



**Executive Committee Agenda**  
**October 12, 2021 from 8:30am-9:30am**  
**Virtual Meeting Via Zoom or Phone**

- I. 8:30am: Call to Order - Gary North, Chair**
  - a) Consent Agenda: Minutes from August Executive Committee Meeting – vote required
  - b) Consent Agenda: ECWIB Subrecipient Monitoring Letter – information only
- II. 8:35: Finances – Jamie Kendellen, Staff**
  - a) EC Works Unaudited Financials, July 1, 2020 – June 30, 2021 – vote required
- III. 8:45am: Budget Modification #1 – Heather Ficht and Jamie Kendellen, Staff**
  - a) Program Year 2021 Budget Modification #1 - Vote Required
- IV. 9:00: Policy Updates – Jamie Kendellen and Jessica Fitzpatrick, Staff**
  - a) Revised Check Signing Authority Policy – vote required
  - b) Revised Monitoring Policy – vote required
  - c) Electronics Disbursement Policy – vote required
  - d) Supportive Services and Needs Related Payments – vote required
  - e) Youth Eligibility and Enrollment – vote required
  - f) Individual Training Accounts – vote required
  - g) On-the-Job Training – vote required
  - h) Priority of Services – vote required
  - i) Adult Work Experience/Internships – vote required
- V. 9:15am: Draft October Board Meeting Agenda – Heather Ficht, Staff**
- VI. 9:25am: Other Updates – All**

**Attachments:**

- Draft August Executive Committee Meeting Minutes
- EC Works Unaudited Financials July 1, 2020 – June 30, 2021
- Program Year 2021 Budget Modification #1
- Policy Updates Summary
- Revised Check Signing Authority Policy
- Revised Monitoring Policy
- Electronics Disbursement Policy
- Supportive Services and Needs Related Payments
- Youth Eligibility and Enrollment
- Individual Training Accounts



- On-the-Job Training
- Priority of Services
- Adult Work Experience/Internships
- Draft October Board Meeting Agenda



**DRAFT: Executive Committee Minutes**

**October 12, 2021 from 8:30am-9:30am**

*Zoom or Call in ONLY- 1-408-638-0968*

Meeting URL: <https://us02web.zoom.us/j/89773299793?pwd=cjdhVVhtSlJLTndkMlEveXpZalg1dz09>

Meeting ID: 897 7329 9793

Passcode: 682196

Board Members Present: Gary North (Chair), Dr. Marta Cronin (Vice-Chair)

COWC Members Present: None

Others Present: None

Staff Present: Heather Ficht, Jessica Fitzpatrick, Jamie Kendellen, Stephanie Tarantino

Board Members Absent: Martin Campos-Davis (Treasurer)

- **Consent Agenda:** Meeting called to order at 8:31 am by Chair Gary North. The minutes of the August meeting were presented and the Chair asked for a motion to approve the minutes.

**Motion:** Marta moved to approve the minutes as presented, Gary seconded, and the minutes were unanimously approved.

- **EC Works Unaudited Financials:** Jamie presented the unaudited financials to the Committee for the fiscal year ending June 30, 2021. Highlights included:
  - Anything highlighted changed compared to last quarterly financials, i.e. de-obligating some funding and extending others.
  - Staffing – under budget due to hiring for new positions later than expected, as well as being conservative about benefits.
  - Operating expenses – under budget due to How To award and Adam not starting full time until Aug.
  - Program Expenses – most unspent amounts are projects in various stages of implementation, so a lot of unspent projects move into next year's budget as we don't recognize them until we spend the money leading to high carry-in amount(s) on the budget modification.
  - Provider expenses – much of the unspent funds are as a result of getting two unanticipated DWG grants, as we always spend funds that are expiring first, so we could free up funds that carry into the next fiscal year, which was another driving factor to the budget modification.
  - Unexpended funds – while there appears to be loss, it is not true loss as we were required to recognize a lot of revenue in prior fiscal year that we could not expend until this year. We asked COHC if we could use our funds primarily last year because we were not sure what our funding would be this year, leading to lots of carry-in.

The Chair asked for a motion to approve the EC Works Unaudited Financials, July 1, 2020-June 30, 2021.

**Motion:** Marta moved to approve the financials as presented, Gary seconded, and the financials were unanimously approved.

- **PY 2021 Budget Modification #1:** Jamie presented the Program Year 2021 Budget Modification #1 to the Committee. Highlights included:
  - Carry in is just over \$1million higher than the original budget, which always happens in our first modification, and primary reasons were discussed during the financials presentation.
  - Staffing – we show a 3% increase due to the addition of a new Youth Program Manager due to ever increasing workload to manage WorkSource centers, and to prepare for significant investment in Youth Internships. Youth Employment Program through state general funds is going to result in us getting ~\$400-600k to spend on internships and wages for young people, so while we are always conservative about adding staff, we need to prepare for this funding as we believe it will be a continuing funding source.
  - Operating expenses – increase in insurance line due to previously approved additional insurance policies added. Decrease in travel due to COVID, increase in other expenses is due to hiring / staff development and new equipment costs.
  - Program expenses – lease for Hood River increased more than budgeted due to expansion.
  - General expenses – increased due to projects from last year carrying over, increased budget for several projects and added in unspent amounts from prior year.
  - Provider expenses – able to increase provider contracts to show diligence in serving people and companies during pandemic (most other areas saw decrease while we saw increase of customers). Since creation of modification 1, we have awarded additional contracts, so more money will be added to the next modification.
  - Fiscal Year Q1 Resources – we target carrying in, about three months of funding, while we wait on funding to come in from Feds, higher than target due to state funds. Carrying in about 50% of state funds which are two-year, so when you take out state and How To money, we are within range of goal.

The Chair asked for a motion to approve the PY 2021 Budget Modification #1.

**Motion:** Marta moved to approve the Budget Modification as presented, Gary seconded, and the budget was unanimously approved.

- **Policy Updates:** The Committee agreed to do a single vote on all policy updates after review. Based on feedback from the field during training on the new policies, some requests for clarification emerged; therefore, we are requesting approval of the below changes.

- Defining “Newly Hired Employee:” <sup>[1]</sup> The term “newly hired employee” means an employee who— (i) has not previously been employed by the employer; or (ii) was previously employed by the employer but has been separated from such prior employment for at least 60 consecutive days.
- Defining “Public Service and its allowability:”- Public service employment is not allowable for an OJT, except to provide disaster relief employment, as specifically authorized in WIOA and under a special Federal disaster relief assistance grant. “Public service employment” means that you work for the government of the United States, a state, the District of Columbia, a territory or possession of the United States, a city, a municipality, a township, a county, a parish, or a similar government.
- Removing NCRC Silver as a measure of Basic Skills Deficiency- According to ACT, a Silver NCRC says you have the skills to do 65% of the jobs in their US labor market database.
- Removed the Chief Financial Officer as a check signer and replaced with “EC Works staff as identified by the Executive Director and approved by the EC Works Executive Committee.” This change ensures maximum effective controls and appropriate delegation of authority. This applies to both the Check Signing Authority Policy and the Electronic Disbursements Policy. Heather Ficht has identified Jessica Fitzpatrick as the authorized individual (vote below).
- Removed “on-site” monitoring requirement, as well as the specificity around timelines for when communication must take place.
- Added additional clarity around the purpose of monitoring and included all required language from federal register and uniform guidance.

The Policy Updates were presented, and the Chair asked for a motion to approve all the updates.

**Motion:** Marta moved to approve all of the updated policies as presented, Gary seconded, and the motion was unanimously approved.

**Motion:** Marta moved to approve Jessica Fitzpatrick as the authorized individual for both the Check Signing Authority and Electronic Disbursements Policies, Gary seconded, and the motion was unanimously approved.

- **Draft October Board Meeting Agenda:** Due to meeting conflicts, Heather will follow-up with feedback via email.
- The meeting was adjourned by Chair Gary North at 9:05 am.

**EAST CASCADES WORKS  
BUDGET VS. ACTUAL  
JULY 1, 2020 THROUGH JUNE 30, 2021**

**UNAUDITED**

Funding Expiration	RESOURCES	ADOPTED BUDGET MOD2	WORKING BUDGET	FUNDS DRAWN/ RECEIVED	REMAINING FUNDS AVAILABLE	BALANCE REMAINING %	NOTES
	<u>Carry In Resources</u>						
12/31/2021	WIOA - Future Ready	57,457	57,457	35,561	21,896	38%	
6/30/2021	WIOA Adult	388,121	388,121	388,121	-	0%	
6/30/2021	WIOA Dislocated Worker	487,651	487,651	487,651	-	0%	
6/30/2021	WIOA Youth	407,038	407,038	407,038	-	0%	
6/30/2021	WIOA - HCEY	11,250	11,250	11,250	-	0%	
6/30/2021	Admin - Formula	261,189	261,189	261,189	-	0%	
6/30/2021	DOL - American Apprenticeship LWP	33,632	33,632	30,102	3,530	10%	
4/30/2021	DOL - Apprenti	87,861	50,361	40,795	9,566	19%	de-obligated \$37,500
3/31/2022	DOL - DWG Disaster & Employment	584,591	584,591	535,221	49,370	8%	
6/30/2021	DOL/State - WTDB COVID Response	78,775	78,775	78,775	0	0%	
6/30/2021	State - Compet Strategies (Board)	104,640	104,640	104,640	-	0%	
6/30/2021	State - TWIP (Work Exp)	161,684	161,684	161,684	(0)	0%	
6/30/2021	State - Industry Eng (Sectors)	138,756	138,756	138,756	0	0%	
7/31/2022	Local - COHC Health Careers	68,776	68,776	58,697	10,079	15%	carry over to PY21
12/10/2019	Local - Facebook	83,672	83,672	-	83,672	100%	recognized in prior FY
n/a	Local - YCC (Tykeson)	50,000	50,000	-	50,000	100%	recognized in prior FY
	<u>Current Year Resources</u>						
6/30/2022	WIOA Adult	1,087,272	1,087,272	459,313	627,959	58%	} target 20% carry in of each to next year
6/30/2022	WIOA Dislocated Worker	845,299	933,709	375,271	558,438	60%	
6/30/2022	WIOA Youth	1,149,809	1,149,809	528,634	621,175	54%	
6/30/2022	WIOA - HCEY	11,250	11,250	-	11,250	100%	
6/30/2022	Admin - Formula	342,486	342,486	-	342,486	100%	target - as much as poss
12/31/2020	Federal - Paycheck Protection Prog	111,350	111,350	111,350	-	0%	
6/30/2021	Federal/State - PY20 TANF	220,000	220,000	193,073	26,927	12%	
6/30/2021	State - GED Wraparound	42,900	42,900	42,900	-	0%	
6/30/2021	State - YDD	-	290,000	288,652	1,348	0%	
3 year	State/Local - HowTo	1,000,000	1,000,000	7,512	992,488	99%	
6/30/2021	Local - YCC (BLPD, Redmond SD)	70,000	134,500	134,500	-	0%	add HDESD \$2500
12/31/2021	Local - PGE Project Zero	-	5,000	3,500	1,500	30%	add for MOU
n/a	County - Lake County	14,500	14,500	14,500	-	0%	
n/a	Fiscal Sponsorships	-	-	2,100	(2,100)	0%	
	Program Income	-	-	88,112	(88,112)	0%	
	Unrestricted Inc - Interest & Misc	-	-	488	(488)	0%	
<b>TOTAL AVAILABLE RESOURCES</b>		<b>7,899,959</b>	<b>8,310,369</b>	<b>4,989,384</b>	<b>3,320,985</b>	<b>40%</b>	

ADOPTED						YTD SPENDING	
	BUDGET	WORKING	YTD	BALANCE	BALANCE		
BOARD EXPENSES	MOD2	BUDGET	SPENDING	REMAINING	REMAINING %	as a % of REVENUE	
Staffing							
Salaries	658,959	642,105	580,182	61,923	10%	11.63%	
Taxes & Benefits	251,723	224,737	179,435	45,302	20%	3.60%	
Total Staffing	910,682	866,842	759,617	107,225	12%	15.22%	
Operating Expenses							
Temporary staff				-	0%	0.00%	
Professional services	30,000	14,000	8,879	5,121	37%	0.18%	
Legal services	4,500	4,500	-	4,500	100%	0.00%	
Audit services	18,746	20,546	20,300	246	1%	0.41%	
Fees/taxes	8,500	8,000	7,052	948	12%	0.14%	
Phone & internet	16,500	16,500	13,606	2,894	18%	0.27%	
Insurance	12,000	13,000	9,482	3,518	27%	0.19%	
Facilities	36,000	36,000	33,989	2,011	6%	0.68%	
Office supplies/expenses	20,000	20,000	15,283	4,717	24%	0.31%	
Memberships	13,500	13,500	12,323	1,177	9%	0.25%	
Printing	2,600	2,500	2,155	345	14%	0.04%	
Postage	300	300	72	228	76%	0.00%	
Staff/Board travel	20,000	5,000	699	4,301	86%	0.01%	
Meetings	5,000	2,500	357	2,143	86%	0.01%	
Staff development	11,500	6,500	1,679	4,821	74%	0.03%	
Total Operating Expenses	199,146	162,846	125,878	36,968	23%	2.52%	
Board Exp as % of Revenue			17.75%				
Program Expenses							
I-Trac	38,510	38,510	33,537	4,973	13%	0.67%	
WSO Exp - Leases, Phone, Tech	42,580	42,450	42,317	133	0%	0.85%	
One Stop Operator	29,289	29,289	24,406	4,883	17%	0.49%	
Program General Expenses	1,114,788	1,063,647	685,956	377,691	36%	13.75%	
Program Outreach	-	-	-	-	0%	0.00%	
Total Program Expenses	1,225,167	1,173,896	786,216	387,680	33%	15.76%	
TOTAL BOARD EXPENSES	2,334,995	2,203,584	1,671,711	531,873	24%	33.51%	

		ADOPTED					
Contract		BUDGET	WORKING	YTD	BALANCE	BALANCE %	% of
Expiration	PROVIDER EXPENSES	MOD2	BUDGET	SPENDING			REVENUE
6/30/2021	WIOA Adult	850,000	755,192	700,807	54,385	7%	14.05%
6/30/2021	WIOA Dislocated Worker	860,000	798,055	680,846	117,209	15%	13.65%
6/30/2021	WIOA Youth	988,750	953,075	736,969	216,106	23%	14.77%
	WIOA Youth - program income exp	-	-	86,441	(86,441)	0%	1.73%
6/30/2021	WIOA HCEY	11,250	11,250	11,250	-	0%	0.23%
12/31/2020	DOL - Disaster/Employment DWGs	460,138	460,138	459,006	1,132	0%	9.20%
6/30/2021	Lake County - WSO Center	10,000	7,927	6,681	1,246	16%	0.13%
6/30/2021	State - Work Experiences (TWIP)	147,383	147,383	147,383	(0)	0%	2.95%
4/30/2021	DOL - Apprenticeship USA	76,158	41,158	33,208	7,950	19%	0.67%
6/30/2021	Future Ready - Warm Springs	35,670	35,670	28,809	6,861	19%	0.58%
6/30/2021	Federal/State - PY20 TANF	193,600	170,000	169,932	68	0%	3.41%
6/30/2021	State - YDD	-	279,312	280,347	(1,035)	0%	5.62%
6/30/2021	State - GED Wraparound	42,900	42,900	42,900	-	0%	0.86%
<b>TOTAL PROVIDER EXPENSES</b>		<b>3,675,849</b>	<b>3,702,060</b>	<b>3,384,580</b>	<b>317,480</b>	<b>9%</b>	<b>67.84%</b>
<b>CONTINGENCY</b>		<b>10,000</b>	<b>10,000</b>	<b>-</b>	<b>10,000</b>	<b>0%</b>	<b>0.00%</b>
<b>GRAND TOTAL EXPENSES</b>		<b>6,020,844</b>	<b>5,915,644</b>	<b>5,056,292</b>	<b>859,352</b>	<b>15%</b>	<b>101.34%</b>
<b>UNEXPENDED FUNDS</b>		<b>1,879,115</b>	<b>2,394,725</b>	<b>(66,907)</b>	<b>2,461,632</b>	<b>103%</b>	<b>-1.34%</b>

**Carry In Notes**  
 \$850k carry in HowTo  
 \$69k carry in COHC  
 \$1m carry in A/DW/Y

**(Loss) Notes**  
 Entirely due to Facebook & Tykeson awards  
 Recognized 100% of revenues last year  
 Spending funds in current year

Program General Exp account tracking  
acct # 8185

	State/Fed funds					
	Adult	DW	Youth	Sectors	Facebook	Other
Target Population	10,000.00	10,000.00	10,000.00			
YCC Data System			24,000.00			
Sponsorships	2,500.00	2,500.00	2,500.00			
Field Training (Super LLT \$6k)	4,000.00		2,000.00			
Sectors projects - other	34,636.25	34,636.25	30,727.50	5,000.00		
COHC & Match - COCC				58,000.00		
Ranemaker Institute	9,466.00		4,734.00			
COCC - WTDB C N A & Nurse Assistant 06/30/21						
Future Ready - Warm Springs						
Crook County School District					83,671.75	
Incumbent Worker	63,003.95					
Project Orange - cohort	28,000.00					
Project Waterfall - KCEDA Econ Dev - cohort	15,000.00					
YCC			50,000.00			
YCC - Hold - do not yet contract			111,675.50			
WorkSource Branding	7,054.90	3,333.00	3,612.10			
Reserve for Future Projects	5,932.57		4,067.43			2,000.00
Erika McCalpine - DEI	3,333.00	3,333.00	3,334.00			6,500.00
COIC - computers	3,000.00	3,000.00				
HowTo - Direct Expenses						5,409.97
BIPOC focus groups						10,000.00
Fiscal Sponsorships						375.00
Layoff Aversion		88,640.00		5,360.00		
<b>Starting Balance</b>	<b>185,926.67</b>	<b>145,442.25</b>	<b>246,650.53</b>	<b>68,360.00</b>	<b>83,671.75</b>	<b>24,284.97</b>



Program General Exp account tracking  
acct # 8185

	YCC	WTDB Covid	HowTo	Future Ready	Totals	Spent YTD	Balance
Target Population					30,000.00		30,000.00
YCC Data System					24,000.00	24,000.00	-
Sponsorships					7,500.00	500.00	7,000.00
Field Training (Super LLT \$6k)					6,000.00		6,000.00
Sectors projects - other					105,000.00	1,250.00	103,750.00
COHC & Match - COCC					58,000.00	58,696.90	(696.90)
Ranemaker Institute					14,200.00	14,200.00	-
COCC - WTDB C N A & Nurse Assistant 06/30/21		70,000.00			70,000.00	70,000.00	-
Future Ready - Warm Springs				20,721.01	20,721.01	5,685.93	15,035.08
Crook County School District					83,671.75	83,671.75	-
Incumbent Worker					63,003.95	29,561.90	33,442.05
Project Orange - cohort					28,000.00		28,000.00
Project Waterfall - KCEDA Econ Dev - cohort					15,000.00		15,000.00
YCC	184,500.00				234,500.00	234,500.00	-
YCC - Hold - do not yet contract					111,675.50	21,675.00	90,000.50
WorkSource Branding					14,000.00	12,315.64	1,684.36
Reserve for Future Projects					12,000.00	5,751.79	6,248.21
Erika McCalpine - DEI					16,500.00	15,000.00	1,500.00
COIC - computers					6,000.00	5,739.93	260.07
HowTo - Direct Expenses			34,090.00		39,499.97	5,457.48	34,042.49
BIPOC focus groups					10,000.00	3,575.00	6,425.00
Fiscal Sponsorships					375.00	375.00	-
Layoff Aversion					94,000.00	94,000.00	-
<b>Starting Balance</b>	<b>184,500.00</b>	<b>70,000.00</b>	<b>34,090.00</b>	<b>20,721.01</b>	<b>1,063,647.18</b>	<b>685,956.32</b>	<b>377,690.86</b>

# East Cascades Works

## Balance Sheet - Unaudited

As of June 30, 2021

	TOTAL
<b>ASSETS</b>	
Current Assets	
Bank Accounts	
1005 Petty Cash	0.00
1011 General Checking	524,782.69
1025 Special Events Checking	30,217.72
1030 Checking - ACH deposits	39.85
<b>Total Bank Accounts</b>	<b>\$555,040.26</b>
Accounts Receivable	
1200 Accounts Receivable (A/R)	1,840.82
<b>Total Accounts Receivable</b>	<b>\$1,840.82</b>
Other Current Assets	
1202 Grants Receivable	801,993.95
1209 Other Receivable	1,113.91
1405 Prepaid Expenses	3,766.85
1410 Pay Advance	0.00
1999 Interfund Advances	0.00
Undeposited Funds	0.00
<b>Total Other Current Assets</b>	<b>\$806,874.71</b>
<b>Total Current Assets</b>	<b>\$1,363,755.79</b>
Other Assets	
1505 Deposits	3,200.00
<b>Total Other Assets</b>	<b>\$3,200.00</b>
<b>TOTAL ASSETS</b>	<b>\$1,366,955.79</b>
<b>LIABILITIES AND EQUITY</b>	
Liabilities	
Current Liabilities	
Accounts Payable	
2011 Accounts Payable (A/P)	986,553.26
<b>Total Accounts Payable</b>	<b>\$986,553.26</b>
Other Current Liabilities	
2015 Other Accrued Expenses	1,298.78
2020 Wages Payable	15,961.93
2025 Payroll Taxes Payable	8,799.94
2030 Benefits Payable	5,854.35
2040 Deferred Revenue	219,688.58
<b>Total Other Current Liabilities</b>	<b>\$251,603.58</b>
<b>Total Current Liabilities</b>	<b>\$1,238,156.84</b>
<b>Total Liabilities</b>	<b>\$1,238,156.84</b>
Equity	
3103 Fund Balance	195,704.18
Opening Balance Equity	0.00
Net Income	-66,905.23
<b>Total Equity</b>	<b>\$128,798.95</b>
<b>TOTAL LIABILITIES AND EQUITY</b>	<b>\$1,366,955.79</b>

# East Cascades Works

## Statement of Revenue and Expenditures - Unaudited

July 2020 - June 2021

	TOTAL
Income	
4501 Federal WIOA	3,489,249.05
4510 Federal Grants	258,318.89
4530 State Grants	939,919.80
4590 Local Revenue	152,500.00
4600 Program Income Subrecipient	86,440.83
4625 Donation	2,136.88
4690 Miscellaneous Revenue	375.00
4700 In Kind Revenue	2,000.00
4800 Interest Income - ECW	76.14
4805 Program Income - ECW	60,369.83
<b>Total Income</b>	<b>\$4,991,386.42</b>
GROSS PROFIT	<b>\$4,991,386.42</b>
Expenses	
5000 EC Works Board Administrative Expenses	
5100 Salaries	580,182.46
5150 Employer Taxes	50,154.91
5160 Employee Benefits	129,279.74
5211 Professional Services	8,879.34
5217 Audit Services	20,300.01
5218 Fees / Taxes	7,052.41
5234 Phone / Internet	13,605.86
5235 Insurance	9,482.25
5236 Office Lease	33,989.47
5261 Office Supplies	15,280.40
5263 Memberships	12,323.06
5264 Printing	2,155.11
5268 Postage	72.05
5280 Travel	699.15
5281 Meetings	356.94
5282 Staff Training	1,678.87
5300 In Kind Expense	2,000.00
5999 Miscellaneous Expense	3.00
<b>Total 5000 EC Works Board Administrative Expenses</b>	<b>887,495.03</b>
8100 EC Works Program Expenses	
8170 ITrac Database	33,536.70
8175 WSO Leases	38,428.96
8178 WSO Phone / Internet	3,888.00
8180 One Stop Operator	24,406.25
8185 Program General Expense 1099 MISC	661,102.28

# East Cascades Works

## Statement of Revenue and Expenditures - Unaudited

July 2020 - June 2021

	TOTAL
8186 Program General Expenses 1099 NEC	24,854.04
<b>Total 8100 EC Works Program Expenses</b>	<b>786,216.23</b>
8200 Subrecipient Expenses	
8201 Sub Program Admin Comp	77,163.65
8210 Sub Professional Services	28,906.83
8213 Sub Insurance	4,169.80
8219 Sub Office Supplies	22,166.06
8222 Sub Tech/Office Equip	17,447.06
8225 Sub Phone/Internet	15,303.50
8231 Sub Facilities	61,468.58
8237 Sub Travel	13,759.46
8240 Sub Staff Training	2,109.42
8251 Sub Program Delivery Compensation	1,300,657.33
8260 Sub Licenses & Certifications	41,794.74
8263 Sub Training/ITA	467,240.98
8264 Sub On-the-Job Training	179,009.26
8266 Sub Support Services - Training Related	25,052.16
8267 Sub Support Services - non Training Related	49,783.06
8271 Sub Work Experience	70,375.02
8272 Sub Occupational Skills	32,675.50
8275 Sub Incentives	2,225.92
8281 Sub WEX - Staff Compensation	390,958.52
8282 Sub WEX - Stipends	41,031.00
8283 Sub WEX - Incentives	6,850.00
8286 Sub WEX - Participant Pay	222,229.11
8295 Sub Indirect Expenses	312,203.43
<b>Total 8200 Subrecipient Expenses</b>	<b>3,384,580.39</b>
<b>Total Expenses</b>	<b>\$5,058,291.65</b>
NET OPERATING INCOME	<b>\$ -66,905.23</b>
NET INCOME	<b>\$ -66,905.23</b>

**East Cascades Works**  
**Statement of Revenues and Expenditures by Fund - Unaudited**  
July 2020 - June 2021

	Total 11 WIOA Admin	Total 12 WIOA Adult	Total 13 WIOA DW	Total 14 WIOA Youth	Total 15 WIOA NEG	Total 17 Federal Other	Total 18 State DHS	Total 44 State Funds
<b>Income</b>								
4501 Federal WIOA	261,189.00	882,995.07	862,921.72	946,922.13	535,221.13	0.00	0.00	0.00
4510 Federal Grants	0.00	0.00	0.00	0.00	0.00	141,452.15	76,071.72	0.00
4530 State Grants	0.00	0.00	0.00	0.00	0.00	0.00	117,001.17	479,579.00
4590 Local Revenue	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4600 Program Income Subrecipient	0.00	0.00	0.00	86,440.83	0.00	0.00	0.00	0.00
4625 Donation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4690 Miscellaneous Revenue	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4700 In Kind Revenue	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4800 Interest Income - ECW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4805 Program Income - ECW	111.49	402.19	1,120.74	0.00	13.47	6.95	6.51	1.96
<b>Total Income</b>	<b>\$ 261,300.49</b>	<b>\$ 883,397.26</b>	<b>\$ 864,042.46</b>	<b>\$ 1,033,362.96</b>	<b>\$ 535,234.60</b>	<b>\$ 141,459.10</b>	<b>\$ 193,079.40</b>	<b>\$ 479,580.96</b>
<b>Expenses</b>								
Total 5000 EC Works Board Administrative Expenses	\$ 92,757.65	\$ 130,123.47	\$ 127,217.80	\$ 101,122.59	\$ 66,143.48	\$ 141,452.35	\$ 23,128.39	\$ 112,628.94
Total 8100 EC Works Program Expenses	\$ 1,664.85	\$ 92,248.94	\$ 131,467.68	\$ 120,377.71	\$ 10,084.77	\$ 6.75	\$ 19.14	\$ 86,604.53
Total 8200 Subrecipient Expenses	\$ 166,877.99	\$ 661,024.85	\$ 605,356.98	\$ 811,862.66	\$ 459,006.35	\$ 0.00	\$ 169,931.87	\$ 280,347.49
<b>Total Expenses</b>	<b>\$ 261,300.49</b>	<b>\$ 883,397.26</b>	<b>\$ 864,042.46</b>	<b>\$ 1,033,362.96</b>	<b>\$ 535,234.60</b>	<b>\$ 141,459.10</b>	<b>\$ 193,079.40</b>	<b>\$ 479,580.96</b>
<b>Net Income</b>	<b>\$ 0.00</b>	<b>\$ 0.00</b>	<b>\$ 0.00</b>	<b>\$ 0.00</b>	<b>\$ 0.00</b>	<b>\$ 0.00</b>	<b>\$ 0.00</b>	<b>\$ 0.00</b>

**East Cascades Works**  
**Statement of Revenues and Expenditures**  
July 2020 - June 2021

	Total 45 State Sectors	Total 46 State GED Wraparound	Total 48 Apprenti	Total 51 State TWIP	Total 85 Lake County	Total 90 Special Events	Total 95 Local Funds	Total 99 Unrestricted General Fund	TOTAL
<b>Income</b>									
4501 Federal WIOA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,489,249.05
4510 Federal Grants	0.00	0.00	40,795.02	0.00	0.00	0.00	0.00	0.00	258,318.89
4530 State Grants	138,755.61	42,900.00	0.00	161,684.02	0.00	0.00	0.00	0.00	939,919.80
4590 Local Revenue	0.00	0.00	0.00	0.00	14,500.00	0.00	134,500.00	3,500.00	152,500.00
4600 Program Income Subrecipient	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	86,440.83
4625 Donation	0.00	0.00	0.00	0.00	0.00	0.00	2,100.00	36.88	2,136.88
4690 Miscellaneous Revenue	0.00	0.00	0.00	0.00	0.00	0.00	0.00	375.00	375.00
4700 In Kind Revenue	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,000.00	2,000.00
4800 Interest Income - ECW	0.00	0.00	0.00	0.00	0.00	2.75	0.18	73.21	76.14
4805 Program Income - ECW	58,702.69	0.00	1.43	2.40	0.00	0.00	0.00	0.00	60,369.83
<b>Total Income</b>	<b>\$ 197,458.30</b>	<b>\$ 42,900.00</b>	<b>\$ 40,796.45</b>	<b>\$ 161,686.42</b>	<b>\$ 14,500.00</b>	<b>\$ 2.75</b>	<b>\$ 136,600.18</b>	<b>\$ 5,985.09</b>	<b>\$ 4,991,386.42</b>
<b>Expenses</b>									
Total 5000 EC Works Board Administrative Expenses	\$ 73,203.37	\$ 0.00	\$ 7,586.39	\$ 9,168.08	\$ 0.00	\$ 0.00	\$ 3.00	\$ 2,959.52	\$ 887,495.03
Total 8100 EC Works Program Expenses	\$ 65,558.03	\$ 0.00	\$ 2.17	\$ 5,134.91	\$ 4,500.00	\$ 0.00	\$ 268,546.75	\$ 0.00	\$ 786,216.23
Total 8200 Subrecipient Expenses	\$ 0.00	\$ 42,900.00	\$ 33,207.89	\$ 147,383.43	\$ 6,680.88	\$ 0.00	\$ 0.00	\$ 0.00	\$ 3,384,580.39
<b>Total Expenses</b>	<b>\$ 138,761.40</b>	<b>\$ 42,900.00</b>	<b>\$ 40,796.45</b>	<b>\$ 161,686.42</b>	<b>\$ 11,180.88</b>	<b>\$ 0.00</b>	<b>\$ 268,549.75</b>	<b>\$ 2,959.52</b>	<b>\$ 5,058,291.65</b>
<b>Net Income</b>	<b>\$ 58,696.90</b>	<b>\$ 0.00</b>	<b>\$ 0.00</b>	<b>\$ 0.00</b>	<b>\$ 3,319.12</b>	<b>\$ 2.75</b>	<b>-\$ 131,949.57</b>	<b>\$ 3,025.57</b>	<b>-\$ 66,905.23</b>



## EC Works Updated Policies October 2021 Summary

### Summary of Compliance Changes:

- Compliance and overall purpose for presenting you with the same policies is that we implemented them and began training with our providers.
- These changes are reflective of programmatic refinements, which Stef will cover for you, as well as some additional compliance requirements which were implemented by the state after our updates were enacted.
- HECC-OWI Policy, Program Engagement-Enrollment, Exit and Services, August 11, 2021
- HECC-OWI Policy Revision necessary to correct inaccurate information published on Youth Eligibility policy, which has impacted enrollment from the beginning of our program.
  - 20 CFR 681.230 provides adult education under Title II of WIOA, YouthBuild programs, the Job Corps program, high school equivalency programs, and dropout re-engagement programs are not considered to be school for the purposes of determining school status.

### Summary of Program Changes:

- Speaking further to the change in the state's youth eligibility policy- this is a game changer for our programs. All of our programs simultaneously provide GED services. Until now, they have had to delay enrollment in GED for the purposes of determining school status at the time of enrollment into Title 1B. That is no longer true with this change.
- Defining "Newly Hired Employee:" <sup>[1]</sup> The term "newly hired employee" means an employee who— (i) has not previously been employed by the employer; or (ii) was previously employed by the employer but has been separated from such prior employment for at least 60 consecutive days.
- Defining "Public Service and its allowability:" - Public service employment is not allowable for an OJT , except to provide disaster relief employment, as specifically authorized in WIOA and under a special Federal disaster relief assistance grant. "Public service employment" means that you work for the government of the United States, a state, the District of Columbia, a territory or possession of the United States, a city, a municipality, a township, a county, a parish, or a similar government.
- Removing NCRC Silver as a measure of Basic Skills Deficiency- According to ACT, a Silver NCRC says you have the skills to do 65% of the jobs in their US labor market database.

**EC Works BUDGET 2021 - 2022 MOD 1**

09.02.21 rev

	2021 - 2022 MOD 1	2021 - 2022 Adopted Budget	Variance	
<b>RESOURCES</b>				
<b>Carry In Resources</b>				
Adult	627,960	414,282	213,678	
Dislocated Worker	470,028	253,334	216,694	
Youth	632,425	355,575	276,850	
WIOA Admin	342,485	342,486	(1)	
WIOA - Future Ready	21,896		21,896	
DOL - American Apprenticeship Initiative			-	
DOL - Apprenti			-	
DOL - DWG Disaster & Employment	49,370		49,370	
DOL/State - WTDB COVID Response			-	
DOL - COVID layoff aversion	88,410		88,410	
State - TWIP			-	
State - Industry Engagement (Sectors)			-	
State - Competitiveness Strategies (Board Supp)			-	
State/Local - HowTo	992,488	846,562	145,926	
Local - COHC Health Careers	68,776	68,776	(0)	
Local - Lake County	3,319		3,319	
Local - Facebook	-		-	
Local - YCC (Tykeson)	-		-	
	<u>3,297,157</u>	<u>2,281,015</u>	<u>1,016,142</u>	
<b>Current Year Resources</b>				
Adult	915,446	978,545	(63,099)	
Dislocated Worker	787,792	760,769	27,023	
Youth	968,681	1,034,828	(66,147)	
WIOA Admin	296,879	308,237	(11,358)	
WIOA - High Concentration of Eligible Youth	7,500	-	7,500	
Federal - Paycheck Protection Program	-	-	-	
Federal/State - TANF Summer Jobs	169,476	169,476	-	
State - TWIP	298,317	257,416	40,901	
State - Industry Engagement (Sectors)	221,034	190,831	30,203	
State - Competitiveness Strategies (Board Supp)	218,279	188,352	29,927	
State - GED Wraparound	-		-	
State - YDD	-		-	
State/Local - HowTo	-		-	
Local - YCC (BLPD, Redmond SD)	107,636	-	107,636	
Local - PGE Project Zero			-	
County - Lake County	14,500	14,500	-	
	<u>4,005,540</u>	<u>3,902,954</u>	<u>102,586</u>	
<b>Total Resources</b>	<u><b>7,302,697</b></u>	<u><b>6,183,969</b></u>	<u><b>1,118,728</b></u>	18.09%
<b>EXPENDITURES</b>				
<b>Board Expenses</b>				
<b>Staffing</b>				
Salaries	893,450	854,098	39,352	
Employer Taxes	89,345	85,410	3,935	
Employee Benefits	241,232	247,688	(6,456)	
<b>Total Staffing</b>	<u>1,224,027</u>	<u>1,187,196</u>	<u>36,831</u>	3.10%
<b>Operating Expenses</b>				
Professional Services	42,000	42,000	-	
Legal Services	6,000	4,500	1,500	
Audit Services	21,110	21,200	(90)	
Fees/Taxes	10,000	9,500	500	
Phone & Internet	18,500	18,000	500	
Insurance	20,448	16,000	4,448	
Facilities	26,000	26,000	-	
Office Supplies/Expenses	19,200	16,000	3,200	
Memberships	13,000	13,000	-	
Printing	2,500	2,500	-	
Postage	-	300	(300)	combined with office supplies
Staff/Board Travel	18,500	28,500	(10,000)	
Meetings	2,500	2,500	-	
Staff Development	13,000	9,500	3,500	
<b>Total Operating Expenses</b>	<u>212,758</u>	<u>209,500</u>	<u>3,258</u>	1.56%
<b>Board expense as % of revenue</b>	<b>20%</b>			
<b>Program Expenses</b>				
ITrac Database	27,262	28,016	(754)	
WSO Expenses - Leases, Phone/Int, Technology, etc...	48,631	42,800	5,831	
One Stop Operator	30,000	30,000	-	
Program General Expenses ***	709,761	298,950	410,811	
<b>Total Program Expenses</b>	<u>815,654</u>	<u>399,766</u>	<u>415,888</u>	104.03%
<b>Total Board Expenses</b>	<b>2,252,439</b>	<b>1,796,462</b>	<b>455,977</b>	25.38%

\*\*\* See attached schedule of 2021-2022 budgeted Program General Expenses



# EC Works BUDGET 2021 - 2022 MOD 1

	2021 - 2022 MOD 1	2021 - 2022 Adopted Budget	Variance	
<b>Program Provider Contracts</b>				
Adult	881,481	818,481	63,000	7.7%
Dislocated Worker	907,161	695,751	211,410	30.4%
Youth	1,069,139	896,139	173,000	19.3%
TANF Summer Jobs	149,139	149,139	(0)	0.0%
DOL DWGs	44,000	-	44,000	
TWIP	134,243	115,837	18,406	15.9%
Future Ready	11,542	-	11,542	
DOL Apprenti	-	-	-	
GED Wraparound	-	-	-	
YDD	-	-	-	
Lake County - WSO Center	13,319	10,000	3,319	33.2%
<b>Total Program Provider Contracts</b>	<b>3,210,024</b>	<b>2,685,347</b>	<b>524,677</b>	19.54%
<b>Contingency Fund</b>	<b>10,000</b>	<b>10,000</b>	<b>-</b>	0.00%
<b>Total EC Works Expenses</b>	<b>5,472,463</b>	<b>4,491,809</b>	<b>980,654</b>	21.83%
<b>Fiscal Year 2022 - 2023 Quarter 1 Resources</b>	<b>1,830,234</b>	<b>1,692,160</b>	<b>138,074</b>	8.16%
<b>Targeted Carry In 3 Months</b>	<b>1,193,255</b>			
	2021 - 2022 MOD 1	2020 - 2021 ACTUAL	Variance	
<b>Program Provider Contracts</b>				
Adult	881,481	700,807	180,674	25.8%
Dislocated Worker	907,161	680,846	226,315	33.2%
Youth	1,069,139	748,219	320,920	42.9%
TANF Summer Jobs	149,139	169,932	(20,793)	-12.2%
DOL DWGs	44,000	459,006	(415,006)	-90.4%
TWIP	134,243	147,383	(13,140)	-8.9%
Future Ready	11,542	28,809	(17,267)	-59.9%
DOL Apprenti	-	33,208	(33,208)	-100.0%
GED Wraparound	-	42,900	(42,900)	-100.0%
YDD	-	280,347	(280,347)	-100.0%
Lake County - WSO Center	13,319	6,681	6,638	99.4%
<b>Total Program Provider Contracts</b>	<b>3,210,024</b>	<b>3,298,140</b>	<b>(88,116)</b>	-2.7%
<b>Historical - Program Provider Contracts</b>	2016 - 2017 = \$2,911,261 2017 - 2018 = \$2,339,259 2018 - 2019 = \$2,733,464 2019 - 2020 = \$2,760,001 COVID-19 2020 - 2021 = \$3,298,140			

Program General Exp account tracking  
acct # 8185

	Adult	DW	Youth	IndustryEng(Sectors)	HowToOHA/OHSU	YCC	Future Ready	Totals
Target Populations	15,000.00	15,000.00	15,000.00					45,000.00
YCC Data System			23,789.00			8,611.00		32,400.00
Sponsorships	2,500.00	2,500.00	2,500.00					7,500.00
Field Training (Super LLT \$6k, OWP c	4,750.00	4,750.00	4,750.00					14,250.00
Sectors Projects - contract out Sectors	34,636.25	34,636.25	30,727.50					100,000.00
REDI				5,000.00				5,000.00
COHC & Match - COCC				67,590.00				67,590.00
Ranemaker Institute	9,466.00		4,734.00					14,200.00
Future Ready - COCC							10,354.07	10,354.07
Incumbent Worker	100,000.00							100,000.00
Abilitree	2,903.33							2,903.33
NeighborImpact	13,187.44							13,187.44
Housing Works	8,508.08							8,508.08
Aperion Management	4,202.00							4,202.00
Cascade Comprehensive	4,641.20							4,641.20
{HOLD}								-
Project Orange - cohort	5,000.00							5,000.00
Project Waterfall - KCEDA Econ Dev -	15,000.00							15,000.00
EDCO - YCC			25,000.00			99,025.00		124,025.00
WorkSource Branding	15,000.00							15,000.00
HowTo - Direct Expenses					99,000.00			99,000.00
Website Build	10,000.00							10,000.00
Reserve for Future Projects	6,666.00		3,334.00					10,000.00
Balance	251,460.30	56,886.25	109,834.50	72,590.00	99,000.00	107,636.00	10,354.07	\$ 707,761.12

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## Financial Management Policy

### TITLE: Check Signing Authority

#### POLICY APPROVED BY:

Heather Ficht

EC Works Executive Director

Gary North

EC Works Board Chair

#### Previous Policy Approval Date:

February 9, 2021

#### Current Policy Effective Date:

October 12, 2021

#### Revision Approval Date:

October 12, 2021

#### POLICY:

The following individuals are authorized to sign checks for East Cascades Works (EC Works):

- a. The EC Works Officers, including the Chair, Vice Chair and Secretary Treasurer.
- b. The Executive Director
- c. EC Works staff as identified by the Executive Director and approved by the EC Works Executive Committee

No check written payable to one of the authorized check signers shall be signed by the same individual to whom the check is written.

Any check in excess of \$5,000 shall be co-signed by two authorized individuals.

#### PROCEDURES:

1. Fiscal staff will review each purchase order, invoice, bill reimbursement request or other to ensure that all charges are accurate.
2. Upon fiscal review, the Executive Director, unless named as the payee, shall approve all purchase orders, invoices, bill reimbursement requests or other. *Where the Executive Director is named as the payee, approval of expense shall be obtained from an EC Works officer.* The Executive Director may delegate the approval process (with the exception of expenses payable to the Executive Director) to appropriate EC Works staff members.
3. Upon Executive Director or EC Works employee approval, fiscal staff will prepare the check per the purchase order, invoice, bill reimbursement request or other and solicit signature from the appropriate authorized individual(s) as described above.
4. Fiscal staff will ensure that payments have been submitted in a timely and accurate manner and will adhere to all necessary EC Works data and records retention policies.



## Risk Management Policy

### TITLE: Program & Fiscal Monitoring

**POLICY APPROVED BY:**

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Heather Ficht

EC Works Executive Director

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Gary North

EC Works Board Chair

**Previous Policy Approval Date:**

September 13, 2016

**Current Policy Effective Date:**

October 12, 2021

**Revision Approval Date:**

October 12, 2021

**PURPOSE:**

The purpose of this policy is to outline procedures East Cascades Works (EC Works) will use to conduct monitoring of sub-recipients and contractors (where appropriate) to ensure compliance of programs receiving Workforce Innovation and Opportunity Act (WIOA) funding.

**POLICY:**

EC Works will conduct regular monitoring of sub-recipients and contractors providing WIOA Title 1 programs to ensure compliance with WIOA rules and regulations in order to determine:

- That expenditures have been made against the proper cost categories and within cost limitations.
- Whether there is compliance with other provisions of WIOA and the WIOA regulations and other applicable laws and regulations.
- That there is demonstrated compliance with 2 CFR Part 200.
- That there is demonstrated compliance with the nondiscrimination, disability, and equal opportunity requirements of WIOA.

EC Works monitoring includes review of selected fiscal items, as well as program and fiscal policies, participant files and participant expenses where applicable. In addition, EC Works staff may select additional items for testing due to the nature of funding and level of risk associated with each sub-recipient/contractor.

EC Works views monitoring as a continuous improvement exercise; therefore, the sub-recipients and contractors may be contacted throughout the monitoring process to provide additional information to support EC Works' observations and work towards a resolution. However, should any sub-recipient/contractor be unable to provide additional information toward a resolution or be unresponsive within a reasonable timeframe set by EC Works, the observation shall be considered unresolved and included in the final report.



## Risk Management Policy

### **TITLE: Program & Fiscal Monitoring**

Following the conclusion of monitoring EC Works will issue a report detailing any observations, findings, or plans for corrective action/technical assistance related to non-compliance or non-performance issues discovered during the process.

A monitoring report or summary must be provided at least annually to the EC Works Board of Directors, the Central Oregon Workforce Consortium, and the Oregon Office of Workforce Investment. In addition, any annual programmatic and accessibility reports conducted to ensure that programs and offices are compliant with EO/ADAs standards shall be provided.

#### **REFERENCES:**

WIOA, Section 107(d)(8) and Section 185

20 Code of Federal Regulations (CFR) 667.400

20 CFR 679.370(i)2 CFR Chapter 1, Chapter II, Part 200

Higher Education Coordinating Commission Monitoring System Policy, March 23, 2021



## Program Management Policy

### TITLE: Supportive Services and Needs Related Payments

#### POLICY APPROVED BY:

Heather Ficht

EC Works Executive Director

Gary North

EC Works Board Chair

#### Previous Policy Approval Date:

June 8, 2021

#### Current Policy Effective Date:

July 1, 2021

#### Revision Approval Date:

October 12, 2021

#### PURPOSE:

To further clarify the use of Supportive Services and Needs Related Payments, for adults and dislocated workers participating in career or training services and for youth currently enrolled in training and education services under Title I, as defined by the Workforce Investment and Opportunity Act (WIOA).

#### POLICY:

Supportive services are intended to be provided in situations in which a participant would otherwise be unable to successfully participate in a WIOA authorized activity. Supportive services will be provided on a case-by-case basis, only when determined necessary and reasonable through a needs-based analysis, using the tools approved by EC Works, and dependent on funds availability. The needs-based analysis must be conducted when a supportive service need is identified and must include a participant's total monthly income compared to their total monthly expenses and must demonstrate the inability to pay for requested service. The needs-based analysis should then be revisited regularly and appropriately updated as new support service requests arise.

Providers shall make every effort to establish methods for supportive services other than participant reimbursement, as this method can be a burden to participants who do not have available funds to purchase goods. Established methods should focus on vendor agreements or direct purchase of goods/services eliminating the need for actual funds to be provided directly to participants, where appropriate and feasible. Direct client payments or reimbursements shall only be made available as a last resort and verification that services were received (i.e., proof of checks, vendor payments, vendor receipts or vouchers provided) will be required to support the payment. For further detail, please consult the EC Works Program Standards.

Supportive services are not intended to take the place of public assistance or income maintenance payments provided by social service agencies and should only be utilized when it has been determined that other sources or services outside of WIOA funding are not available to the participant, including all local workforce partners, community services providers, and other public and/or private agencies. Providers must ensure the equitable treatment of participants, as well as the documentation of last resort and coordination with other resources, and non-duplication of funding.



## Program Management Policy

### TITLE: Supportive Services and Needs Related Payments

#### A. Allowable Supportive Services

Supportive services may include transportation, childcare, housing, assistance with work related tools and attire, and in the procurement of identification for the purposes of proving legal to work status. Supportive services for youth can also include assistance with educational testing, making reasonable accommodations for youth with disabilities and referrals to health care. While not an exhaustive list, the following includes allowable supportive services as guided by WIOA.

Community Services & Local Resources: services or local resources that can assist participants in overcoming barriers to employment. This includes, but is not limited to, obtaining birth certificates and government identification. For youth, supportive services can pay for fees to organizations that provide opportunities to develop leadership skills through service to their respective communities.

Transportation: assistance may include bus passes, mileage reimbursement, emergency car repairs, tire purchases, car payments, vehicle licenses, driver's licenses, and parking passes. Requests for transportation assistance by check or gas voucher/card can be made for participants engaged in job search, training, and employment activities, or WIOA program services.

Child Care: assistance with payment for dependent children, under the age of 13, who receive services from state registered childcare facilities or providers; limited to the actual hours of childcare required for a participant to engage in an approved activity, which may include up to one-hour travel time to a training site (two-hours round trip).

Dependent Care: assistance with payment for the care of a legal dependent who is unable to dress, clean, or feed themselves OR if the dependent must have constant attention to prevent the dependent from injuring themselves or others; limited to the actual hours of care required for a participant to engage in an approved activity, which may include up to one-hour travel time to a training site (two-hours round trip).

Housing: Support Service payments that provide for the safe and equitable shelter of participants while engaged in approved WIOA activities. Housing support payments may include temporary and transitional living accommodations, housing application fees, rental fees, rent and mortgage payments. Utilities such as electricity, water, and sewage are considered necessary housing expenses and allowable. WIOA programs are also required to coordinate with appropriate agencies and/or social service organizations to provide emergency services when needed.

Educational Testing: Fees and other costs associated for educational testing are allowable expenses. This includes testing for high school equivalency tests, occupational certifications, and credentials.

Reasonable Accommodations for Individuals with Disabilities: Qualified participants with a disability can request reasonable accommodation to effectively participate in education or employment.



## Program Management Policy

### **TITLE: Supportive Services and Needs Related Payments**

Lodging for Training Participants: Participants attending an approved training, that has been determined by the service provider, as unavailable at a closer distance or within a reasonable timeframe to meet the customer need, may be able to obtain support for overnight lodging.

Referrals to Health Care: Allowable expenses include medical testing/treatment, prescriptions, mental health testing, or counseling.

Legal Aid Services: Legal aid services must be able to assist the participant in removing certain barriers to employment.

Uniform or Appropriate Work Attire and Work-Related Tools: Assistance with the purchase of uniforms, tools, equipment, and footwear, not supplied by the employer, or as required for an interview or training.

Books, Fees, and School Supplies: Supplies necessary to complete secondary or post-secondary educational training, not already paid for through an Individual Training Account.

Training Related Applications, Tests, and Certificates: Professional license fees, certificates, applications, and test preparation materials that ensure participant is prepared for a job interview, entering employment, and/or obtaining or renewing a licensure for employment opportunities, not already paid for through an Individual Training Account.

Needs-Related Payments: Needs-Related Payments (NRPs) are financial supports that may be made available to eligible participants who are unable to participate in, or complete, an approved training program without such assistance. This assistance would be contingent upon the availability of funds and the number of requests received and is limited to the amount and duration of the current unemployment compensation benefits set by the State of Oregon and through a needs-based analysis, using the tools specified by EC Works.

East Cascades Works (ECW) may limit or eliminate the availability of NRPs, at its sole discretion, at any time based on funding availability. Needs Related Payments should be provided when it is determined that ongoing resources and income from all other sources are not adequate to support the participant while currently enrolled in a WIOA-approved training.

To be eligible to receive a Needs Related Payment, an adult participant must:

- Be unemployed,
- Not qualify for, or have ceased qualifying for, unemployment compensations; and
- Be enrolled in a training program under WIOA.

To be eligible to receive a Needs Related Payment, a dislocated worker participant must:





## Program Management Policy

### TITLE: Supportive Services and Needs Related Payments

- Be unemployed,
- Have ceased to qualify for unemployment compensation or trade readjustment allowance under TAA,
- Be enrolled in a program of training services under WIOA sec. 134(c)(3) by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or, if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months; or
- Be unemployed and did not qualify for unemployment compensation or trade readjustment assistance under TAA and be enrolled in a training program under WIOA.

#### **B. Exclusions and Restrictions**

Community Services & Local Resources: Providers may use their non-training related support services to assist in obtaining state identification for the purpose of enrollment and participation in programs and/or training. State identification is limited to an Oregon identification card only. Support services are not allowable for the purchase of an Oregon driver's license or passport until a participant has been fully enrolled.

Child Care: services can only be paid for dependent children, under the age of 13, who receive services from state registered childcare facilities or providers. Tutoring centers, summer school, and summer camps/recreational programs are not allowable childcare services. The number of childcare hours and the rates negotiated with the childcare provider shall be documented. WIOA program funding will pay childcare costs up to the rates established by the State of Oregon Department of Human Services. Payments for childcare will be made only for actual hours of childcare required to participate in an approved activity. This shall not include more than one-hour travel time to a training site (two-hours round trip). The participant is liable for payment of any childcare costs incurred over and above the amount authorized by the WIOA program.

Dependent Care: assistance with payment for the care of a legal dependent who is unable to dress, clean, or feed themselves OR if the dependent must have constant attention to prevent the dependent from injuring themselves or others; limited to the actual hours of care required for a participant to engage in an approved activity, which may include up to one-hour travel time to a training site (two-hours round trip). Payments for care cannot be paid to the participant's spouse, parent of qualifying person, or other family members in the home. Application fees for the care of a qualified individual is an allowable expense, As are dependent care centers, however overnight care centers or camps are not.

Educational Testing: Fees and other costs associated for educational testing are allowable expenses. This includes testing for high school equivalency tests, occupational certifications, and credentials.

Lodging for Training Participants: The service provider must document that travel to and from training must begin before 6am and after 6pm; and training is further than 75 miles from the participant's home. The maximum amount allowed for lodging: must not exceed the Standard Daily Rate, approved by the General Services Administration ([www.gsa.gov](http://www.gsa.gov)), for the state travel will take place; and must not exceed 10 total days of travel during the duration of active enrollment.



## Program Management Policy

### **TITLE: Supportive Services and Needs Related Payments**

Other Disallowed Supportive Services Costs: WIOA funds may not be used to pay for goods or services incurred prior to the participant's enrollment; for fines or penalties; for alcohol, tobacco or any goods or services illegal under federal, state, or local law or statute. In addition, union dues, memberships and subscriptions may only be paid for when it is a necessary and related cost associated with training or a reasonable condition of employment and can be clearly documented by the provider as such.

#### **C. Maximum Allowable Cost:**

The total cost of all reimbursement or direct payments to participants for supportive services and needs related payment shall be the actual costs incurred up to the maximum amount allowed as determined by the sub-recipient's approved contract budget.

#### **REFERENCES:**

WIOA Sections 3 (59), 134 (d) (2-3), 129 (c) (2) (G)

Proposed 20 CFR 680.300, 680.330, 680.900-970 and 681.570

State of Oregon WIOA Policy 134(c) Career and Training Services

WIOA, TEGL 19-16, March 1, 2017

HECC-OWI Policy, Program Engagement-Enrollment, Exit and Services, August 11, 2021



## Financial Management Policy

### TITLE: Electronic Disbursement Authority

#### POLICY APPROVED BY:

Heather Ficht

EC Works Executive Director

Gary North

EC Works Board Chair

#### Previous Policy Approval Date:

February 9, 2021

#### Current Policy Effective Date:

October 12, 2021

#### Revision Approval Date:

October 12, 2021

#### PURPOSE:

To establish authority and guidelines for processing of electronic payments and disbursements.

#### POLICY:

The following individuals are authorized to approve electronic disbursements for East Cascades Works (EC Works):

- The EC Works Officers, including the Chair, Vice Chair and Secretary Treasurer
- The Executive Director
- EC Works staff as identified by the Executive Director and approved by the EC Works Executive Committee

#### Electronic Disbursements

Electronic disbursements, including but not limited to Automated Clearing House (ACH), electronic bill payments in all formats, credit card payments and electronic payroll processing shall be initiated and processed by EC Works staff as delegated by the Executive Director to achieve segregation of duties to the extent practical. All electronic disbursements shall be documented and adhere to all necessary EC Works data and records retention policies.

- ACH Payment: shall be reviewed and approved by a single authorized check signer for transactions up to \$5,000. Any transaction in excess of \$5,000 shall be subsequently reviewed and approved by a second authorized check signer. No ACH payment disbursed to one of the authorized approvers shall be approved by the same individual to whom the disbursement is made.
- Electronic Payroll Disbursements: shall be reviewed and approved by the Executive Director.
- Online Credit Card Payment: shall be reviewed and approved by a single authorized check signer for monthly statement amounts up to \$5,000. Any monthly statement amounts in excess of \$5,000 shall be subsequently reviewed and approved by a second authorized check signer.
- Electronic Employee Benefits Payments: Shall be reviewed and approved by the Executive



## Financial Management Policy

### **TITLE: Electronic Disbursement Authority**

- Director and a second authorized check signer when statement amounts exceed \$5,000. Annual employee benefit amounts are approved within the EC Works budget.
- e. Bill Pay Payments: shall be reviewed and approved by a single authorized check signer for transactions up to \$5,000. Any transaction in excess of \$5,000 shall be subsequently reviewed and approved by a second authorized check signer. No Bill Pay payment disbursed to one of the authorized approvers shall be approved by the same individual to whom the disbursement is made.



## Program Management Policy

### TITLE: Youth Eligibility and Enrollment

#### POLICY APPROVED BY:

Heather Ficht

EC Works Executive Director

Gary North

EC Works Board Chair

#### Previous Policy Approval Date:

June 8, 2021

#### Current Policy Effective Date:

July 1, 2021

#### Revision Approval Date:

October 12, 2021

#### PURPOSE:

To establish a policy in support of State standards for eligibility regarding youth participating in Workforce Innovation and Opportunity Act (WIOA) Title IB funded programs. This policy also reinforces expectations for the enrollment of eligible youth into services funded by WIOA under Title IB and provides flexibility for providers of Title IB youth services when current waivers are in place.

#### POLICY:

East Cascades Works expects providers to make every effort to integrate and align services and to leverage other federal, state, local, and philanthropic resources to support in-school youth (ISY) and out-of-school youth (OSY). EC Works investments in youth services are specifically intended to ensure that disadvantaged youth become employed and enter career paths that ultimately lead to self-sufficiency.

As required in WIOA Section 129(4)(A), a minimum of 75 percent of the WIOA funds allocated to a Local Workforce Development Board for eligible youth must be used to provide youth activities to Out-of-School youth. Eligibility is determined at the time of enrollment.

#### Out-of-School Youth Eligibility:

- A. Not attending any school including:
  - a. A youth who does not have a GED or secondary diploma and is not enrolled in secondary education,
  - b. A youth who has a GED or secondary diploma and is not enrolled in postsecondary education,
  - c. A youth who is attending an alternative education program, dropout reengagement program or high school equivalency program; or
- B. A youth who is attending an adult education program under Title II (ABE/ESL), or a YouthBuild or Job Corps program.
- C. Age 16 to 24 at the time of enrollment; and
- D. One or more of the following:
  - 1. A secondary school dropout as defined in ORS 339.505(1)(b),



## Program Management Policy

### **TITLE: Youth Eligibility and Enrollment**

2. A youth who is within the age of compulsory school attendance as defined in ORS 339.010, but has not attended school for at least the most recent complete school year calendar quarter,
3. A recipient of a secondary school diploma or its recognized equivalent who is low-income and is either basic skills deficient or an English language learner,
4. An offender,
5. Is a homeless individual aged 16 to 24 who meets the criteria defined in sec. 41403(6) of the Violence Against Women Act of 1994, a homeless child or youth aged 16 to 24 who meets the criteria defined in sec. 725(2) of the McKinney-Vento Homeless Assistance Act or a runaway,
6. In foster care or has aged out of the foster care system or who has attained age 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out of-home placement,
7. Is pregnant or parenting,
8. Has a disability; or
9. Is low-income who requires additional assistance to enter or complete an educational program or to secure or hold employment.

ORS 660.310 provides that for the purposes of WIOA, an individual enrolled in alternative education programs, as provided by ORS 336.615 to 336.675, may be an out-of-school youth. See the exception to this below.

20 CFR 681.230 provides adult education under Title II of WIOA, YouthBuild programs, the Job Corps program, high school equivalency programs, and dropout re-engagement programs are not considered to be school for the purposes of determining school status.

#### Out-of-School Youth (OSY) Enrollment at a rate of 75%:

- Contractors shall use at least 75% of WIOA Title I Youth program resources available after administrative costs have been deducted to serve OSY as defined by WIOA.
- EC Works expects that at least 75% of participants enrolled as youth will be enrolled as OSY.
- EC Works defines OSY who require “additional assistance” as youth who do not otherwise meet the OSY enrollment criteria and can benefit from any of the required elements (Please refer to the ECWIB OSY- “Needs Additional Assistance” Policy).

#### In-School Youth Eligibility:

- A. Enrolled in a secondary or post-secondary education institution\*,
- B. Age 14 to 21 at the time of enrollment,
- C. Is, or is a member of a family that is low-income; and
- D. One or more of the following:

1. Basic skills deficient,



## Program Management Policy

### **TITLE: Youth Eligibility and Enrollment**

2. An English language learner,
3. An offender,
4. Is a homeless individual,
5. An individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement,
6. Is pregnant or parenting,
7. Has a disability; or
8. Is an individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

\*Exception: TEGL 21-16 provides that youth attending high school equivalency programs, including those considered to be dropout re-engagement programs, funded by the public K-12 school system who are classified by the school system as still enrolled in school are considered In-School Youth.

#### In-School Youth (ISY) Enrollment at a rate of 25%:

- Contractors must not expend more than 25% of WIOA Title I Youth program resources available after administrative have been deducted to serve ISY as defined by WIOA.
- EC Works expects no more than 25% of participants enrolled as youth will be enrolled as ISY.
- Each eligible youth must be provided with an objective assessment of academic and skill levels and service needs, to develop an Individual Service Strategy (ISS) directly linked to one or more performance indicators and that identifies career pathways that include education and employment goals.
- Contractors will track enrollments and investments to maintain the expectation that at least 75% of resources and enrollments will be directed at OSY and no more than 25% will be directed at ISY.
- All youth will be provided access to the required program elements, as defined by WIOA Sec. 129 (c)(1). The program elements identified as appropriate for the participant must be based on the objective assessment and the plan developed in the ISS.

#### Flexibility Pertaining to State or Federal Issued Waivers:

Should at any point the State of Oregon or the US Department of Labor issue a Waiver regarding the eligibility or enrollment outlined herein, EC Works grants maximum flexibility to its providers to align with the requirements of the Federally or State issued Waiver.

#### Serving Older Youth

EC Works acknowledges that some 18- to 24-year-olds may be ready for adult services and therefore encourages program providers to coordinate services with their WorkSource partners. Funding streams and services must be tracked concurrently to avoid any duplication of service or payment.



## Program Management Policy

### **TITLE: Youth Eligibility and Enrollment**

#### **REFERENCES:**

Section 129(4)(A) and 20 CFR 681.410; Section 127(b)(1)(C), reserved under Section 128(a)  
Training and Guidance Letter 23-14  
Training and Guidance Letter 8-15  
Training and Guidance Letter 21-16  
EC Works OSY Needs Additional Assistance Policy PM03A  
Higher Education Coordinating Commission, Title 1B Youth Eligibility Policy  
OR PY 2020 Waiver Response letter 06.30.20  
PY21 DOL Waiver Request to Reduce OSY Enrollment  
HECC-OWI Policy, Program Engagement-Enrollment, Exit and Services, August 11, 2021





## Program Management Policy

### TITLE: Individual Training Accounts (ITAs)

**POLICY APPROVED BY:**

Heather Ficht

EC Works Executive Director

Gary North

EC Works Board Chair

**Previous Policy Approval Date:**

June 8, 2021

**Current Policy Effective Date:**

July 1, 2021

**Revision Approval Date:**

October 12, 2021

**PURPOSE:**

To establish a policy to support the Workforce Innovation and Opportunity Act (WIOA) and further defined through Oregon's Eligible Training Provider List policy for the use of Individual Training Accounts (ITAs) for eligible Adults and Dislocated Workers.

**POLICY:**

Individual Training Accounts are one way that eligible participants can access training to obtain and retain employment that leads to self-sufficiency or higher wages. An ITA is limited in cost and duration and to training that is defined as one or more courses or classes or a structured regimen that leads to:

1. An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the state or the federal government, an associate or baccalaureate degree.
2. A secondary school diploma or its equivalent if provided concurrently or in combination with occupational skills training.
3. Employment or measurable skill gains toward employment or a credential.

These training programs are required to be on the Oregon Eligible Training Provider List (ETPL) or eligible through a reciprocal agreement with another state and may be delivered as stackable services and could be provided in-person, online, or in a blended approach.

ITAs shall be provided to eligible participants based on an individualized assessment, which may include informal discussions as part of the intake process. Documentation of the person's job readiness, employment and training needs, financial, social, and supportive needs, labor market demand and potential for successful completion must be included in the participant's Individual Employment Plan (IEP).



## Program Management Policy

### **TITLE: Individual Training Accounts (ITAs)**

#### Coordination of WIOA Training Funds and Other Federal Assistance (20 CFR 680.230)

(a) WIOA funding for training is limited to participants who:

- (1) Are unable to obtain grant assistance from other sources to pay the costs of their training; or
- (2) Require assistance beyond that available under grant assistance from other sources to pay the costs of such training. Programs and training providers must coordinate funds available to pay for training as described in paragraphs (b) and (c) of this section.

In making the determination under this paragraph (a), one-stop centers may consider the full cost of participating in training services, including the cost of support services and other appropriate costs.

(b) One-stop centers must coordinate training funds available and make funding arrangements with one-stop partners and other entities to apply the provisions of paragraph (a) of this section. One-stop centers must consider the availability of other sources of grants to pay for training costs such as Temporary Assistance for Needy Families (TANF), State-funded training funds, and Federal Pell Grants so that WIOA funds supplement other sources of training grants.

(c) A WIOA participant may enroll in WIOA-funded training while their application for other tuition assistance (such as a Pell Grant) is pending if the one-stop center has made arrangements with the training provider and the WIOA participant regarding allocation of funding if it is subsequently awarded. The training provider must clearly document, using the budget tool approved by EC Works, the portion of the tuition and other training-related expenses covered by WIOA, and those expenses covered by other sources. In the case where WIOA is used to underwrite the full amount of the tuition, the training provider must reimburse WIOA for the portion of tuition subsequently awarded through other sources.

#### ITA Authorization

- ITAs must be approved by a service provider's program manager prior to issuance. ITAs are authorized only for training programs listed on the Eligible Training Provider List (ETPL), as required in WIOA Section 134(c)(F)(iii).
- ITA funds are paid directly to the training provider. If a student drops a course or if FAFSA funds are used, WIOA funds expended must be reimbursed to the service provider.
- ITAs may be used for pre-apprenticeship programs; however, only pre-apprenticeship programs listed on the ETPL may be approved (20 CFR 680.330(a)).
- ITAs may be authorized for training programs in other states or online training if the training program is listed on the ETPL or there are existing reciprocity agreements with other states.
- ITAs are not authorized for individualized career services such as short-term prevocational training. Short-term pre-vocational services may include the development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, professional conduct, or other non-occupation-specific topics that are intended to prepare individuals for unsubsidized employment or training.



## Program Management Policy

### **TITLE: Individual Training Accounts (ITAs)**

- The amount and duration of each participant's ITA award is determined on an individual basis. Funding amounts will consider the total costs of the selected training program, any other financial assistance available to the participant, the WIOA funding available within the provider budget, and other applicable factors such as career seeking barriers.
- The ITA funding can only include the cost of training services such as instructor salaries and benefits, classroom space, instructional materials, tuition, books, individual materials, supplies, tools, and equipment. All costs must be clearly documented using the tool approved by EC Works.
- An ITA may fund prerequisite training to a vocational training program if it is required by the educational institution and there is no other way to pay for these prerequisites.

#### Reporting Progress

Service providers must arrange to receive training progress reports (i.e. transcripts) from participants and/or the training provider. Providers must also develop a service strategy to overcome the barriers impacting progress with participants who are not earning satisfactory progress in their coursework.

#### Exceptions

Per 20 CFR 663.430, East Cascades Works may allow for mechanisms other than ITA's to be used for training. In addition to On-the-Job Training, Incumbent Worker Training and Customized Training, the following may be used. The use of funds to provide training in such circumstances must be submitted through a formal request by the Title 1B provider to EC Works staff for review. Use of the funds for the following is up to the sole discretion of EC Works:

- When EC Works determines that there is an insufficient number of eligible providers in the local area to accomplish the purpose of a system of ITA's.
- When EC Works determines that there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve special participant populations that face multiple barriers to employment<sup>1</sup>.

#### **REFERENCES:**

Workforce Innovation and Opportunity Act Section 134(b)(3)(E)

WIOA Regulations 20 CFR 681.290 and 680.600

TEGL 19-16 Guidance on Services Provided Through Adult and Dislocated Worker Programs

State of Oregon Workforce Programs Eligible Training Provider Policy 122(a), 3/12/2018

HECC-OWI Policy, Program Engagement-Enrollment, Exit and Services, August 11, 2021

EC Works Participant Waiver

<sup>1</sup> Special participant populations that face multiple barriers to employment are populations of low-income individuals that are included in one or more of the following categories:

- (1) Individuals with substantial language or cultural barriers;
- (2) Offenders; and
- (3) Homeless individuals



## Program Management Policy

### TITLE: On-The-Job Training (OJT)

#### POLICY APPROVED BY:

Heather Ficht

EC Works Executive Director

Gary North

EC Works Board Chair

#### Previous Policy Approval Date:

June 8, 2021

#### Current Policy Effective Date:

July 1, 2021

#### Revision Approval Date:

October 12, 2021

#### PURPOSE:

To further articulate East Cascades Works implementation of On-the-Job Training as defined by the Workforce Innovation and Opportunity Act Section 3(44).

#### POLICY:

The East Cascades Works encourages the use of On-the-Job Training (OJT) by its contracted service providers to better meet the needs of job seekers so they may find and keep jobs with local employers, and offset employer costs associated with new employee training.

OJT is not a subsidized employment program, it is a WorkSource service that assists businesses in training and retaining skilled, productive workers by offsetting the extraordinary costs of providing the training and additional supervision related to the training. These costs include the provision of occupational training as well as supervision of a new employee. An agreement with the employer specifies the duration of training as well as the skills and competencies to be acquired by the participant. WIOA also allows both Individual Training Accounts (ITA) and OJT funds to be used together when placing participants into a registered apprenticeship program or with a training provider. OJTs are intended to encourage the development of in-company training programs that lead to transferrable skills for eligible individuals who would not otherwise be hired or promoted to a given position. OJT is not an entitlement program for employers.

OJT is provided under a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. Through the OJT contract, occupational training is provided for the WIOA participant in exchange for the reimbursement, typically up to 50 percent of the wage rate of the participant, for the extraordinary costs of providing the training and supervision related to the training. In limited circumstances, as provided in WIOA sec. 134(c)(3)(h) and § 680.730, the reimbursement may be up to 75 percent of the wage rate of the participant.



## Program Management Policy

### TITLE: On-The-Job Training (OJT)

- I. Eligible trainees: Contracted service providers will only enter OJTs on behalf of the eligible trainees who meet one of the following:
  - A. Job seekers enrolled in the WIOA Title I Adult, Dislocated Worker and/or Youth program that the employer agrees to hire, or a newly hired employee<sup>1</sup> that requires additional training that the employer intends to retain,
  - B. Assessed as having the skills and qualifications to participate successfully in an OJT training contract, to obtain or retain employment that leads to self-sufficiency,
  - C. Unable or unlikely to obtain employment without retraining,
  - D. Low income, receiving unemployment insurance or public assistance, or need to earn a wage while learning an occupational skill,
  - E. Individuals with barriers to employment who need help finding their next job.
  - F. Individuals who can learn the skills necessary for the occupation more easily and thoroughly on the job; and/or
  - G. Need supervision as they learn specific skills for an occupation.
- II. Eligible employers: Contracted service providers will only enter into OJT contracts and provide OJT reimbursements to eligible employers that meet **all** the following criteria:
  - A. Have the capacity and resources to adequately train the OJT candidate with the intent of retaining the employee in long-term employment,
  - B. Enter into a signed training contract that spells out the training and retention expectations of the employee, the employer, and the contracted service provider,
  - C. Have adequate payroll and record keeping systems in place,
  - D. Have the explicit agreement of the bargaining agent if OJT positions are covered by collective bargaining agreements,
  - E. Provide the same rate of pay, fringe benefits and working conditions offered to the OJT trainee as similarly situated employees in similar positions in the local labor market; and
  - F. Have adequate workers' compensation or accident insurance coverage is in effect.
- III. Ineligible employers: An employer is not eligible to enter into an OJT contract or receive OJT reimbursements if any of the following applies:
  - i. OJT positions result in worker displacement:
    - a. Any other individual is on layoff status with recall rights from the same or any substantially equivalent job in compliance with the employer's layoff policy or those of the East Cascades Workforce Area,
    - b. The employer has terminated the employment of any regular employee with the intention of filling the vacancy with an OJT participant,
    - c. The OJT position infringes on the promotional opportunities of currently employed

<sup>1</sup> The term "newly hired employee" means an employee who— (i) has not previously been employed by the employer; or (ii) was previously employed by the employer but has been separated from such prior employment for at least 60 consecutive days.



## Program Management Policy

### TITLE: On-The-Job Training (OJT)

- workers; or
- d. The prohibited displacement may also include a partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits of any currently employed employee.
- ii. Employer has relocated all or part of their business within the previous 120 days where the relocation action has resulted in the loss of employment of any employee at the original location; or
- iii. Employer has been convicted of violating federal laws and regulations.
- iv. Public service employment<sup>2</sup>, except to provide disaster relief employment, as specifically authorized in WIOA and under a special Federal disaster relief assistance grant.
- v. Section 188(a)(3) of WIOA prohibits the use of funds to employ participants to carry out the construction, operation, or maintenance of any part of any facility used for sectarian instruction or as a place for religious worship except for maintenance of facilities that are not primarily used for instruction or worship and are operated by organizations providing services to WIOA participants. (b) 29 CFR part 2, subpart D, governs the circumstances under which Department support, including WIOA Title I financial assistance, may be used to employ or train participants in religious activities. Under that subpart, such assistance may be used for such employment or training only when the assistance is provided indirectly within the meaning of the Establishment Clause of the U.S. Constitution, and not when the assistance is provided directly. That subpart also contains requirements related to equal treatment in Department of Labor programs for religious organizations, and to protecting the religious liberty of Department of Labor social service providers and beneficiaries.

- IV. OJT Training Duration. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided, considering the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate. The contract should include a planned retention period to assure that the trainee has mastered the skills needed to succeed in the occupation.
- V. Employer Involvement in Registered Apprenticeship. Employers are the foundation of every Registered apprenticeship (RA) program and must be the provider of the OJT, for the duration set by the Joint Apprenticeship Training Council (JATC). In addition, every RA program will include a classroom training or academic component to supplement on-the-job learning and training; and must have at least one incremental wage increase commensurate with an increase in skills. Lastly, the completion of the RA Completion Certificate is a recognized post-secondary credential under WIOA and shall be documented as such by the service provider.

<sup>2</sup> “Public service employment” means that you work for the government of the United States, a state, the District of Columbia, a territory or possession of the United States, a city, a municipality, a township, a county, a parish, or a similar government.





## Program Management Policy

### TITLE: On-The-Job Training (OJT)

- VI. Reimbursement. Employers may be reimbursed only for the portion of the trainee's wages agreed upon in the OJT contract. Employers may be reimbursed only for time the trainee was on the job and receiving training.
- A. An On-the-Job Training Plan must outline the skills the participant is expected to learn during the duration of their training.
  - B. The reimbursement amount will be a negotiated percentage of the wage paid to the trainee.
    - i. The employer reimbursement rate for OJT may not exceed 50 percent unless prior approval has been given to allow for up to 75 percent. Contracted staff must request a waiver from EC Works to exceed the 50 percent reimbursement rate.
    - ii. The employer reimbursement may only exceed 50 percent of the trainee's wage rate under the following conditions and with approval of EC Works staff:
      - a. The characteristics of the participant(s) with an emphasis on barriers to employment as defined in WIOA Section 3(24),
      - b. The size of the employer with an emphasis on small businesses (i.e., employers with fewer than 100 employees),
      - c. The quality of employer-provided training (e.g., an industry-recognized credential, advancement opportunity) and advancement opportunities,
      - d. The number of employees participating in the training,
      - e. Wage and benefit levels of the employees (both pre and post participation earnings); and
      - f. The relation of the training to the competitiveness of the participant).

Contracted services providers shall consult East Cascades Works Program File Standards for the documentation requirements.

#### REFERENCES:

Workforce Innovation and Opportunity Act Section 134(b)(3)(E)  
WIOA Regulations 20 CFR 681.290 and 680.600  
TEGL 19-16 Guidance on Services Provided Through Adult and Dislocated Worker Programs  
Training and Employment Guidance Letter (TEGL) 10-16  
Training and Employment Guidance Letter (TEGL) 19-16  
OAR 589-007-0800  
HECC-OWI Policy, Program Engagement-Enrollment, Exit and Services, August 11, 2021



## Program Management Policy

### TITLE: Priority of Service

#### POLICY APPROVED BY:

Heather Ficht

EC Works Executive Director

Gary North

EC Works Board Chair

#### Previous Policy Approval Date:

June 8, 2021

#### Current Policy Effective Date:

July 1, 2021

#### Revision Approval Date:

October 12, 2021

#### PURPOSE:

To establish a policy to support that of the Workforce Innovation and Opportunity Act (WIOA), the Oregon Workforce Talent and Development Board (WTBD) in providing priority for individualized career services and training services to recipients of public assistance, other low-income individuals, individuals who are basic skills deficient and veterans.

#### POLICY:

As established by WIOA, further defined by the WTDB and the Governor of the State of Oregon, priority must be given to recipients of public assistance, low-income individuals, individuals who are basic skills deficient and veterans, in accessing individualized career and training services.

EC Works' Board of Directors may identify additional populations of which to prioritize. Any additional populations must be outlined within the EC Works' approved local plan and shall not be given priority over the WIOA priority of services populations outlined within this policy.

#### Recipients of Public Assistance:

An individual or an individual who is part of a family currently receiving, or who in the past 6 months has received assistance through any of the following programs:

- Supplemental Nutrition Assistance Program (SNAP),
- Temporary Assistance for Needy Families (TANF),
- Supplemental Security Income (SSI/SSID); or
- Any other Federal, State, or local income-based public assistance.

#### Low-Income Individuals:

WIOA sec. 3(36) defines a low-income individual as someone who receives public assistance as described above or:

- In a family with a total family income that does not exceed the higher of—(I) the poverty line; or (II) 70 percent of the lower living standard income level,





East Cascades  
**WORKS**

Connecting Talent To Opportunity

## Program Management Policy

### **TITLE: Priority of Service**

- b. A homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994), or a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act),
- c. Receives or is eligible to receive a free or reduced-price lunch under the Richard B. Russell National School Lunch Act,
- d. A foster child on behalf of whom State or local government payments are made; or
- e. An individual with a disability whose own income meets the income requirement, but who is a member of a family.

#### Basic Skills Deficient:

- a. A youth, that has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test, such as the CASAS or TABE; or
- b. A youth or adult, that is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society as determined by one of the following generally accepted assessments:
  - a. measuring at or below the 8<sup>th</sup> grade level on a generally accepted standardized test such as the CASAS or TABE.
  - b. ACCUPLACER® with a score that is less than the recommended score for a post-secondary program of study.
  - c. ACT® WorkKeys® Curriculum™ Placement Quiz or WorkKeys® Assessment with a Level 4 or below in any assessment.
  - d. NCRC Bronze.
  - e. Best Plus™, or Best Literacy™, and/or
  - f. Through an initial and/or objective assessment conducted by the WIOA Title 1B or WorkSource partner; and through thoroughly case noting the following, which may be part of the overall intake process and may include informal verbal discussion:
    - i. Identification of strengths.
    - ii. Identification of workplace skills.
    - iii. Career interests.
    - iv. Work values.
    - v. Identification of prior work history.
    - vi. Family situation.
    - vii. Service needs.

#### Veteran:

An individual who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2).

Active service includes full-time Federal service in the National Guard or a Reserve component. This definition of "active service" does not include full-time duty performed strictly for training purposes (i.e., that which often is referred to as "weekend" or "annual" training), nor does it include full-time active duty performed by National



East Cascades  
**WORKS**

Connecting Talent To Opportunity

## Program Management Policy

### **TITLE: Priority of Service**

Guard personnel who are mobilized by State rather than Federal authorities (State mobilizations usually occur in response to events such as natural disasters).

#### Eligible Spouse:

An individual who is the spouse of any of the following:

- a. Any veteran who died of a service-connected disability,
- b. Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
  - i. Missing in action,
  - ii. Captured in line of duty by a hostile force; or
  - iii. Forcibly detained or interned in line of duty by a foreign government or power.
- c. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
- d. Any veteran who died while a disability was in existence. A spouse whose eligibility is derived from a living veteran or service member (i.e., categories b. or c. above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g., if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

Providers of Title 1B Programs must refer to the EC Works Programs Standards for appropriately documenting priority of service eligibility.

#### **REFERENCES:**

Workforce Innovation and Opportunity Act Section 134(b)(3)(E)

WIOA Regulations 20 CFR 681.290 and 680.600

TEGL 19-16 Guidance on Services Provided Through Adult and Dislocated Worker Programs

TEGL 10-09 Priority of Service for Veterans and Eligible Spouses

The Jobs for Veterans Act: Title 38

Priority of Service Under Veterans Program Letter 07-09

Higher Education Coordinating Commission Office of Workforce Investments Policy Basic Skills Deficient Policy, 5/3/21

Workforce Innovation and Opportunity Act Manual 4.9 Assessments and Assessments Guide

Higher Education Coordinating Commission Office of Workforce Investments Policy Program Engagement-Enrollment, Exit and Services, August 11, 2021



East Cascades  
**WORKS**  
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## Program Management Policy

### TITLE: Work Experience/Internship

**POLICY APPROVED BY:**

Heather Ficht

EC Works Executive Director

Gary North

EC Works Board Chair

**Previous Policy Approval Date:**

June 8, 2021

**Current Policy Effective Date:**

July 1, 2021

**Revision Approval Date:**

October 12, 2021

**PURPOSE:**

To establish a policy to support that of the Workforce Innovation and Opportunity Act (WIOA) in providing work experience/internship opportunities to eligible Title 1B participants.

**POLICY:**

For the purposes of the Workforce Innovation and Opportunity Act (WIOA) a work experience, better known by employers as an “internship”, is a planned, structured learning experience that provides an opportunity for career exploration and skill development, and that takes place within the workplace for a specified and limited period. When provided to eligible youth, work experiences must also include academic and occupational education.

A work experience/internship may be provided in the private, for profit, nonprofit, or public sectors. The work experience/internship must be linked to the participants career goals, however unlike and On-the-Job Training contract, employers are not required to hire a work experience/internship participant, although in some cases the opportunity may result in an employment offer.

As further defined within the Fair Labor Standards Act, a work experience/internship opportunity shall not reduce current employees’ work hours, displace, or infringe upon promotional opportunities for current employees, or result in a reduction of current employees. In addition, employers must adhere to all federal, state, and local laws, governing employment.

Workforce Innovation and Opportunity Act (a) Section 188(a)(3) prohibits the use of funds to employ participants to carry out the construction, operation, or maintenance of any part of any facility used for sectarian instruction or as a place for religious worship except for maintenance of facilities that are not primarily used for instruction or worship and are operated by organizations providing services to WIOA participants. (b) 29 CFR part 2, subpart D, governs the circumstances under which Department support, including WIOA Title I financial assistance, may be used to employ or train participants in religious activities. Under that subpart, such assistance may be used for such employment or training only when the assistance is provided indirectly within the meaning of the Establishment Clause of the U.S. Constitution, and not when the assistance is provided



East Cascades  
**WORKS**

Connecting Talent To Opportunity

## Program Management Policy

### **TITLE: Work Experience/Internship**

directly. That subpart also contains requirements related to equal treatment in Department of Labor programs for religious organizations, and to protecting the religious liberty of Department of Labor social service providers and beneficiaries.

WIOA providers must ensure that the work experience/internship is referenced in the participant's Individualized Employment Plan (IEP) or youth Individual Service Strategy (ISS). The provider must also coordinate the execution of a Work Experience/Internship Agreement, detailing the training plan, the specific skill requirements, any assessments used for determining the participant's skills at the beginning of the opportunity, planned performance check-ins, and any skill attainments during training.

When determining the duration of a work experience/internship activity, the provider should consider the overall objectives; the length of time necessary for the participant to learn the skills identified in the learning plan, the employer having enough meaningful work activities for the participant, and service provider budget. When determining the hourly wage for the work experience/internship the provider should consider the average wage paid for the same or similar positions, the type of work performed and the service provider budget.

In addition to the above, the agreement shall detail any wages paid, the training plan, dates for when the training shall begin and end; as well as compliance with Fair Labor Standards Act, Equal Opportunity Employment and Non-Discrimination regulations, and any additional rules or assurances that may apply. Finally, the WIOA service provider must carry Worker's Compensation Insurance and make federal and state tax withholdings, as required by law when WEX is a paid opportunity.

#### **REFERENCES:**

WIOA Section 3

WIOA Section 134

20 CFR 678-680

2 CFR 200

Workforce Innovation & Opportunity Act, Training & Education Guidance Letter No. 19-16, March 1, 2017

HECC-OWI Policy and Attachments, Program Engagement- Enrollment, Exit and Services, August 11, 2021,



**EC Works Board Meeting Agenda**  
**October 27, 2021 from 11:30am-1:30pm**  
**Virtual Meeting Via Zoom or Phone**

Phone one-tap: US: [+12532158782](tel:+12532158782), [8793810312#](tel:+13462487799) or [+13462487799](tel:+13462487799), [8793810312#](tel:+13462487799)

Meeting URL: <https://us02web.zoom.us/j/8793810312>

Meeting ID: 879 381 0312

**I. 11:30am: Call to Order - Gary North, Chair**

- a) Introductions
- b) Consent Agenda – Minutes from July EC Works Board Meeting – vote required
- c) Policy Updates – information only

**II. 11:50am: Sector Partnership Updates – Stefanie Siebold, Staff**

- a) Manufacturing
- b) Health Care
- c) Construction
- d) Technology

**III. 12:20pm: WIOA Performance – Mel Barrett, Staff**

**IV. 12:35pm: System Evaluation / Continuous Improvement Committee – Heather Ficht, Staff and Wendy Peterson, Board Member**

**V. 12:45pm: General Group Updates and Discussion – All Present**

- a) Advocacy – Time for Action
- b) October is National Disability Employment Awareness Month (NDEAM) – Bambi
- c) 2022 Meetings

**Attachments:**

- Draft July EC Works Board Meeting Minutes
- Policy Updates (if we need)
- Sector Partnership Update (possible)
- Performance Presentation
- System Evaluation (possible)
- Time For Action Letter