released a Request for Proposals (RFP) seeking qualified organizations to deliver WIOA Title 1B Youth services across the region. This competitive procurement aimed to identify providers with strong capacity to support out-of-school youth in obtaining education, training, and employment services aligned with PacMtn's strategic priorities and the federal WIOA framework.

### **Procurement Timeline**

- **RFP Released:** January 24, 2025
- **Bidders Conferences:** February 5 and February 12, 2025
- **Proposal Due Date:** February 24, 2025
- **Total Submissions Received:** 11

All proposals were reviewed by PacMtn staff using a standardized scoring rubric. The evaluation considered key criteria including program design, organizational capacity, past performance, equity approach, staffing plan, fiscal capability, and regional service coverage.

### **Award Recommendations**

Based on the evaluation results and funding availability, we recommend awards to the following organizations:

1. **Community Youth Services (CYS)**  
*CYS demonstrated strong regional experience, a solid performance track record, and a comprehensive plan for serving both in-school and out-of-school youth.*



*building community prosperity*

2. **Gravity Learning Center**

*Gravity presented an innovative re-engagement strategy tailored to youth facing multiple barriers and showed strong alignment with local education partners.*

3. **Morningside**

*Morningside proposed a strengths-based model focused on youth with disabilities, offering individualized support and inclusive work-based learning opportunities.*

We respectfully request the EFC's concurrence with these award recommendations, which will allow us to move forward with presenting them to the full WDC Board for final approval, followed by contract negotiations and timely implementation of services for the upcoming program year.



## MEMORANDUM

To: Executive Finance Committee

Date: April 10, 2025

Subject: Summary of Federal Financial Statement Audit, Federal Single Audit, and Compliance Audit

---

### **Background**

Pacific Mountain Workforce Development Council (PacMtn) undergoes an annual audit conducted by the Washington State Auditor's Office (SAO), as required under federal guidance for organizations that expend more than \$750,000 in a program year for funding issued prior to October 1, 2024. The expenditure threshold for funding issued after October 1, 2024, has increased to \$1 million. The audit consists of a Financial Statements Audit and a Federal Single Audit. Additionally, PacMtn is subject to a biennial Accountability Audit covering two years.

### **Activities and Progress**

#### **Financial Statements Audit**

The SAO issued an **unmodified opinion** on the fair presentation of PacMtn's basic financial statements, including governmental activities and each major fund, in accordance with Generally Accepted Accounting Principles (GAAP).

- **Internal Control Over Financial Reporting:**
  - No **significant deficiencies** were reported.
  - No **material weaknesses** were identified.
  - No instances of **noncompliance** material to the financial statements were noted.

#### **Federal Single Audit**

- **Internal Control Over Major Federal Programs:**
  - No **significant deficiencies** were reported.
  - No **material weaknesses** were identified.
- The SAO issued an **unmodified opinion** on PacMtn's compliance with requirements applicable to each of its major federal programs.
- No findings required disclosure under 2 CFR 200.516(a).

## **Accountability Audit (July 1, 2022 - June 30, 2024)**

The Accountability Audit ensures PacMtn’s compliance with state laws, regulations, internal policies, and procedures while safeguarding public resources from fraud, loss, or abuse. The audit, conducted under RCW 43.09.260, assessed high-risk areas, including:

- **Payroll:** Gross wages were examined.
- **Compliance with State Grants:** Review of adherence to grant requirements.
- **Open Public Meetings:** Compliance with meeting minutes, public meetings, and executive session requirements.
- **Financial Condition:** Evaluation for indications of financial distress.

### **Conclusion**

PacMtn has received **clean audit results** across all three audit components, with **no significant deficiencies, material weaknesses, or compliance issues** identified. These results reflect strong financial management, internal controls, and regulatory compliance within the organization.

### **Resources:**

Full reports may be found on the PacMtn website: <https://pacmtn.org/about/reports-resources/>

Or SAO’s website: <https://sao.wa.gov/reports-data/audit-reports>

Or for just the Federal Audit, visit the Federal Audit Clearinghouse: <https://app.fac.gov/dissemination/search/>

- Search for **Pacific Mountain Workforce**