



**Your Voice Matters! Please Take the Workforce Development Survey**

## **BOARD MEETING AGENDA**

**March 21, 2024 | 9:00 a.m. – 4:00 p.m. | Meeting No. 269**

**Location:** Fire Station 95, 5911 Black Lake Blvd SW, Olympia, WA 98512

This is an in-person meeting – please register [here](#) for remote access.

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|-------------------|--|--------------|
| <b>9:00 a.m.</b>  | <b>Call to Order</b><br>Welcome and Introductions  |              |
| <b>9:10 a.m.</b>  | <b>Chairs Report (ACTION)</b><br>Consent Agenda <ol style="list-style-type: none"><li>Executive Director's Report</li><li>Minutes from February 15, 2024, Board Meeting</li></ol>  | <b>Tab 1</b> |
| <b>9:30 a.m.</b>  | <b>CTE / Perkins Group Discussion</b><br>Joe Wilcox, Workforce Board; Becky Wallace, OSPI;<br>William Belden and Kimberly Ingram, SBCTC <ul style="list-style-type: none"><li>Consolidated Annual Report (CAR)<ul style="list-style-type: none"><li>CAR introduction</li><li>OSPI and SBCTC to discuss State Determined Performance Levels (SDPLs)</li></ul></li></ul> | <b>Tab 2</b> |
| <b>10:30 a.m.</b> | <b>Break</b>   |              |
| <b>10:45 a.m.</b> | <b>Legislative Update</b><br>Nova Gattman, Workforce Board <ul style="list-style-type: none"><li>Updates from the 2024 Legislative Session</li></ul>   | <b>Tab 3</b> |
| <b>11:30 a.m.</b> | <b>Local Plan and Certification Process (ACTION)</b><br>Drew Cassidy, Workforce Board <ul style="list-style-type: none"><li>Policy 5614 Local Workforce Development Board Certification</li></ul>  | <b>Tab 4</b> |
| <b>12:00 p.m.</b> | <b>Lunch</b>   |              |

PLEASE NOTE: Times above are estimates only. The Workforce Board reserves the right to alter the order of the agenda. For information regarding testimony, handouts, other questions, or for people needing special accommodation, please contact Bianca Laxton at [bianca.laxton@wtb.wa.gov](mailto:bianca.laxton@wtb.wa.gov).

- 1:00 p.m.      Policy 1015 (ACTION)      Tab 5**  
Drew Cassidy, Workforce Board, and Liz Casey, Employment Security Department
- Response and rebuttal
  - Public comment period
- 1:30 p.m.      TAP Plan (ACTION)      Tab 6**  
Ben Robinson, FirstRule Group
- Final document for Federal submission
  - Governor's input
- 4:00 p.m.      Adjourn**

# Tab 1

## Consent Agenda

**PRESENTED BY:** Co-Chairs Larry Brown and Gary Chandler

**CHECK ONE:**

☒ Action Item

☐ Possible Action

☐ Discussion Only

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**SUMMARY:**

The consent agenda enables the Board to approve items listed below together without discussion or individual motions. If any Board member believes an item does not belong on the consent agenda, you may at any time request the item be removed and considered for an individual discussion and vote.

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**BACKGROUND:**

Materials included in Tab 1 of your Board meeting packet:

1. Executive Director's report.
2. Minutes from the February 15, 2024, Board meeting.

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**STAFF GUIDANCE & RECOMMENDATION:**

Without dissent, the consent agenda items will be approved as drafted.

# **Executive Director's Report**

## **Workforce Board Meeting**

### **March 21, 2024**

### **Meeting No. 269**

#### **2024 WAVE Scholarship**

The application period for the 2024 Washington Award for Vocational Excellence (WAVE) Scholarship opened Feb. 1 and closes March 19. This year's application period includes new outreach methods in addition to existing internal and external strategies.

The agency managed a reasonably-priced advertising campaign via social media that focused on special populations as defined by the federal Perkins Act. This campaign reached 324,000 social media accounts and generated more than 834,000 impressions over two weeks.

The agency also expanded its existing outreach efforts to better connect with high school counselors and career and technical education instructors.

Finally, the agency shared the news that this year's WAVE scholarship will increase to about \$5,500 per year or \$11,000 over two years, thanks to new investments from the Governor and Washington Legislature in this year's state budget. This is an increase of 43 percent over the original estimate for this year's award. This development is expected to generate additional interest.

#### **Volunteers Needed for WAVE Scholarship Review Committee**

The Workforce Board is recruiting volunteers for the WAVE Scholarship Review Committee. Each spring, this volunteer committee of business, labor, education, and community leaders reviews scholarship applications. This commitment takes no more than a few hours and helps Washington students succeed. Learn more at <https://wtb.wa.gov/wave/wavevolunteer/>.

Last year's committee included four Workforce Board members or proxies. If you'd like to sign up this year and/or would like to recruit your colleagues and partners, please contact scholarship administrator Colleen Seto at [wave.award@wtb.wa.gov](mailto:wave.award@wtb.wa.gov).

#### **Data Sharing Integration & Improved Service Delivery**

##### **Project Updates**

The Workforce Board is tasked with coordinating among workforce partner agencies to improve customer experience and system integration through data sharing. Kim Goutam is our project lead from the Board staff. Additional information on this effort can be found in the [progress report \(Sept 2023\)](#) and [presentation \(Nov 2023\)](#). Below are some key project updates:

##### **Updates**

- The Master Person Index (MPI) is the identity matching solution for the Health and Human Services Coalition, which demonstrated the product for the workforce data integration working group in December 2023. The governance body for the MPI initiative is reviewing and will make a determination on a potential partnership with the Workforce Data Integration efforts.

- The Workforce Board is seeking inclusion of four-year postsecondary education data as part of the data integration efforts for workforce system partners. The Workforce Board will present to the Council of Presidents—which represents the state’s six public four-year institutions—facilitated by the state’s Education Research and Data Center.

### Upcoming

- The Data Integration Project is directly aligned with the systems integration priority for Talent and Prosperity for All (TAP) 2024-2028, the state’s strategic plan for workforce development, including data sharing and common intake. As pre-implementation efforts begin for the TAP plan, the recommendation is to begin formalizing the Data Governance Council presented at the Nov. 2023 Board Meeting.
  - The Data Integration Manager will prepare a Data Governance Charter, outlining the purpose, structure, responsibilities, and operations of the Data Governance Council to the Steering Committee by April 2024.
  - As approved by the Steering Committee, partner agencies will be asked to sign this Charter to serve as a letter of interest and commitment to the ongoing data integration efforts to support the state’s workforce system. This will precede a Memorandum of Understanding (MOU), which will further enumerate the responsibilities of data-sharing partners as the project progresses into an implementation phase.
- The Steering Committee convened on March 5, 2024.
- A condensed project plan, as a precursor to a full feasibility study report, has been shared with the Steering Committee and Working Group. It will be expanded to include resourcing as discussions continue with partner agencies.
- The feasibility study report is in progress and on track for completion in Spring 2024.

### SkillsUSA Conference March 21-23

The Washington SkillsUSA state conference is scheduled for March 21-23 at Clover Park Technical College in Tacoma. Karmen Warner and Courtney Hutchinson from SkillsUSA presented at the February Board meeting.

This special event will highlight career and technical education through technical competitions, a skilled trades fair, guest speakers, networking and more. A VIP tour is scheduled for 10 a.m. Friday March 22. Learn more at <https://skillsusawashington.org>.

### Conference Highlights

The Veterans State Approving Agency (SAA) staff, including Workforce Board staff Lane Anderson, Darlene Bartlett, John Murray, and Anthony Whitesides, attended the National Association of State Approving Agencies Mid-Winter annual business and training in Washington, D.C., Feb. 10-15. NASAA recently celebrated its 75th year of service to Veterans Education and Training. The team participated in several specialized breakouts, a West region meeting, committee report-outs, and general sessions with speakers from the Veteran Students of America, the American Legion, Tragedy Assistance Program for Survivors (TAPS), National Association of Veterans’ Program Administrators (NAVPA), and Veteran Administration Central Office (VACO) including Director Joseph Garcia. This team, part of the Consumer Protection Unit, greatly appreciates the opportunity to attend such a valuable training meeting and looks forward to utilizing the new information to complete the tasks within the cooperative agreement

with USVA. All four members received certificates of appreciation to recognize their participation on various committees, unique contributions to the Washington SAA, and continued commitment to serving the veterans of Washington State.

## Washington's Health Workforce Sentinel Network

The Health Workforce Council, staffed by the Workforce Board, partners with the University of Washington Center for Health Workforce Studies on Washington's Health Workforce Sentinel Network. The [data dashboards](#) and [findings briefs](#) on the Washington Health Workforce Sentinel Network website have been updated with the latest information from Fall 2023 feedback collected from the state's healthcare employers. Please visit the website today to see what healthcare employers are saying about their workforce needs and possible solutions.

Some high-level findings from this data collection round include:

- Employers continue to report challenges with access to childcare, housing, and transportation as factors that are hard for them to influence but affect their ability to hire and retain workers. These issues can be especially challenging in rural settings.
- Lower wage occupations, such as nursing assistants, medical assistants, and dental assistants, are reported to be difficult to hire and retain due to wage competition and, in some cases, switching to a field other than healthcare.
- Staffing difficulties have meant that some settings and organizations have had to reduce services or delay care for clients/patients. This is contributing to longer wait times for patients seeking appointments.

We received an overwhelming number of responses during this data collection effort. That is due in large part to the work of our Council members, trusted leaders, and other partners promoting the Sentinel Network and encouraging colleagues to participate.

## Long Term Care (LTC) Workforce Initiative

In January and February, four subcommittees of the Workforce Board's [Long-Term Care Workforce Initiative met](#). Dr. Donald Smith is the Board's lead staff on this project. The subcommittees are HR & Worker Support; Long-Term Care (LTC) Ecosystem; Education and Career Development, and Rural and Underserved Communities. The subcommittees are considering recommendations to policymakers based upon five guiding factors, centered on recruitment, retention, career training and education, credentialing, and leadership training and culture change.

Chris Dula, Workforce Board Senior Researcher, has surveyed committee members regarding the priorities of the group and identified approximately a dozen areas of focus for the subcommittees to consider. Using the feedback from the committee members, and in keeping with the five guiding factors, subject matter experts were invited to three of the four subcommittees. They presented information on licensing, fee structure, training and testing, leadership skills and culture change in LTC settings that can impact retention. Upcoming presentations will look at the design and implementation of LTC-focused nursing training and a 2019 report from the Washington Department of Commerce on child care. In addition, LTC Subcommittees are considering the following areas of focus:

1. The role of artificial intelligence (AI) in long-term care.
2. Refugee and immigrant populations in healthcare.

3. Support for high school education and options for students to enter healthcare careers directly after graduation.
4. Development and implementation of a pilot initiative for leadership training aimed at improving retention of the existing workforce and the recruitment of new workforce.
5. Looking at provider training and testing options.
6. Explore home care aide/nursing assistant-certified licensing options for improving the efficiency and expediency of the licensing process.
7. Marketing nursing as a career opportunity with an emphasis upon underserved communities, rural communities, and LTC.
8. Development and implementation of career pathways for healthcare workers that provide direction and mentorship for emerging healthcare professionals.

### State WorkSource System and WIOA Title I-B Policies Update

The table below presents an update on State WorkSource System and WIOA Title I-B Policies. We will be including this information in every Executive Director's report to keep the Board informed of both upcoming items for future review as well as recent policy developments. This will ensure that our collective decisions and strategies remain aligned with the latest regulatory standards and operational practices.

Notice of Proposed Policy Revisions for Future Board Approval	
Policy	Description
<a href="#">WIN 0108/WIOA Title I Policy 5401-4</a>	<p>Fund Transfers Between Adult and Dislocated Worker Grants under Title I of the Workforce Innovation and Opportunity Act (WIOA)</p> <p>To provide guidance on the request, review, and approval process for local level transfers of funds between the WIOA Title I adult and dislocated worker programs, which will be capped at 30 percent until such time as the State Workforce Development Board (SWDB) acts on a state policy for fund transfers of up to and including 100 percent.</p>
<a href="#">WorkSource System Policy 1016-3</a>	<p>One-Stop Assessment and Certification</p> <p>To communicate Washington's process and procedures for assessing and certifying one-stop sites under the Workforce Innovation and Opportunity Act (WIOA).</p>
<a href="#">WorkSource System Policy 1013-5</a>	<p>One-Stop Memorandum of Understanding (MOU)</p> <p>This policy establishes a framework and minimum standards that align with federal law, regulation, and guidance for the development of One-Stop MOU.</p>
<a href="#">WorkSource System Policy 1024-3</a>	<p>Infrastructure Funding Agreements and State Funding Mechanism</p> <p>This policy communicates the requirements of and guidance to LWDBs and Partners regarding the requirement to enter into an Infrastructure Funding Agreement (IFA) for the operating costs of the one-stop prior to the start of each program year. Additionally, this policy communicates requirements on LWDBs, the Governor and the State Workforce Development Board (SWDB) when LWDBs are unable to achieve consensus among local one-stop delivery system partners regarding local IFAs, thus, triggering the State Funding Mechanism (SFM).</p>



Policies Issued Since December 13, 2023, Workforce Board Meeting		
Policy	Description	Issued
<a href="#">WIOA Title I Policy 5622</a>	<p>Youth Stipends</p> <p>Communicates the allowable youth program elements to which youth stipend payments can or cannot be applied, the internal controls and safeguards that need to be in place with respect to youth stipend payments, and the required elements of Local Workforce Development Board policies governing youth stipend payments.</p>	12/28/23
<a href="#">WIOA Title I Policy 5250-1</a>	<p>Subrecipient/Contractor and Pass-Through Entity Determination Requirements</p> <p>Aligns state policy with 2 CFR 200.331-332 by (1) clarifying what pass-through entities must include in their subrecipient contracts, (2) clarifying pass-through entities' responsibility to resolve subrecipients' audit findings, and (3) provide guidance for pass-through entities when negotiating indirect costs.</p>	01/09/24
<a href="#">WorkSource Information Notice 0139-1</a>	<p>Required Local Workforce Development Board policies</p> <p>Communicates state guidance of the LWDB policies that (1) all LWDBs must have in place and (2) must have in place if the activities are undertaken locally. Change 1 added new WorkSource System Policy 1026.</p>	01/31/24
<a href="#">WIOA Title I Policy 5200-4</a>	<p>Fiscal Definitions</p> <p>Updates the Department of Labor definition of <i>consultant</i> to reflect the increase in allowable consultant fees from \$750 per day to \$815 per day.</p>	02/02/24
<a href="#">WIOA Title I Policy 5623</a>	<p>Transitional Jobs</p> <p>Communicates the requirement for a local policy and the required elements of that policy to Local Workforce Development Boards that want to provide transitional jobs as part of the service delivery strategy in their workforce development areas.</p>	02/28/24
<a href="#">WorkSource System Policy 1028</a>	<p>Required Local Workforce Development Board policies</p> <p>Communicates state guidance of the LWDB policies that (1) all LWDBs must have in place and (2) must have in place if the activities are undertaken locally. Change 2 added new WIOA Title I-B Policy 5623.</p>	02/29/24



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**MINUTES OF MEETING NO. 268**  
**February 15, 2024**

**Board Members Present:**

Larry Brown, Co-Chair  
Gary Chandler, Co-Chair  
Wade Larson, Representing Business  
Todd Mitchell, Representing Labor  
Kairie Pierce, Representing Labor  
Jane Hopkins, Representing Labor  
Daniel Zeitlin for Commissioner Cami Feek, Employment Security Department (ESD)  
Terry Redmon for Secretary Jilma Meneses, Department of Social and Health Services (DSHS)  
Rebecca Wallace for Superintendent Chris Reykdal, Office of Superintendent of Public Instruction (OSPI)  
Paul Francis, State Board for Community and Technical Colleges (SBCTC)  
Carolyn Busch for Director Michael Fong, Department of Commerce  
Miriam Halliday for Mark Mattke, Spokane Workforce Council, Representing Local Government (remote)

**Call to Order**

Co-Chair Gary Chandler called the meeting to order at 9:05 a.m. at a hybrid meeting using Zoom for remote attendees. In-person attendees convened at the Association of Washington Business (AWB), 1414 Cherry Street SE, Olympia, WA, 98501.

**Chairs Report MOTION-2024-268-01**

Consent Agenda **(Action)**

1. Minutes from January 3, 2024, Board Meeting
2. Executive Director's Report

A motion was made to approve the consent agenda by Todd Mitchell and seconded by Wade Larson. The motion passed unanimously.

**National Governors Association Winter Workforce Symposium – Washington, D.C.**

Co-chair Larry Brown spoke about the winter conference for workforce board chairs from across the U.S. The team heard from guest speakers around the country. The meeting was an opportunity to compare Washington's unique balance of business and labor in our workforce board structure compared with other states, which are business-led and tend to be much larger.

Co-chair Gary Chandler shared updates on WA's Congressional delegates that he met with. He noted that there was a lot of discussion around youth and how they need to be integrated into

the workforce at a time when many older workers are retiring and leaving the workforce. National conferences are a great chance to connect with our counterparts across the country.

### **SkillsUSA State Leadership & Skills Conference**

Karmen Warner, Executive Director of SkillsUSA Washington, and Courtney Hutchin, Director of Education and Association Support, gave a rich presentation that began with a video about how SkillsUSA provides a framework for career and technical education (CTE) to support the future workforce. SkillsUSA is one of eight Career and Technical Student Organizations (CTSOs) in Washington, helping students in middle, high school, and postsecondary programs be more fully prepared to enter the workforce. Warner shared a story of a student who found success through her experience with SkillsUSA, learning soft skills with technical skills grounded in academics.

Warner's presentation reinforced several key components of the state's strategic plan for workforce development, Talent and Prosperity for All (TAP), including the plan's focus on youth and improving career pathways and work experience opportunities.

Warner shared that the upcoming SkillsUSA Washington State Leadership & Skills Conference will be held in Lakewood on Friday, March 22. The event will include technical championships, a skilled trades fair, VIP tour, and leadership championships. Warner also shared that judges are needed, as there are more than 95 competitions across 12 career clusters. The event will take place at the McGavick Conference Center at Clover Park Technical College.

The discussion also covered equity and racial justice--how SkillsUSA has implemented practices to ensure that all students feel like they belong and are welcome to participate at every level. The presentation also informed on how SkillsUSA builds pathways into community and technical colleges, how school credit and certification works within their system, and how funding and support can include rural school districts with fewer resources. Chandler suggested the Workforce Board should investigate supporting additional funding for CTSOs such as SkillsUSA Washington in the future.

### **Washington Award for Vocational Excellence (WAVE) Scholarship Update**

Colleen Seto, Workforce Board Program and Research Analyst, and Andrew Lenderman, Communications Manager, provided updates on the WAVE scholarship and introduced speakers to describe the impact the funds are having on awardees' school experience and prospects for the future.

Board members heard directly from WAVE awardees through a series of Zoom presentations from across the state. They included: Madelyn Winter, Clark College student, Jessie Leone, Highline College student, Calvin Cha, Western Washington University student, Boramy "Ramy" Sam, Everett Community College student, and Jesus Chavez Lara, Central Washington University



student. These WAVE scholarship recipients discussed how the WAVE award supports their education, career pathways, and other opportunities to establish a secure economic future.

Several education leaders from the Monroe School District traveled to the Board meeting in Olympia to share their successful approach to career and technical education and also how they helped their students learn about the WAVE opportunity. Five Monroe students received WAVE scholarships in 2023 and Board Co-Chair Brown visited an award ceremony in Monroe last spring. The educators that shared their story with the board included Shannon Tarrach, Director of Career and College Readiness; Michelle Dickinson, Career and Technical Education Program Manager; Shannon Barksdale, Career and Technical Education Department Manager; and Michele Poteet, Administrative Intern and ASL Teacher. The team gave an enlightening presentation starting with the Monroe High School mission: High School PLUS for EVERY Student. PLUS stands for Purpose, Life-Long Learning, Unity, and Support. The mission is that all students in the Monroe School District will have the opportunity to engage in high quality, robust, CTE programs with strong vertical and programmatic alignment to prepare them for college and career readiness upon leaving high school.

Tarrach shared the CTE program goals, community partnerships and opportunities as well as challenges they are working to overcome. Highlights from the Career and College Readiness Team were shared including credentials earned, CTE Student Spotlights of noteworthy achievements in career and technical education sectors, financial aid preparation, and opportunities in the trades. The Monroe High School team closed by expressing gratitude to the Board for their support and guidance.

### **Workforce Board Legislative Engagement Update**

Nova Gattman, Workforce Board Deputy Executive Director, gave a Legislative Session update. She shared that Workforce Board staff are tracking over 350 pieces of legislation this year, including those still moving from the 2023 session. She also shared that, at the time of her presentation, about 1,200 new bills had been introduced in 2024.

Gattman also highlighted the Workforce Board [Legislative webpage](#), which includes a list of bills and their status, budget requests, staff and board member testimony and presentations, and partner agency endorsement items.

The presentation included updates on the Board's legislative requests and their funding status in the Governor's budget proposal. This included WAVE Modernization and award-level increase, Digital Literacy & IT Career Equity, LPN Registered Apprenticeship Continuation, and the Perkins State Match. Gattman also went through the partner agency funding requests that the Board endorsed and their funding amounts in the Governor's budget proposal.

Gattman also shared additional details about the WAVE Modernization request. The board discussed the request for additional funding in the Governor's budget to increase award levels, and the ultimate goal of aligning scholarship funding with actual tuition costs at the state's public research institutions, about \$12,000 per year. She said the request for funding to create a new scholarship application portal focused on WAVE had received interest from a member of the Senate. Co-chairs Brown and Chandler stated that they would send a letter of support to the legislative budget team affirming support on behalf of the Workforce Board for the additional \$500,000 included in the budget for WAVE scholarship tuition funds. These additional funds would boost scholarship levels for 2024 recipients.

Gattman concluded with a summary of a small number of workforce development bills of interest to the board, some no longer under consideration.

### **Labor and Business Leaders Presentation**

April Sims, President of the Washington State Labor Council (WSLC), and Kris Johnson, President & CEO of Association of Washington Business (AWB), shared their perspectives on Washington workforce challenges and solutions.

Sims shared her lived experience of growing up in poverty until her mother was able to secure a union job that provided livable wages and a path towards retirement. Sims shared some of WSLC's workforce initiatives for deeper collaboration opportunities such as Unemployment Insurance (UI) for striking workers, sanitary conditions on construction jobsites, ensuring large healthcare plans include fertility coverage for workers, and affordable and accessible childcare.

Sims shared that a six-person workforce development department has been established, including a UI navigator to assist with the unemployment benefits system. Sims brought up Project Health, a three-person department with the sole responsibility of helping workers navigate the worker compensation system, including a Spanish-speaking bilingual claims specialist. Sims noted that work is being done to engage in meaningful conversations around infrastructure investment funds coming to Washington. She mentioned opportunities to deepen the work around workforce needs in clean tech and artificial intelligence and transition to a post-carbon economy. Finally, Sims noted the importance of finding a solution to the lack of childcare, and how business, labor, and government can work together for affordable, quality options.

Johnson discussed the unique model of leadership at the Workforce Board and that it should be continued. He talked about the consistent mission of AWB since it was founded in 1904: advocating on behalf of Washington employers and improving the business climate, bringing prosperity to all. Johnson shared data and analysis of the workforce, from past impacts like the pandemic, to current forecasting for the future of population growth and hiring in Washington. The business outlook report and other data taken from member surveys is available on AWB's [Washington Workforce Portal](#). Co-chair Chandler asked Johnson to expand on the statistics



available on [AWBINstitute.org](https://awbinstitute.org) that cover manufacturing, talent, business environment, infrastructure and connectivity, entrepreneurship and innovation, and place and community both across the state and from individual county perspectives. Johnson used an interactive approach on which counties were impacted by different factors and took guesses from the audience to share his point about future growth and workforce impact.

### **Talent and Prosperity for All (TAP) Update**

Ben Robinson, FirstRule Group, gave a presentation on the timeline of the state's strategic priorities. Washington's workforce plan, Talent and Prosperity for All 2024-2028, is in the final stages of development. This four-year plan provides direction to a workforce system that includes approximately \$1.4 billion in state and federal funds that serve nearly 500,000 Washingtonians.

Robinson gave an update on meetings conducted with board members to hear about additional business and labor feedback, and to check in with agency leaders about the alignment of their organizational plans to TAP. He spoke about the schedule for completing these meetings and a future business forum at AWB scheduled for March 6.

The TAP Plan timeline was shared with the board, and showed that the report is on target for submission to the U.S. Department of Labor (DOL) prior to April 15, per ongoing conversations with the Executive Director and a liaison at DOL. The plan is currently being reviewed by the Governor's office for feedback and guidance. The public comment period is open and will close on March 15. The public is encouraged to review the draft plan on the [Workforce Board site](https://workforceboard.wa.gov) and offer feedback via email to [tap.plan@wtb.wa.gov](mailto:tap.plan@wtb.wa.gov).

Survey results were shared about where responses were sent from, broken up by county. A consistent theme from employer respondents is that recruitment and retention are a problem for Washington employers. Survey results were shared about how employers interacted with the workforce system and the services they used, if any. Job seeker responses showed that 57% know how to find public services to help them find a job or get a better job.

The Board is expected to approve the TAP plan at the March 21 board meeting, with the final submission to the DOL portal in April. The project will undergo a handoff from FirstRule Group to the Workforce Board over the next two months.

The meeting adjourned at 2:54 p.m.

# Tab 2

## CTE/Perkins Group Discussion

**PRESENTED BY:** Joe Wilcox, Workforce Board; Becky Wallace, Office of Superintendent of Public Instruction (OSPI), Kimberly Ingram and William Belden, State Board for Community and Technical Colleges (SBCTC).

**CHECK ONE:**

☐ Action Item

☐ Possible Action

☒ Discussion Only

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**SUMMARY:**

This presentation will provide Board members with a review of CTE and the Perkins Strengthening Career and Technical Education (CTE) for the 21st Century Act of 2018 (Perkins V) in Washington. It will include an overview of the Workforce Board's role in CTE as state administrator of Perkins V funds, along with a focus on the Perkins 2023 Combined Annual Report (CAR) submitted to the U.S. Department of Education in January. OSPI and SBCTC will also report on selected State Determined Performance Level (SDPL) indicators submitted in the CAR, providing context and background on these metrics including performance levels, student demographics, and their relevance to larger state CTE efforts and the state's strategic workforce plan, Talent and Prosperity for All (TAP).

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**BACKGROUND:**

The Board has long advocated for a multiple pathways approach to educational and career success—recognizing that all students, including adult learners, have different goals, values, training needs, and educational backgrounds at different times throughout their lives. CTE extends beyond the traditional classroom setting and can include career-connected learning, apprenticeships, competency-based education, and simulated learning. Prior learning assessments can help validate these and other viable pathways that build skills, competencies, and credentials—and lead to high skill, high wage, in-demand jobs.

Washington's three key CTE partners are the Workforce Board, OSPI, and SBCTC. The Workforce Board is mandated to provide planning, coordination, evaluation, and policy analysis for the state training system as a whole, including secondary and postsecondary CTE programs and courses. At the same time, OSPI and SBCTC are responsible for implementing CTE programs at the secondary and postsecondary levels, respectively.

On Jan. 29, the Workforce Board submitted its annual Perkins V Combined Annual Report (CAR) to the U.S. Department of Education. Compiled in collaboration with OSPI and SBCTC, the CAR tracks secondary and postsecondary CTE program outcomes and fulfills reporting requirements for state programs utilizing federal Perkins V CTE grant funding. The report includes information on three components:



- A narrative description of CTE programs, results, and administration.
- Financial reports detailing CTE program expenditures.
- Performance data reports tracking the outcomes of core indicators of performance known as State Determined Performance Levels (SDPLs). States are also required to report disaggregated data on the performance of students by gender, race/ethnicity, special population categories, and career clusters.

As part of creating a new state strategic workforce plan, Talent and Prosperity for All (TAP) that will be submitted to federal agencies as a “Combined State Plan,” the Board will ensure federal Perkins funding supports multiple industry-driven career pathways. Because CTE is fundamentally workforce training, and because Perkins V requires states to link Perkins funding to labor market demands, it makes sense that CTE programs and policies in Washington closely align with the state’s overall strategic workforce plan.

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#### **STAFF GUIDANCE & RECOMMENDATION:**

Discussion only.

# Washington's Perkins V 2024-28 State Determined Levels of Performance

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Workforce Training and Education Coordinating Board  
Office of Superintendent of Public Instruction  
State Board for Community and Technical Colleges

March 2024



## **Proposed State Determined Levels of Performance, Perkins V Plan 2024-28, Washington State**

The Strengthening Career and Technical Education for the 21st Century Act (Perkins V) was signed into law by President Trump on July 31, 2018. This bipartisan measure reauthorized the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) and continued Congress' commitment in providing nearly \$1.4 billion annually for career and technical education (CTE) programs for our nation's youth and adults.

Under Perkins V, states are required to set and report on the following core indicators of performance. States are also required to report disaggregated data on the performance of students by gender, race/ethnicity, special population categories, and career clusters.

Below are the secondary system's performance indicators and proposed targets for the next four years, and corresponding methodology and reasoning. Followed by the postsecondary system's performance indicators and proposed targets for the next four years, along with corresponding methodology and reasoning.

### **SECONDARY BACKGROUND**

The State Determined Performance Levels (SDPLs), OSPI used the last two years of available Concentrator data to determine the upcoming state targets beginning 2025 through 2028. The proposed targets aligned Washington's proposed Every Student Succeeds Act (ESSA) targets for the Four-Year Graduation Rate (1S1) and the Extended Graduation Rate (1S2). All other targets were proposed using the last two years of available data with an increase each year.

OSPI presented the proposed state targets at the Washington Association of Career and Technical Administrators (WACTA) area leadership meeting on December 7. The leadership reviewed the proposed targets and has disseminated the documents to their members and asked for feedback by December 11.

### **POSTSECONDARY BACKGROUND**

To determine the next four years of postsecondary State Determined Performance Levels (SDPLs), SBCTC used the actual percentage of performance indicators for 1P1, 2P2, and 3P1 by averaging the last two years of data as a starting point.

SBCTC initially introduced information about Perkins State Determined Performance Levels (SDPLs)/State Targets during the fall Workforce Education Council meeting in October 2023. Additionally, SBCTC emailed colleges, on November 14, 2023, asking for feedback about the proposed state targets. The email was sent to all Perkins contacts, Workforce Education Council members, and the workforce education listserv. Any college that did not respond within ten days was sent a follow-up email.

The process to establish minimum targets is fairly prescriptive. What is more difficult to propose or

articulate is meaningful progress and improvement. We have taken into consideration the challenges our colleges have faced in staffing turnover, budget reductions, investing in new technology and state of the art equipment, and the pandemics impact on student enrollment and outcomes. We believe the proposed targets will drive deeper engagement in new investments and programming at the college level, utilizing Perkins funding differently to attain these goals.

# OSPI Proposed Secondary Indicators – 2025-2028

**Proposed Indicators Methodology:** The proposed targets aligned Washington’s proposed Every Student Succeeds Act (ESSA) targets for the Four-Year Graduation Rate (1S1) and the Extended Graduation Rate (1S2). All other targets were proposed using the last two years of available data with an increase each year.

**CTE Concentrator Definition:** A CTE Concentrator will be any student who earns two credits in a single career cluster within their four-year cohort.

**CTE Participant Definition:** A CTE participant will be any student that earns a high school credit in a CTE course in a single school year as reported annually.

Indicator/Definition from Perkins	2025	2026	2027	2028
<b>1S1: Four-Year Graduation Rate</b> <i>Defined as: The percentage of <u>CTE concentrators</u> who graduate high school, as measured by the four-year adjusted cohort graduation rate (defined in section 8101 of the Elementary and Secondary Education Act of 1965).</i>	84.7%	85.7%	86.8%	87.9%
<b>Numerator:</b> CTE concentrators who graduate in the 4-year adjusted cohort. <b>Denominator:</b> All CTE concentrators in the four-year adjusted cohort.				
<b>Methodology/Background:</b> <p>If a student withdraws at any point in their high school career, they will still contribute to the denominator. If a student achieves concentrator status at any time during high school, the student will be identified as a concentrator for the 1S1 indicator. Wherever the student is last served is where the student will show up in data, whether they achieved concentrator status at that location or not. This is consistent with OSPI’s adjusted cohort methodology used for the official federal graduation rate calculation.</p> <p>Washington’s primary goal is for students to graduate from high school, ready for college, career, and life. Consistent with the goals and indicators described in the state’s ESSA plan, OSPI proposes establishing a 90 percent minimum graduation rate for all students. In review of data from recent years, no student group was performing higher than the 90 percent threshold, and some of the most underserved student groups will need to make substantial annual gains to meet the 10-year goal identified in the ESSA plan. OSPI proposes to mimic the state targets for all-students for the 1S1 indicator.</p>				



# OSPI Proposed Secondary Indicators – 2025-2028

Indicator/Definition from Perkins	2025	2026	2027	2028
<b>1S2: Extended Graduation Rate</b> <i>Defined as: The percentage of <u>CTE concentrators</u> who graduate high school, as measured by extended-year adjusted cohort graduation rate defined in such section 8101.</i>	86.7%	87.6%	88.4%	89.3%
<b>Numerator:</b> CTE concentrators who graduate in the five-year adjusted cohort. <b>Denominator:</b> All CTE concentrators in the five-year adjusted cohort.				
<b>Methodology/Background:</b> If a student withdraws at any point in their high school career, they will still contribute to the denominator. If a student achieves concentrator status at any time during high school they will be identified as a concentrator for the 1S2 indicator. Wherever the student is last served is where the student will show up in data, whether they achieved concentrator status at that location or not. This is consistent with OSPI's adjusted cohort methodology used for the official federal graduation rate calculation.				

Indicator/Definition from Perkins	2025	2026	2027	2028
<b>2S1: Academic Proficiency in Reading/Language Arts</b> <i>Defined as: <u>CTE concentrator</u> proficiency in the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act.</i>	61.6%	62.1%	62.6%	63.1%
<b>Numerator:</b> Any CTE concentrators in the denominator who achieved proficiency on the ELA academic assessment, as defined in the Washington ESSA State Plan. <b>Denominator:</b> All CTE concentrators in the four-year adjusted cohort who were expected to take the ELA academic assessment.				
<b>Methodology/Background:</b> This indicator will represent proficiency based on a cohort of students rather than a snapshot in time. Students will be reported only once, in their expected on-time graduation year regardless of when they took their ELA academic assessment. If a student becomes a concentrator in their 5 <sup>th</sup> , 6 <sup>th</sup> , or 7 <sup>th</sup> year, they will not be reflected in this measure. If a student drops out prior to their expected graduation year, they will still be reflected in this measure.				



# OSPI Proposed Secondary Indicators – 2025-2028

Indicator/Definition from Perkins	2025	2026	2027	2028
<b>2S2: Academic Proficiency in Mathematics</b> <i>Defined as: CTE concentrator proficiency in the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in mathematics as described in section 1111(b)(2) of such Act.</i>	29.6%	30.1%	30.6%	31.1%
<b>Numerator:</b> Any CTE concentrators in the denominator who achieved proficiency on the mathematics academic assessment, as defined in the Washington ESSA State Plan. <b>Denominator:</b> All CTE concentrators in the four-year adjusted cohort, who were expected to take the mathematics academic assessment.				
<b>Methodology/Background:</b> This indicator will represent the proficiency based on a cohort of students rather than a snapshot in time. Students will be reported only once, in their expected on-time graduation year regardless of when they took their math academic assessment. If a student becomes a concentrator in their 5 <sup>th</sup> , 6 <sup>th</sup> , or 7 <sup>th</sup> year, they will not be reflected in this measure. If a student drops out prior to their expected graduation year, they will still be reflected in this measure.  For 2S1 and 2S2: The academic indicators in Washington's ESSA plan are related to proficiency on the statewide assessment for English Language Arts (ELA) and Mathematics. Washington uses the Smarter Balanced Assessment System, which is aligned to the Washington K-12 Learning Standards. Students currently take the statewide assessment for ELA and Mathematics in the 10 <sup>th</sup> grade. The state ESSA plan articulates targets for all students, at all grade levels. Considering the definition of CTE concentrator, high school students in grades 9-12 will contribute to the concentrator definition.				

Indicator/Definition from Perkins	2025	2026	2027	2028
<b>2S3: Academic Proficiency in Science</b> <i>Defined as: CTE concentrator proficiency in the challenging State academic standards measured by the academic assessments in science.</i>	45.5%	46%	46.5%	47%
<b>Numerator:</b> Any CTE concentrators in the denominator who achieved proficiency on the science academic assessment. <b>Denominator:</b> All CTE concentrators in the four-year adjusted cohort, who were expected to take the science academic assessment.				
<b>Methodology/Background:</b> This indicator will represent the proficiency based on a cohort of students rather than a snapshot in time. Students will be reported only once, in their expected on-time graduation year regardless of when they took their science academic assessment. If a student becomes a concentrator in their 5 <sup>th</sup> , 6 <sup>th</sup> , or 7 <sup>th</sup> year, they will not be reflected in this measure. If a student drops out prior to their expected graduation year, they will still be reflected in this measure.  There is no current academic indicator or metric in the ESSA plan for academic proficiency in science. The Washington Comprehensive Assessment of Science (WCAS) is aligned with the Washington State 2013 K-12 Science Learning Standards, which are the Next Generation Science Standards (NGSS). Students are assessed through the WCAS in the 11 <sup>th</sup> grade.				



# OSPI Proposed Secondary Indicators – 2025-2028

Indicator/Definition from Perkins	2025	2026	2027	2028
<b>3S1: Postsecondary Placement</b> <i>Defined as: The percentage of <u>CTE concentrators</u> who, in the second quarter after exiting from secondary education, are in postsecondary education or advanced training*, military service or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are employed.</i>  <i>*Washington does not collect data on "advance training."</i>	77.1%	77.6%	78.1%	78.6%
<b>Numerator:</b> Those students in the denominator who are placed in the second quarter after being reported in the denominator of 1S1. This includes postsecondary education, advanced training, military service, or employment. <b>Denominator:</b> The number of CTE concentrators that exited (graduated or dropped out) from secondary education within the four-year adjusted cohort of the prior reporting year.				
<b>Methodology/Background</b> This data is driven by performance 2 quarters after the student is expected to leave the system as part of the four-year adjusted graduation cohort. OSPI relies on the Education Research & Data Center (ERDC) to provide the data on post-high school activities (post-secondary education, military service or employment). OSPI will provide ERDC with the cohort of students that make up the denominator so that they can create the numerator. Students who continue enrollment beyond four years will not be included in this measure.  <i>3S1 data is available from ERDC the following year, for instance 2023 cohort data will be available in Fall 2024.</i>				





# OSPI Proposed Secondary Indicators – 2025-2028

Indicator/Definition from Perkins	2025	2026	2027	2028
<b>4S1: Non-traditional Program Enrollment</b> <i>Defined as: The percentage of <u>CTE concentrators</u> in career and technical education programs and programs of study that lead to non-traditional fields.</i>	19.8%	20.3%	20.8%	21.3%
<p><b>Numerator:</b> Those students in the denominator who at any time during their secondary enrollment, but prior to their on-time four-year expected graduation year, was enrolled in a CTE course that was designated as preparing students for non-traditional fields based upon the indicator on the CIP code chart, and the student's gender.</p> <p><b>Denominator:</b> All CTE concentrators in the four-year adjusted cohort. Students that identify as "Gender X" are not permitted to be reported at the federal level. Due to this issue, students that identify as "gender X" will not be represented in the gender categories reported for this indicator but gender X will be represented in all other reporting groups for this indicator.</p> <p><b>Methodology/Background:</b>            Students will be reported only reported once, in their expected on-time graduation year. If a student becomes a concentrator, or enrolls in a non-trad program only in their 5<sup>th</sup>, 6<sup>th</sup>, or 7<sup>th</sup> year, they will not be reflected in this measure. If a student drops out prior to their expected graduation year, they will still be reflected in this indicator.</p> <p>Washington understands the constraints associated with the federal definition of non-traditional being restricted to gender. This is problematic, as available data shows disproportional employment among many special populations, not solely restricted to gender. Additionally, Washington's secondary data system provides for students to be represented as "gender X". This will potentially impact the validity of data reported at the local and state level for this indicator. OSPI reviewed the previous state targets and state performance metrics for non-traditional participation and non-traditional completion to inform proposed targets.</p>				

Indicator/Definition from Perkins	2025	2026	2027	2028
<b>5S1: Program Quality – Attained Recognized Postsecondary Credential</b> <i>Defined as: The percentage of <u>CTE concentrators</u> graduating from high school having attained a recognized postsecondary credential.</i>	36.9%	37.4%	37.9%	38.4%
<p><b>Numerator:</b> Of students in the denominator, those that have attained an industry recognized credential through CTE coursework, as reported in the state data system .</p> <p><b>Denominator:</b> All CTE concentrators in the four-year adjusted cohort.</p>				



# OSPI Proposed Secondary Indicators – 2025-2028

Indicator/Definition from Perkins	2025	2026	2027	2028
<b>5S2: Program Quality – Attained Postsecondary Credits</b> <i>Defined as: The percentage of <u>CTE concentrators</u> graduating from high school having attained postsecondary credits in the relevant career and technical education program or program of study earned through a dual or concurrent enrollment or another credit transfer agreement.</i>	96.8%	97.3%	97.8%	98.3%
<b>Numerator:</b> Of students in the denominator, students that completed courses that provided dual credit. <b>Denominator:</b> All CTE concentrators in the four-year adjusted cohort who graduated.				
Indicator/Definition from Perkins	2025	2026	2027	2028
<b>5S3: Program Quality – Participated in Work-Based Learning</b> <i>Defined as: The percentage of <u>CTE concentrators</u> graduating from high school having participated in work-based learning.</i>	43.3%	43.8%	44.3%	44.8%
<b>Numerator:</b> Of students in the denominator, CTE concentrators that participated in work-based learning. <b>Denominator:</b> All CTE concentrators in the four-year adjusted cohort who graduated.				
<b>Methodology/Background:</b> As work-based learning is a required component of CTE programs in Washington, work-based learning was defined as guest speakers, structured field trips, school-based enterprises, job shadows, cooperative and instructional worksite learning, paid and unpaid internships, all Supervised Agricultural Experience (SAE) projects, appropriate career and leadership development activities through CTSOs, and employment.				



# Postsecondary Perkins V Performance Indicators

1P1: Post College	Proposed Indicator PY 2024-25	Proposed Indicator PY 2025-26	Proposed Indicator PY 2026-27	Proposed Indicator PY 2027-28
The percentage of CTE concentrators who, during the second quarter after program completion, remain enrolled in postsecondary education, are in advanced training, military service, or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 20 2504(a)), or are placed or retained in employment.	40%	40.5%	41%	41.5%
<p><b>Methodology/Background:</b>            For purposes of reporting 1P1 performance, SBCTC will include CTE completers who participated in registered apprenticeships, enrolled in postsecondary baccalaureate degree programs within the community and technical colleges system, those that enroll in postsecondary programs outside Washington's two-year college system, and those who were employed the second quarter following the completion year.</p> <p>Like most states, Washington is unable to report the number of program completers who transitioned to military service, a service program that receives assistance under Title 1 of the National and Community Service Act, or who transitioned to the Peace Corps. Additionally, the state is not able to gather placement data of CTE concentrators who in the second quarter after exiting from postsecondary education, are in military service or are volunteers as described in section 5a of the Peace Corps Act. This is a FEDES issue and one that comes under the direction of the Department of Defense (DOD).</p> <p><b>Denominator:</b>            CTE Concentrator Cohort</p> <p><b>Numerator:</b>            Cohort that has received a postsecondary credential and is an exiter as well as one of the following: in the L&amp;I apprenticeship completers or active files, enrolled in Bachelor Program in our CTC system, found in post-secondary (National Student Clearinghouse) outside of our CTC system, or employed.</p>				

2P1: Degree Completion	Proposed Indicator PY 2024-25	Proposed Indicator PY 2025-26	Proposed Indicator PY 2026-27	Proposed Indicator PY 2027-28
The percentage of CTE concentrators who receive a recognized postsecondary credential during participation in or within 1 year of program completion.	50.5%	51%	51.5%	52%
<p><b>Methodology/Background:</b> SBCTC will include all CTE concentrators who completed a CTE credential and who were no longer enrolled at a community or technical college two quarters after their last credential award.</p> <p><b>Denominator:</b> CTE Concentrator Cohort</p> <p><b>Numerator:</b> Earned a postsecondary credential in the current or following academic year.</p>				

3P1: Degree Completion	Proposed Indicator PY 2024-25	Proposed Indicator PY 2025-26	Proposed Indicator PY 2026-27	Proposed Indicator PY 2027-28
The percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.	21%	21.5%	22%	22.5%
<p><b>Methodology/Background:</b> For purposes of reporting 3P1 performance, SBCTC will include CTE concentrators from underrepresented gender groups (25% or less of the gender represented in the field) who were enrolled in CTE programs that lead to employment in non-traditional fields.</p> <p><b>Denominator:</b> CTE Concentrator Cohort enrolled in programs that lead to employment in non-traditional fields.</p> <p><b>Numerator:</b> Students who are in a nontraditional program and are not of the dominate gender are included in the numerator.</p>				

## Definitions

**CTE Concentrator:** At the postsecondary level, a student is an eligible recipient who has:

- (i) earned at least 12 credits within a career and technical education program or program of study; or
- (ii) completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.

**Exiter:** Not enrolled in the CTC system the following year excluding enrollments in bachelorette programs.

# Tab 3

## Legislative Update

**PRESENTED BY:** Nova Gattman, Workforce Board

**CHECK ONE:**

☐ Action Item

☐ Possible Action

☒ Discussion Only

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**SUMMARY:**

This presentation will review the results of the Board's 2024 Legislative Agenda and new responsibilities charged to the Board in the 2024 budget. Board staff will provide potential options for future legislative requests in alignment with the new priority areas within the state's strategic plan for workforce development, Talent and Prosperity for All (TAP).

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**BACKGROUND:**

The Workforce Board put forward requests for funding to the Legislature and Governor in the Fall of 2023. Board staff will provide an update on the status of each of these requests as well as key legislation that passed that impacts the Board's responsibilities. As part of the Board's agenda, several partner agency requests were endorsed as workforce system legislative agenda items and their status will also be covered in this presentation.

Board staff have created a handout of select workforce bills of interest that passed the session. This handout follows this coversheet. The full bill list is linked on our [Legislative page](#).

While not part of the presentation to the Board, the staff have also prepared a list of all of the provisos in the final Operating Budget that impact workforce development topics. This list is extensive, so is not included as part of the Board packet. To access the list, please see <https://wtb.wa.gov/about-us/workforce-board-legislative-tracker/>.

The remainder of the presentation will include items or themes for consideration for the 2025 Legislative Session that are in alignment with the new priorities for TAP.

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**STAFF GUIDANCE & RECOMMENDATION:**

Discussion only. The information presented in this session may support additional conversation and prioritization for potential inclusion in the Board's strategic priorities discussions at the Board Retreat in May.

Bill	Title	Original Sponsor	Board Staff Lead	Staff Summary
SHB 1870	Local community federal funding	Barnard	Ilene	Requires Commerce to assist local communities by providing technical assistance with federal grant applications—prioritizing applications for federal funds in an existing grant program and creating a resource guide for federal grant applications. The bill would support a concept raised by the Clean Energy Technology Workforce Advisory Committee (CETWAC, staffed by the Workforce Board), which recommended that the state provide additional capacity and matching funds to state and local organizations to better support success in accessing federal grants for clean energy funding.
SHB 1889	Professionals/immigration	Walen	Shawna	Prevents state agencies (including regulatory and disciplining authorities) from denying an application based on immigration or citizenship status alone, by encouraging the use of the individual tax-payer identification number instead of a social security number. The occupations and professions affected are specific, numerous, and called out within the bill.
SHB 1892	Workforce housing program	Leavitt	Ilene	Offers up to \$20M or 20 percent of the cost of construction of low-income housing to those who have secured sufficient private financing and have shovel-ready projects.
2SHB 1929	Post-inpatient housing	Cortes	Claire	Creates the Post-Inpatient Housing Program for Young Adults as a form of transitional housing for young adults (18-24) exiting inpatient behavioral health treatment to assist them in securing long-term housing. Directs the Health Care Authority (HCA) to provide funding to at least one community-based organization, federally recognized tribe, or tribal organization to establish/operate at least two voluntary residential programs with 6-10 beds, with one program on either side of the Cascades, to serve residents for up to 90 days. HCA will also provide flexible funding so programs can meet the immediate needs of the young adult residents (e.g., car repair, rental application fees). <i>Companion Bill: SB 6050–Dhingra.</i>
SHB 1945	Food assistance access	Alvarado	Drew	Streamlines and enhances access to the Early Childhood Education and Assistance Programs (ECEAP) and the Working Connections Child Care (WCCC) childcare programs administered by the Department of Children, Youth, and Families (DCYF) by expanding eligibility to include families or members of an assistance unit who are eligible for or receiving federal or state Basic food benefits (FAP or SNAP).
HB 1946	Behavioral health scholarship	Eslick	Renee	Expands the Washington Health Corps' behavioral health loan repayment program to also include conditional scholarships. The Washington Health Corps is administered by the Washington Student Achievement Council (WSAC).

A sample of workforce system bills that passed the 2024 Legislature. List is not exhaustive. Last updated 3/14/24 for the 3/21/24 Workforce Board meeting.

For the full list of bills the Workforce Board tracked in 2024, see <https://www.wtb.wa.gov/about-us/workforce-board-legislative-tracker/>.

Bill	Title	Original Sponsor	Board Staff Lead	Staff Summary
HB 1950	Student loans/PSLF	Slatter/ OFM request	Renee	Adds new requirements for state agencies: provide Public Service Loan Forgiveness (PSLF) information to employees upon separation; certify eligibility for PSLF for any employees who submit a partially completed form or online request; and send a reminder notice annually to employees they have previously certified. OSPI is added to the group working to remove barriers to PSLF participation for all eligible public service employees (which includes nonprofits). <i>Companion Bill: SB 6035–Liias</i>
SHB 2007	Cash assistance time limits	Peterson	Drew	Creates a reason for exemption to the Temporary Assistance for Needy Families (TANF) time limit requirement of 60 months to include if the recipient or applicant is a parent or legal guardian to a child under the age of two who lives in the same household and qualifies for an infant, toddler, or postpartum exemption from WorkFirst activities.
ESHB 2019	Native American apprentices	Stearns	Paulette	Establishes the Native American Apprenticeship Assistance Program, slated to begin in 2025. Administered by the Office of Student Financial Assistance within WSAC, funding must be prioritized to cover any tuition costs for related supplemental instruction. Additional funding may be used to provide a grant to cover required supplies, tools, materials, work clothing, and living expenses. For purposes of eligibility for the Native American Apprentice Assistance Program, eligible persons include members of federally recognized Indian tribes whose traditional lands and territories included parts of Washington, rather than members of federally recognized Indian tribes located within Washington.
2SHB 2084	Construction training/DOC	Fosse	Paulette	Establishes an oversight committee to improve construction-related training and pathways to state registered apprenticeships in state correctional facilities. The committee is required to include but is not limited to representatives from: Department of Corrections (DOC), correctional industries, L&I, SBCTC, Building and Construction Trades Council, registered apprenticeship programs in construction, college corrections and apprenticeship navigators, Department of Children, Youth, and Families (DCYF), and two people with lived experience.  Requires DOC to collect data related to the employment outcomes of incarcerated persons who participate in construction-related training programs. It also requires the oversight committee and the DOC to submit reports to the Legislature regarding the work of the oversight committee and data, findings, and recommendations related to construction-related training programs for incarcerated persons.
2SHB 2124	Child care program eligibility	Eslick	Dave W.	Expands eligibility for the Working Connections child care subsidy. Requires rates be adjusted every two years to inflation (rather than subject to appropriation) and exempts individuals in education/training programs from work requirements.

A sample of workforce system bills that passed the 2024 Legislature. List is not exhaustive. Last updated 3/14/24 for the 3/21/24 Workforce Board meeting.

For the full list of bills the Workforce Board tracked in 2024, see <https://www.wtb.wa.gov/about-us/workforce-board-legislative-tracker/>.



Bill	Title	Original Sponsor	Board Staff Lead	Staff Summary
SHB 2195	Early learning facilities	Callan	Dave W.	Removes the monetary caps to grants & loans for planning, renovation & repair of existing facilities, and major construction of early learning facilities projects. The bill also prioritizes construction ready projects.
2SHB 2214	College grant/public assistance	Slatter/WSAC request	Joe	Beginning in the 2025-26 academic year, 10-12 grade students who receive Basic Food or Food Assistance Program benefits automatically qualify as income-eligible for the Washington College Grant. WSAC must certify eligibility for students and notify eligible students about the value of submitting the FAFSA/WAFSA to be considered for additional state and federal aid. <i>Companion Bill: SB 6300—Nobles</i>
SHB 2216	State employee degree requirements	Cheney	Joe	Prohibits state agencies from using a two- or four-year college degree as the only way to demonstrate qualifications for a classified position unless a degree is legally required for the worker/applicant to carry out the job duties of the job classification.
ESHB 2230	Economic security grants (EcSA)	Peterson	Drew	Codifies the state Economic Security for All (EcSA) grant program, aimed at coordinating existing programs to increase collective impact and promote equity, economic inclusion, and financial stability to move low-income people towards self-sufficiency. The Employment Security Department (ESD), in consultation with Department of Social and Health Services (DSHS), Department of Commerce, DCYF, HCA, Poverty Reduction Workgroup, and the Workforce Board shall make and oversee implementation of EcSA grants. The Board's role includes consulting on program analysis, workforce integration, potential federal reforms, and contributing to the development of poverty reduction metrics to include use of the University of Washington Self-Sufficiency Calculator.

A sample of workforce system bills that passed the 2024 Legislature. List is not exhaustive. Last updated 3/14/24 for the 3/21/24 Workforce Board meeting.

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Bill	Title	Original Sponsor	Board Staff Lead	Staff Summary
ESHB 2236	CTE Core Plus programs	Shavers	Joe	<p>Directs OSPI, with SBCTC, DOH, representatives from the allied health industry (workers and business), and the Health Workforce Council (supported by Workforce Board staff), and others to develop an Allied Health Professions CTE program for qualifying students pursuing industry-recognized credentials that "lead or articulate to" related, recognized nondegree credentials, two or four-year degrees, or both. Requires that curriculum and other instructional materials developed for the Allied Health Program reflect consideration of a specified list of issues that includes instructional, training and professional development, and industry partnership development and maintenance. The curriculum and other instructional materials for the Program must be available for optional use at the beginning of the 2027-2028 school year.</p> <p>Establishes a temporary Statewide CTE Task Force (Task Force). Members of the Task Force shall include OSPI, Workforce Board, SBCTC, and various industry core plus instructors. The Task Force must develop recommendations for expanding and strengthening the accessibility, stability, and uniformity of secondary work-integrated learning opportunities, including CTE, career-connected learning, regional registered apprenticeship programs, Core Plus programs, work-based learning, internships, and externships. Existing Core Plus programs are grandfathered. Recommendations should also include how to administer and operate a CTE Core Plus program in collaboration with industry sector leaders to inform and improve the program. The Task Force must develop a Core Plus model framework and must consider a range of components including programs that lead to, or articulate to, industry recognized non-degree credentials, expansion of industry and community partnership, and employer cohorts willing to hire and place students that have successfully completed CTE core plus programs. Task Force findings are due to the Legislature by November 15, 2025.</p>
E2SHB 2247	Behavioral health providers	Bateman	Renee	<p>Allows agency affiliated counselors (AAC) to work at federally qualified health centers beginning in 2028, creates psychology associate licenses for individuals enrolled in a doctoral psychology program or participating in a supervised postdoctoral experience; allows substance use disorder professional-trainees (SUDP-T) to work outside a state regulated agency, removes the four-time renewal limit on SUDP-T credentials, allows a masters level associate (social work, counselor, or marriage/family therapy (MFT)) to work for up to 120 days while the application is pending, removes the six-time renewal limit on social work, counselor and MFT associate licenses, changes the supervision program created in HB 1724 (2023) to pay the supervising clinician a stipend of up to \$2000/year/supervisee. Requires the Secretary of Health to study and make recommendations on creating new disciplining authorities for mental health professionals.</p>
HB 2415	Economic assistance/TANF	Cortes	Drew	<p>Increases the maximum amount of Diversion Cash Assistance that eligible individuals can receive from \$1,500 to \$2,000 once in a 12-month period. To be eligible for the program, families must meet the same income and resource requirements as for Temporary Assistance for Needy Families (TANF). The program is intended to reduce reliance on TANF.</p>

A sample of workforce system bills that passed the 2024 Legislature. List is not exhaustive. Last updated 3/14/24 for the 3/21/24 Workforce Board meeting.

For the full list of bills the Workforce Board tracked in 2024, see <https://www.wtb.wa.gov/about-us/workforce-board-legislative-tracker/>.

Bill	Title	Original Sponsor	Board Staff Lead	Staff Summary
ESHB 2441	College in the HS fees	Corry	Joe	Directs WSAC to select one private not for profit four-year college in Yakima County for a pilot program to offer free College in the High School courses. The pilot institution is required to report annually on the programs including course details, student enrollment, academic performance, and demographics, and postsecondary credit awarded. WSAC will compile these reports and submit them annually to the Legislature starting December 1, 2025, until the pilot expires December 1, 2030.
E2SSB 5670	Running Start/rising juniors	Hawkins	Joe	Permits rising 11 <sup>th</sup> grade students to participate in Running Start classes during the summer, limited to ten quarter credits. Requires school districts to educate students about this new opportunity.
E2SSB 5838	AI task force	Nguyen/ Attorney General request	Joe	<p>Creates an Artificial Intelligence (AI) Task Force to assess uses, develop guiding principles, and make recommendations for the regulation of generative AI. Staffing of the task force is assigned to the Attorney General's Office. The Committee will include state elected officials, academia, and members of selected industries. The Executive Committee has the authority to define scope and convene and appoint qualified members to subcommittees.</p> <p>Findings and recommendations to the Legislature are to be around standards for the use, guiding principles, and regulation of AI systems to protect Washingtonians' safety, privacy, and civil and intellectual property rights. This includes benefits and risks to the public broadly, historically excluded communities, and other identifiable groups, racial equity considerations, workforce impacts, and ethical concerns. Other areas for development are means to promote innovation in AI, use and limitations by the government, and public education on AI, and establish an ongoing committee that must study emerging technologies not limited to AI.</p> <p><i>Companion Bill: HB 1934–Couture</i></p>
E2SSB 5853	Behavioral crisis services/minors	Dhingra	Claire	Establishes “23-hour crisis resource centers” (CRCs) serving children, which must provide resources specific to children (aged 8-17) and their families. CRCs serving children must either exclusively serve children or have separate entrances, spaces, and treatment areas for adults and children to prevent contact between these clients. By March 31, 2025, DOH, in consultation with HCA and DCYF and with stakeholder input, must amend licensure/certification rules to create standards and rules for licensure/certification of CRCs providing services to children. Bill amends other sections of the RCW to add CRCs to lists of facilities providing behavioral health/substance use disorder treatment to minors (e.g., peace officers may transport minors in crisis to CRCs in addition to the emergency room, stabilization facility, etc.). Creates new rules regarding the involuntary treatment of adolescents.

A sample of workforce system bills that passed the 2024 Legislature. List is not exhaustive. Last updated 3/14/24 for the 3/21/24 Workforce Board meeting.

For the full list of bills the Workforce Board tracked in 2024, see <https://www.wtb.wa.gov/about-us/workforce-board-legislative-tracker/>.

Bill	Title	Original Sponsor	Board Staff Lead	Staff Summary
SB 5904	Financial aid terms	Nobles/ WSAC request	Paulette	Extends the Washington College Grant eligibility from five to six years or 150 percent of published program length, up from 125 percent. This aligns timelines with federal financial aid programs that generally run through six years. The requirement that a student use a passport award before age 26 is eliminated.
E2SSB 5908	Extended foster care	Wilson, C.	Paulette	Directs DCYF to update the Extended Foster Care Program, including changing the eligibility requirements so youth no longer have to meet federal eligibility requirements to be eligible for extended foster care and providing better education about the Program to foster children. DCYF is directed to develop an incentive payment for youth in extended foster care who participate in qualifying activities. The program design is to include stakeholder engagement from impacted communities. <i>Companion Bill: HB 2218–Cortes</i>
SSB 5953	Incarcerated student grants	Wilson, C.	Paulette	Creates new parameters around financial aid application requirements and program eligibility based on four different goals. Also adds a requirement for DOC to produce a complete list of postsecondary degree and certificate education programs offered at each state correctional facility, including enrollment rates and completion rates for each program, is added to the annual state agency report on postsecondary education programs and incarcerated individuals.
ESSB 6038	Child care tax preference	Wilson, C.	Dave W.	Expands B&O exemptions until 2035 for providers of individuals under 13 years of age or under 19 with a verified special need.
SSB 6053	Education data sharing	Holy/ WSAC request	Paulette	Requires the ERDC to share student enrollment and outcome information from institutions of higher ed to OSPI. The purpose of the data-sharing is to provide postsecondary financial aid opportunities in addition to educational opportunities. <i>Companion Bill: HB 2443–Nance</i>
ESSB 6286	Nurse anesthetist workforce	Rivers	Renee	Requires the Board of Nursing to develop a nurse preceptor grant program for certified registered nurse anesthetists (CRNA) and requires the University of Washington’s Center for Health Workforce Studies to study workforce shortages in anesthesia care in each facility providing anesthesia services. A report is due to the Legislature by June 30, 2025. <i>Companion Bill: HB 2462 – Taylor</i>
ESB 6296	Retail industry work group	Boehnke	Joe	Builds on a recommendation in the Workforce Board’s 2023 Retail Workforce Analysis. It calls for SBCTC to establish a new retail work group to explore programs of value to and registered apprenticeship programs for the retail sector including education pathways, credentials, curriculum, and barriers in the retail sector. The group will also recommend up to four colleges to pilot short-term credentials and micro-credential programs in retail. The work group includes higher education, business, labor, and workforce development representatives with expertise in the retail workforce.

A sample of workforce system bills that passed the 2024 Legislature. List is not exhaustive. Last updated 3/14/24 for the 3/21/24 Workforce Board meeting.

For the full list of bills the Workforce Board tracked in 2024, see <https://www.wtb.wa.gov/about-us/workforce-board-legislative-tracker/>.

# Tab 4

## Local Plan Approval and Board Certification Process

**PRESENTED BY:** Drew Cassidy, Workforce Board

**CHECK ONE:**

☒ Action Item

☐ Possible Action

☐ Discussion Only

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**SUMMARY:**

In compliance with the Workforce Innovation and Opportunity Act (WIOA), Local Workforce Development Boards (LWDBs) are required to submit 4-year local plans to the State Workforce Development Board (as the Governor's designee) for approval. To streamline this process and reduce duplication, Board staff propose a workgroup to review these plans and simultaneously conduct LWDB recertifications, leveraging local plans to address as many of the recertification criteria as possible as outlined in WIOA and state WIOA Policy 5614.

The Board's task is to endorse the formation of this workgroup and determine its composition, facilitating an integrated approach to local plan approvals and LWDB certifications, thereby enhancing the efficiency and coherence of the state's workforce development system.

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**BACKGROUND:**

Consistent with the requirements of WIOA Sections 106, 107, and 108, every four years, LWDBs craft a comprehensive plan that details their policies, procedures, and activities in alignment with Washington's workforce development vision and the Talent and Prosperity for All (TAP) State Plan. The plans address important regional and local planning elements such as labor market information, economic development, business engagement, career pathways, equal opportunity, and performance accountability. The four-year local plan serves as a strategic and comprehensive roadmap for workforce development in local and regional areas, with the opportunity for modification every two years.

State Policy 5614 directs the Workforce Board, as the Governor's designee, to facilitate LWDB recertification, in alignment with local plan approval every two years, with the local plan serving as a means to assess the LWDB's fulfillment of the 13 required functions of local boards. Policy 5614 provides that prior to June, a workgroup (designated by the Board) using the information from the certification tool populated by Board staff from the local plans will present recommendations for certification to the Board. The Workforce Board approves the local plans and determines whether to recertify LWDBs. The proposed workgroup will play a crucial role in reviewing these plans and the LWDB's adherence to

outlined criteria, ensuring a coordinated and effective approach to workforce development across Washington State, underscoring the importance of their strategic alignment with broader workforce development objectives. The approval process must be completed by June 30, 2024, to meet federal reporting requirements.

To synchronize the local plan review and LWDB certification timelines efficiently, the following alignment strategy is proposed by Board staff, integrating key milestones from both the Certification Process Timeline and the Local Plan Submission Timeline:

- **April 10, 2024 - Draft Local Plans Submission:**

- Coinciding with the submission of draft local plans to the State Workforce Board and ESD, Board staff will compile received information into the certification tool.

- **April 17, 2024 - Feedback on Draft Plans:**

- Staff comments on draft local plans are transmitted to LWDBs for review. Board staff may forward completed certification tools to the certification committee members (as defined by the Board).

- **May 15, 2024 - Final Local Plans Submission:**

- With final, signed local plans due to the Workforce Board and ESD on May 15th, the workgroup will convene shortly thereafter to review the compiled information and discuss plan approval and certification recommendations. Any arising queries will be directed to Board staff or the relevant LWDBs for response.

- **May 27-28, 2024 - Board Action on Local Plans and Certification:**

- Any necessary clarifications with LWDBs should be concluded by this period. The Board will then receive the workgroup's summary and recommendations, communicated via email, in preparation for the Board's final approval.

- **June 2024 - Final Approvals:**

- Following the Board's vote on plan approval and certification recommendations on June 20, 2024, results will be communicated to LWDBs. For LWDBs recommended for provisional certification, a clear timeline and expectations for resolution will be established. Subsequently, Board recommendations, including local plan approvals and LWDB certifications, will be forwarded to the Governor.

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## **STAFF GUIDANCE & RECOMMENDATION:**

To enhance the efficiency of the local plan approval and LWDB certification processes in accordance with WIOA Section 107(d) and Policy 5614, the following key decisions are recommended for the Board's consideration:

**Action:** The Board should motion to authorize an interagency state staff workgroup, organized and overseen by the Executive Director, to review the submitted 2024 local plans,

complete the certification tool, and make plan approval and local board certification recommendations.

The Board may consider whether to also establish a Certification Committee to assist the interagency state staff workgroup in the review and recommendation process. If so, the Board must decide on the composition of the Certification Committee. The policy states one representative each from labor, business, and a voting agency, be appointed by the Board.





# Employment Security Department

WASHINGTON STATE

## Workforce Innovation and Opportunity Act Title I Policy Employment System Administration and Policy

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Washington envisions a nationally recognized fully integrated One-Stop system with enhanced customer access to program services, improved long-term employment outcomes for job seekers and consistent, high-quality services to business customers. In order to achieve this vision, Employment System Administration and Policy sets a common direction and standards for Washington's WorkSource system through the development of WorkSource system policies, information memoranda, and technical assistance.

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**Policy Number:** 5614

**To:** Washington WorkSource System

**Effective Date:** July 1, 2015

**Subject:** Local Workforce Development Board Certification

### 1. Purpose:

Section 107(c)(2) of the Workforce Innovation and Opportunity Act (WIOA) requires the Governor to certify one Local Workforce Development Board (LWDB) for each local area in the state. The Governor has designated that the State Workforce Development Board (SWDB) conduct the LWDB certification, recertification and decertification process.

This policy establishes the certification process and criteria, consistent with the directive issued by the SWDB on August 27, 2015, that will be used by the Governor and SWDB to certify all LWDBs.

This policy further includes a tool to identify which data will be collected and reviewed from which sources in order to certify LWDBs.

### 2. Background:

WIOA requires that one LWDB be certified for each local area by July 1, 2016. After that, LWDBs must be recertified every two years

WIOA identifies the primary role of LWDB leadership as assuring that the needs of business, workers, and job seekers are met by the public workforce system. LWDBs may act as leaders for specific efforts, as well as convening, organizing, coordinating, facilitating, and/or supporting the efforts of others in the community to achieve the best possible results for system customers.

WIOA clearly defines 13 functions that LWDBs must perform in order to maintain certification. The process described in this policy utilizes the Local Workforce Development Plan developed and updated by LWDBs as a primary resource for determining whether

LWDBs are performing those 13 functions.

### **3. Policy:**

#### **a. Certification Committee Membership**

The Certification Committee consists of one labor, one business, and one (voting) agency member, to be appointed by the SWDB.

#### **b. Certification**

LWDBs must be certified once every two years, as required by WIOA. The Certification Committee will convene prior to June on even numbered years to determine whether LWDBs meet certification criteria in Section 3(c) of this policy.

Certifications will be performed and documented using a certification tool (Attachment A) based on criteria in Section 3(c) of this policy. The tool identifies acceptable source documentation used to address these criteria.

Local plan updates must be submitted to the SWDB staff for use in populating the certification tool. The plan updates will serve to address certification criteria as outlined in the tool. These updates will not require major plan modifications unless local areas determine changes in status require the plan to be modified.

The Certification Committee must inform the SWDB of its determination regarding whether LWDBs meet the criteria. The SWDB must recommend to the Governor whether to certify, provisionally certify or decertify LWDBs based on the advice of the Certification Committee.

#### **c. Certification Criteria**

- i. Initial certification: LWDBs are only required to meet membership criteria as described in WIOA Title I Policy [5610 Rev 1](#).
- ii. Subsequent certification: LWDBs are required to meet the criteria for:
  - Board membership as described in WIOA Title I Policy [5610 Rev 1](#)
  - Successful performance
  - Fiscal integrity
  - Fulfilling the 13 required functions of LWDBs

#### **d. Provisional Certification**

LWDBs may be provisionally certified if the LWDB is generally in compliance with certification criteria and able to address any issues in a reasonable time as determined via negotiations between the SWDB and the LWDB, pending remediation of those issues.

#### **e. Decertification**

LWDBs may be considered for decertification for:

- i. Failure to remedy issues identified via provisional certification.
- ii. Failure to achieve certification.
- iii. Fraud, abuse, or failure to carry out required functions as per the Act, as described in the local plan submission and/or update.

**f. Decertification Process and Identification of a New Workforce Board**

LWDBs that are unable to rectify issues that affect certification, have committed fraud or abuse, or have failed to carry out the required functions as per the Act, the Governor, in consultation with the Chief Elected Official(s), will decertify and reorganize the LWDB and establish timelines for the organization, appointment, and certification of a new LWDB.

**4. Definitions:**

Leadership – A process of social influence in which a person can enlist the aid and support of others in the accomplishment of a common task.

Performed Successfully – The local area met or exceeded local levels of performance negotiated by the Governor with local boards and chief local elected officials and the local area has not failed any individual measure for the last two consecutive program years before the enactment of WIOA for initial designation and in the first two years of enactment for subsequent designation. The terms “met or exceeded” and “failed” are defined as consistent with how those terms were defined at the time the performance levels were negotiated. The Governor cannot retroactively apply higher thresholds to previously negotiated performance targets. [WIOA Section 106(e)(1)]

Sustained Fiscal Integrity – The Secretary of Labor has not made a formal determination that either the grant recipient or administrative entity of the local areas misexpended funds due to willful disregard of the requirements of the provisions involved, gross negligence, or failure to comply with accepted standards of administration for the two-year period preceding the Secretary’s determination. [WIOA Section 106(e)(2)]

**5. References:**

- [WIOA Section 106\(e\)\(1-2\)](#)
- [WIOA Section 107\(c\)\(2\)](#)
- [WIOA Section 107\(c\)\(2\)\(A-C\)](#)
- [WIOA Section 107\(c\)\(3\)](#)
- [WIOA Section 107\(c\)\(3\)\(C\)](#)
- [WIOA Section 107\(d\)](#)
- [20 CFR 679.310-370](#)
- [Training and Employment Guidance Letter \(TEGL\) 27-14](#)

**6. Supersedes:**

NA

**7. Website:**

[Workforce Professionals Center](#)

**8. Action:**

LWDBs and their contractors, as well as Employment Security Regional Directors, should distribute this policy broadly throughout the system to ensure that WorkSource System staff are familiar with its content and requirements.

**9. Attachments:**

[Attachment A - Certification Tool \(PDF\)](#)

[Attachment A – Certification Tool \(Word\)](#)

**Direct Inquiries To:**

*Employment System Administration and Policy Unit  
Employment System Policy and Integrity Division  
Employment Security Department  
PO Box 9046  
Olympia, WA 98507  
[SystemPolicy@esd.wa.gov](mailto:SystemPolicy@esd.wa.gov)*

**Certification Process:**

1. ***Nine weeks prior to certification:***
  - a. WTECB staff complete the tool using information submitted by LWDBs in their approved local/regional plan, plan update and/or other sources as indicated below.
  - b. WTECB staff request letters of nomination, evidence of recruitment for vacant LWDB seats, evidence that one-stop certification has occurred (as appropriate), and approved budgets from LWDBs.
  - c. WTECB staff request ESD monitoring staff to confirm that LWDB is meeting expectations for program oversight and fiscal management.
2. ***Six weeks prior to certification:*** LWDBs and ESD return information to WTECB staff to compile into the tool.
3. ***Five weeks prior to certification:*** WTECB staff forward completed tools to certification committee members.
4. ***Four weeks prior to certification:*** Certification committee members convene to review information and discuss certification recommendations. Any committee question arising from information in the completed tools will be forwarded to WTECB staff and/or the appropriate LWDB for response.
5. ***Three weeks prior to certification:*** Certification committee members review clarification and/or meet with LWDBs as needed to resolve any remaining issues.
6. ***Two weeks prior to certification:*** Certification Committee submits its recommendation to WTECB for review and discussion by Interagency Committee and inclusion in board packet.
7. ***WTECB Board votes on recommendation.*** Results are shared with LWDBs. If the WTECB recommends provisional certification of a LWDB, a timeline and expectations for resolution will be identified. WTECB recommendations will be forwarded to the Governor for approval.

**Contact information**

LWDB	
Contact person	
Phone	
Email	
Type of Board	_____ Membership conforms to WIOA _____ Alternative Entity

**CERTIFICATION CRITERIA****Criteria 1: Board membership**

LWDB must meet all items below to be certified as meeting this criteria

- ☐ ***Board has required board members in the appropriate categories to meet WIOA or alternative entity requirements (see attachment A – board membership template)***

**Policy 5610: Local Board Membership**

Business Membership: The majority of local board members must be representatives of businesses or business organizations in the local area. At a minimum, two members must represent small business as defined by the U.S. Small Business Administration. Business representatives serving on local boards may also serve on the state board.

Each business representative must meet the following criteria:

- Be an owner, chief executive officer, chief operating officer, or other individual with optimum policy-making or hiring authority;
- Provide employment opportunities that, at a minimum, include high-quality, work-relevant training in local in-demand industry sectors or occupations as those terms are defined in WIOA Section 3(23) in the local area;

Representatives meeting the criteria above and representing non-profit corporations that play a role as an employer in a high demand/high growth industry or prioritized sector – such as non-profit hospitals, nursing homes, etc. – may serve in the business category.

Representatives of non-profit corporations whose primary function is to provide services to help people become employed or move out of poverty may not serve in the business category. Such nonprofits serve in the workforce representative category.

Representatives of non-profit business organizations (trade associations, chambers of commerce, etc.) as identified in WIOA may serve in the business category.

Representatives of non-profit economic development organizations led by the business community may serve in the business category or the economic development category,

Public economic development organizations may not serve in the business category. Such non-profits serve in the economic development category.

**Workforce Representatives:** At least 20 percent of local board members must be workforce representatives who meet the following criteria:

- Two or more members in this category must be representatives of labor organizations, if such organizations exist in the local area. If labor organizations do not exist, representatives must be selected from other employee representatives;
- One or more members in this category must represent a joint labor-management or union-affiliated registered apprenticeship program within the local area who must be a training director or a member of a labor organization. If no union-affiliated registered apprenticeship programs exist in the area, a representative of a registered apprenticeship program with no union affiliation must be appointed, if one exists;

In addition to the workforce representatives cited above, the local board may include the following to contribute to the 20 percent requirement:

- One or more representatives of community-based organizations that have demonstrated experience and expertise in addressing the employment, training, or education needs of individuals with barriers to employment, including organizations that serve veterans or provide or support competitive integrated employment for individuals with disabilities; and
- One or more representatives of organizations that have demonstrated experience and expertise in addressing the employment, training, or education needs of eligible youth, including representatives of organizations that serve out-of-school youth.

**Balance of Representatives:**

- At least one eligible provider administering adult education and literacy activities under WIOA Title II;
- At least one representative from an institution of higher education providing workforce investment activities, including community colleges; and
- At least one representative from each of the following governmental and economic and community development entities:
  - Economic and community development entities;
  - The state employment service office under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) serving the local area; and
  - The programs carried out under Title I of the Rehabilitation Act of 1973, other than Section 112 or part C of that title;

Local boards may include representatives of other appropriate entities in the local area, including:

- Entities administering education and training activities who represent local educational agencies or community-based organizations with demonstrated expertise in addressing the education or training needs for individuals with barriers to employment;
- Governmental and economic and community development entities who represent transportation, housing, and public assistance programs;
- Philanthropic organizations serving the local area; and
- Other appropriate individuals as determined by the chief elected official.

**Policy 5610: Alternative Entity:** Pursuant to WIOA Section 107(i), the State may recognize as the local board a local entity (including a local council, regional workforce development board, or similar entity) that (1) is established to serve the local area or the service delivery area that most closely corresponds to the local area; (2) was in existence the day before the date of enactment of

WIA, pursuant to state law; and (3) includes representatives of business in the local area; and representatives of labor organizations (for a local area in which employees are represented by labor organizations), nominated by local labor federations; or other representatives of employees in the local area (for a local area in which no employees are represented by such organizations).

- ☐ **Board has only one board member per seat** (see attachment A – board membership template)
- ☐ **Each board member was nominated by an appropriate entity** (see attachment A – board membership template)

**Policy 5610: Board Member Nominations:** Chief elected officials must establish local board member nomination and appointment processes, consistent with criteria established by the Governor and State Workforce Development Board, that ensure:

- Business representatives are appointed from among individuals who are nominated by local business organizations and business trade associations.
- At least 51 percent of workforce representatives must be selected from among individuals nominated by local labor federations;
- When there is more than one local area provider of adult education and literacy activities under title II, or multiple institutions of higher education providing workforce investment activities as described in WIOA 107(b)(2)(C)(i) or (ii), nominations are solicited from those particular entities. [WIOA Section 107(b)(6)]
- All other representatives are appointed from among individuals who are nominated by locally-recognized organizations or entities, such as chambers of commerce, non-profit networks, or coalitions, etc.

- ☐ **LWDB has provided evidence of a broadly based recruitment strategy** (see attachment A - board membership template)
- ☐ **Each board member has optimal decision making authority and demonstrated experience.** (see attachments A & B)

*NOTE: Committee members may use a variety of data to address this criteria, including the position a board member holds in the organization s/he represents, information in the letters of nomination included in attachment B, and/or specific information requested from the LWDB.*

**Policy 5610: Definitions**

- Optimum policy-making authority – Characteristics of an individual who can reasonably be expected to speak affirmatively on behalf of an entity and commit that entity to a chosen course of action.
- Demonstrated experience and expertise – Characteristics of an individual who is a workplace learning advisor as defined in WIOA Section 3(70); contributes to the field of workforce development, human resources, training and development, or a core program function; or is recognized by a local board for valuable contributions in education/workforce development related fields.

- ☐ **LWDB has provided evidence that it is actively recruiting for any open seats** (see attachment C)



**Criteria 2: Sustained fiscal integrity *(to be completed by WTECB staff)***

- ☐ The Secretary of Labor has not made a formal determination that the grant recipient or administrative entity misexpended funds due to willful disregard of the requirements of the provisions, gross negligence, or failure to comply with accepted standards of administration for the two-year period preceding the determination. (WTECB staff to check with ESD/DOLETA)

**Criteria 3: Performance**

- ☐ The local area met or exceeded local levels of performance negotiated by the Governor with local boards and chief local elected officials and the local area has not failed any individual measure for the last two consecutive program years. (see attachment D)

**Criteria 4: Board is performing the 13 Functions Required of LWDBs *(to be completed by WTECB staff)***

- ☐ Board has an approved regional/local plan on file.
- ☐ Workforce research and regional labor market analysis is included in the approved plan.
- ☐ Approved plan includes documentation that the board has convened local stakeholders to develop the plan and identify non-Federal expertise/resources to leverage for workforce development activities.
- ☐ Approved plan includes a plan for or evidence that the LWDB is leading employer engagement by developing/implementing strategies for meeting employment skill needs of workers and employers.
- ☐ Approved plan includes a plan for or evidence of leading local efforts, with secondary/postsecondary education, to develop/ implement career pathways aligning employment, training, education, and support services are needed by adults and youth, particularly those with barriers to employment.
- ☐ Approved plan includes a plan for or evidence that the LWDB is leading efforts in the local area to identify and share promising practices.
- ☐ Approved plan includes a plan for or evidence that the LWDB is developing strategies using technology to maximize accessibility and effectiveness of the local workforce system for employers, workers and jobseekers.
- ☐ Approved plan includes negotiated local performance accountability measures.
- ☐ Approved plan includes a plan for or evidence that the LWDB is coordinating with education providers.
- ☐ Approved plan includes a plan for or evidence that the LWDB annually assesses the physical and programmatic accessibility, in accordance with section 188, and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), of all one-stop centers in the local area.
- ☐ Approved plan includes a plan for or evidence that the LWDB has selected one stop operators and providers.
- ☐ LWDB has provided evidence that it has conducted one-stop certification at least once every three years.
- ☐ ESD monitoring shows that the LWDB provides program oversight.
- ☐ LWDB has provided evidence that it has an adopted budget and reports expenditures against this budget to the board on at least a quarterly basis.
- ☐ ESD monitoring/contract management shows that LWDB has an adopted budget and draws resources in compliance with its contract.

**Attachment A: Board Membership Template**

*(To be inserted by WTECB staff from the regional/local plan or update for WIOA board or alternative entity)*

Required categories	Name/Title/Organization*	Nominated by
Business majority (greater than 50% of all members – add lines if needed)		
1. Business		
2. Business		
3. Business		
4. Business		
5. Business		
6. Business		
7. Business		
8. Business		
9. Business		
10. Business		
Workforce (20% of members. Majority must be nominated by organized labor – add lines if needed)		
1. Labor		
2. Labor		
3. Apprenticeship		
4. Other workforce		
Education (add lines if needed)		
1. Title II Adult Ed		
1. Higher Education		
Government (add lines if needed)		
1. Wagner-Peyser		
1. Vocational Rehabilitation		
1. Economic Development		
Add more rows if needed		

\* LWDBs must provide evidence of recruitment for any empty seats on the board.

**Complete this table for an alternative entity.**

<b>Categories</b>	<b>Name/Title/Organization*</b> (please list one per line and add lines as needed)	<b>Nominated by</b>
Business majority (>50%) - Please indicate the total number of seats available for this category: ____		
Workforce/Labor - Please indicate the total number of seats available for this category: ____		
Education - Please indicate the total number of seats available for this category: ____		
Government/workforce programs (may include economic development) - Please indicate the total number of seats available for this category: ____		
Add more rows if needed		

\* LWDBs must provide evidence of recruitment for any empty seats on the board.

The table should identify how an alternative entity serving as a Local Workforce Development Board is substantially similar to the local entity described in WIOA Section 107(b)(2), by indicating membership in each of the four categories listed above.

Attachment A  
Board Certification Tool

**Attachment B: Letter of nomination**  
*(To be provided by LWDB and inserted by WTECB staff)*

Attachment A  
Board Certification Tool

**Attachment C: how is the LWDB recruiting for open seats?**  
***(To be provided by LWDB and inserted by WTECB staff)***

**Attachment D: Performance Targets vs Actual Performance for Prior two Years**  
*(To be inserted by WTECB staff from plan or plan update)*

# Tab 5

## **Policy 1015: Procurement and Selection of One-Stop Operators and Service Providers**

**PRESENTED BY:** Elizabeth Casey, Employment Security Department and Drew Cassidy, Workforce Training & Education Coordinating Board

### **CHECK ONE:**

☒ Action Item

☐ Possible Action

☐ Discussion Only

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**SUMMARY:** WorkSource System Policy 1015, a revision of WIOA Policy 5404.1, proposes essential updates to *Procurement and Selection of One-Stop Operators and Service Providers* in alignment with the Workforce Innovation and Opportunity Act (WIOA) and the Office of Management and Budget (OMB) Uniform Guidance (2 CFR 200). The Board is requested to approve these updates, reflecting the culmination of extensive stakeholder engagement and confirmation of alignment with federal law, regulations, and state guidelines.

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### **BACKGROUND:**

The Workforce Training and Education Coordinating Board (the Board) was asked to review and consider approval of System Policy 1015, at the December 13, 2023, Board Meeting. The Board motioned to release the Policy for public comment, with continued conversation at a future meeting.

During the December 13th meeting, staff highlighted that there were three primary points of departure between staff recommendations, as reflected in the draft policy, and the perspectives of Local Workforce Development Boards (LWDBs). During the public comment period, LWDBs, Board Chairs, Chief Local Elected Officials, and the Washington Workforce Association (WWA) submitted letters and public comments to the Governor's Office, the Employment Security Department (ESD), and the Board expressing similar concerns as those that were discussed during the December Board Meeting. The letters received in the public comment process are contained in the packet.

### **Public Comment Summary**

Here is a summary of the concerns presented, with steps taken by staff following:

#### **1. Direct Youth Service Provision & Compliance with Federal Law**

- Comments state that the requirement for LWDBs to obtain approval from the Board to directly provide youth services (sec 3.d.iii) overrides federal law (20 CFR 681.400(a) & (b)) without justification. Comments state the regulation grants LWDBs the autonomy to decide on delivering youth services without such approval. Stakeholders express a strong desire to maintain the authority and autonomy of local boards and elected officials granted by the Workforce Innovation & Opportunity Act (WIOA). Comments argue the need for local decision-making and control to respond to the unique needs of their communities.



## **2. Evaluation & Monitoring, Administrative Burden & Costs**

- Comments state the requirement for a neutral outside entity to monitor LWDBs, when they serve dual roles, imposes unnecessary administrative burdens and costs. Concerns were raised about what is viewed as additional, redundant layers of monitoring that do not enhance service quality or compliance. They argue that internal controls and firewalls could be effectively utilized instead.

## **3. Application and Approval Criteria**

- There's a request from the comments for clearer standards and objective criteria for evaluating direct delivery applications for Adult and Dislocated Worker career services. Stakeholders argue that the lack of standards makes decisions subject to arbitrary challenges, potentially affecting service delivery and performance, and would like to ensure that decisions are made transparently and based on merit rather than subjective judgments.

## **Actions Taken by State Staff in Response**

Staff have taken several steps to ensure an adequate response to the public comments and concerns we received:

- The Board Co-Chairs, Executive Director, ESD Policy Manager, and state staff met with the Governor's Office Senior Policy Advisor to reconfirm that Policy 1015 in its current draft form aligns with the expectations of the Governor. Staff provided to the Governor's office the public comments received and draft responses.
  - The Governor's Office stated that the expectation of the Governor is to go no lower than the competitive standards established in 2016 under the prior policy version (5404.1). Support was expressed for the requirement for a neutral outside entity to perform monitoring in situations where dual roles are being fulfilled to prevent any conflict of interest.
- Board staff contacted the Attorney General's Office (AGO) for a legal opinion on the Policy 1015 draft. Board staff included all public comments received and state staff's proposed responses to the public comments in our request for guidance. The AGO concluded that the proposed policy aligns with WIOA, federal regulations, and state law, despite the complexity and apparent conflict between the statutory requirement for competitive solicitations of youth services and regulatory language suggesting LWDB discretion.
  - "Although the implementing regulations contain language that suggests LWDBs may have the authority to decide not to conduct such solicitations, when read in the context of the statutory language, particularly WIOA Section 107(d)(10)), as well as TEGL 15-16 and 21-16, that appears to be in conflict with the language and published interpretations of WIOA. The statutory language supersedes the language of the regulation... The proposed policy contains an approval process that allows for LWDBs to directly provide services gives meaning to the regulatory language and recognizes that competitive solicitation is not always a viable option for LWDBs. The proposed approval process is quite defensible as it maintains the general requirement for competitive solicitation and can rely on the regulatory language of 20 C.F.R. § 681.400 for support."
- Board staff contacted U.S. Department of Labor (USDOL), Regional Federal Project Officer (FPO), Carol Padovan, who has been consulted throughout the process of this policy revision, including a full review and approval of the draft policy prior to presentation at the December

Board Meeting. Recently, she provided additional legal context for the state's responsibility and authority to set standards for federal awards.

- 2 CFR 200.303(a) - "the non-Federal entity must: (a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with...the terms and conditions of the Federal award." 2 CFR 200.400(c) states "The non-Federal entity...has the primary responsibility for employing whatever form of sound organization and management techniques may be necessary in order to assure proper and efficient administration of the Federal award."
- ESD, as the grantee, is the non-Federal entity, and also stands as designee for the Governor. The State Board under WIOA section 101(d)(12) "shall assist the governor in ...the development...of such other policies as may promote statewide objectives for, and enhance the performance of, the workforce development system in the State."

As a result of all these steps and input, staff completed a draft Public Comments and Responses document, contained in the board packet for your consideration. The Board's review of these items and careful consideration of points of departure is critical in the endorsement process of Policy 1015.

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## STAFF GUIDANCE & RECOMMENDATION:

**Discussion and Action.** The Board is requested to review, evaluate, and approve Policy 1015 *Procurement and Selection of One-Stop Operators and Service Providers*, weighing its strategic alignment with WIOA objectives against the concerns raised by LWDBs and other stakeholders. The decision on Policy 1015 presents the Board with an opportunity to reinforce competitive procurement practices while addressing the nuanced challenges of service delivery and governance within the WorkSource system.

### The Board's options include:

- **Approve Policy 1015** *Procurement and Selection of One-Stop Operators and Service Providers* as presented.
- **Request changes** to address specific concerns.
- **Defer action** to maintain the status quo under WIOA Policy 5404.1 from 2016.
  - Staff Note: This results in the One-Stop Operator section, and other components of the policy being out-of-date and not in alignment with the most recent guidance released by USDOL.



## Revised WorkSource System Policy

**Policy Number: 1015 (formerly 5404, Revision 1)**

**Policy Name: Procurement and Selection of One-Stop Operators and Service Providers**

**DRAFT Summary Public Comment and Response**

Good afternoon, system partners and other interested stakeholders.

WorkSource System Policy [1015](#), *Procurement and Selection of One-Stop Operators and Service Providers* is now available on the Workforce Professional Center website.

This policy revision communicates essential updates in alignment with the Workforce Innovation and Opportunity Grant (WIOA), State responsibilities and expectations, and the Office of Management and Budget (OMB) Uniform Guidance (2 CFR 200), including:

- Expands elements of One-Stop Operator procurement in compliance with Training and Employment Guidance Letter (TEGL) 15-16;
- Highlights documentation standards and public notice requirements for procurement processes surrounding WIOA Title I-B programs and services;
- Clarifies and enhances conflict of interest and firewall requirements;
- Ensures strategic alignment by emphasizing transparency, competition, and equity;
- Clarifies monitoring and evaluation protocols to ensure oversight compliance and effective service delivery;
- Augments and streamlines the direct service provision application and approval process used by the State Workforce Development Board (SWDB) on behalf of the Governor.

During the 30-business day public comment period, the state received several comments/requests, including:

- **Public Comment #1.** Commenters stated that requiring LWDBs to receive permission or approval from the Governor or his designee, the Workforce Training and Education Coordinating Board (SWDB), to directly provide some or all youth workforce investment activities violates [20 CFR 681.400](#)(a) & (b), which they interpret as allowing LWDBs the autonomy to decide to deliver youth services without such approval.

**Response:**

Staff to the State Workforce Board and State Workforce agency, upon reviewing WIOA Section 107(d)(10), Section 123(a), and 20 CFR 681.400 in their entirety, determined that while regulations do allow that LWDBs may directly provide some or all youth workforce investment activities, the competitive procurement of these services is the expectation, as reinforced by Uniform Guidance at 2 CFR parts 200 and 2900, in addition to applicable state and local procurement laws. WIOA Section 107(d)(10), in conflict with regulations, explicitly requires LWDBs to "identify eligible providers of youth workforce investment activities in the local area by awarding grants or contracts on a competitive basis," with the only exception outlined in Section 123(b) for situations where a competitive process is not feasible due to a lack of eligible providers in the area. The legal authority of the statute supersedes that of the regulation. However, in order to give meaning to the regulatory language and to provide for flexibility, a process for Board approval to directly provide youth services is available, and has been in place since 2016. Under TEGL 21-16, "If a State chooses to do so, it has the authority to set policy requiring Local WDBs to competitively select some or all youth services." Here, the State policy is to competitively select youth services unless, upon review, the facts justify sole source procurement or direct provision of services.

**§681.400 "What is the process used to select eligible youth service providers?"**

*(a) "The grant recipient/fiscal agent has the option to provide directly some of all of the youth workforce investment activities.*

*(b) "However, as provided in WIOA sec. 123, if a Local WDB chooses to award grants or contracts to youth service providers to carry out some or all of the youth workforce investment activities, the LWDB must award such grants or contracts on a competitive basis subject to the exception explained in paragraph (b)(4):*

*(1) The Local WDB must identify youth service providers based on criteria established in the State Plan (including such quality criteria established by the Governor for a training program that leads to a recognized postsecondary credential) and take into consideration the ability of the provider to meet performance accountability measures based on the primary indicators of performance for youth programs.*

*(2) The Local WDB must procure the youth service providers in accordance with the Uniform Guidance at [2 CFR parts 200](#) and [2900](#), in addition to applicable State and local procurement laws.*

*(3) If the Local WDB establishes a standing youth committee under [§ 681.100](#) it may assign the committee the function of selecting of grants or contracts.*

*(4) Where the Local WDB determines there are an insufficient number of eligible youth providers in the local area, such as a rural area, the Local WDB may award grants or contracts on a sole source basis.*

The Governor's office has also previously noted the expectation for the procurement process to be open, fair, and competitive, to encourage transparency and continuous improvement as stated in letters to the LWDBs regarding their initial approvals in 2016. Thus, following the expectations outlined in WIOA Sec.

101, Sec. 123, §20 CFR 679.130, in 2016 the SWDB adopted in Policy 5401.1 the expectation that, should a LWDB wish to directly provide youth services (any or all), it must receive written approval from the Local Board and CLEO, and apply for approval to the SWDB, as the Governor's designee. The current proposed Policy 1015 did not change, or further the requirements or expectations regarding youth service procurement that have been in effect since WIOA was established in 2016.

As briefly referenced above, guidance issued by the U.S Department of Labor (USDOL) in TEGL 21-16, further states "DOL encourages Local WDBs to award contracts to youth service providers, using a competitive procurement process, when local areas have access to experienced and effective youth service providers. **If a State chooses to do so, it has the authority to set policy requiring Local WDBs to competitively select some or all youth services. The State as grant recipient has the ultimate accountability to DOL for the performance of the Youth program, including outcomes and fiscal integrity** (emphasis added)." It is the State's responsibility to establish standards and statewide expectations for outcome and integrity that may exceed federal regulations.

Staff, seek to balance:

1. The requirements outlined in WIOA Law, and regulations: 2 CFR 200, 20 CFR 679.410, and 20 CFR 681.400.
  2. The state and Governor's expectations for competitive procurement standards, and transparency.
  3. And local control where appropriate, allowable, prudent, and/or necessary.
- **Public Comment #2.** Several Commenters suggested the current policy fails to identify clear evaluation standards for the application to directly deliver Adult and Dislocated Worker Career Services, potentially leading to arbitrary decision-making by the SWBD, as the application is not seen as outlining clear requirements for approval.

**Response:**

The policy includes a detailed application process, tailored to each type of direct service for which LWDBs might apply and specific to the requirements, expectations, and circumstances. The SWDB will evaluate these applications on a case-by-case basis, considering each application's unique context and merits. Because the situations will vary between local jurisdictions, this must be a fact-specific inquiry that looks at a number of different, and potentially unforeseeable factors. The sufficiency of the responses to the questions on the application will inform the SWDB's decision. This process is designed to be comprehensive and aligned with the strategic goals of the Governor, the SWDB and WIOA's emphasis on local flexibility and innovation while ensuring accountability and alignment with state and federal objectives.

- **Public Comment #3.** Several Commenters suggest Section 3.g.iii. requiring a “neutral outside entity or state agency” perform monitoring and evaluation of the LWDB when the LWDB is acting in a **dual role** as both a strategic and managing entity as well as a direct provider of services creates an unnecessary administrative burden. Commenters state that the burden and cost of doing this would be onerous and that appropriate firewalls and internal controls can instead be applied and followed.

**Response:**

The requirement for an external monitoring entity is grounded in WIOA's accountability principles, as outlined in 20 CFR 679.370(i) and State WIOA Policy 5414 governing LWDB monitoring requirements. USDOL Guidance in TEGL 15-16 further clarifies that sufficient firewalls must be in place to prevent conflicts of interest in monitoring functions. Annual compliance reviews are already required for recipients of pass-through funding pursuant to Policy 5414, Revision 1, and direct one-stop provider services should be reviewed as a part of that annual compliance review.

When LWDBs serve in multiple roles, inherent conflicts necessitate unbiased oversight, as stated in 20 CFR 679.430 (entities performing multiple functions in a local area must demonstrate internal controls and prevent conflict of interest by developing a written agreement with the LWDB and CEO to clarify how the organization will carry out its responsibilities while demonstrating compliance with WIOA, OMB Uniform Guidance, and the state's conflict of interest policy). That passage alone does not cure or correct potential conflicts (real or apparent) when an employee of the LWDB, who reports to the CEO, is tasked with monitoring and reporting findings. If an LWDB is a direct provider of services, this may result in a real or apparent conflict of interest, as they would be responsible for both monitoring their own compliance with the Title IB program requirements, beyond the monitoring that is conducted by the state workforce agency and monitoring their own direct service provision.

State staff recommend maintaining this policy expectation to ensure the integrity and effectiveness of WIOA program oversight and delivery, aligning with federal regulations and the need for independent evaluation to mitigate potential conflicts of interest.

- **Public Comment #4:** One commenter stated that no formal public comment period was afforded at the time this Policy was presented to the SWDB for approval.

**Response:** The Board took action to move the draft to public comment from December 15, 2023, through January 31, 2024.

This Policy and others can be found on the Workforce Professional Center website under [State Policies and Guidance](#).

Please [email](#) questions to Employment System Administration and Policy.

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# Washington State WorkSource System Policy

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**Policy Number:** 1015

**Policy Title:** Procurement and Selection of One-Stop Operators and Service Providers

**Effective Date:** July 1, 2024

## 1. Purpose:

To communicate requirements for the procurement and selection of one-stop operators and service providers under the Workforce Innovation and Opportunity Act (WIOA). All WIOA service delivery, whether through a competitively selected service provider or Local Workforce Development Board (LWDB), must be selected in accordance with this policy.

## 2. Background:

WIOA and the Office of Management and Budget (OMB) Uniform Administrative Guidance, 2 CFR 200, set the general expectation that LWDBs conduct fair, open, and competitive procurement processes to identify appropriate providers of one-stop operator and other services to promote efficiency and effectiveness of these roles.

Per WIOA Section 107(d)(10)(E) and 20 CFR 679.370 (l and m), LWDBs work with the State to ensure that the number, type, and quality of providers is sufficient to maximize consumer choice and meet the needs of the community. WIOA sets the expectation that LWDBs will serve as strategic entities and the Department of Labor (DOL) further clarified that expectation in 20 CFR 679.410 by citing “restrictions” on LWDBs (and LWDB staff) as one-stop operators and service providers and outlining the requirements of LWDBs that may want to assume those roles.

## 3. Policy:

- a. LWDBs must have local procurement policies that adhere to applicable sections of federal law and regulations and state policy in selecting one-stop operators and service providers and awarding contracts under WIOA.
  - i. Specifically, these sections and policies include, but are not limited to:
    - Competitive Procurement Policy and Process compliant with WIOA 121(d)(2)(A), Uniform Administrative Guidance, 20 CFR 678.605(c) and (d), 20 CFR 679.430, and 2 CFR 200.320.
    - Record Retention Policy.
    - Conflict of Interest Policy.



- Dispute Resolution Policy/Process.
  - Written Standards of Conduct, Fairness and Ethics.
  - Internal Controls - including description of firewalls, or policies and procedures that act as a barrier against undesirable influence, outcome, or authority and provide clear separation between job duties and responsibilities.
- b. LWDBs must document, maintain, and provide to authorized state or federal organizations upon request, where applicable:
- (1) efforts to identify the availability of qualified, eligible one-stop operators and service providers;
  - (2) compliance with the Sunshine Provisions outlined in 20 CFR 679.390, 2 CFR 200.320, and this policy by demonstrating that they made their board members and the public aware of the procurement process to be used with a minimum 30-day public notice via media where prospective local, state, and national bidders typically identify such opportunities (e.g., local print newspapers, online newspapers, LWDB websites, other community websites, etc.), with solicitations including the selection criteria for the process and retained as records; and,
  - (3) the allowable processes used to select one-stop operators and service providers, and how they were followed, including procurement processes (with selection criteria by which bids were scored).
- c. LWDB must ensure that procurements using federal funds are designed in ways to promote racial equity and support for underserved communities, promoting equitable access for vendors and customers as highlighted in [Executive Order 13985](#).
- d. Programmatic Requirements
- i. **One-Stop Operator Eligible Entities**
    - A. Single entities (public, private, or nonprofit) or a consortium of entities (which must include a minimum of three required one-stop partners within the local area with demonstrated effectiveness per WIOA Section 121(d)(2)(B)). Please see full description of eligible entities in [TEGL 15-16](#).
    - B. The one-stop operator may operate more than one one-stop, or conversely, there may be more than one one-stop operator in a local area.
  - ii. **Procurement of One-Stop Operators**
    - A. One-stop operators must be designated and certified through a competitive procurement process. The full and open competitive process used by LWDBs to procure one-stop operators must be conducted **at least once every four years**, must follow the principles of competitive procurement set forth in Uniform Administrative Guidance at 2 CFR 200.317-326, and cannot be waived. Additionally, it is recommended LWDBs utilize the processes and phases outlined in TEGL 15-16, Section 9.
    - B. The allowable forms of formal procurement processes per 2 CFR 200.320 are as follows:

a. **Sealed Bid(s)** (2 CFR 200.320(b)(1))

b. **Competitive Proposal(s)** (2 CFR 200.320(b)(2))

- I. LWDBs may be selected to serve as the one-stop operator in their designated region through the competitive process required under WIOA sec. 121(d)(2)(a) and meet mandatory competition requirements described in 20 CFR 678.650(c) and 678.615(a).
- II. LWDB must do the following, in order:
  1. Publicly declare their intent to bid in the one-stop operator procurement process.
  2. Successfully bid in a one-stop operator solicitation that conforms to the principles of competitive procurement set forth in Uniform Administrative Guidance at 2 CFR 200.318-326, and only if board-approved internal control and conflict of interest policies are followed. Internal controls include the requirement that the solicitation and scoring process be managed by a fair and impartial third-party entity free of conflicts of interest and that LWDB staff and the agency that employs such staff cannot develop the solicitation for proposals, facilitate the scoring process, or score proposals.

**OR**

c. **Sole Source/Noncompetitive Procurement:** Noncompetitive procurement is expected to be used as a last resort only after other procurement methods have been exhausted. Sole source is to be exercised, as allowed in local policy, if it complies with federal procurement regulations at 2 CFR 200.320(c), 20 CFR 678.610 and federal guidance in TEGL 15-16, and one or more of the following circumstances apply:

1. The acquisition of services, the aggregate dollar amount of which does not exceed the micro-purchase threshold of 2 CFR 200.320(a)(1), or lower threshold established by local policy;
2. The item or service is only available from a single source;
3. Public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;<sup>1</sup>
4. The Federal awarding agency or pass-through entity expressly authorizes non-competitive proposals in response to a written request from the non-Federal entity; or
5. After soliciting a number of sources, competition is determined inadequate, whether for reasons of number or quality of proposals/bids<sup>2</sup>

C. Regardless of the procurement method, if LWDB staff is to provide direct one-stop operator services, it must:

- receive LWDB approval (recorded in public meeting notes),

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<sup>1</sup> Examples of compelling circumstances that outweigh delays that would result from competitive solicitations include a need to avoid a break in services if an operator is terminated for cause or is unable to continue providing services through the end of a contract period.

<sup>2</sup> Inadequate responses are those judged by a panel of impartial reviewers to score below a pre-determined minimum level on scoring criteria published as part of the solicitation, responses that did not address all required elements, or meet the published deadline.

- obtain Local Chief Elected Official(s) written approval,
- complete and submit to the State Workforce Development Board (SWDB) [Attachment A: One-Stop Operator and/or Title I Service Delivery Request Process and Application](#),
- receive SWDB approval on behalf of the Governor, and
- engage a neutral outside entity to annually monitor the LWDB as the one-stop operator in accordance with Policy 5414, Revision 1.

The approval from the SWDB on behalf of the Governor will serve as certification of the one-stop operator per WIOA Section 121(d)(2)(A).

**Note:** Under TEGL 15-16, Sec. 200.318(i) of the Uniform Administrative Guidance, and as stipulated in 20 CFR 678.635(b), LWDBs must maintain detailed procurement records, especially on the decision-making and justification to sole source one-stop operators. This process extends beyond publishing requests for interest, proposals, or invitations for bids; it requires LWDBs demonstrate market research and outreach prior to sole sourcing and ensuring solicitations are widely publicized to promote full and open competition. Further, USDOL interprets WIOA Sunshine Provisions at Sections 101(g) and 107(e) as requiring LWDBs to present documentation and justification of decisions to use sole source procurement at open LWDB meetings to provide transparency and perhaps attract additional offerors/bidders for the next competition. All contracts, agreements, or MOUs between the one-stop operator and LWDB, SWDB, or state workforce agency must include the essential elements of a legally executed and binding written agreement, as outlined in TEGL 15-16, Section 10.

### iii. Procurement of Youth Service Providers

- A. LWDBs must competitively award grants/contracts for eligible providers of youth workforce investment activities, except in the case of sole-source awards/contracts, and only then if there is satisfactory and demonstrable evidence that there are an insufficient number of providers with the expertise required for serving in-school or out-of-school youth. Bid solicitations must include the selection criteria to be used in this process and must be maintained as documentation of the process.
- B. LWDBs must establish and use criteria, including the ability of service providers to meet performance accountability measures based on the primary indicators of performance for youth programs, as well as full and open competition consistent with 2 CFR parts 200 and 2900 in addition to applicable state and local procurement laws to procure eligible providers of youth workforce investment activities.
- C. In accordance with WIOA law and regulations some or all youth program activities may be exempted from a competitive process if LWDBs determine that they can more appropriately and efficiently perform these activities. However, to directly provide some or all youth workforce investment activities, LWDBs must receive written approval of the Local Chief Elected Official(s) and submit [Attachment A](#) to request approval from the SWDB on behalf of the Governor.

- D. LWDBs must establish local policies and procedures to assess the ability of youth program providers to meet performance accountability measures based on the primary federal indicators of performance and criteria establish in the State Plan for the youth program.
- E. LWDBs may serve as youth service providers if they are determined to be the successful bidder in a solicitation that conforms to the principles of competitive procurement set forth in Uniform Administrative Guidance at 2 CFR 200.318-326, and only if approved internal control and conflict of interest policies are followed. Internal controls include the requirement that the solicitation and scoring process be managed by an impartial third party free of conflicts of interest and that LWDB staff and the agency that employs such staff cannot develop the solicitation for proposals, facilitate the scoring process, or score proposals.

#### **iv. Procurement of Training Services**

- A. In general, training providers must be on the State's Eligible Training Provider List (ETPL) and subject to data reporting requirements. LWDBs are prohibited from providing training services unless the SWDB on behalf of the Governor grants a waiver (WIOA Section 107(g)(1)). However, a LWDB can contract with providers of on-the-job training, customized training, incumbent worker training, internships, and paid or unpaid work experience opportunities, or transitional employment and are not subject to the ETPL (WIOA Section 122(h)(1), 20 CFR 680.320, 680.760, 680.790).
- B. If a LWDB wishes to provide a program of training services directly, they must receive written approval from the SWDB on behalf of the Governor by submitting [Attachment A](#) to request a waiver.
  - a. The waiver must include:
    - Satisfactory evidence of insufficient number of eligible training providers of such a program of training services to meet local demand in the local area;
    - Information demonstrating the LWDB meets the requirements of a training service provider in WIOA Section 122;
    - information demonstrating that the program of training services prepares participants for an in-demand industry sector or occupation in the local area; and,
    - Evidence the LWDB made the request available to eligible providers of training services and other interested members of the public for a public comment period of no less than 30 days.
  - b. Duration of the waiver cannot exceed the duration of the current local plan.
  - c. The SWDB and Governor has the authority to revoke this waiver during the approved period under WIOA Section 107(g)(1)(D).

## **v. Procurement of Career Services**

- A. WIOA Section 107(d)(10)(D) states that if the one-stop operator does not provide career services, described in Section 134(c)(2), the LWDB must identify eligible providers of those career services by awarding contracts. LWDBs are encouraged to select providers of career services through a competitive procurement process.
- B. Allowable forms of competitive procurement include sealed bid, competitive proposals, and sole source (refer to Section 3.d.ii.C).
- C. LWDBs can provide basic and individualized career services by agreement of the Local Chief Elected Official, and then by submitting [Attachment A](#) and receiving approval of the SWDB on behalf of the Governor.

## **e. Procurement-Related Fiscal Requirements**

- i. Subawards are not procurement actions governed by this policy or other procurement laws, rules, or policies ([Policy 5250](#)) unless:
  - A. Required by statute;
  - B. Required by own policies and procedures; or
  - C. Awarded on a competitive basis, in which instance the subaward will be governed by procurement rules detailed in 2 CFR 200.318-326.
- ii. When a competitive procurement process is not used in the selection of a subrecipient for a subaward, it must be guided by;
  - A. Documented internal controls, including written procedures for employee conduct and conflict of interest provisions;
  - B. The service provider's track record, considering past record of performance, cost principles, record of compliance and audit and monitoring results.
- iii. Procurement standards must ensure fiscal accountability and prevent waste, fraud, and abuse in WIOA programs. Where applicable, standards must support fair and competitive procurement of goods and services.
- iv. Wherever possible and where required, all agreements must be performance-based, as defined in Federal Acquisition Regulations (FAR) 37.6, and include the following minimum requirements:
  - A. Performance requirements defined in measurable, mission-related terms;
  - B. Performance standards (e.g., quality metrics, required quantities, and timeliness) tied to performance requirements;
  - C. Quality assurance plan describing how the contractor's performance will be measured against performance standards; and,
  - D. Appropriate positive and negative incentives for performance standards critical to accomplishing agreement objectives.
- v. All other non-federal entities, including LWDBs, must:



- A. Follow general procurement standards established through applicable state law, rule, and policy, as well as through 2 CFR 200.318-326;
- B. Develop and document their own procurement policies, procedures and standards that reflect applicable state law, rule, and policy and conform to federal law and standards of OMB Uniform Administrative Guidance;
- C. Ensure full and open competition, where necessary;
- D. Use the most economical approach to the procurement of goods and services;
- E. Award only to responsible contractors;
- F. Maintain oversight in order to monitor contractor performance regarding contract terms, conditions, and specifications; and,
- G. Maintain records detailing the history of the procurement, including the rationale for the selected method of procurement, selection of contract type, basis for contractor selection or rejection, and basis for contract price.

**f. Consumer Choice Compliance and LWDB Responsibilities**

- i. Consistent with WIOA Section 122, paragraphs (2) and (3) of section 134(c), and 20 CFR 679.380, LWDBs will work with the State, using shared data and joint efforts to ensure there are sufficient numbers and types of providers of career services and training services serving their local areas and providing the services involved in a manner that maximizes consumer choice. This goal is to ensure that there is a diverse network of career services and training services providers that reflect the varied needs of the local workforce, including eligible providers with expertise in assisting individuals with disabilities and adults in need of adult education and literacy activities.

**g. Evaluation and Monitoring of One-Stop Operator, Service Providers - 20 CFR 679.370(i)**

- i. WIOA and [WIOA Policy 5414, Rev. 1](#), require LWDBs monitor one-stop operators and service providers, at least annually, to ensure compliance with the requirements of WIOA, the activities in the statement of work, performance reporting requirements, and the terms and conditions of the written agreement. Monitoring includes an attestation by the monitoring entity that it has examined compliance with WIOA, 2 CFR 200, and the terms and conditions of the written agreement with the one-stop operator or service provider.
- ii. The LWDB, in partnership with the local CEO for the local area, must:
  - A. Conduct oversight of youth workforce investment activities authorized under WIOA sec. 129(c), adult and dislocated worker employment and training activities under WIOA secs. 134(c) and (d), and the entire one-stop delivery system in the local area;
  - B. Ensure the appropriate use and management of the funds provided under WIOA subtitle B for the youth, adult, and dislocated worker activities and one-stop delivery system in the local area; and
  - C. Ensure the appropriate use and management, and investment of funds to maximize performance outcomes under WIOA sec. 116.
- iii. When the LWDB and/or fiscal agent staff acts as the one-stop operator or direct service provider, they must ensure a separation of duties and establish firewalls to

mitigate any actual or potential conflicts of interest, with an agreement and plan in place to be monitored by a neutral outside entity or state agency. The LWDB must develop a written agreement with local Chief Elected Official to clarify how the organization will carry out its responsibilities while demonstrating compliance with WIOA and corresponding regulations, relevant Office of Management and Budget circulars (20 CFR 679.430), and the WIOA Policy 5405, Rev. 2. The results must be reported to the local CEO and the Local Board, and provide a copy to the SWDB, as the Governor's representative.

#### **4. Definitions:**

Conflict of interest – Conflict between the official responsibilities and the private interests of a person or entity that is in a position of trust. A conflict of interest would arise when an individual or organization has a financial or other interest in or participates in the selection or award of funding for an organization. Financial or other interests can be established either through ownership or employment. Any potential conflict of interest must be documented and disclosed in writing (2 CFR 200.112).

Contract - A legal instrument by which the fiscal agent, service provider, or subrecipient is committed to pay for goods, property, or services needed to accomplish the purposes of the contract or agreement. The term, as used in this policy, does not include a legal instrument, even if the non-federal entity considers it a contract when the substance of the transaction meets the definition of a federal award or subaward (see 2 CFR 200.92 - Subaward).

Contractor - An entity responsible for providing generally required goods or services related to the administrative support of the federal award. These goods or services may be for the recipient's or subrecipient's own use or for the use of participants in the program. Distinguishing characteristics of a contractor include:

- Providing the goods and services within normal business operations;
- Providing similar goods or services to many different purchasers;
- Operating in a competitive environment; and;
- Program compliance requirements do not pertain to the goods or services provided.

Demonstrated effectiveness - Demonstrated expertise and effectiveness means that an individual or group has documented leadership in developing or implementing workforce development, human resources, training and development, or a core program function, which may include individuals with experience in education or the training of job seekers with barriers to employment, as defined in Section 3 (24) of WIOA, including but not limited to serving veterans; providing or supporting competitive integrated employment for individuals with disabilities; or serving eligible youth.

Firewall - An established policy or procedure that acts as a barrier or protection against an undesirable influence, outcome, or authority. Examples of firewalls include but are not limited to organizational arrangements that provide clear separation of duties and responsibilities, reporting hierarchy of managers and staff that provide clear separation between job duties and responsibilities, and conflict of interest/confidentiality/disclosure agreements.

Non-Federal Entity - a state, local government, Indian tribe, institution of higher education (IHE), or nonprofit organization that carries out a federal award as a recipient or subrecipient.

One-Stop Operator - The one-stop operator coordinates the service delivery of participating American Job Center (AJC) (branded as WorkSource in Washington) partner programs and service providers and other duties identified by the LWDB in each local area. One-stop operators ensure that WorkSource can provide customers with career, training and employment-related services provided by required partner programs and often manage the day-to-day operations of the center(s). See [20 CFR 678.620\(b\)](#) for prohibitions and conflicts of interest requirements.

Pass-through Entity - a non-federal entity that provides a subaward to a subrecipient to carry out part of a federal program.

Single Source - Only one company or entity provides the unique item or service.

Subaward - an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Subrecipient – An entity that receives federal assistance funds passed-through from a prime recipient or another subrecipient to carry out or administer a WIOA program.

Distinguishing characteristics of a subrecipient include:

- Determining eligibility for assistance;
- Performance measured against meeting the objectives of the program;
- Responsibility for programmatic decision making;
- Responsibility for applicable program compliance requirements;
- Use of the funds passed through to carry out a program of the sub-entity as compared to providing goods or services for a program of the prime recipient.

Sunshine Provision – Requirement to conduct business in an open manner (20 CFR 679.370), also see website of AG and/or TEGL 15-16 page 9-10.

## **5. References:**

All fiscal policies and guidance letters published for WIOA are governed, as appropriate, under:

- Title 2, Subpart A, Chapter 11 CFR 200.317-326
- OMB Uniform Administrative Guidance, Cost Principles, and Audit Requirements for Federal Awards

Programmatic policies, rules, and guidance:

- Public Law 113-128, Workforce Innovation and Opportunity Act of 2014, Sections 107(d)(10), 107(g)(1), 121(d) (1-2), 123, 134(c)(2)(C)
- 2 CFR 200.319-327
- 20 CFR 678.600-635, 679.370(l), 679.410, 679.430, 680.160, 680.300, and 681.400
- [Training and Employment Guidance Letter \(TEGL\) 15-16](#)



- [Training and Employment Guidance Letter \(TEGL\) 16-16](#)
- [Training and Employment Guidance Letter \(TEGL\) 21-16](#)
- [Training and Employment Guidance Letter \(TEGL\) 23-14](#), Section 8
- [WIOA Title I Policy 5619, Rev. 2 - Increased Capacity Training](#)
- [WIOA Title I Policy 5250 - Subrecipient/Contractor and Pass-Through Entity Determination](#)
- [WIOA Title I Policy 5405, Rev. 2 - Conflict of Interest](#)

**6. Supersedes:**

WIOA Title I Policy 5404, Revision

**7. Website:**

[Workforce Professionals Center](#)

**8. Action:**

Local Workforce Development Boards and their contractors must distribute this policy broadly throughout the system to ensure that WorkSource System staff are familiar with its content and requirements.

**9. Attachments:**

[Attachment A](#) - One-Stop Operator and/or Title I Service Delivery Request Process and Application

**Direct Fiscal Inquiries To:**

*Contracts and Procurement  
Employment Security Department  
P.O. Box 9046  
Olympia, WA 98507-9046  
[ESDGPGGrantsOffice@esd.wa.gov](mailto:ESDGPGGrantsOffice@esd.wa.gov)*

**Direct Inquiries To:**

*Workforce Training and Education Coordinating Board  
P.O. Box 43105  
Olympia, WA, 985041-3105  
[Workforce@wtb.wa.gov](mailto:Workforce@wtb.wa.gov)*

*Employment System Administration and Policy  
Employment System Policy and Integrity Division  
Employment Security Department  
P.O. Box 9046  
Olympia, WA 98507-9046  
[SystemPolicy@esd.wa.gov](mailto:SystemPolicy@esd.wa.gov)*

## Attachment A: One-Stop Operator and/or Title I Service Delivery Request Process and Application

LWDBs must submit this form to request approval to directly provide services as part of the LWDB's One Stop Service Delivery System, as documented in the Local Plan and One-Stop MOU. This application must be used to document requests to serve as a One-Stop Operator, Youth Service Provider, or WIOA Title I-B Career or Training Services Provider. Submissions must include documentation of competitive procurement or explanation of why competitive procurement was not utilized and plans for ensuring that appropriate separations and firewalls are in place.

### **Instructions:**

LWDBs must complete this application and submit it to:

#### **Workforce Training and Education Coordinating Board**

P.O. Box 43105

Olympia, WA 98504-3105

[Workforce@wtb.wa.gov](mailto:Workforce@wtb.wa.gov)

Please submit a separate application for each service the LWDB is wanting approval. For example, if the LWDB is seeking approval to serve as a Career Services Provider and One Stop Operator, please submit two individual applications and corresponding documentation.

The State Workforce Board, in coordination with the Employment Security Department, may review and verify the LWDB's five-year performance data, and compare performance against state averages and LWDBs with similar size and comparable economic conditions to provide a staff analysis and recommendation to be presented for the Board's approval. The State Workforce Board reserves the right to request further documentation or discussion.

### Local Request to Serve in Operational Role

Date	
LWDB	
Contact Person/Title	
Phone	
E-mail Address	
Mailing Address	

1. Please indicate the specific One-Stop site(s) in which you are requesting approval to serve as direct operational provider (add more rows as necessary):

	Name	Address
1		
2		
3		

2. Please indicate what services your LWDB and/or the organization supporting your LWDB are seeking approval for and the time period (not to exceed expiration date of current local plan) to provide these services (separate application is required for each service area):

- ☐ One Stop Operator Start & End Date:
- ☐ Career Services Provider Start & End Date:
- ☐ Adult Basic Career Services Start & End Date:
- ☐ Adult Individualized Career Services Start & End Date:
- ☐ Dislocated Worker Basic Career Services Start & End Date:
- ☐ Dislocated Worker Individualized Career Services Start & End Date:
- ☐ Training Services Provider Start & End Date:
- ☐ Youth Services Provider Start & End Date:

3. List specific services you are seeking to directly provide. See Attachment B for a complete list of Career Services. For youth services, list the specific Youth Program Elements which can be found on Attachment C.

4. Please provide a written narrative of the competitive process that was utilized, if any, for the selection of the One Stop Operator, Career Services Provider, Training Services Provider, or Youth Services Provider. **Or**, provide an explanation of why competitive procurement was not utilized and what factors led the LWDB to believe participants will be better served by providing these services directly rather than through a competitive procurement process. Where applicable, include information about specifics of the local procurement process which ensured no unfair advantage was afforded to the LWDB, the role of any partner or third-party neutral entity, why you feel you were unable to secure qualified bidders, the LWDBs qualifications to directly provide these services, and strengths of the proposal that led to the selection.
5. Provide the WDA's WIOA Title I-B state and federal performance outcomes, costs per participant, and cost per employment for programs for each program the LWDB intends to provide direct services (Youth; Adult and/or Dislocated Worker Career Services, One-Stop Operator, Training Service Provider) for each of the past five years. Describe how those outcomes compare with other LWDBs in the state. Explain how direct service delivery will improve equitable access, performance, and outcomes.

6. Provide a statement of how the LWDB has or will establish a clear firewall that separates and defines its existing role as the strategic coordinator and oversight body for the local one-stop system from the role of One-Stop Operator or direct service provider. This must include a delineation of the internal controls, distinct separation of duties, and processes for preventing and mitigating conflicts of interest. Include details about how the LWDB will ensure appropriate oversight and monitoring practices are in place. Please attach or link any specific policies and/or procedures that codify these separations.
7. Explain how the LWDB will secure against conflicts of interest in any future competitive procurement processes. This explanation may include an outreach plan to engage a wider array of potential bidders, and for educating local community-based organizations (CBOs) on the procurement.
8. Attach documentation (signed and dated letter) that the members of the Local Workforce Development Board reviewed the information prepared for the request (items 1-7 above) and approved the request in a public meeting.
9. Attach documentation (signed and dated letter) that the local Chief Elected Official reviewed the information prepared for the request (items 1-8 above) and approved the request.
10. If applicable, attach the following:
  - ☐ RFI, RFQ, and/or RFP
  - ☐ Evidence of RFI/RFP Distribution and Outreach
  - ☐ Evidence of Pre-Proposal or Bidder's Conference and Supporting Meeting Notes including Attendees
  - ☐ All Submitted Proposals
  - ☐ Summary of Proposal Evaluations including Scoring Matrix

**Complete question 11 and 12 only if you are applying to directly provide youth services.**

11. Please attach a narrative explaining LWDB's unique service strengths in providing Youth Program Elements described in #3 and what factors went into the decision for the LWDB to directly provide youth services. Please explain how youth participants will be better served by LWDB directly providing these services.
12. Describe the youth services to be directly provided by the LWDB including any prior experience in providing such services and duration, if applicable.

**Complete Questions 13 and 14 only if you are applying to directly provide training services.**

13. Please attach a narrative explaining (1) how the LWDB meets the requirements of an eligible training provider under WIOA Section 122, and (2) how the LWDB's proposed

training services prepare adult and dislocated worker participants for in-demand industry sectors or occupations in the local area.

14. Describe how the LWDB subjected its approval determination to a minimum 30-day public comment period. Attach supporting documentation, including any and all comments received during the public comment period.

**Complete Question 12 only if you are applying to directly provide career services.**

15. Describe the basic and/or individualized career services the LWDB plans to provide, including its qualifications, prior experience, and efficiency in providing those services, how long it has served in this role, and how it plans on meeting/exceeding performance expectations.

**FOR SWB STAFF USE ONLY:**

Local CEO approval letter included? Yes\_\_\_ No\_\_\_

Approval Granted: Yes\_\_\_ No\_\_\_

Date of Approval: \_\_\_\_\_

Duration of Approval: \_\_\_\_\_ (Max: Current Local Plan Duration)

Notes:

## Attachment B: WIOA Services expected to be provided in One-Stop Centers

<b>BASIC CAREER SERVICES</b> per 20 CFR 678.430(a)
Eligibility determination to receive assistance from the adult, dislocated worker, or youth programs
Outreach, intake, and orientation to information and services available through the one-stop delivery system
Initial assessment of skill levels ( <i>including literacy, numeracy, and English language proficiency</i> ), aptitudes, abilities ( <i>including skills gaps</i> ), and supportive service needs
Labor exchange services, including job search and placement assistance, career counseling, provision of information on in-demand industry sectors and occupations, provision of information on non-traditional employment
Appropriate recruitment and business services on behalf of employers, including information and referrals to specialized business services other than those traditionally offered through the one-stop delivery system
Provision of referrals to and coordination of activities with other programs and services, including programs and services within the one-stop delivery system and other workforce development programs
Provision of workforce and labor market information including accurate information relating to: <ul style="list-style-type: none"> <li>• job vacancy listings in labor market areas,</li> <li>• information on job skills necessary to obtain the vacant jobs listed,</li> <li>• information relating to local occupations in demand and the earnings, skill requirements and opportunities for advancement</li> </ul>
Provision of information (in usable and understandable languages and formats) regarding how the State and local area are performing on the performance accountability measures
Provision of information on: <ul style="list-style-type: none"> <li>• Performance and cost information on eligible providers of training by the program</li> <li>• Eligible providers of Youth workforce investment activities</li> <li>• Providers of adult education</li> <li>• Providers of career and technical education activities available to school dropouts</li> <li>• Providers of career and technical education activities available to school dropouts</li> </ul> Providers of vocational rehabilitation services
Provision of information (in usable and understandable formats and languages) relating to the availability of assistance and supportive services, and appropriate referrals to those programs, services and assistance including: <ul style="list-style-type: none"> <li>• Childcare</li> <li>• Child support</li> <li>• Medical or child health assistance through states' Medicaid and Children's Health Insurance program</li> <li>• SNAP benefits</li> <li>• Assistance through earned income tax credit</li> <li>• TANF assistance, including other supportive services and transportation provided by that program</li> </ul>
Provision of meaningful assistance to individuals seeking assistance in filing a claim for unemployment insurance compensation including: <ul style="list-style-type: none"> <li>• Providing assistance on-site using staff who are well-trained in unemployment compensation claims filing and rights and responsibilities of claimants; or</li> <li>• Providing assistance by phone or via other technology, as long as the assistance is provided by trained staff within a reasonable time</li> </ul>
Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not funded under WIOA

<b>INDIVIDUALIZED CAREER SERVICES</b> per 20 CFR 678.430(b)
Comprehensive and specialized assessment of skills levels and service needs of adults and dislocated workers including: <ul style="list-style-type: none"> <li>• Diagnostic testing and use of other assessment tools</li> <li>• In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals</li> </ul>
Development of an individual employment plan, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve their employment goals, including list of, and information about eligible training providers
Group counseling
Individual counseling
Career planning (e.g., case management)
Short-term pre-vocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for unsubsidized employment or training
Internship and work experience (including transitional jobs) that are linked to careers
Workforce preparation activities (as described in 34 CFR 463.34)
Financial literacy services available through WIOA Title I youth program, including: <ul style="list-style-type: none"> <li>• Supporting ability of participants to create household budgets, initiate savings plans, and make informed financial decisions about education, retirement, home ownership, wealth building, or other savings goals</li> <li>• Supporting the ability to manage spending, credit, debt, including credit card debt, effectively</li> </ul>
Out of Area job search assistance and relocation assistance
English language acquisition programs and integrated education and training programs
<b>FOLLOW UP CAREER SERVICES</b> per 20 CFR 678.430(c)
Counseling regarding the workplace, for participants in adult or dislocated worker workforce investment activities who are placed in unsubsidized employment, for up to 12 months after the first day of employment
<b>BUSINESS SERVICES</b> per 20 CFR 678.435
<b>TRAINING SERVICES</b> per 20 CFR 680.200
Occupational skills training, including training for nontraditional employment
On-the-job training (OJT)
Incumbent worker training per WIOA sec. 134(d)(4)
Programs that combine workplace training with related instruction
Training programs operated by the private sector
Skills upgrading and retraining
Entrepreneurial training
Transitional jobs in accordance with WIOA sec. 134(d)(5)
Job readiness training provided in combination with activities listed in 20 CFR 680.200 (a-h)
Adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with training services listed in 20 CFR 680.200 (a-g)
Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training (see 20 CFR 680.760-770)

# Washington State WorkSource System Policy

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## Attachment C: WIOA Youth Program Elements

The local plan must describe the design framework for youth programs in the local area, and how the 14 program elements required in [§ 681.460](#) are to be made available within that framework.

- Tutoring, study skills, and dropout prevention
- Alternative Education
- Paid and unpaid work experience
- Occupational skills training
- Leadership development
- Supportive services
- Adult mentoring
- Follow-up services
- Comprehensive guidance and counseling
- Education offered concurrently with workforce preparation
- Financial literacy
- Provision of labor market information
- Preparation for postsecondary education
- Entrepreneurial skills training





Jan. 29, 2024

Local Workforce Development Board concerns and recommendations on [WorkSource System Policy 1015](#)

Dear Workforce Training and Education Coordinating Board Chairs:

On behalf of Washington's 12 Local Workforce Development Boards (Local Boards), which comprise the Washington Workforce Association (WWA), we would like to offer our collective comments and perspective on the [WorkSource System Policy 1015](#) currently being considered by the Workforce Training and Education Coordinating Board (WTECB). The policy, if adopted, would govern procurement and selection of One-Stop Operators and service providers.

We believe the policy directly conflicts with the federal Workforce Innovation & Opportunity Act (WIOA) that provides clear guidance to reduce redundancies and excessive administrative burden that negatively impacts local service delivery. The effects of the proposed policy elements include greater inequities, new and unnecessary costs and burden, and undermining of Local Board authority that would hinder performance and service delivery.

Locally driven leadership is one of the greatest strengths of WIOA. Added administrative requirements through policies like this one only serves to undermine local decision making in determining the best fit for service delivery that meets the needs within the diverse regions across Washington state. The Washington Workforce Association opposes any move that leads to the erosion of local authority over workforce development matters in our state. Here are some facts that demonstrate why the policy is over-reaching and encroaching on local decision-making:

- Federal law clearly allows for local determination of how to approach youth services. Local boards and local elected officials should retain their authority (as provided in federal regulation) to determine how best to deliver those services.
- Adult and Dislocated worker career services both clearly require governor approval for direct service delivery. However, the policy must be written to provide local boards with clear instruction and pertinent evaluation measures while eliminating excessive administrative burden.

The WWA requests the following changes be made to this draft policy:

**Youth Services:**

- Adhere to [20 CFR 681.400](#) (a) & (b): which explicitly allow Local Boards to directly deliver all youth services without competitive procurement OR Governor approval/agreement.
- Repeal section 3.d.iii A-F from the policy, as it applies to direct delivery. This section unnecessarily overrides federal law.
- All references to youth service direct delivery should be removed from Attachment A – Application. No such application is required under federal regulation.

**Career Services for Adults & Dislocated Workers – clarify or remove all provisions for the following reasons:**

- The policy fails to identify standards by which direct delivery applications for Adult and Dislocated Worker career services will be evaluated. This makes decisions subject to arbitrary and capricious challenges unrelated to past performance. Evaluation standards must be added so local areas are clear what they must meet to obtain approval to directly deliver services. The criteria are listed but void of any standards.
- Determinations for approval need to align with requirements set forth in the approved policy and adhere to the published criteria. Instructions in past approval letters to Local Boards received from the governor and the WTECB have not adhered to the requirements outlined in the current policy or this proposed policy. The approval letters have included stipulations and additional requirements that are not outlined in the policy, and do not reflect local performance or track record.

**Evaluation/Monitoring – strike the requirement for the following reasons:**

- It creates a requirement for an outside entity to perform an additional layer of internal monitoring.
- It adds administrative burden and cost when appropriate firewalls and internal controls can instead be appropriately applied. Any competent entity administering prudent fiscal and management practices will perform internal monitoring no matter how many external monitors examine its operations.
- The state Employment Security Department already monitors compliance of their own directly delivered programs such as TAA, Wagner Peyser & others, so clearly there is precedence and procedure to work from.

WWA and its members are grateful for our strong relationship with the WTECB and other system partners. We know that workforce development systems can be complicated and have the added element of being incredibly diverse because each region of the state has different needs. This policy, while well intentioned, is one we believe includes unnecessary elements and would add additional administrative burden and costs at a time when Local Boards are already stretched thin.

We appreciate the opportunity to provide input on this policy and we ask that you accept the changes requested above, if this policy is to move forward.

Sincerely,



John Traugott  
Executive Director  
Washington Workforce Association



Amy Martinez  
Board Chair  
Washington Workforce Association

## **Lisa Romine Comments from December Board Meeting**

**Good afternoon,**

Thank you for the opportunity to comment on this important policy. My name is Lisa Romine. I am the CEO of SkillSource, the Local Workforce Board covering the North Central region of Chelan/Douglas, Grant/Adams and Okanogan counties. My comments today pertain to the direct delivery aspects of this policy.

I would like to thank the workforce board staff for their approach that included local board staff in the development of this policy. This is a complex endeavor. My comments today have all been shared with your staff and the task team over the last 6 months.

(Challenge flag): You will see I have brought my challenge flag today. I felt it fitting since we're in the heart of football season and it dawned on me this morning that I'm essentially challenging the call on the field. Though I haven't thrown it down yet, I am hopeful the right call will be made here.

This policy, as written, ignores, sets aside, passes over certain provisions afforded local boards by federal law. It also adds unnecessary and excessive administrative burden and cost to local boards (especially in large rural areas) where funding is already insufficient to effectively carryout the requirements of the statute. I argue the effects of these unnecessary and unsubstantiated policy elements create inequities, undermine local authority and hinder performance. It is also worth noting that the Workforce Innovation & Opportunity Act includes clear guidance to reduce redundancies and excessive administrative burden.

**Some context & background:** Workforce investment services in the North Central region have been provided through a combination of outsourcing and direct delivery for almost 40 years. The board contracts in Okanogan county and directly deliver services in the other 4 counties. The North Central Region covers just shy of 15K square miles, the largest in the state (including largest county in state).

- a. It is 100% rural population as defined by the US Census Bureau (no county with an urban area of over 50k residents)
- b. Lacks a comprehensive public transportation system.
- c. Incomplete broadband availability throughout the region

Despite these real challenges, and many others, NC consistently turns out performance results top in class, including clean audits and compliance monitoring results year after year. I'm convinced this is a direct result of letting the local board and elected officials make these decisions just like we let coaches call the plays.

**Request:** I request the State Workforce board acknowledge and honor what federal statute and regulation allows local boards and remove unnecessary and costly administrative barriers. The policy offers no data or research that substantiates reducing local board and elected official's authority to make these decisions improves programming, access to services, outcomes or upward mobility for career seekers or youth.

I have 4 specific requests:

**1) Youth Services:**

Adhere to 20 CFR 681.400 (a) & (b): which explicitly allows local boards to directly deliver all youth services without competitive procurement OR Governor approval/agreement. Repeal section 3.d.iii A-F from the policy, as it applies to direct delivery. It overrides federal law without justification. Flawed policy made 7 years ago does not make it good today. Also, I ask all references to youth service direct delivery be removed from Attachment A - Application.

**2) Career Services for Adults & Dislocated Workers:**

The policy fails to identify standards by which direct delivery applications will be evaluated. This makes decisions subject to arbitrary and capricious challenges. Evaluation standards must be added so local areas are clear what they must meet to get approval. The criteria are listed but void of any standards. In addition, determinations for approval need to align with requirements set forth in the approved policy and adhere to the published criteria. The instruction in past approval letters to local boards received from the governor and this body, on two occasions, have not adhered to the requirements outlined in the current policy or this proposed policy.

**3) Evaluation/Monitoring:**

Strike the requirement for an outside entity to perform an additional layer of internal monitoring. This adds administrative burden and cost when appropriate firewalls and internal controls can instead be appropriately applied. Any competent entity administering prudent fiscal and management practices will perform internal monitoring no matter how many external monitors examine its operations. \*\* (ESD monitors compliance of their own directly delivered programs such as TAA, Wagner Peyser & others, so clearly there is precedence and procedure).

**4) Public Comment:**

No formal public comment period was provided to critique this proposed policy. Public comment is customarily provided before approval.

**In summary:** An inherent tenant and strength of the Workforce Innovation & Opportunity Act is the provision and authority of local control.

- Federal law clearly allows for local determination of how to approach serving youth. The framers understood the unique challenges of youth services. Lack of access to providers across Washington is a significant issue, with rural communities often having no qualified providers to serve. Local boards and local electeds should retain authority to determine how best to deliver these services.
- As for Adult or Dislocated worker career services, both clearly require governor approval of direct delivery. Policy must be written to provide local boards clear instruction and evaluation measures while eliminating excessive administrative burden.

I sincerely thank you for your time and consideration of my comments today. I urge this body to carefully consider these and other comments before acting on such an important policy.

Please let the coaches strategize the game and call the plays.

Thank you.



January 19, 2024

Gary Chandler & Larry Brown, Co-chairs  
Workforce Training and Education Coordinating Board  
128 10th Ave SW,  
Olympia, WA 98501

Dear Mr. Chandler and Mr. Brown,

Thank you for the opportunity to comment on this important State Policy 1015. My name is Lisa Romine. I am the CEO of SkillSource, the Local Workforce Board covering the North Central region of Chelan/Douglas, Grant/Adams and Okanogan counties. My comments pertain to the direct delivery aspects of this policy.

This policy, as written, ignores certain provisions afforded local boards by federal law. It also adds unnecessary and excessive administrative burden and cost to local boards (especially in large rural areas) where funding is already insufficient to effectively carryout the requirements of the statute. I argue the effects of these unnecessary and unsubstantiated policy elements create inequities, undermine local authority and hinder performance. It is also worth noting that the Workforce Innovation & Opportunity Act includes clear guidance to reduce redundancies and excessive administrative burden.

**Some context & background:** Workforce investment services in the North Central region have been provided through a combination of outsourcing and direct delivery for almost 40 years. The board contracts in Okanogan county and directly deliver services in the other 4 counties. The North Central Region covers just shy of 15K square miles, the largest in the state (including largest county in state).

- a. It is 100% rural population as defined by the US Census Bureau (no county with an urban area of over 50k residents)
- b. Lacks a comprehensive public transportation system.
- c. Incomplete broadband availability throughout the region

Despite these real challenges, and many others, NC consistently turns out performance results top in class, including clean audits and compliance monitoring results year after year. I'm convinced this is a direct result of letting the local board and elected officials make these decisions.

**Request:** I request the State Workforce board acknowledge and honor what federal statute and regulation allows local boards and remove unnecessary and costly administrative barriers outlined in this policy. The policy offers no data or research that substantiates reducing local board and elected official's authority to make these decisions improves programming, access to services, outcomes or upward mobility for career seekers or youth.

I have 3 specific requests:

**1) Youth Services:**

Adhere to 20 CFR 681.400 (a) & (b): which explicitly allows local boards to directly deliver all youth services without competitive procurement or Governor approval/agreement. Repeal section 3.d.iii A-F from the policy, as it applies to direct delivery. It overrides federal law without justification.

**2) Career Services for Adults & Dislocated Workers:**

The policy fails to identify standards by which direct delivery applications will be evaluated. This makes decisions subject to arbitrary and capricious challenges. Evaluation standards must be added so local areas are clear what they must meet to get approval. The criteria are listed but void of any standards. In addition, determinations for approval need to align with requirements set forth in the approved policy and adhere to the published criteria. The instruction in past approval letters have included stipulations and additional requirements that are not outlined in the policy.

**3) Evaluation/Monitoring:**

Strike the requirement for an outside entity to perform an additional layer of internal monitoring. This adds administrative burden and cost when appropriate firewalls and internal controls can instead be appropriately applied. Any competent entity administering prudent fiscal and management practices will perform internal monitoring no matter how many external monitors examine its operations. (ESD monitors compliance of their own directly delivered programs such as TAA, Wagner Peyser & others, so clearly there is precedence and procedure).

**In summary:** A tenet and inherent strength of the Workforce Innovation & Opportunity Act is the provision and authority of local control.

- Federal law clearly allows for local determination of how to approach serving youth. The framers understood the unique challenges of youth services. Lack of access to providers across Washington is a significant issue, with rural communities often having no qualified providers to serve. Local boards and local elected officials should retain authority to determine how best to deliver these services.
- As for Adult or Dislocated worker career services, both clearly require governor approval of direct delivery. Policy must be written to provide local boards clear instruction and evaluation measures while eliminating excessive administrative burden.

I sincerely thank you for your time and consideration of my comments. I urge this body to carefully consider these and other comments before acting on such an important policy.

Thank you,



Lisa Romine  
Chief Executive Officer

Cc: Eleni Papadakis, WTECB  
System Policy, ESD





**Zach Williams, Chair**  
*Sternilt Growers  
Wenatchee*

**Michelle Price, Vice Chair**  
*NC Educational Service District  
Wenatchee*

**Tom Legel, Treasurer**  
*Confluence Health  
Wenatchee*

**Ryan Beebout**  
*Sabey Data Centers  
East Wenatchee*

**Randy Curry**  
*IBEW  
Wenatchee*

**Crystal Gage**  
*Omak Clinic  
Omak*

**Augustine Gallegos**  
*Teamsters 760  
Moses Lake*

**Faimous Harrison**  
*Wenatchee Valley College  
Wenatchee*

**Julie Helligso**  
*Cascade Veterinary Clinics  
Wenatchee*

**Annette Herup**  
*Genie/Terex  
Moses Lake*

**Tad Hildebrand**  
*Nash Consulting  
Moses Lake*

**Roni Holder-Diefenbach**  
*Okanogan Economic Alliance  
Omak*

**Ken Johnson**  
*Johnson's Glass & More  
Othello*

**Nate Mack**  
*LiUNA Local 348  
Wenatchee*

**Bryant Mayo**  
*Grant County EDC  
Moses Lake*

**Kyle Neihenke**  
*Adams County Dev. Council  
Ritzville*

**Irasema Ortiz-Elizalde**  
*DSHS Community Service Office  
Moses Lake*

**Anthony Popelier**  
*Oroville Reman & Reload  
Oroville*

**Sara Thompson Tweedy**  
*Big Bend Community College  
Moses Lake*

**Pablo Villarreal**  
*Division of Voc. Rehabilitation  
Omak*

**Todd Wurl**  
*Employment Security Dept  
Moses Lake*



January 22, 2024

Gary Chandler & Larry Brown, Co-chairs  
Workforce Training and Education Coordinating Board  
128 10th Ave SW,  
Olympia, WA 98501

Dear Mr. Chandler and Mr. Brown,

On behalf of the SkillSource Regional Workforce Board, I am writing to voice concerns over the proposed WorkSource System Policy 1015 (Procurement and Selection of One-Stop Operators and Service Providers) and offer our recommendations to the Workforce Training and Education Coordinating Board.

The Workforce Innovation and Opportunity Act rightfully recognizes that determining the best method for service delivery is a local decision. As written, the proposed policy ignores this authority without cause or justification. This undermines the authority of local elected officials and workforce development boards and creates inequitable burden, especially for rural areas.

North Central Washington's five counties form the geographically largest workforce area in the state, yet the region receives only roughly six percent of state allocated dollars for workforce development. It is in the best interest of our communities and constituents that these limited resources be committed and deployed carefully. Services must be provided for minimum cost and with maximum effect.

The SkillSource Regional Workforce Board has a long record of providing excellent and responsible service to the career seekers of Adams, Chelan, Douglas, Grant and Okanogan counties. This is reflected in continued excellent performance against federal targets, consistently clean fiscal audits, and consistently compliant results from Employment Security Department compliance monitoring. This amply demonstrates the validity of local boards providing direct delivery of services to youth and career seekers and should remain a decision made locally.

We request the following specific changes to the policy:

**1) Youth Services:**

Adhere to 20 CFR 681.400 (a) & (b); which explicitly allows local boards to directly deliver all youth services without competitive procurement or Governor approval/agreement. Therefore, we request removal of section 3.d.iii A-F from the policy, as it applies to direct delivery. This section overrides federal law without justification.

**2) Career Services for Adults & Dislocated Workers:**

Evaluation standards must be added so local areas are clear what they must meet to obtain approval to directly deliver services. The policy fails to identify standards by which direct delivery applications for Adult and Dislocated Worker career services will be evaluated. This makes decisions subject to arbitrary and capricious challenges unrelated to past performance.

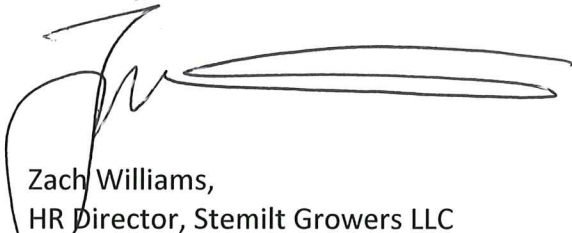
In addition, determinations for approval need to align with requirements set forth in the approved policy and adhere to the published criteria. Instructions in past approval letters to local boards received from the governor and the WTECB have included stipulations and additional requirements that are not outlined in the policy.

**3) Evaluation/Monitoring:**

Strike the requirement for an outside entity to perform an additional layer of internal monitoring. This adds administrative burden and cost when appropriate firewalls and internal controls can instead be appropriately applied. ESD monitors compliance of their own directly delivered programs such as Trade Adjustment Assistance, Wagner Peyser & others, so clearly there is precedence and procedure.

I appreciate the opportunity to express these concerns regarding this important policy and urge you will make the appropriate revisions to allow for maximum flexibility in federal law afforded to local boards and local elected officials.

Sincerely,



Zach Williams,  
HR Director, Stemilt Growers LLC  
SkillSource Regional Workforce Board Chair

Cc: Eleni Papadakis, WTECB  
Lisa Romine, SkillSource  
Employment System Administration and Policy , ESD







**ISLAND**  
265 NE Kettle St., Ste. 102  
Oak Harbor, WA 98277  
360.675.5966

**SAN JUAN**  
540 Guard St., Ste. 160  
(PO Box 1696)  
Friday Harbor, WA 98250  
360.378.4662

**SKAGIT**  
2005 E. College Way  
Mount Vernon, WA 98273  
360.416.3600

**WHATCOM**  
101 Prospect Street  
(PO Box 2009)  
Bellingham, WA 98225  
360.676.3209

January 30, 2024

Dear Workforce Training and Education Coordinating Board Chairs:

As the Chair of the Northwest Workforce Council, WDA III, I am submitting these comments on behalf of the board for consideration as [State Policy 1015](#) moves forward toward final form. Our board is committed to assuring that all authority vested in local boards by the Workforce Innovation and Opportunity Act is maintained by those boards and not diluted by state action, whatever the goal of any such state action might be.

As draft policy 1015 states, WIOA cites the expectation that local boards 'serve as strategic entities.' Sound strategy, then, for any board to maintain full ability to provide that strategic approach would be to not give up any options that it may utilize in support of its vision. Draft State Policy 1015, in its current form, does not support maintaining full board authority as authorized in WIOA and federal rules implementing it.

One clear example is how draft 1015 treats requirements for procurement of Youth Services Providers. The proposed state policy on page 4 of 17 provides several ways in which the local board may secure such providers, but none of those complies fully with the federal rule on the topic:

***20 CFR § 681.400 - What is the process used to select eligible youth service providers?***

***(a) The grant recipient/fiscal agent has the option to provide directly some or all of the youth workforce investment activities.***

Subpart (a) above clearly permits local boards "to provide directly some or all of the youth workforce investment activities." It then goes on in subpart (b) to state what must be done if the board chooses not to directly provide the services.

Under proposed Policy 1015, local boards are provided several options for procurement: to conduct a competitive procurement, or seek approval ultimately from the Governor to provide the service, etc. Nowhere is option (a) under the federal rule, simple and straightforward as it is, among the options available to local boards.

The proposed policy has several additional areas of significant concern to this board, as it does to most local boards in the state, as articulated in the comments provided by the Washington Workforce Association (WWA) (attached). The Northwest Workforce Council fully endorses the comments and suggestions of the WWA for improvement to draft policy 1015. Those comments support maintenance of the authority of local boards and point out how the policy as proposed would as well add unnecessary costs and burdens to local boards, and tend to hinder, rather than improve, local service delivery.

Thank you for your attention to these comments.

Sincerely,



Mark Vorobik, Chair  
Northwest Workforce Council

January 30, 2024

Larry Brown, Co-Chair  
Gary Chandler, Co-Chair  
Workforce Training and Education Coordinating Board  
128 10th Avenue SW  
Olympia, WA 98501

SERVING KITTITAS, Klickitat,  
SKAMANIA AND YAKIMA COUNTIES



Subject: Urgent Concerns and Recommendations Regarding WorkSource System Policy 1015

Co-Chairs Brown and Chandler,

As representatives of the South Central Workforce Board of Directors, we are writing to express our serious concerns about WorkSource System Policy 1015, which is currently under public comment by the Workforce Training and Education Coordinating Board (WTECB). Our apprehension arises from the policy's apparent violation of 20 CFR 681.400 (a) & (b) and its adverse effects on local authority, service delivery, and overall efficiency.

The policy, as presently drafted, overlooks crucial provisions granted to local boards by federal law concerning the direct delivery of services. These policy elements introduce unnecessary inequities, costs, and burdens, while concurrently undermining local authority and hindering performance. We wish to emphasize that the Workforce Innovation & Opportunity Act (WIOA) advocates for reducing redundancies and excessive administrative burdens, and this policy seems to deviate from that objective.

WIOA affirms the strength of local jurisdiction, allowing local boards the authority to determine the most effective approaches to service delivery. However, Policy 1015 seems to perpetuate the removal of this local authority, which is inconsistent with the needs of Washington State. We, the Chair and Vice Chair of the South Central Workforce Board of Directors, staunchly oppose any erosion of local boards' authority in this matter.

Specifically, we urge the following changes to be made to the draft policy:

**1. Youth Services:**

- a. Adhere to 20 CFR 681.400 (a) & (b), which explicitly allow local boards to directly deliver all youth services without competitive procurement or Governor approval/agreement.
- b. Repeal section 3.d.iii A-F from the policy, as it violates federal law without justification.
- c. All references to youth service direct delivery should be removed from Attachment A – Application, as no such application is required under federal regulation.

**2. Career Services for Adults & Dislocated Workers:**

- a. The policy fails to identify standards by which direct delivery applications for adult and dislocated worker career services will be evaluated. This makes decisions subject to arbitrary and capricious challenges unrelated to past performance. Evaluation standards

must be added so local areas are clear on what they must meet to obtain approval to directly deliver services. The criteria are listed but void of any standards.

b. Determinations for approval need to align with requirements outlined in the approved policy and adhere to the published criteria. Instructions in past approval letters to local boards received from the Governor and the WTECB have not adhered to the requirements outlined in the current policy or this proposed policy. The approval letters have included stipulations and additional requirements that are not outlined in the policy and do not reflect local performance or track record.

### **3. Evaluation/Monitoring:**

a. Strike the requirement for an outside entity to perform an additional layer of internal monitoring. This adds administrative burden and costs when appropriate firewalls and internal controls can instead be appropriately applied. Agencies that receive these funds are required to have a single audit and to prepare for those audits prudent fiscal and management practices of internal monitoring already occur.

b. The state Employment Security Department monitors compliance with their directly delivered programs such as TAA, Wagner Peyser & others, so clearly there is precedence and procedure and would add redundancy.

We appreciate your attention to these critical matters and trust that, with your leadership, we can ensure that workforce development policies align with both federal regulations and the unique needs of our local communities.

Thank you for your time and consideration.

Sincerely,

*Leanne Liddicoat*

---

Leanne Liddicoat, Chair  
Digital Design and Development

*Dennis M. Flabetich*

---

Dennis Flabetich, Vice Chair  
Catering Creations by Toni

Attachment: Governor Inslee Letter

Cc: Eleni Papadakis, Executive Director, WTECB  
Cami Feek, Commissioner, Employment Security Department  
Dan Zeitlin, Chief of Staff Commissioners Office, Employment Security Department  
Amy Martinez, CEO, South Central Workforce



# BOARD OF YAKIMA COUNTY COMMISSIONERS

Amanda McKinney  
District 1

Kyle Curtis  
District 2

LaDon Linde  
District 3

January 29, 2024

Governor Jay Inslee  
Office of the Governor  
PO Box 40002  
Olympia, WA 98504-0002

Subject: Urgent Concerns and Recommendations Regarding WorkSource System Policy 1015

Governor Inslee,

The Yakima County Board of Commissioners staunchly oppose any erosion of local boards' and elected officials' authority. As representatives of the South Central Consortium of County Commissioners, we write to express our serious concerns about [WorkSource System Policy 1015](#), which is currently under public comment by the Workforce Training and Education Coordinating Board (WTECB). Our apprehension arises from the policy's apparent violation of [20 CFR 681.400](#) (a) & (b) and its adverse effects on local authority, service delivery, and overall efficiency.

The policy, as presently drafted, overlooks crucial provisions granted to local boards by federal law concerning the direct delivery of services. These policy elements introduce unnecessary inequities, costs, and burdens, while concurrently undermining local authority and hindering performance. We wish to emphasize that the Workforce Innovation & Opportunity Act (WIOA) advocates for reducing redundancies and excessive administrative burdens, and this policy seems to deviate from that objective.

WIOA affirms the strength of local jurisdiction, allowing local boards the authority to determine the most effective approaches to service delivery. However, Policy 1015 seems to perpetuate the removal of this local authority, which is inconsistent with the needs of Washington State.

Specifically, we urge the following changes to be made to the draft policy:

**1. Youth Services:**

- a. Adhere to [20 CFR 681.400](#) (a) & (b), which explicitly allow local boards to directly deliver all youth services without competitive procurement or Governor approval/agreement.
- b. Repeal section 3.d.iii A-F from the policy, as it violates federal law without justification.
- c. All references to youth service direct delivery should be removed from Attachment A – Application, as no such application is required under federal regulation.



# BOARD OF YAKIMA COUNTY COMMISSIONERS

Amanda McKinney  
District 1

Kyle Curtis  
District 2

LaDon Linde  
District 3

## 2. Career Services for Adults & Dislocated Workers:

- a. The policy fails to identify standards by which direct delivery applications for adult and dislocated worker career services will be evaluated. This makes decisions subject to arbitrary and capricious challenges unrelated to past performance. Evaluation standards must be added so local areas are clear on what they must meet to obtain approval to directly deliver services. The criteria are listed but void of any standards.
- b. Determinations for approval need to align with requirements outlined in the approved policy and adhere to the published criteria. Instructions in past approval letters to local boards received from the Governor and the WTECB have not adhered to the requirements outlined in the current policy or this proposed policy. The approval letters have included stipulations and additional requirements that are not outlined in the policy and do not reflect local performance or track record.

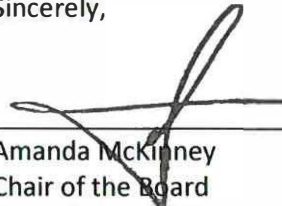
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- b. The state Employment Security Department monitors compliance with their directly delivered programs such as TAA, Wagner Peyser & and others, so clearly there is precedence and procedure and would add redundancy.

We appreciate your attention to these critical matters and trust that, with your leadership, we can ensure that workforce development policies align with both federal regulations and the unique needs of our local communities.

Thank you for your time and consideration.

Sincerely,



Amanda McKinney  
Chair of the Board  
Commissioner, District 1



Kyle Curtis  
Commissioner, District 2



LaDon Linde  
Commissioner, District 3





January 29, 2024

Governor Jay Inslee  
Office of the Governor  
PO Box 40002  
Olympia, WA 98504-0002

Subject: Urgent Concerns and Recommendations Regarding WorkSource System Policy 1015

Governor Inslee,

The Pacific Mountain Workforce Development Council staunchly oppose any erosion of local boards' and elected officials' authority. As representatives of the Pacific Mountain Workforce Development Consortium of County Commissioners, we write to express our serious concerns about [WorkSource System Policy 1015](#), which is currently under public comment by the Workforce Training and Education Coordinating Board (WTECB). Our apprehension arises from the policy's apparent violation of [20 CFR 681.400](#) (a) & (b) and its adverse effects on local authority, service delivery, and overall efficiency.

The policy, as presently drafted, overlooks crucial provisions granted to local boards by federal law concerning the direct delivery of services. These policy elements introduce unnecessary inequities, costs, and burdens, while concurrently undermining local authority and hindering performance. We wish to emphasize that the Workforce Innovation & Opportunity Act (WIOA) advocates for reducing redundancies and excessive administrative burdens, and this policy seems to deviate from that objective.

WIOA affirms the strength of local jurisdiction, allowing local boards the authority to determine the most effective approaches to service delivery. However, Policy 1015 seems to perpetuate the removal of this local authority, which is inconsistent with the needs of Washington State.

Specifically, we urge the following changes to be made to the draft policy:

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



**2. Career Services for Adults & Dislocated Workers:**

- a. The policy fails to identify standards by which direct delivery applications for adult and dislocated worker career services will be evaluated. This makes decisions subject to arbitrary and capricious challenges unrelated to past performance. Evaluation standards must be added so local areas are clear on what they must meet to obtain approval to directly deliver services. The criteria are listed but void of any standards.
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- b. The state Employment Security Department monitors compliance with their directly delivered programs such as TAA, Wagner Peyser & and others, so clearly there is precedence and procedure and would add redundancy.

We appreciate your attention to these critical matters and trust that, with your leadership, we can ensure that workforce development policies align with both federal regulations and the unique needs of our local communities.

Thank you for your time and consideration.

Sincerely,

<b>Signature:</b>		Commissioner Sharon Trask	29/01/2024
<b>Email:</b>	<a href="mailto:strask@co.mason.wa.us">strask@co.mason.wa.us</a>		
<b>Signature:</b>		Commissioner Jerry Doyle	31/01/2024
<b>Email:</b>	<a href="mailto:jdoyle@co.pacific.wa.us">jdoyle@co.pacific.wa.us</a>		
<b>Signature:</b>		Commissioner Sean Swope	29/01/2024
<b>Email:</b>	<a href="mailto:sswope@co.grays-harbor.wa.us">sswope@co.grays-harbor.wa.us</a>		
<b>Signature:</b>		Commissioner Kevin Pine	30/01/2024
<b>Email:</b>	<a href="mailto:kpine@co.grays-harbor.wa.us">kpine@co.grays-harbor.wa.us</a>		
<b>Signature:</b>		Commissioner Carolina Mejia	29/01/2024
<b>Email:</b>	<a href="mailto:carolina.mejia@co.thurston.wa.us">carolina.mejia@co.thurston.wa.us</a>		

PacMtn's mission is to build a strong workforce development that enhances economic success

# FORUM OF COUNTY COMMISSIONERS



Chelan | Douglas | Grant | Adams | Okanogan Counties

January 29, 2024

Gary Chandler & Larry Brown, Co-chairs  
Workforce Training and Education Coordinating Board  
128 10th Ave SW  
Olympia, WA 98501

Dear Mr. Chandler and Mr. Brown,

We, the chief local elected officials of North Central Washington, are writing to jointly voice concerns over the proposed WorkSource System Policy 1015 (Procurement and Selection of One-Stop Operators and Service Providers) and offer our recommendations to the Workforce Training and Education Coordinating Board.

The Workforce Innovation and Opportunity Act rightfully recognizes that determining the best method for service delivery is a local decision. As written, the proposed policy ignores this authority without cause or justification. This undermines the authority of local elected officials and workforce development boards and creates inequitable burden for rural areas.

North Central Washington's five counties form the geographically largest workforce area in the state, yet the region receives only roughly six percent of state allocated dollars for workforce development. It is in the best interest of our communities and constituents that these limited resources be committed and deployed carefully. Services must be provided for minimum cost and with maximum effect.

The SkillSource Regional Workforce Board has a long record of providing excellent and responsible service to the career seekers of Adams, Chelan, Douglas, Grant and Okanogan counties. This is reflected in their continued excellent performance against federal targets, their consistently clean fiscal audits, and their consistently compliant results from Employment Security Department compliance monitoring. This amply demonstrates the validity of local boards providing direct delivery of services to youth and career seekers and should remain a decision made locally.

We recommend the following changes to the draft policy:

**1) Youth Services:**

Adhere to 20 CFR 681.400 (a) & (b), which explicitly allows local boards to directly deliver all youth services without competitive procurement or Governor approval/agreement. Therefore, we request removal of section 3.d.iii A-F from the policy, as it applies to direct delivery. This section overrides federal law without justification.

Chris Branch, Chair  
Okanogan County

Dan Sutton  
Douglas County

Danny Stone  
Grant County

Tiffany Gering  
Chelan County

Jay Weise  
Adams County



## FORUM OF COUNTY COMMISSIONERS

PAGE 2

Chelan | Douglas | Grant | Adams | Okanogan Counties

**2) Career Services for Adults & Dislocated Workers:**

The policy fails to identify standards by which direct delivery applications for Adult and Dislocated Worker career services will be evaluated. This makes decisions subject to arbitrary and capricious challenges unrelated to past performance. Evaluation standards must be added so local areas are clear what they must meet to obtain approval to directly deliver services.

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Strike the requirement for an outside entity to perform an additional layer of internal monitoring. This adds administrative burden and cost when appropriate firewalls and internal controls can instead be appropriately applied. ESD monitors compliance of their own directly delivered programs such as Trade Adjustment Assistance, Wagner Peyser & others, so clearly there is precedence and procedure.

We appreciate the opportunity to express these concerns over this important policy and trust you will make the appropriate revisions to allow for maximum flexibility as allowed local boards and elected officials by federal law.

Sincerely,

DocuSigned by:  
*Chris Branch*  
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Commissioner Chris Branch  
Okanogan County

DocuSigned by:  
*Jay Weise*  
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Commissioner Jay Weise  
Adams County

DocuSigned by:  
*Tiffany Gering*  
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Commissioner Tiffany Gering  
Chelan County

DocuSigned by:  
*Dan Sutton*  
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Commissioner Dan Sutton  
Douglas County

DocuSigned by:  
*Danny Stone*  
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Commissioner Danny Stone  
Grant County

Cc: Eleni Papadakis, WTECB  
Lisa Romine, SkillSource

Chris Branch, Chair  
Okanogan County

Dan Sutton  
Douglas County

Danny Stone  
Grant County

Tiffany Gering  
Chelan County

Jay Weise  
Adams County

# Tab 6

## Talent and Prosperity for All Plan Review

**PRESENTED BY:** Ben Robinson, FirstRule Group

**CHECK ONE:**

☒ Action Item

☐ Possible Action

☐ Discussion Only

---

**SUMMARY:**

Final Board approval is required prior to submitting the final Talent and Prosperity for All (TAP) Plan. The Board identified a planning framework at the 2023 Board Retreat, consisting of three guiding principles and five strategic priorities, which aligned with the Governor's vision, as set forth in his letter to the Board (included in this packet item). The planning framework guided the input-gathering process and the development of an action agenda. Year one activities are described in the plan and are designed to narrow the focus and hone the plan for years two through four.

The plan still requires some copy-editing, but the content is near final. The Board is asked to either approve the content of the plan, or to provide direction to staff on desired modifications. If significant changes are requested, the Board will need to schedule a special Board meeting in which to take action for approval.

A brief summary of the process and feedback collected will be presented with high-level recommendations for future processes.

---

**BACKGROUND:**

The Talent and Prosperity (TAP) for All Plan 2024-2028 is the result of a year-long process of engagement and conversation with state and local partner agencies, service providers, businesses, labor, participant advocates, and other community stakeholders. The TAP Plan 2024-2028 is a combined strategy, developed within the guidelines of the Workforce Innovation and Opportunity Act (WIOA), the Carl D. Perkins Career and Technical Education Act (Perkins), and the state authorizing statutes of the Board (Chapter 28C.18 RCW) marking a collaborative effort across Washington state's comprehensive workforce system. Planning kicked off in Spring 2023 with Governor Inslee's letter outlining his vision. In May 2023, the Board worked with partners and stakeholders to establish a core set of guiding principles and strategic priorities to frame statewide input-gathering, which encompassed 25 community forums, a widely distributed survey, and listening sessions at various meetings and conferences across the state. The three guiding principles and five strategic priorities were affirmed by the broad cross-section of plan contributors.

Following public comment, the plan was updated to reflect valuable feedback, including:

- Revised Year 1 planning and commitments for each strategic priority.
- Incorporation of the feedback from industry panels facilitated by AWB and Impact Washington.

- Inclusion of “Spotlights” highlighting specific needs and successful initiatives aligned with plan goals, including:
  - Economic Security for All
  - Career Connect Washington
  - Healthcare
  - Re-Entry and Justice Involved Populations
  - Small Business Resiliency Network (SBRN)
  - Community Reinvestment Project
  - Poverty Reduction Workgroup
  - Child Care Support
  - Clean Energy Technology Workforce
- A new section focusing on the challenges and opportunities of AI integration, supported by each strategic priority.
- A new introduction segment calling out Washington’s robust financial aid system for all forms of postsecondary education. Washington has been noted as having the most generous and far-reaching state financial aid system in the country.

Due to the updated deadline of March 4, 2024 provided by U.S. Department of Labor, the Board has submitted an extension request to April 15, 2024. The draft plan for your consideration has been reviewed by the Governor’s office, and resulting feedback has been updated within the document. A high-level summary of the full plan follows this coversheet. A final run through with the Governor’s office is planned for March 28. Board staff are requesting the Board’s approval of the plan, with any changes noted. If significant changes require additional time for Board review, staff will schedule a special Board meeting to finalize approval, after which the plan can be finalized and submitted. If all items are complete, the plan may be submitted in advance of our April 15, 2024, extension date.

Year one activities begin with the launch of a working group, with Board sponsorship, for each of the five strategic priorities, with an additional working group for performance accountability. These leadership teams will develop the workplans, identify the pilot projects, research existing successes, and coordinate the full resources available from across the partner organizations. Measures for success of each project will be identified that will guide ongoing assessment and formal review in year 3. Regular reports will be provided to the Board as summarized in the Board commitments section.

Feedback has been collected throughout the process. Additionally, meetings were held with many agency partners over the past weeks to collect a final round of feedback. Overall, the process was viewed favorably, and all felt they had the opportunity to provide input and that input was heard.

---

### **STAFF GUIDANCE & RECOMMENDATION:**

A motion is requested to approve the draft TAP plan for final copy-editing and submission to the U.S. Department of Labor Employment and Training Administration WIOA Portal, and U.S. Department of Education Perkins Portal. If the Board needs additional time for official approval, a special Board meeting will need to be scheduled before the April 15, 2024 submission deadline.

Additionally, to ensure effective implementation of the strategic priorities, Board sponsors are needed for each of the working groups: System, Industry, Youth, Credential Transparency, Job Quality, and Performance Accountability.

- Recommended Action: Motion to approve the TAP Plan to be submitted to the federal agencies.
- Recommended Action: Identify a Board Sponsor for each of the strategic priority groups.



STATE OF WASHINGTON  
— OFFICE OF GOVERNOR JAY INSLEE —

February 22, 2023

Gary Chandler  
Co-Chair  
Washington Workforce Training and  
Education Coordinating Board  
PO Box 43105  
Olympia, WA 98504-3105

Larry Brown  
Co-Chair  
Washington Workforce Training and  
Education Coordinating Board  
PO Box 43105  
Olympia, WA 98504-3105

Eleni Papadakis  
Executive Director  
Washington Workforce Training and  
Education Coordinating Board  
PO Box 43105  
Olympia, WA 98504-3105

Dear Colleagues:

Congratulations on an early start to updating Talent and Prosperity for All, Washington's strategic workforce development plan. As we move past the pandemic, employers continue to face unprecedented workforce shortages, and too many Washingtonians are being left behind. We have a lot of work to do.

Today, workforce challenges are one of the top concerns for both employers and workers here in Washington and across the country. Our extraordinary workforce challenges limit the ability of businesses to expand and grow, stifle economic opportunity for Washington families, and hinder our work to create a Washington where everyone can thrive.

Our state is still recovering from the impacts of the COVID-19 pandemic and the Great Recession a decade prior. In 2023, there are more open positions than people looking for work, and the skillset of the labor force does not always align with employer needs.; In addition, workers are struggling with the high cost of education and training, a lack of childcare and long-term care, and a feeling of being disconnected altogether.

The economic environment has changed dramatically over the past few years and will continue to evolve. Technological and societal shifts such as the increased usage of automation and artificial intelligence, the implementation of new climate policies, and the restructuring of

employer-worker relationships with the gig economy and hybrid work have reshaped the labor landscape here at home and around the world.

Our public workforce development system must not only respond to the issues of today, but also ready itself for coming tests — both expected and unanticipated. . The system is critical to Washington’s economic security, but also to its resiliency in the throes of an economic crisis. The committed individuals who work across the system are doing their best within the current structure, but we can do better. It is encouraging that you will bring many voices and perspectives from across the state together to help re-imagine service delivery. Please consider this letter a formal request to include the following principles in our upcoming Talent and Prosperity for All plan due in spring 2024.

1. Improved access and outstanding customer service for people who rely on our public workforce system to move them into new jobs, education opportunities and career pathways. This includes expanded hours beyond traditional work schedules; simplified intake and eligibility determination; more individualized case management and job placement services, and accelerated attainment of credentials of value.
2. Stronger ongoing supports for people seeking to sustain and improve their economic circumstances. Develop and advocate for budget and policy proposals that minimize challenges workers face in accessing social safety net programs that are critical to maintaining economic stability and connection to the workforce, such as unemployment insurance and paid leave.
3. A robust and seamless referral system that ensures customers receive and benefit from the services they need, when they need them. Apply the “no-wrong-door” approach to connecting individuals to services. This includes career and education counseling, health care, scholarships and training grants, cash assistance, legal aid, childcare, supplemental nutrition benefits, transportation, housing and more. Seamlessly connecting our fellow citizens with these services will improve their chances to gain and keep meaningful employment and eventually improve the quality of life in our communities.
4. Create a system-wide management information system to help us understand the real value of our collective services, not just the performance of individual programs. Track a customer’s experience from the minute they encounter the workforce system through their participation in a variety of supports and services offered by Washington state agencies, and share data in ways that facilitate customer success.
5. Stronger connections and meaningful participation with workers and labor unions and with employers throughout the state. Washington is fortunate to have strong unions and innovative employers. Both have been grappling with the dramatic changes we’ve been experiencing. It is critical that we listen to and partner with the people that make our economy work.
6. Reaching underserved and/or economically underrepresented populations in all corners of the state to eliminate economic disparities: Rural, urban, communities of color, workers with disabilities, immigrant communities and others who have been marginalized or disenfranchised from full economic participation. We must be better at reaching people where they are and providing services in ways that are enticing to and beneficial to the

populations that are historically left behind. If you have not already done so, please invite assistance from Dr. Karen Johnson, the Executive Director of the Office of Equity.

In addition to considering the above principles to help guide the planning process, I also ask that you consider joining the Employment Security Department (ESD) and my office in advocating for funds to address the remaining backlog of pandemic-related Unemployment Insurance (UI) claims in dispute. This board understands the consequences of having workers of all types in a state of limbo regarding their claims. There are currently over 100,000 claimants with pandemic-era overpayments, and over 20,000 awaiting appeal hearings. Federal funding for UI has fallen more sharply post-pandemic than is typical after an economic downturn, yet a higher-than-normal workload remains due to the prolonged impact of standing up and implementing pandemic-era programs. With current funding levels, ESD is facing significant layoffs this biennium at a time when constituent needs are more complex. To urge action on this issue, my office has sent a letter to the legislature asking that they include ESD's request in their budgets. It would be appreciated if the board would add this item to their legislative agenda and advocate strongly for these funds to resolve this situation.

Based on the board's history, I anticipate a robust, unified approach to creating the 2024 Talent and Prosperity for All plan. Washington is unique in its approach to workforce development, with equal representation among business, labor, and state agencies on our state workforce board—especially with our new business-labor co-chair structure. We have an opportunity to leverage resources across all components of our system by working together toward true integration of services, centered on our jobseeker and employer customers. Together we can create the nation's strongest Talent and Prosperity for All plan.

I commend you all for your leadership, passion, hard work, and dedication on behalf of employers, workers, and communities throughout Washington.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jay Inslee", written in a cursive style.

Jay Inslee  
Governor



# Talent and Prosperity for All Plan Summary

## Introduction

The Talent and Prosperity for All Plan 2024-2028 is the result of a year-long process of engagement and conversation with state and local partner agencies, service providers, businesses, labor, participant advocates, and other community stakeholders. Planning kicked off in spring 2023 with Governor Inslee's letter outlining his vision. In May 2023, the Workforce Board worked with partners and stakeholders to establish a core set of guiding principles and strategic priorities to frame statewide input-gathering, which encompassed 25 community forums, a widely distributed survey, and listening sessions at various meetings and conferences across the state. The three guiding principles and five strategic priorities, described below, were affirmed almost unanimously by the broad cross-section of plan contributors.

## Guiding Principles:

The strategic plan for the next four years will be underpinned by the following guiding principles. The planning for each strategic priority was led and informed by these principles:

- 1. Close economic disparities for marginalized populations.**

Too many Washingtonians do not, and have not, shared in the state's prosperity. Those being left behind today are similar to the populations that have been economically marginalized throughout our state's history. Plan activities will be implemented to ensure that the needle finally moves towards shared and equitable prosperity. Involvement of individuals with lived experience and commitment to transparent performance measurement of metrics that matter will advance the Board's vision "that every Washington community is thriving, inclusive, and economically resilient."

- 2. Deliver comprehensive support for individuals with barriers to employment.**

People are isolated from the workforce for many different reasons, from needing education and training to wrap-around support services, such as child care, elder care, affordable housing, and transportation. Needs are not bound by the eligibility and service limitations established in federal and state statutes. Success over the next four years will be determined by how well we meet workers and industry where they need support, and work with them to achieve their workforce development goals. This may also require statutory and administrative reforms in how service is provided.

- 3. Provide systemwide performance metrics and accountability.**

Disaggregated, reliable data is critical for understanding how the workforce system is operating as a whole, rather than how any single program might be performing in its silo. Without significant new resources, we will only be able to achieve positive transformation if we work together across our siloes, we are able to hold each other accountable to commitments made, and we are willing to be responsible for every individual seeking our services, regardless of where they enter the system (no wrong door). We will need to be more expansive and inventive in our data collection and analysis to identify and address the disparities that still exist.

## Strategic Priorities:

Five strategic priorities guide the efforts of the workforce system over the next four years. These priorities amplify and expand priorities from partners' own strategic plans.

	Description	Impact Statements
System	Integrate system services, data, accountability, and resources with clear partners and roles to expand, improve, and streamline customer outcomes.	<ul style="list-style-type: none"><li>• Simplified common intake.</li><li>• Improved data sharing.</li><li>• Data-informed, integrated service planning and delivery.</li></ul>
Industry	Support business development and competitiveness by aligning with economic development and growth efforts.	<ul style="list-style-type: none"><li>• Support sustainable and equitable industry growth.</li><li>• Build and expand career pathways for critical industries.</li><li>• Expand the definition of worker supports.</li></ul>
Youth	Improve opportunities for young people to transition to an economically successful adulthood.	<ul style="list-style-type: none"><li>• Increase youth awareness of services and programs.</li><li>• Broaden access and shorten the time to gain industry-valued credentials.</li></ul>
Credential Transparency	Explore credential transparency and expansion to improve equitable access, mobility, and long-term economic success.	<ul style="list-style-type: none"><li>• Create a common definition of credentials using a single taxonomy.</li><li>• Put learners at the center of credential pathway reforms.</li></ul>
Job Quality	Develop a job quality framework to guide decisions and key investments in the delivery of business services.	<ul style="list-style-type: none"><li>• Ensure pathways to living wage jobs that are critical to communities.</li><li>• Expand registered apprenticeships to more fields.</li></ul>

## TAP Plan Implementation

The comprehensive state strategic plan is designed to be used by all partners together, to help guide actions towards transformative system improvement—to be more responsive to current and future workforce needs in Washington, and a rapidly evolving global economy. The TAP Plan fulfills other statutory requirements as well, serving as compliance-based operating plans for each of the programs contained in the plan (Appendix A of the formal document lists all programs included in TAP). The full plan document is described in bullet form at the end of this document. Directly below is a summary of Year1 activities, which begin with the establishment of priority working groups representing the broad cross-section of partners and stakeholders required to bring about the transformation envisioned in this forward-thinking four-year plan.

### Year 1 (July 2024-June 2025): Working Groups and Activities

A working group will lead each strategic priority beginning July 2024. This team will work closely with Board sponsors to drive work forward. Each priority leadership team will develop the workplans, establish success indicators, research existing successes and lessons learned, identify promising practices or pilot projects, and coordinate the full resources available from across the partner organizations. Progress and barriers will be reported at regular Board meetings, with a commitment to transparent performance accountability and continuous progress. The following table summarizes the partner agencies and organizations that have committed staff to serve on these working groups.

System	Industry	Youth	Credential Transparency	Job Quality
<ul style="list-style-type: none"><li>• WA Dept of Services for the Blind</li><li>• DSHS</li><li>• ESD</li><li>• LNI</li><li>• OSPI</li><li>• State Board for Community &amp; Technical Colleges</li><li>• Workforce Board</li></ul>	<ul style="list-style-type: none"><li>• Building Industry Association of Washington</li><li>• WA Retail Assoc</li><li>• WA State Medical Assoc</li><li>• NW Maritime Trade Assoc</li><li>• WA Film Works</li><li>• IMPACT WA</li><li>• WA Hospitality Assoc</li><li>• WA Office of Financial Mgmt</li></ul>	<ul style="list-style-type: none"><li>• Dept of Corrections</li><li>• SBCTC</li><li>• DSHS</li><li>• ESD</li><li>• Workforce SW</li><li>• OSPI</li><li>• DSB</li></ul>	<ul style="list-style-type: none"><li>• State Board for Community &amp; Technical Colleges</li><li>• WA Student Achievement Council</li><li>• WSU</li><li>• Dept of Licensing</li><li>• DSHS</li><li>• Community Colleges of Spokane</li><li>• DOH</li><li>• WA State Council of Presidents</li></ul>	<ul style="list-style-type: none"><li>• Workforce SW</li><li>• DSHS</li><li>• Workforce Central</li><li>• Spokane Workforce Council</li><li>• Pacific Mountain WDC</li><li>• Commerce</li><li>• Washington Workforce Assoc</li><li>• MLK Labor Council</li><li>• Employment Security Dept</li><li>• Seattle-King WDC</li></ul>

# The Full TAP Plan

In order to meet the criteria for plan approval for each of the programs within TAP, the plan must contain separate operating plans for each. Additionally, each program must answer the same set of common questions. The full plan is therefore about 600 pages in length. A summary version has been developed which synthesizes across the individual program plans, highlights common themes, and spotlights critical targets and promising practices. The summary version also articulates the anticipated collective impact of all partners working in synch and can be accessed at [TAP Overview Summary](#).

The following provides a bulleted summary of the structure of full plan, which can be accessed at [TAP-Washington 2024 DRAFT IN PROCESS 1-17-24 PM Markup Copy.docx](#).

1. Introduction: Very brief high-level overview of the system and the intentions of the plan. The section quotes Governor Inslee's letter to the Board in spring 2023, and summarizes the three guiding principles and five strategic priorities as the foundation for the plan and planning process.
2. Strategic Elements:
  - a. Economic and Workforce Data Chapters: These chapters are largely comprised of the data and information that formed the basis for prioritization of strategic areas of focus. Disaggregated data identifies those the populations of the workforce that have not realized the full benefits of our economic strength. This includes disaggregation by location, industry, and resident demographics, such as race, age, gender, disability, etc.
  - b. State Strategy
    - i. Expansion of each of the strategic priorities and the implementation timeline. Each of the five priorities has a background section, partner agencies, and four-year plans. Community feedback from 25 community forums, surveys, and listening sessions is summarized. Board oversight commitments are identified.
    - ii. This section also includes spotlights that provide details on the following topics:
      1. Economic Security for All
      2. Health Care Workforce
      3. Career Connect Washington
      4. Re-entry & Justice Involved Populations
      5. Small Business Resiliency Network
      6. Community Reinvestment Project
      7. Poverty Reduction Workgroup
      8. Child Care Collaborative Workgroup
      9. Clean Energy Technology Workforce Advisory Committee
3. Operational Planning Elements
  - a. Detailed summary of state operations, MIS and other systems that support the programs within TAP and will likely provide foundational support for TAP implementation. This section focuses on operational details about the present and recent past operations as requested by federal guidelines.
4. Coordination with State Plan Programs
  - a. Brief section outlining how the Board coordinates activities across partners.
5. Common Assurances

- a. List of statements and concurrence assuring that Washington State follows federal requirements.
- 6. Combined program summaries included in the TAP plan:
  - a. WIOA specific programs
    - i. Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B
    - ii. Program-Specific Requirements for Wagner-Peyser Program (Employment Services)
    - iii. Program-specific Requirements for Adult Education and Family Literacy Act Programs
    - iv. Program-Specific Requirements for Vocational Rehabilitation (Combined or General)
    - v. Program-Specific Requirements for Vocational Rehabilitation (Blind)
  - b. Combined Plan Partner Programs Reports
    - i. Carl D. Perkins CTE Education Act (Perkins V)
    - ii. Temporary Assistance for Needy Families (TANF)
    - iii. Basic Food Employment and Training (BFET)
    - iv. Trade Adjustment Assistance (TAA)
    - v. Jobs for Veterans' State Grants
    - vi. Unemployment Insurance (UI)
    - vii. Senior Community Service Employment Program (SCSEP)
    - viii. Housing and Urban Development (HUD) Employment and Training Activities
    - ix. Community Services Block Grant (CSBG)