



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 – Brenda Stewart, Staff**
 - a) Manufacturing – Jon Stark, REDI
 - b) Construction – Tim Johnson, Fortis Construction (CO) & Matt Bogatay, Board Member
 - c) Technology – Sally Bell, Tech Association of Oregon & Dr. Cronin, Board Member
 - d) Health Care – Adam Dickey, Staff
- III. 12:25pm: WIOA Annual Performance – Stefanie Siebold, Mel Barrett & Brenda Stewart, Staff**
- IV. 12:45pm: System Evaluation / Continuous Improvement Committee – Heather Ficht, Staff**
- V. 1:00pm: General Group Updates and Discussion – All Present**
 - a) Education and Outreach: Time for Action – Heather Ficht, Staff
 - b) Diversity, Equity and Inclusion Work Group – Stefanie Siebold, Staff
 - c) October is National Disability Employment Awareness Month (NDEAM) – Bambi Bevel, Board Member
 - d) 2022 Board Meetings

Attachments:

- Draft July EC Works Board Meeting Minutes
- Policy Updates
- Performance Presentation (PPT)
- WorkSource Oregon Evaluation (PPT)
- Time For Action Letter



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Board Members Present: Gary North (Chair), Dr. Marta Cronin, Robbie Smith, David Burger, John Hanner, Dave Aiken, Martin Campos-Davis, Bambi Bevill, Erin Szymoniak, K'Lynn Lane, Nicole Hough, Matt Bogatay

Others Present: Jon Stark, REDI; Sally Bell, TAO; Tim Johnson, Fortis Construction; Mike Derrickson, OED

Staff Present: Heather Ficht, Jessica Fitzpatrick, Jamie Kendellen, Adam Dickey, Melissa Barrett, Brenda Stewart, Stefanie Siebold, Stephanie Tarantino

Board Members Absent: Wendy Peterson, Michelle Alvarado, Trevor Janeck, Julie Matthews, Maggie Hubbell, Mike Graham

- **Consent Agenda:** Meeting called to order at 11:33 am by Chair Gary North. At the start of the meeting, we did not have quorum, so voting on the minutes was postponed.
- **Introductions:** The Chair asked for everyone to introduce themselves and their roles / organizations.
- **Policy Updates:** The Chair mentioned the updates approved by the Executive Committee at their October meeting and asked for any questions or concerns. The Board had no questions or additional comments.
- **Sector Partnership Updates:** Brenda (staff) introduced the discussion around meeting the needs of industry, how EC Works provide resources with employers at the helm to provide solutions, and the challenging yet productive year we have had with initiatives. The following updates were provided:
 - **Jon Stark, REDI (Manufacturing – Central Oregon)**
 - Main issues facing manufacturing are: 1) Workforce availability - lack of applicants and gaps related to skills especially in leadership training, problem solving, and project management. 2) Ability to grow due to power outages -not related to service providers but by equipment or upgrades needed. 3) State policy - regulatory environment making it harder to operate. Workforce development was number 1 priority and leadership training was tackled first.
 - Discussion around these needs drove meetings, and companies identified that there is not a single resource list that they could refer to (i.e. mask rules), so they began working on a list with Brenda and created a draft page on website that will be launched in the next couple weeks which will also be made available for EC Works to add to website.

- Leadership training that was planned through COCC was postponed until January due to lack of sign-ups, so we are going to market to larger audience. This will be a hybrid class (virtual and in-person – see attached flyer. Companies outside of Central Oregon can access and can contact Brenda (staff), Jon (REDI), or Nancy Jumper at COCC for more information.
- **Tim Johnson, Fortis Construction (Construction – Central Oregon)**
 - As co-chair of CO Construction Collaborative along with co-chair Ron Wanless, our quarterly meeting's primary purpose was to set goals for 2022.
 - We have a marketing sub-group, which is in collaboration with Association of General Contractors (AGC), are working on a Facebook page for Build CO, which is now live, where contractors, etc. will post what is happening in the construction world and any / all needs. Please like and follow page and share out from regions.
 - We also have a training sub-group, which has turned in an application to BOLI for a JATC open shop in partnership with COCC, with the first two occupations focused on interior/exterior finisher and general pre-apprenticeship. BOLI to vote in December.
 - The collaborative continues to be supportive of other Pre-Apprenticeship programs in the area and has similar concerns facing manufacturing sector. Fortis, along with Facebook, launched an 8-week workforce development program in October and are hoping to do another in 2022, with lots of interest in replicating this program for other businesses. <https://www.facebook.com/groups/951509275605157/>
- **Matt Bogatay, Bogatay Construction (Construction – Southern Oregon)**
 - The Southern Oregon JATC is now up and running, and WorkSource has been helpful driving some initial advertising campaigns as this has been a long collaborative effort among general contractors in Southern Oregon with a huge need for an apprenticeship program in region. This is the first BOLI approved open shop Construction Apprenticeship in Oregon.
 - We have implemented a pre-training program at local high school Eagle Ridge, employing kids with minimal skills which has gotten a great response
 - Klamath Community College (KCC) is about to start construction on new training facility and it is likely the problem of finding talent is not going away in our industry, so really coming together as competitors is important and knowing smaller companies are having even more problems with hiring.
- **Sally Bell, Tech Association of Oregon (Tech – Central Oregon)**
 - TAO is a non-profit focused on supporting a thriving ecosystem across the state, with about 500 companies in membership and a focus on workforce development and marketing for membership and partners.
 - Main challenges right now are: 1) affordable housing 2) digital divide and broadband 3) talent recruitment and retention 4) access to capital.
 - Been challenging to engage since COVID and going virtual as the landscape has really changed. Companies have gone through acquisitions and seen a lot of turnovers, especially in senior leadership as people get recruited away.
 - How do we effectively engage in 2022 as tech really varied across state and it's so important to connect even if people have virtual fatigue. Oregon doesn't have

massive tech companies so value of in-person networking becomes even more important.

- Biggest need is in Cloud Computing and Cyber Security as there are huge gaps within these areas for talent and education. Demand is currently around 1200 graduates per year with Oregon only producing around 100. TAO working with local legislators to bring in more training opportunities and build more advocacy around tech including:

<https://web.cvent.com/event/2be5e065-e77f-4598-9ad9-c406b27bec50/summary?RefId=TAOWEB>

- CEO and local legislators exploring ways to address business in Oregon, meeting again in December. Additionally, OR Dept of Education is helping to create more standards for Career Tech Education, as existing standards are 15 years old.

- Educational resources:

E Impact Trade Report:

<https://tao.eimpactv2.report/reports/embed/5c4101e171040d3300a593ec>

Online magazine published last week about state of tech:

<https://techlandia.org/mag/0079474001631566163/p48>

Lots of events coming up through end of year including health tech summit:

www.techoregon.org

Contact Sally to provide input on learning how to support: sally.bell@techoregon.org

▪ **Dr. Marta Cronin, Board Member (Tech – Gorge):**

- Met in December 2020 to discuss why the college does not have agriculture program of any kind, as this is a huge industry in our region. We brought in local Ag Industry to determine what an Ag worker of tomorrow looks like and if the college can be a partner
- CGCC is also looking at robotics as far as connects between ag and tech. Interest grew from 12 to 63 people, showing this will be really impactful when it comes to fruition.
- Currently in the process of drafting something for the media as we want to be sure everyone has the right information as we map out the curriculum, and we put in a funding request to solidify come January. A year from now, we hope we can be training on where tech and ag connect.

▪ **Adam Dickey, Staff (HealthCare – Central Oregon):** Adam works for EC Works as

Director of the newly formed Behavioral Health Consortium. Main goals of consortium:

- CO has a huge deficit in the number of mental health providers, with less than 1 mental health provider for 1000 people. An average of 16,000 people facing one mental health condition per year (i.e. depression).
- Majority of current providers are private practice and only a handful touch 100 people per year. We are tasked with increasing the number of mental health providers in CO.
- The Consortium is growing and has already partnered with 14 agencies across CO who are dedicated to getting students, interns, and fellows into work force. We will hopefully create opportunities for already licensed partners in region so they

can continue to stay licensed and bring in specific training for everyone so we are well trained for our population's needs. Additionally, we need parity in the amount of hours for licensure, but this is a national issue.

- We are funded by Oregon Health Authority right now, working with agencies to continue to seek grants throughout the state. Reach out to Adam about how mental health may be impacting your work and drum up ideas as this is a group effort to serve our community: Adam Dickey, Psy.D. Ph: 458-218-5603 email: adam@ecworks.org
- **WIOA Annual Performance:** Stef, Mel and Brenda (staff) presented the report for Program Year 2020, which runs from July 1, 2020 – June 30, 2021. We focused on how to quantify our collective work and report on outcomes that the US Department of Labor and state of Oregon track as well as performance of the Regional Business Services that we provide. Of note:
 - Our resources focus on how we prepare people for careers and investments have to follow a Federal formula for allocation.
 - Targeted populations include emergent workers, veterans, English Language Learners and justice-impacted individuals.
 - Our role is oversight of the public workforce system, branded as WorkSource in Oregon and we are prohibited by Governor Executive Order from providing direct services in order to stay neutral as an evaluator within the WorkSource partnership.
 - We are exceeded performance within many categories, especially during the pandemic (specifically see Slide 7). There is a three-month lag in data reporting, so sometimes it is hard to get a realistic snapshot of actual performance, but providers have done very well despite challenges from COVID.
 - At this time in the meeting, quorum was met; therefore, the minutes of the July Board meeting were presented, and the Chair asked for a motion to approve the minutes.

Motion: Martin moved to approve the minutes as presented, Dave seconded, and the minutes were unanimously approved.

- **System Evaluation / Continuous Improvement Committee:** Heather presented for Wendy Peterson (board member from Google) an update on the Continuous Improvement Committee of the Workforce Talent Development Board, which was formed in order to evaluate the public workforce system and pushed through legislation via SB623. See attached PowerPoint.
 - The Committee was charged with assess what can be done immediately to have the most impact on responsiveness around the pandemic to improve the workforce system, as well as conduct an ongoing assessment every other year to identify quality and continuous improvement of the Public Workforce / WorkSource system.

- They conducted a limited procurement to move quickly through the process, which was awarded to Coraggio Group, who then conducted outreach and is compiling a summary report.
 - 14 things came up, so they pulled together a committee with people from the Oregon Employment Department, Local Workforce Boards, and a One Stop Operator to make a recommendation for prioritization.
 - This group should produce a final report to be approved by Workforce Talent Development Board and then distributed to the state legislator and Governor.
- **General Group Updates and Discussion**
 - Heather reminded the Board about education and outreach, thanking everyone able to share their logo in support of request for Oregon Legislature to invest \$50 million in ARPA funds to local workforce boards. There are more than 100 supporters across state. The return on investment would be huge and pay for itself in just over two years. If you want to learn more or send logo as a demonstration of support, contact Heather.
 - Diversity, Equity and Inclusion Work Group: one of your values as EC Works ambassadors is to embrace DEI, which we take seriously and have been doing internal work to see how staff feel we are doing. Results of internal assessment were average, so we are looking at how we can operationalize this work. Stef shared our assessment and we can share out with anyone who wants a copy (Dave Aiken requested a copy). Stef asked for volunteers interested in helping to support this work. Nicole, Dave A., Bambi and Martin were interested, and Stef clarified that members do not have to be on this Board, they can appoint a designee.
 - October is National Disability Employment Awareness Month: Bambi (board member) shared information and resources. Highlights:
 - I. 20% of Americans have a disability including mental health.
 - II. 65% of those who want to work cannot find a job and experience some form of discrimination (statistics about pandemic and its impacts are hard to find).
 - III. Vocational Rehab and other partners are here to help job seekers as well as businesses who are very aware they need to be inclusive, but often don't know how.
 - IV. 50% of accommodations cost nothing to make, the rest cost less than \$500.
Resource: <https://askjan.org/>
 - 2022 Board Meetings Schedule: everyone wanted to keep the day / time of the meetings for next year, so Stephanie T. will send calendar invites for 2022 later today.
 - Meeting was adjourned by Co-Chair Marta Cronin at 1:32 pm.



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:" ^[1] 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.



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.



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):

- 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

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.

- a. 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.
- b. Electronic Payroll Disbursements: shall be reviewed and approved by the Executive Director.
- c. 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.
- d. 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: 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), 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



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 employment¹.

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

¹ 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, enrolled in the WIOA Title I Adult, Dislocated Worker and/or Youth program that meet one of the following:
 - A. The employer agrees to hire or a newly hired employee¹ that requires additional training that the employer intends to retain,
 - B. Is 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. Is unable or unlikely to obtain employment without retraining,
 - D. Is low income, receiving unemployment insurance or public assistance, or need to earn a wage while learning an occupational skill,
 - E. Is an individual with barriers to employment who need help finding their next job.
 - F. Is an individual 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.
 - H. Is currently employed with the employer, but the OJT relates to the introduction of new technologies, introduction to new production or service procedures; or the acquisition of new skills necessary for upgrading to a new job.
- 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,

¹ 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)

- 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 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 employment², 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

² "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)

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.

- 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:

- a. Supplemental Nutrition Assistance Program (SNAP),
- b. Temporary Assistance for Needy Families (TANF),
- c. Supplemental Security Income (SSI/SSID); or
- d. 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:

- a. 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,



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 8th 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



Connecting Talent To Opportunity

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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



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



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,



Risk Management Policy

TITLE: Program & Fiscal Monitoring

POLICY APPROVED BY:

Heather Ficht

EC Works Executive Director

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



**OREGON WORKFORCE
PARTNERSHIP**

The Time for Action on Workforce Training and Re-Employment is Now

Oregon workers and businesses are in crisis!

On September 7, nearly 80,000 Oregonians lost some form of extended unemployment compensation, and thousands more remain idled by the pandemic. With the expiration of the aforementioned supports, these Oregonians will seek assistance from the public workforce system. At the same time, employers across the State are having a difficult time finding qualified talent. This is impeding their ability to grow and may ultimately slow the State's recovery.

Yet, despite nearly double the unemployment rate of a year ago, increasing numbers of people considered long-term unemployed (>52 weeks), and declining labor market participation, there have been no designated investments in workforce development through the public workforce system through the CARES Act or the American Rescue Plan.

To ensure an equitable economic recovery, Oregon needs to help local businesses recoup from the pandemic and provide a hand-up for Oregonians most impacted by COVID-19, including communities of color, women, and younger, less-educated and lower-income workers.

*To address these challenges,
we recommend a \$50 million investment in 3 broad, proven workforce
strategies to transition 10,000 Oregonians to good jobs:*

1. Increase Local Service Capacity: Local Workforce Boards have a scalable, big-tent approach that connects the strengths of local community-based, education, business and other partners with services offered through the public workforce system. This broad and scalable approach will be implemented through established networks of local partners that provide start-to-finish career coaching services including outreach, referrals to skill development and training opportunities, and referrals to wraparound support services that enable participation and success. Resources will be used to expand Local Workforce partners' capacity to respond to COVID-related workforce and local business needs.

2. Earn and Learn Opportunities to Re-Career: A large share of low-income workers have lost their jobs and need support meeting their basic needs while going through training and placement to re-career. This means providing paid internships, paid community service work, stipends, and other income supports in conjunction with occupational training and placement into middle-income career opportunities. Services include: Paid Internships, Cohort-Based Occupational Training, Training Stipends, Scholarships, Registered Pre-Apprenticeship Programs, On-the-Job Training, Current Worker Training, and Registered Apprenticeships.





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R&H
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OHDC
OREGON
HUMAN
DEVELOPMENT
CORPORATION



Northwest
Housing
Alternatives

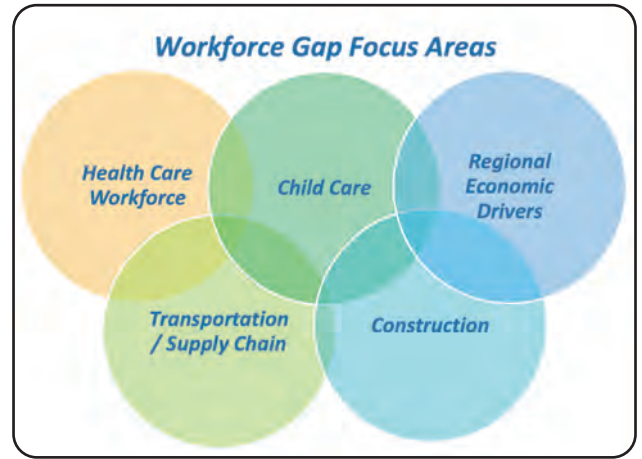
Discover
Chemeketa
Community College



3. Wrap Around Supports:

Wrap-around supports, including childcare, housing, and behavioral health support, are needed to enable people navigating poverty to participate in programs that will help them re-engage in the workforce. We must provide childcare support for people navigating poverty

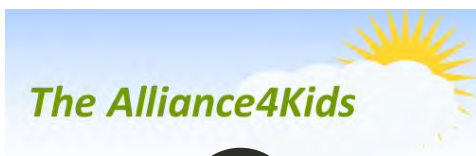
with young children. Otherwise, the high cost and limited access to childcare will prohibit them from going through a training program and starting a new job. We will seek to assist with housing placement and connecting renters to state and local rental assistance programs to maintain housing stability. Otherwise, the impacts of homelessness will greatly reduce their ability to get back into a new job and career. Finally, we must provide supports such as mental health and substance use treatment as we help people return to new careers after the traumatizing impacts of the pandemic. Services include: Rental Assistance, Childcare, Utilities payment support, Computer and Internet Access, Transportation, Mental Health, Alcohol & Drug Treatment, Household Assistance Work, Related Clothing and Tools. Local Workforce Boards will ensure coordination with the WSO system and distribute resources to community-based organizations, education entities, and other local partners with a requirement to serve BIPOC, Latino a/x, women, young workers, rural residents, and others most impacted by COVID -19. Services and outcomes will be tracked and reported using the existing statewide workforce data and reporting system (I-Trac). All data will be disaggregated by race, gender, and geography.



OREGON HAS NO TIME TO WASTE.

PEOPLE ARE SUFFERING, COMMUNITIES ARE STRUGGLING, AND EMPLOYERS ARE FACING A WORKFORCE CRISIS.

We can address these issues with proven, scalable fixes that benefit workers and employers. Local workforce boards and their existing community partners can move quickly and make a difference now!





Building an Equitable Economy



Klamath County Economic Development Association

