

## **FISCAL SYSTEMS SECTION**

F-1 Please provide a copy of the monitoring process used to satisfy requirements for monitoring each project, program, subaward, function or activity supported. (20 CFR 667.410) and (CCWD Policy 589-40.6) (Revised)

Please highlight sections which test that:

- expenditures have been charged to the proper cost categories within cost limitations;
- there is compliance with the provisions of the applicable contract, local policies, the WIA, final regulations, and other applicable federal and state laws.

Program Year 2013 Quality Assurance Guide attached.

B-2 Provide your written procedures describing the internal controls for:

- a) Authorizing each level of expenditures
- b) Ensuring that all disbursements are recorded in the accounting system to the correct cost category

B-16 Provide the official accounting system General Ledger Detail Report (preferably in electronic form) showing all expenditures for Program Year 2013-2014 through April 30,2014.

Note: A sample of costs will be chosen to validate the system's integrity.

C-5 Describe the procedures used to ensure that all expenditures are reasonable, necessary, allocable, and allowable under WIA.



# **Workforce Investment Council of Clackamas County**

## **Workforce Investment Act (WIA)**

### **Service Provider**

### **Quality Assurance Guide**

### **Program Year 2013**

### **Annual Review**

## Preface

The purpose of this guide is to provide a tool to conduct reviews of WIA and discretionary grant service providers in accordance with Workforce Investment Council’s Policy P-01 “Quality Assurance and Program Oversight Reviews”. Workforce Investment Council staff will review programs for compliance with applicable federal and state laws, regulations, and policies related to WIA and discretionary grants.

The Quality Assurance report will be used to develop information about service providers which may be the basis for corrective action, providing needed technical assistance, the discontinuance of future funding, or identifying outstanding practices which may serve as a model for other programs.

## Contents

A.	Contract Overview .....	1
B.	Fiscal Systems & Administration.....	1
C.	Budget & Audit.....	2
D.	Cost Allocations.....	3
E.	Financial & Risk Management .....	3
F.	Procurement & Subcontracts .....	4
G.	Records Management.....	4
H.	Program Management and Service Delivery .....	5

## Service Provider:

Contract Period: July 1, 2013 through June 30, 2014

Service Provider: \_\_\_\_\_

Service Provider Contact Info: \_\_\_\_\_

(Name) (Title)

\_\_\_\_\_  
(Phone) (Email)

Date: \_\_\_\_\_

## WORKFORCE INVESTMENT COUNCIL QA Staff:

Deb Zang, Fiscal Director

Jan Filgas, Program Manager

Amy Evans, Program Manager

## Section A - Contract Overview

- A-1. Briefly describe your WIA funded program.
- A-2. List the discretionary grants that you have received from the Workforce Investment Council for PY 2013.
- A-3. What are your most significant accomplishments implementing the contracted services from July 1, 2013 through June 30, 2014?
- A-4. Have you experienced any significant variations from your implementation plan? Please explain.
- A-5. Is there information or other technical assistance the Workforce Investment Council could provide that would help your organization in managing your contract?

## Section B - Fiscal Systems & Administration

### Internal Controls

- B-1. Provide a general description of your Internal Control system.
- B-2. Provide your written procedures describing the internal controls for:
  - a) Authorizing each level of expenditures
  - b) Ensuring that all disbursements are recorded in the accounting system to the correct cost category
- B-3. Are contract related purchases charged to **agency** credit cards? If yes, under what circumstances?
- B-4. Are contract related purchases charged to **personal** credit cards? If yes, under what circumstances?
- B-5. Provide your written procedures for use of petty cash.
- B-6. Provide your written procedures for use and internal control of gift cards, gas cards, bus passes, bus tickets, incentive payments, or other “cash like” payments.
- B-7. Provide the written policy for Signature Authority for funded expenditures.

### Personnel Costs

- B-8. Do the personnel costs charged to the contract match the approved contract budget? If not, why?
- B-9. How are time and attendance records kept for each position that:
  - c) Document hours worked and charged to the contract?

d) Are signed and dated by both the employee and supervisor?

B-10. Are state and federal payroll tax deposits and reports current? Have they been submitted in a timely manner throughout the contract?

B-11. Provide documentation of the payroll costs charged to the grant to assure they comply with federal executive compensation requirements. (TEGL 05-06)

B-12. Identify by location WIA office space/ # of WIA staff in space in use on June 30, 2013 vs. office space/ staff occupancy currently in use.

### **Financial Reporting / Invoicing**

B-13. Describe the procedures for ensuring costs are submitted on a reimbursement basis and in accordance with contract timelines.

B-14. Are financial transactions posted in more than one accounting system? If yes, how often are the systems reconciled?

B-15. Provide the Chart of Accounts that show how contracted funds are tracked distinctly from other revenue sources.

B-16. Provide the official accounting system General Ledger Detail Report (preferably in electronic form) showing all expenditures for Program Year 2013-2014 through April 30, 2014.

Note: A sample of costs will be chosen to validate the system's integrity.

## **Section C – Budget & Audit**

### **Budget**

C-1. Describe the process for incorporating the contract budget into the greater agency budget and official accounting system.

C-2. Are contract modifications reflected in a timely manner in the greater agency budget? If not, why?

C-3. Are all budgetary and expenditure documents maintained on-site and available upon request? If not, please explain why.

- C-4. Describe how planned to actual expenditures are monitored and what occurs if there is a significant variance from plan to actual.
- C-5. Describe the procedures used to ensure that all expenditures are reasonable, necessary, allocable, and allowable under WIA.
- C-6. Identify the source of non-federal funds that would be used if disallowed costs had to be repaid to the federal government.

### **Audit**

- C-7. Provide an inventory list with acquisition date, descriptions, cost and current location for all real and tangible property purchased with contract funds. Include items with a useful life of more than one year and a unit cost of \$500 or more.
- C-8. When was the last inventory conducted?
- C-9. Provide a copy of your most recent financial audit report. (In compliance with OMB Circular A-133 Single Audit Act where applicable)
- C-10. Identify any findings or questioned costs related to contract resources and action taken by subcontractor.

## **Section D – Cost Allocations**

- D-1. If applicable, provide a copy of the approved indirect rate and describe how it applies to costs charged to the contract.
- D-2. If applicable, provide a copy of the cost allocation plan for contracted funding streams..

## **Section E – Financial & Risk Management**

### **Cash Management**

- E-1. How are refunds credited back to the contract (i.e., when a participant drops a class or withdrawals from training)?
- E-2. Describe agency procedures for assuring that bank accounts are reconciled and reviewed by a second person.
- E-3. How often are reconciled bank accounts compared with the general ledger cash balance?

### **Program Income**

- E-4. Describe the source and use of any program income earnings for this year. If applicable, how are program income earnings tracked and accounted for?

### **Incident Reporting**

- E-5. Describe the procedures for staff and contractors to report fraud, abuse or other criminal activity related to contract. How are staff and contractors informed of the procedures?
- E-6. To whom would staff report a suspected incident? Have there been any incidents reported? If so, please describe.

## **Section F – Procurement & Subcontracts**

- F-1. What policies or procedures are used to procure products or services, including contracts for services?
- F-2. Describe the elements of and processes for monitoring your subcontractors to assure conformance with terms and conditions of their contracts.
- e) Are subcontractor costs reported accurately and timely?
  - f) Do subcontractor invoices reflect their contractual scope of work requirements?
  - g) How is it ensured that subcontractors have the required types of insurance coverage?
- F-3. Do all of your subcontractors follow applicable local, state, and federal procurement standards?
- F-4. Please submit copy(s) of your subcontract boilerplate language.

## **Section G – Records Management**

- G-1. What is the procedure for complying with the record retention requirements of your contract?
- G-2. What provisions are in place to protect the confidentiality of participant records?
- G-3. Which most recent program year records have been destroyed? What is the schedule for destroying records?
- G-4. If using a document management and electronic filing document management system, provide information that demonstrates safeguards for data such as:
- Written procedures for data security
  - Frequent back-up of data base (how often)
  - Storage of back-up data off site that maintains confidentiality as well as data security.

## Section H - Program Management and Service Delivery

- H-1. [YOUTH] How is it ensured that the ten required program elements for youth are available in accordance with 20 CFR 664.410?
- H-2. [YOUTH] Demonstrate how achievements of performance measures that do not use wage records are documented:
- Placement in employment or education outcome in first quarter after exit quarter
  - Attainment of a degree or certificate outcome by end of third quarter after exit quarter
  - Literacy and numeracy gain outcomes
- H-3. [YOUTH] Describe the strategy or program design modifications developed to address the WIA common measures performance indicators. What process or procedures are in place to determine when to exit participants?
- H-4. [YOUTH] Does your program utilize the 5% window? If yes, describe the system used to monitor the percentage of non-income eligible youth enrolled in the youth program, and provide a hard copy report which demonstrates that no more than 5% of the youth enrolled during PY08 were non-income eligible. (20 CFR 664.220)
- H-5. [YOUTH] How are youth assessed to determine basic skill levels and categories of eligibility? What assessment tool is used? If CASAS is used, please provide a list of certified staff members. (20 CFR 664.205)
- H-6. [YOUTH] How does the objective assessment provided to each youth participant meet the requirements at Section 129 and include a review of the academic and occupational skill levels and service needs of each youth? (20 CFR 664.405)
- H-7. [YOUTH] Do you have a supportive services policy or incentive and stipends standards specific to youth? If yes, please provide a copy. (20 CFR 664.440 and Section 129 (c)(2)(G))
- H-8. [YOUTH] Describe the policies, training for case managers/contractors to deliver effective 12 months of follow-up for youth which includes (a) regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise; (b) assistance in securing better paying jobs, career development and further education; (c) work-related peer support groups; (d) adult mentoring; and (e) tracking the progress of youth in employment after training. (WIASRD #349)
- H-9. [YOUTH] Describe how your program defines in your youth application the sixth barrier for youth eligibility i.e. an individual who requires additional assistance to complete an educational program or secure and hold employment. Provide an example of how individualized goals for this barrier are documented in an ISS.
- H-10. Provide copies of all WIA program handbooks, procedures, guidelines and/or eligibility policies.



- H-11. Provide copies of supportive services standards relating to gas vouchers or transportation costs and reimbursements.
- H-12. [A/DW] How is the need for intensive services documented in participant files? (20 CFR 663.160)
- H-13. Is program information available in languages other than English? Please provide samples.
- H-14. How is staff able to effectively communicate with persons with disabilities? Is program information available in alternative formats? Provide samples. (29 CFR 37.9)
- H-15. Provide samples of brochures and media communications which demonstrate that applicable EO language (EO employer/program, auxiliary aids/services available), TDD/TTY, and other required information is included. (29 CFR 37.34)
- H-16. Indicate where the current EO notices and the EO Officer's name and contact information are located. (29 CFR 37.26)
- H-17. Describe how discrimination complaints are, or would be, handled. How does the process compare to a non-EO/ADA WIA complaint? Provide a copy of the EO/ADA complaint process. (29 CFR 37.76)
- H-18. [YOUTH] Provide a copy of the grievance procedure information made available to registrants. (20 CFR 667.600 (b) (1))
- H-19. Provide a copy of your procedure for grievances and complaints.
- H-20. How are grievance procedures/policies communicated to program staff?
- H-21. Have any grievances been initiated during PY 2013?
- H-22. Describe data collection procedures including deadlines for inputting data after collection and data documentation procedures to insure the integrity of the MIS and data transmitted to the State.
- H-23. What is your process for ensuring electronic customer files do not erroneously exit after 90 days without a service?
- H-24. Describe the internal file review process including how often reviews are conducted, how many files are sampled, who completes the review, and the scope of the review (i.e. eligibility documentation, assessment, etc.).
- H-25. How does your program ensure that services to participants are not a duplication of WIA services provided by another region?
- H-26. How does your program ensure that participants employed in programs and activities funded under WIA meet wage and labor standards at Section 181(a)(1)? (20 CFR 667.272)

- H-27. How does your program ensure that WIA funds are not spent on:
- the wages of incumbent employees during their participation in economic development activities provided through a statewide workforce investment system. (Section 181(b)(1) and 20 CFR 667.264 (a)(1))
- H-28. How does your program ensure that participants in programs or activities do not:
- displace any currently employed employee (including a partial displacement, such as a reduction in the hours of non-overtime work, wages or employment benefits). (Section 181(b)(2)(A) and 20 CFR 667.270(a))
  - cause impairment of existing contracts for services and existing collective bargaining agreements, unless the employer and the labor organization concur in writing? (Section 181(b)(2)(B) and 20 CFR 667.270(b))
- H-29. How does your program ensure that a participant in a specified activity shall not be employed in a job if:
- any other employee or individual is on layoff from the same or substantially equivalent job;
  - the employer has terminated the employment of any regular employee or otherwise reduced the workforce with the intention of filling the vacancy with the participant;
  - the job is created in a promotional line that infringes upon the promotional opportunities of currently employed individuals. (Section 181(b)(3) and 20 CFR 667.270 (c))
- H-30. Describe how your program ensures:
- that the health and safety standards and working conditions provided to participants are comparable to those provided to other employees. (Section 181(b)(4) and 20 CFR 667.274 (a))
  - that to the extent that workers' compensation law applies, workers' compensation is provided to participants on the same basis as other individuals in similar employment. (Section 181(b)(4) and 20 CFR 667.274 (b))
- H-31. How does your program ensure that WIA funds are not used:
- to encourage or induce to relocate a business or part of a business if such relocation would result in a loss of employment at the original location. (Section 181(d)(1) and 20 CFR 667.268)
  - to provide specified services to an employer who has relocated, for at least 120 days after the employer begins operation at the new location, when the relocation resulted in the loss of employment of any employee at the original location. (Section 181(d)(2) and 20 CFR 667.268)
  - for employment generating activities, economic development activities, investment in revolving loan funds, capitalization of businesses, investment in contract bidding resource centers, and similar activities that are not directly related to training for eligible individuals under Title IB. (Section 181(e) and 20 CFR 667.262(a))
- H-32. Do you use WIA funds for participant drug testing? (Section 181(f))

- H-33. How does your program ensure that participants are not employed in the construction, operation or maintenance of any religious facility? (Section 188(a)(3) and 20 CFR 667.266)
- H-34. How does your program ensure that WIA funds are used only for activities that are in addition to those that would otherwise be available in the local area in the absence of such funds? (Section 195 (2))
- H-35. How does your program ensure that no person or organization charges an individual a fee for placement in or referral to a workforce investment activity? (Section 195 (5))
- H-36. How does your program ensure that funds are not used for public service employment? (Section 195 (10) and 20 CFR 667.264 (2))
- H-37. How does your program ensure that individuals referred to training are:
- assessed as being in need of training services in order to obtain or retain employment and as having the skills and qualifications needed to successfully complete the selected training program? (20 CFR 663.310 (b))
  - selecting a program of training that is directly linked to the employment opportunities either in the local area or in another area to which the individual is willing to relocate? (20 CFR 663.310 (c))
  - unable to obtain grant assistance from other sources to pay the costs of such training including Pell grants or required WIA assistance in addition to other sources of grant assistance? (20 CFR 663.310 (d))
- H-38. Describe how your program coordinates with Higher Education financial aid programs, including Pell grants, so that WIA funds supplement other sources of training grants. (20 CFR 663.320)
- H-39. [A/DW] What is your average cost for Individual Training Accounts?
- H-40. Did your program provide On-The-Job-Training (OJT)? (20 CFR 663.700) If no, please provide information on why OJTs were not provided. If yes, provide information for H-39 through H-45.
- H-41. How does your program ensure that the following OJT conditions are met?
- Participant wages are at the same rate, including periodic increases, as similarly situated employees or trainees, and not less than the highest of the Federal or State minimum hourly wage. (20 CFR 667.272 (a))
  - Reimbursement to the employer is for no more than 50% of the participant's regular wages paid over the period of the contract. (20 CFR 663.700 (a))
  - OJT contracts are not written with an employer who has exhibited a pattern of failing to provide continued long-term employment for participants trained in previous OJTs. (20 CFR 663.700 (b))
  - OJT contracts are written for eligible employed workers only when the training relates to the introduction of new technologies, new production or service procedures, upgrading skills, workplace literacy, or other appropriate purposes identified by local policy, and when it is determined that the worker is not earning a self-sufficient wage in their current

employment. (20 CFR 663.705 (c))

- H-42. Describe how your program determines the length of the OJT contract and self-sufficient wage for eligible employed workers. (20 CFR 663.700 (c) and 663.705)
- H-43. Describe the process for the development of job descriptions for OJTs (task analysis, etc.)
- H-44. Describe the process for conducting periodic on-site reviews of OJT agreements to ensure that training is being provided and that reimbursements are justified. (20 CFR 664.460 (d))
- H-45. Please describe the processes utilized to assure compliance with CCWD's On-the-Job Training Contract Reimbursement Documentation Policy 589-10.19.
- Approved contract exists between the service provider and employer.
  - Costs submitted for reimbursement were incurred during contract period.
  - Gross amount paid the participant include check stubs or payroll records that support the payments.
  - Reimbursement is no more than 50% of the participant's wage rate multiplied by the number of hours worked excluding overtime pay. 20 CFR 663.700(b).
  - Maximum contract amount for reimbursement has not been exceeded.
- H-46. Please describe how you:
- Ensure that NCRC participants complete registration in WOMIS.
  - Have incorporated the NCRC into your service delivery model.
  - Ensure that participants must be Oregon residents or employed by Oregon employers.
- H-47. Please describe how you have been involved in the Sector-Industry Strategy Initiative.

F-2 Please provide copies of monitoring reports which demonstrate a standardized review methodology including documentation of findings, needs for corrective action and due dates for completion of corrective actions.

- While on-site, the review team will test aspects of the audit resolution control log. Please ensure that the control log, or the instrument used to track monitoring findings, is made available to the review team.

See attached Program Year 2013 Monitoring Reports for Adult & Dislocated Workers services providers Clackamas Community College and Community Solutions for Clackamas County.

Fiscal Monitoring Reports for Adult & Dislocated Workers services provider IRCO, and Youth services provider Clackamas Education Service District are in process. Written QA Guides have been received from providers, and onsite fiscal monitoring scheduled. See attached schedule confirmation letters.



September 8, 2014

Roni Wilhelm, Clackamas Community College  
Workforce Development Services Dept.  
Clackamas Community College  
19600 S. Molalla Avenue  
Oregon City, OR 97045

Dear Roni,

This serves as notice that the WICCO Program Year 2013 Quality Assurance Fiscal Monitoring of the CCC Adult & Dislocated Workers program is completed. Enclosed is the final report. No further response is needed.

All monitoring documentation and reports will be kept in the Workforce Investment Council of Clackamas County offices in accordance with WIA regulations.

Thank you to Sheila, Angie, and Roni for their time and assistance.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Deb Zang'.

Deb Zang  
Fiscal Director

**Workforce Investment Council of Clackamas County  
 Program Year 2013-2014 (July 1, 2013 – June 30, 2014)  
 Service Provider Quality Assurance Monitoring  
 Report for: Clackamas Community College (CCC)**

**Fiscal Review - Final Report**

Review conducted by:

Deb Zang (WICCO)

Site Visit: 8/20/14

Additional Information Request: 9/03/14,

Response Received: 9/05/14

Final Report Issued: 9/08/14

Introduction

To satisfy requirements for oversight and monitoring of Workforce Investment Act (WIA) Title I funds and discretionary grants, the Workforce Investment Council of Clackamas County provides an annual on-site quality assurance review of local programs.

WICCO's monitoring review ensures that fiscal policies and outcomes meet the objectives and regulations of WIA, and determines if compliance with WIA requirements has been demonstrated. Annual monitoring allows for determination as to whether a program is making acceptable progress in addressing any deficiencies, and also addresses compliance with the Department of Labor's uniform administrative requirements.

On August 20, 2014 WICCO staff conducted an on-site review of the fiscal records and activities of CCC's implementation of the WIA Adult & Dislocated Worker Services Contract. Sheila Baack, Grant Accountant and Angela Russell, Administrative Assistant, participated in this review.

Review

The WICCO Quality Assurance Guide (Program Year 2013-2014) was utilized to conduct the review. Financial reports, payroll records and 39 transactions were randomly selected for review. Transactions included samples from all contracted funding streams including WIA Formula, NCRC, CWRC, H1B projects, as well as DWT NEG, Blount NEG, Additional Assistance Dutchmen, and Back to Work Oregon. The results of this fiscal review are detailed below, and may include:

- Observations: the identification of a current item or issue discovered in the course of a review that involves system/procedural problems that need immediate attention, but are not serious and /or material enough to warrant being categorized as a finding. The recommendation would identify whether CCC needs to respond in writing concerning action taken to address the recommendation. Observations may be discussed between CCC and WICCO staff for additional guidance.
- Findings: the identification of an item or issue that is of a significant concern or indicated the violation of a guiding principle or requirement. Prior to identifying a finding, the standard operating procedure is for WICCO to confer with CCC staff on whether the item or issue was an abnormality/exception.
- Commendations: To recommend as worthy of notice.

**This final report cites no observations or findings.**

Summary

Testing indicates that Clackamas Community College Adult & Dislocated Worker Services operations comply with the objectives and regulations of WIA and DOL uniform administrative requirements.

PY13-14 Adult & DW Services Fiscal Monitoring	Meets Requirements	Observation	Recommendation	Finding	Commendation
Section B Fiscal Systems & Administration	X				
Section C Budget & Audit	X				
Section D Cost Allocations	X				
Section E Financial & Risk Management	X				
Section F Procurement & Subcontracts	X				
Section G Records Management	X				



September 9, 2014

Maureen Thompson  
Community Solutions for Clackamas County  
112 11<sup>th</sup> Street  
Oregon City, OR 97045

Dear Maureen,

This serves as notice that the WICCO Program Year 2013 Quality Assurance Fiscal Monitoring of the CSCC Adult and Dislocated Worker WIA program, including discretionary grants, is completed. Enclosed is the final report. No further response is needed.

All monitoring documentation and reports will be kept in the Workforce Investment Council of Clackamas County offices in accordance with WIA regulations.

My thanks to you, Scott and Lori for your time and assistance.

Respectfully,

A handwritten signature in blue ink that reads "Deb Zang".

Deb Zang  
Fiscal Director



**Workforce Investment Council of Clackamas County  
 Program Year 2013-2014 (July 1, 2013 – June 30, 2014)  
 Service Provider Quality Assurance Monitoring  
 Report for: Community Solutions of Clackamas County (CSCC)**

**Fiscal Review - Final Report**

Review conducted by:

Deb Zang (WICCO)

Site Visit: 8/26/14

**Final Report Issued: 9/9/14**

Introduction

To satisfy requirements for oversight and monitoring of Workforce Investment Act (WIA) Title I funds and discretionary grants, the Workforce Investment Council of Clackamas County (WICCO) provides an annual on-site quality assurance review of local programs.

WICCO's monitoring review ensures that fiscal policies and outcomes meet the objectives and regulations of WIA, and determines if compliance with WIA requirements has been demonstrated. Annual monitoring allows for determination as to whether a program is making acceptable progress in addressing any deficiencies, and also addresses compliance with the Department of Labor's uniform administrative requirements.

On August 26, 2014 WICCO staff conducted an on-site review of the fiscal records and activities of Community Solutions' implementation of the WIA Adult and Dislocated Worker Services Contract. Scott Vandecoevering, Accounting Specialist, participated in this review.

Review

The WICCO Quality Assurance Guide (Program Year 2013-2014) was utilized to conduct the review. Financial reports, payroll records and 25 general ledger transactions were randomly selected for review. Transactions included samples from all contracted funding streams including WIA Formula, NCRC, CWRC, Solutions to Work, and Housing Works. The results of this fiscal review are detailed below, and may include:

- Observations: *the identification of a current item or issue discovered in the course of a review that involves system/procedural problems that need immediate attention, but are not serious and /or material enough to warrant being categorized as a finding. The recommendation would identify whether CSCC needs to respond in writing concerning action taken to address the recommendation. Observations may be discussed between CSCC and WICCO staff for additional guidance.*
- Findings: *the identification of an item or issue that is of a significant concern or indicated the violation of a guiding principle or requirement. Prior to identifying a finding, the standard operating procedure is for WICCO to confer with CSCC staff on whether the item or issue was an abnormality/exception.*
- Commendations: *To recommend as worthy of notice.*

**This final report cites no observations or findings.**

Summary

Testing indicates that Community Solutions of Clackamas County Adult and Dislocated Services operations comply with the objectives and regulations of WIA and DOL uniform administrative requirements.

PY13-14 Adult & DW Services Fiscal Monitoring	Meets Requirements	Observation	Recommendation	Finding	Commendation
Section B Fiscal Systems & Administration	X				
Section C Budget & Audit	X				
Section D Cost Allocations	X				
Section E Financial & Risk Management	X				
Section F Procurement & Subcontracts	X				

September 4, 2014



Molly Aleshire  
C-TEC Youth Services  
Clackamas Education Service District  
13455 SE 97<sup>th</sup> Avenue  
Clackamas, OR 97015

Dear Molly:

This letter is to confirm the date for the on-site Quality Assurance Fiscal Review of the WIA and discretionary grants contracted services with Clackamas Education Service District provided by C-TEC Youth Services for Program Year 2013.

As discussed, this review will take place on Thursday, September 18, 2014 at 9 am in the ESD office. Please have staff available to access financial documents and answer questions.

Approximately five days before the on-site visit, WICCO will provide you with a list of transactions to be pulled. Transactions will be selected from all contracted funding streams including WIA formula, CWRC, and county Youth to Work. This list will be a representative sample of both payroll and accounts payable activity. While on-site, WICCO will also test the cost allocation plan, review source documents used to substantiate cash requests, and request additional transaction detail for clarification.

Should you have questions or need clarification, please contact me at (503)657-1728.

Respectfully,

A handwritten signature in blue ink that reads 'Deb Zang'.

Deb Zang  
Fiscal Director

September 16, 2014

Victoria Libov  
Employment Services Manager  
Immigrant & Refugee Community Organization  
10301 NE Glisan  
Portland, OR 97220



Dear Victoria:

This letter is to confirm the date for the on-site Program Year 2013 Quality Assurance Fiscal Review of the WIA 1B Adult and Dislocated Worker contracted services provided by IRCO.

As discussed, this review will take place on Wednesday, September 24, 2014 at 9 am in the IRCO fiscal office. Please have staff available to access financial documents and answer questions.

Attached is a list of transactions to be pulled. This list is a representative sample of both payroll and accounts payable activity. For payroll, please have available the documentation of payment showing gross, deductions and net pay, authorization of pay rate, time/effort logs, signed verification by employee and supervisor, and allocation (if applicable). While on-site, additional information may be reviewed, including source documents used to substantiate cash requests, and transaction detail for clarification.

Should you have questions or need clarification, please contact me at (503)657-1728.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Deb Zang', is written over the typed name.

Deb Zang  
Fiscal Director

F-3 Please provide a copy of the most recent audit report and management letter.

Audit report for PY12 was provided to reviewers during PY13 monitoring.

Audit of PY13 is currently underway, and the report will be available in November 2014.

F-4 Please describe or attach the resolution or plan for resolution to any internal control deficiencies, questioned costs or issues in your last management letter and audit report.

There were no findings, questioned costs or issues.

F-5 Retired because the attestational engagement requirement went away.

F-6 Please attach your detailed cost allocation plan and highlight any changes made within the past year.

Review staff will test the cost allocation methodology while on-site by studying labor distribution records, personal services expenditures, and expense payments (such as rent, utility, telephone, equipment, facility maintenance, and contract payments).

Please see attached Cost Allocation Plan for PY14.

## WICCO PY14-15 Cost Allocation Basis

### **Postage**

All Programs  
% based on staff wages charged to all funds  
does not include wages of outstationed CTE Liason

### **Workers Comp Insurance**

All Programs  
% based on staff wages charged to all funds

### **Benefits**

All Programs  
% based on staff wages charged to all funds

### **Printing-Duplication**

All Programs  
% based on staff wages charged to all funds  
does not include wages of outstationed CTE Liason

### **Liability Insurance**

All Programs  
% based on staff wages charged to all funds

### **Equipment Leasing Maintenance & Repair**

All Programs  
% based on staff wages charged to all funds  
does not include wages of outstationed CTE Liason

### **Rent**

All Programs  
% based on staff wages charged to all funds  
does not include wages of outstationed CTE Liason

### **Office Supplies**

All Programs  
% based on staff wages charged to all funds  
does not include wages of outstationed CTE Liason

### **Marketing/Outreach**

Mandate Media  
based on 3 major programs

### **Telephone**

All Programs  
% based on staff wages charged to all funds  
does not include wages of outstationed CTE Liason

### **Participant Data Consultant Services**

based on 3 major programs

### **Professional Svcs: Payroll Service Fees**

All Programs  
% based on staff wages charged to all funds

### **Audit Services**

All Programs  
% based on total direct costs

### **Computer Hardware/Software**

All Programs  
% based on staff wages charged to all funds  
does not include wages of outstationed CTE Liason  
If for use of one staff: % based on wages of that staff only



F-7 Please describe debt collection activities pursued this year.

WICCO had no debt collection activities in PY14.

F-8 Please attach a copy of your debt collection procedure or process.

PY 2013 response is still applicable. Deb Zang

See attached policy F-04 Debt Collection.



**POLICY #:** F-04  
**Debt Collection**

**ISSUED:** January 17<sup>th</sup>, 2013

**PURPOSE:**

To set forth procedures for collection of any debt due and owed to Workforce Investment Council. This establishes procedures for the recovery of unallowable and disallowed expenditures under the Workforce Investment Act or other grants to help ensure that all funds administered by Workforce Investment Council are properly accounted for, and whenever feasible, recoverable.

**REFERENCE:**

- Workforce Investment Act, Section 184
- Title 20 Code of Federal Regulations (CFR) 667
- 29 CFR 95 or 97

**BACKGROUND:**

Workforce Investment Council is liable to the State of Oregon for all collectible debts incurred in the operation of the WIA program within its local workforce investment area. WIA requires repayment of miss-expended funds received under the Act. The WIA regulations at 667.705 specifically state that: "The political jurisdiction(s) of the chief elected official(s) in a local workforce investment area is liable for any misuse of the WIA grant funds allocated to the local area under WIA sections 128 and 133, unless the chief elected official(s) reaches an agreement with the Governor to bear such liability."

**POLICY:**

Once it has been determined that a debt is owed to Workforce Investment Council by any contractor or subcontractor, the following procedures will be followed.

**PROCEDURE:**

When a contractor or subcontractor's liability is established as a result of an audit, monitoring finding or other means Workforce Investment Council will notify the entity by certified mail of the following:

1. Amount of the debt
2. Basis for the debt
3. Date debt will be considered delinquent
4. Interest rate to be charged after the delinquency date
5. Administrative appeal rights of the debtor

Workforce Investment Council will negotiate any resolution of the debt or any agreed upon repayment schedule. Options for debt resolution that may be offered at the discretion of Workforce Investment Council include cash or installment payments, offset against a subsequent grant, or a reduction in payments.

If the debt is not repaid or resolved in thirty (30) days, a second more strongly worded thirty (30)-day notice will be sent. If no satisfactory resolution occurs at the end of the sixty (60)-day period, a third and final collection letter will be issued. The final collection letter will indicate that Workforce Investment Council will impose one or more of the following sanctions:

1. Withholding payments due the contractor
2. Initiate litigation against the contractor
3. Withholding of future funding
4. Termination of current agreements
5. Initiation of debarment

In the event a contractor or subcontractor desires to compromise and settle the debt for less than the full amount, Workforce Investment Council shall make a determination as to whether or not the compromise is in its best interests. In making that determination Workforce Investment Council shall consider the following factors:

1. Amount of the debt
2. Possible repayment methods
3. Debtor's repayment history to date
4. Debtor's ability to satisfy the terms of the compromise
5. Cost of further debt collection proceedings
6. Probable success of any litigation

Before any debt is compromised or terminated an approval will be obtained from the appropriate governmental authorities with oversight of the affected funds.

Workforce Investment Council shall seek legal counsel to determine if litigation is in its best interests. If after considering the probable success of litigation, Workforce Investment Council determines to proceed, legal counsel will be retained to carry out the litigation. If after consultation it is determined that litigation is not in the best interests of Workforce Investment Council, a request for waiver may be submitted to the proper authority for any disallowed cost.

Workforce Investment Council must maintain a record of all actions taken during the collection process, including any supporting documentation. These records shall include any information supporting the outcome of any decisions made regarding courses of action during the collection process.

Approved:

Frank Wall 1/12/13  
Workforce Investment Council Board Chair Date

F-9 Do the programs generate any program income?

There was no program income generated in Region 15.

F-10 How is program income tracked and reported to ensure that the income is added to the funds committed and is used prior to drawing additional federal funds? (20 CFR 667.200(a)(5))

PY 2013 response is still applicable. Deb Zang.

There was no program income generated in Region 15.

F-11 Please describe your cash forecasting system that assures that federal (WIA) cash on hand does not exceed the organization's immediate cash needs.

During the on-site visit, review team members will review source documents and general ledger expenditures reports to substantiate cash draw downs.

PY 2013 response is still applicable. Deb Zang.

Each week the Fiscal Director prepares vouchers which are entered into the accounting system as accounts payable by the Fiscal Director. Also an estimated payroll is prepared twice monthly.

An analysis report is prepared which breaks down total cash needed by funding stream. These amounts are drawn down on Friday, and checks are issued when funds are received from CCWD.



F-12 Please provide a copy of your organization's certificate of insurance\* or evidence of self-insurance for the following:

- Professional liability resulting from errors, omissions or negligent acts of its officers, employees or agents.
- Motor vehicle insurance \*
- Property insurance \*
- Workers' Compensation Insurance
- Bonding coverage for every officer, director, agent, or employee authorized to receive or deposit WIA funds or to issue financial documents, checks or other instruments of payment of program costs.

\* These policies must list CCWD as an additional insured.

See attached



# CERTIFICATE OF LIABILITY INSURANCE

WORKF-1

OP ID: LM

DATE (MM/DD/YYYY)

09/16/2014

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT:** If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

<b>PRODUCER</b> WSC Insurance PO Box 128 * 2000 Pacific Ave. Forest Grove, OR 97116 Deborah Delfs, CIC CISR	Phone: 503-357-3154 Fax: 503-716-1022	<b>CONTACT NAME:</b> Linda McCoy <b>PHONE (A/C, No, Ext):</b> 503-906-8934 <b>E-MAIL ADDRESS:</b> lindam@wscinsurance.com	<b>FAX (A/C, No):</b> 503-716-1022
	<b>INSURER(S) AFFORDING COVERAGE</b>		<b>NAIC #</b>
<b>INSURED</b> Workforce Investment Council 365 Warner Milne Road Ste 202 Oregon City, OR 97045	<b>INSURER A:</b> Foremost Ins Co	<b>INSURER B:</b>	<b>INSURER C:</b>
	<b>INSURER D:</b>	<b>INSURER E:</b>	<b>INSURER F:</b>

**COVERAGES****CERTIFICATE NUMBER:****REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	GENERAL LIABILITY	X		PPS42819244	12/01/2013	12/01/2014	EACH OCCURRENCE \$ 1,000,000
	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY						DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 1,000,000
	<input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR						MED EXP (Any one person) \$ 10,000
	GEN'L AGGREGATE LIMIT APPLIES PER POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC						PERSONAL & ADV INJURY \$ 1,000,000
							GENERAL AGGREGATE \$ 2,000,000
							PRODUCTS - COMP/OP AGG \$ 2,000,000
							\$
A	AUTOMOBILE LIABILITY			PPS42819244	12/01/2013	12/01/2014	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000
	<input type="checkbox"/> ANY AUTO						BODILY INJURY (Per person) \$
	<input type="checkbox"/> ALL OWNED AUTOS						BODILY INJURY (Per accident) \$
	<input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> SCHEDULED AUTOS NON-OWNED AUTOS						PROPERTY DAMAGE (Per accident) \$
							\$
	UMBRELLA LIAB						EACH OCCURRENCE \$
	EXCESS LIAB						AGGREGATE \$
	DED						\$
	RETENTION \$						\$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY						WC STATUTORY LIMITS OTHER
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH)						E L EACH ACCIDENT \$
	If yes, describe under DESCRIPTION OF OPERATIONS below						E L DISEASE - EA EMPLOYEE \$
							E L DISEASE - POLICY LIMIT \$

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)

The State of Oregon, Dept of Community Colleges and Workforce Development, their Officers, Directors, Agents and Employees are additional insured as respects to Workforce Investment Act Grant Funds per form 9S2313, subject to policy terms, conditions and exclusions.

**CERTIFICATE HOLDER****CANCELLATION**

OREGO73  Oregon Dept. of Community Colleges & Workforce Development 255 Capitol Street NE Salem, OR 97310	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.  AUTHORIZED REPRESENTATIVE <i>Linda McCoy</i>
---	---

© 1988-2010 ACORD CORPORATION. All rights reserved.



301 E. Fourth Street, Cincinnati, OH 45202

ExecPro<sup>sm</sup>
DECLARATIONS
for
Nonprofit Solutions
Insurance Policy

Insurance is afforded by the company indicated below: (Each a capital stock corporation)

[X] Great American Insurance Company

Policy Number: EPP9711715

Policy Form Number: D16100

Item 1. Name of Organization: WORKFORCE INVESTMENT COUNCIL OF CLACKAMAS COUNTY
Mailing Address: 365 WARNER MILNE ROAD, SUITE 202
City, State, Zip Code: OREGON CITY, OR 97045
Attn: EXECUTIVE DIRECTOR

Item 2. Policy Period: From 07/01/2014 To 07/01/2015
(Both dates at 12:01 a.m. Standard Time at the address of the Organization as stated in Item 1)

Item 3. Aggregate Limit(s) of Liability for each Policy Year:

- (a) \$ 2,000,000 for all Claims other than Claims for Employment Practices Wrongful Acts.
(b) \$ 10,000 Donor Data Loss Crisis Fund Sublimit of Liability. This limit is part of and not in addition to the Limit of Liability provided for in 3(a).
(c) \$ 2,000,000 for all Claims for Employment Practices Wrongful Acts. This limit is:
[ ] part of and not in addition to the Limit of Liability provided for in 3(a).
[X] separate from and in addition to the Limit of Liability provided for in 3(a).
(d) \$ 150,000 FLSA Defense Sublimit of Liability. This limit is part of and not in addition to the Limit of Liability provided for in 3(c).

Item 4. Retentions:

Insuring Agreement A: \$ 0 Each Claim
Insuring Agreements B and/or C: \$ 1,000 Each Claim

Item 5. Premium:

\$ 2,241

Item 6. Endorsements Attached:

D16311 DTCV\_09P DTDP\_09P

Item 7. Notices: All notices required to be given to the Insurer under this Policy shall be addressed to:

Great American Insurance Companies
Executive Liability Division
P.O. Box 66943
Chicago, Illinois 60666

Item 8. Prior & Pending Litigation Date: 07/01/2008

These Declarations along with the completed and signed Proposal Form and Nonprofit Solutions Insurance Policy, shall constitute the contract between the Insureds and the Insurer.

THIS IS A CLAIMS MADE POLICY. READ IT CAREFULLY.

**Travelers Casualty and Surety Company of America**  
**Hartford, Connecticut**  
 (A Stock Insurance Company, herein called the Company)

<b>ITEM 1</b>	<p><b>NAMED INSURED:</b></p> <p><b>Workforce Investment Council of Clackamas County</b></p> <p>D/B/A:</p> <p>Principal Address:  <b>365 Warner Milne Road, Ste 202</b>  <b>OREGON CITY, OR 97045</b></p>
<b>ITEM 2</b>	<p><b>POLICY PERIOD:</b></p> <p>Inception Date: <b>July 1, 2014</b>                      Expiration Date: <b>July 1, 2015</b>      12:01 A.M. standard time both dates at the Principal Address stated in ITEM 1.</p>
<b>ITEM 3</b>	<p><b>ALL NOTICES OF CLAIM OR LOSS MUST BE SENT TO THE COMPANY BY EMAIL, FACSIMILE, OR MAIL AS SET FORTH BELOW:</b></p> <p><b>Email:bfpcclaims@travelers.com</b>  <b>FAX:(888) 460-6622</b></p> <p><b>Mail:Travelers Bond &amp; Financial Products Claim</b>  <b>385 Washington St. – Mail Code 9275-NB03F</b>  <b>St Paul, MN 55102</b></p>
<b>ITEM 4</b>	<p><b>COVERAGE INCLUDED AS OF THE INCEPTION DATE IN ITEM 2:</b></p> <p>Crime</p>

**ITEM 5**

<b>CRIME</b>		
<b>Insuring Agreement</b>	<b>Single Loss Limit of Insurance</b>	<b>Single Loss Retention</b>
<b>A. Fidelity</b>		
1. Employee Theft	<b>\$250,000</b>	<b>\$1,000</b>
2. ERISA Fidelity	<b>\$250,000</b>	<b>\$0</b>
3. Employee Theft of Client Property	<b>Not Covered</b>	
<b>B. Forgery or Alteration</b>	<b>\$10,000</b>	<b>\$1,000</b>
<b>C. On Premises</b>	<b>Not Covered</b>	
<b>D. In Transit</b>	<b>Not Covered</b>	
<b>E. Money Orders and Counterfeit Money</b>	<b>Not Covered</b>	
<b>F. Computer Crime</b>		
1. Computer Fraud	<b>Not Covered</b>	
2. Computer Program and Electronic Data Restoration Expense	<b>Not Covered</b>	
<b>G. Funds Transfer Fraud</b>	<b>Not Covered</b>	
<b>H. Personal Accounts Protection</b>		
1. Personal Accounts Forgery or Alteration	<b>Not Covered</b>	
2. Identity Fraud Expense Reimbursement	<b>Not Covered</b>	
<b>I. Claim Expense</b>	<b>\$5,000</b>	<b>\$0</b>

60 (Policy Provisions: WC 00 00 00 B)

25 INFORMATION PAGE

PF WORKERS COMPENSATION AND EMPLOYERS LIABILITY POLICY

WEG SURER: SEE ATTACHED ENDORSEMENT



NCCI Company Number: 14974  
Company Code: 9

POLICY NUMBER: 76 WEG PF2560  
Previous Policy Number: 76 WEG PF2560

Suffix  
LARS RENEWAL  
10

1. Named Insured and Mailing Address: WORKFORCE INVESTMENT COUNCIL OF  
(No., Street, Town, State, Zip Code) CLACKAMAS COUNTY

FEIN Number: 931246270  
365 WARNER MILNE RD STE 202  
OREGON CITY, OR 97045

State Identification Number(s):  
UIN:

The Named Insured is: CORPORATION

Business of Named Insured: INVESTMENT COMPANY

Other workplaces not shown above: 365 WARNER MILNE RD STE 202  
ORGEON CITY OR 97045

2. Policy Period: From 12/15/13 To 12/15/14  
12:01 a.m., Standard time at the insured's mailing address.

Producer's Name: AUTOMATIC DATA PRCSNG INS AGY/WEST

PO BOX 33015  
SAN ANTONIO, TX 78265  
Producer's Code: 250721

Issuing Office: THE HARTFORD  
3600 WISEMAN BLVD.  
SAN ANTONIO TX 78251  
(877) 287-1316

Total Estimated Annual Premium: \$1,211  
Deposit Premium:  
Policy Minimum Premium: \$350 OR (INCLUDES INCREASED LIMIT MIN. PREM.)

Audit Period: ANNUAL  
Instalment Term:  
The policy is not binding unless countersigned by our authorized representative.

Countersigned by *Suan S. Castaneda* 10/12/13  
Authorized Representative Date

F-13 Please describe how your organization ensures contractors/subcontractors have evidence of certificate of insurance or self-insurance for the following:

- Professional liability resulting from errors, omissions or negligent acts of its officers, employees or agents.
- Motor vehicle insurance
- Property insurance
- Workers' Compensation Insurance
- Bonding coverage for every officer, director, agent, or employee authorized to receive or deposit WIA funds or to issue financial documents, checks or other instruments of payment of program costs.

PY 2013 response is still applicable. Deb Zang

WICCO requires program service providers to provide annual Certificates of Insurance.

Below is our contract language that deals with insurance requirements

13. **Certificates of Insurance:**

As evidence of the insurance coverages required by this contract, Contractor shall furnish a certificate of insurance to the WICCO. Any certificate of insurance required under this contract shall specify parties who are Additional Insureds and must include a provision requiring notice to WICCO in the event of cancellation. Insurance coverages required under this contract shall be obtained from insurance companies authorized to do business in the State of Oregon. If Contractor is self-insured under the laws of the State of Oregon, Contractor shall provide appropriate declarations of coverage.

Contractor shall not cancel, materially change, or not renew insurance coverages affecting this contract. Contractor shall notify the WICCO, in writing, of any material reduction or exhaustion of aggregate limits. Should any policy be canceled before final payment by the WICCO to the Contractor, and should Contractor fail to immediately procure other insurance as specified, the WICCO reserves the right to procure such insurance and to deduct the cost thereof from any sum due Contractor under this contract. Failure to maintain the insurance coverages required herein, may result in termination of the contract.

Contractor shall not commence any work until Contractor obtains, at Contractor's own expense, all required insurance as specified below. Such insurance must have the approval of the WICCO as to limits, form, and amount. The types of insurance Contractor is required to obtain or maintain for the full period of the contract are as follows:

- (A) Commercial General Liability insurance including contractual liability coverage with limits no less than \$1,000,000 combined single limit;
- (B) Automobile Liability Insurance, comprehensive form, with limits not less than \$500,000 combined single limit when using motor vehicles in performance of actions authorized under this contract;
- (C) Worker's compensation coverage consistent with the laws of the State of Oregon;
- (D) A fidelity or surety bond shall be purchased by the Contractor at Contractor's own expense in an amount to exceed the total amount of cash on hand at any time provided under this contract.

The bond shall cover all persons who handle funds provided under this contract and shall extend beyond the contract termination dates to the contract close-out date.

- (E) Additional Insureds Clause. The liability insurance coverages required for the performance of this contract shall be endorsed to name Workforce Investment Council of Clackamas County AND Clackamas County AND the Oregon Department of Community Colleges & Workforce Development, as additional insureds with respect to the activities performed under this contract.

Nothing contained in these insurance requirements is to be construed as limiting the extent of the Contractor's responsibility for payment of damages resulting from Contractor's operation under this contract.

14. **Workers' Compensation** ORS 656.017

The Contractor and its subcontractors, if any, are subject employers under the Oregon Workers' Compensation Law and shall comply with ORS 656.017, which requires them to provide Workers' Compensation coverage for all their subject workers. The Contractor is also an independent contractor for purposes of the Oregon Workers' Compensation Law and is solely liable for Workers' Compensation coverage under this contract.

Unless specified elsewhere, when Contractor places or employs participants in subsidized jobs the participants shall be provided with workers' compensation coverage, benefits, and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work.



F-14 Describe how injuries of registered individuals not covered by Workers' Compensation Insurance will be handled if individuals suffer injuries while involved in WIA allowable activities. (Note: WIA does not require insurance coverage for this type of risk.)

PY 2013 response is still applicable. Deb Zang

Injuries that are suffered while involved in WIA allowable activities are handled through the applicable insurance of the organization liable for the activity.

F-15 What non-federal funds would be used if disallowed costs had to be repaid to the federal government?

The source of repayment of disallowed costs is dependent upon where the disallowed costs are identified. All disallowed costs identified at the contractor level must be repaid by the responsible contractor from non-federal funds. Any disallowed costs identified at the WIB level would be repaid first from WICCO unrestricted funds, and then if needed from Clackamas County general funds.

F-16 Please provide a copy of the procurement policy. (CCWD Policy 589-10.11)

See attached policy F-06 Procurement of Goods and Services

**POLICY #:** F-06  
**Procurement of Goods and Services**

**ISSUED:** January 17<sup>th</sup>, 2013  
January 16<sup>th</sup>, 2014



**PURPOSE:**

To provide guidance on the procurement and purchase of goods and services for program or administrative needs. The intent of this policy is to ensure open competition while securing the best possible price.

**REFERENCES:**

- WIA Sec.184(a)(2)(A)
- 20 CFR 667.200(a)(1)-(7)
- 29 CFR 95.40-48
- TAG Ch II-10
- CCWD 589-10.11

**POLICY:**

The Board, through approval of the annual working budget and Region 15 Local Unified Plan, must approve all funds expended by the Workforce Investment Council. Staff will ensure fiscal accountability and prevent fraud and abuse by acting in accordance with procurement standards.

At a minimum, procurements will include the following:

1. Be conducted in a manner that provides fair and open competition regardless of method or dollar amount. Conduct appropriate analysis to determine which procurement method will be the most economical. Avoid purchasing unnecessary or duplicate items.
2. Document applicable cost/price and lease vs. purchase analysis when appropriate for every procurement action. Minimize the use of sole source procurement and justify it in every case.
3. Solicitations for goods and services will include:
  - a. Clear and accurate written descriptions of the requirements for the goods or services to be procured,
  - b. Criteria for contractor selection or rejection,
  - c. Written protest procedure, negotiation procedure and settlement process.
4. Contracts will be awarded to responsive and responsible bidders who possess the potential ability to perform successfully under the terms and conditions of the

procurement. Small businesses, minority-owned firms, and women's business enterprises will be used to the fullest extent practicable.

5. In performance under this policy, funds will not be used to duplicate facilities or services available in the area (with or without reimbursement) from Federal, State or local sources, unless it is demonstrated that additional capacity is needed or that alternative services or facilities would be more effective or more likely to achieve the performance goals and mission of the Workforce Investment Council.

**EXCLUSIONS:** Purchase of the following items is excluded from this procurement policy:

1. On-the-Job-Training (OJT)
2. Individual Training Accounts (ITAs)
3. Support Services

**CODE OF CONDUCT:**

All Workforce Investment Council procurements must comply with Board Policy A-01 Code of Conduct.

**PROCUREMENT LEVELS:**

Small Procurements: Procurement of goods or annual services not exceeding \$5,000.

1. Contracts may be awarded in any manner deemed practical or convenient, including by direct selection or award.
2. Not intended to eliminate competitive quotations, but rather to expedite the purchasing process, as dollar values may not justify further solicitation efforts.

Intermediate Procurements: Procurement of goods or annual services exceeding \$5,000 but not exceeding \$50,000.

1. Obtain at least three (3) informally solicited competitive price quotes. If three quotes are not reasonably available, fewer will suffice, but a written record of the effort made to obtain the quotes or proposals must be kept.
2. Keep a written record of the sources of the quotes or proposals received.

Competitive Sealed Bids: Procurement of goods or services exceeding \$50,000.

1. Publicly solicited Invitation For Bids for firm, fixed-price contracts when specifications can adequately be defined.
2. Award made to responsive bidder with the lowest price.

Competitive Sealed Proposals: Procurement of goods or services exceeding \$50,000.

1. Publicly solicited RFP identifying all significant evaluation factors and their relative importance.
2. Type of solicitation where negotiation is used and cost is not the overriding consideration.

Sole source Procurements: Procurement of goods or annual services from a single source

1. Used when other procurement methods are impractical, infeasible or inadequate, AND one of the following circumstances applies:
  - a. Goods or service is available from only one source, or
  - b. Urgency for goods or service will not permit a delay, or
  - c. Awarding agency authorizes non-competitive procurement.

Partnership: When partnership can strengthen a proposal, Workforce Investment Council will work with partners to submit a grant application or consider the partnership and potentially award funding to the partners when:

1. The partner organization is an integral part of the awarded program effort
2. The organization is a partner in the development of the application and subsequent to the grant award, the implementation plan
3. The work performed by the partner organization is integral to the successful operation and performance of the grant.

Partner activities are those specified in the original Statement of Work and/or Implementation Plan. Any additional or subsequent changes to the original partner activities are subject to applicable procurement policies and procedures.

**PURCHASING AUTHORITY:**

Any signatory named under board resolution #RS-002 Power to Execute Contracts may authorize Small, Intermediate, and Partnership procurements.

Recommendations of committees evaluating Competitive Sealed Bids and Competitive Sealed Proposals will be brought before the board of directors for approval.

Sole Source procurements need board officer approval.

Approved:



\_\_\_\_\_  
Workforce Investment Council Board Chair



\_\_\_\_\_  
Date



F-17 Please provide a copy of the most recent Request for Proposal and contract boilerplate language, a list of current contracts (including external auditor's contract) with expiration dates and identify the non-discrimination provision. (Revised)

See attached Youth Services RFP released January 27, 2014 and PY14 Youth service provider contract boilerplate. Non-discrimination is addressed in Section A.10

Current Adult & Dislocated Worker service provider contracts:

Clackamas Community College contract #14-15-1 (expires June 30, 2015 with option to renew through June 30, 2018)

Community Solutions for Clackamas County contract #14-15-3 (expires June 30, 2015)

Immigrant and Refugee Community Organization contract #14-15-4 (expires June 30, 2015)

Current Youth service provider contract:

Clackamas Education Service District contract #14-15-2 (expires June 30, 2015 with option to renew through June 30, 2019)

Current Audit Services Contract

Jones & Roth, P.C. contract #PS7-14-15 expires June 30, 2015 for audit of the fiscal year ending June 30, 2014. Contract may be renewed to audit services of subsequent fiscal years through June 30, 2017. (Final contract ending date June 30, 2018)



# REQUEST FOR PROPOSALS

For the period July 1, 2014 – June 30, 2016  
(With option to extend)

---

## WORKFORCE INVESTMENT ACT (WIA) YOUTH SERVICES

**RELEASE DATE:**  
**January 27, 2014**

**DUE DATE:**  
**March 14, 2014**  
**4:00PM (PST)**



Workforce Investment Council of Clackamas County  
365 Warner Milne Road, Suite 202  
Oregon City, OR 97045  
(503) 657-6644  
[www.wicco.org](http://www.wicco.org)

*The Workforce Investment Council of Clackamas County is an equal opportunity employer / program. Auxiliary aids and services available upon request to individuals with disabilities.*

## TABLE OF CONTENTS



<b>1. GENERAL INFORMATION</b>	<b>2</b>
Purpose and Amount of Request for Proposal, Timeline	2
Inquiries, Bidder's Conference	3
Internet Links	4
Provisions and Disclaimers	5
<b>2. BACKGROUND</b>	<b>6</b>
Workforce Investment Council of Clackamas County	6
Youth Services	8
Performance Expectations	9
<b>3. PROPOSAL RESPONSE</b>	<b>10</b>
Submission Requirements	10
Withdrawals	10
Appeals	11
Proposal Cover Page	12
Proposal Checklist	13
Statement of Compliance	14
Administrative Requirements	15
Evidence of Expertise	17
Experience and Past Performance	17
Program Design	18
Staffing Plan	19
Program Cost	19



**1. GENERAL INFORMATION**

**Purpose and Amount of Request for Proposal (RFP)**

The Workforce Investment Council of Clackamas County in Workforce Region 15, Clackamas County, is soliciting competitive proposals for the delivery of workforce development services to in-school and out-of-school youth, ages 14-21, under the Workforce Investment Act Title IB. The successful contractor will be required to provide continuity of service to those participants in the existing Youth Program who are already enrolled and/or in follow up as of June 30, 2014, as well as recruit and enroll new participants throughout the contracted period.

The contract resulting from this RFP is anticipated to begin July 1, 2014 and end June 30, 2016. The Workforce Investment Council reserves the option to extend the contract for an additional three years on a year-to-year basis, based on future funding availability, contractors' satisfactory performance, and other factors as determined by the Workforce Investment Council.

The federal government allocates WIA Youth funds annually each spring. Bidders should ensure that the grand total of their proposal does not exceed the amount below.

<b>2014-2015 ESTIMATED WIA FUNDING ALLOCATION</b>
\$645,000

**Timeline**

Date	Activity
Monday, January 27, 2014	RFP Released
Friday, February 14, 2014 – 4:00PM	RSVP for bidder's conference
Tuesday, February 18, 2014 – 1:00PM	Bidders conference
Tuesday, March 11, 2014 – 3:00PM	End date for bidder's questions
Friday, March 14, 2014 – 4:00PM	Proposals due
Monday, March 17, 2014	Evaluation process begins
May 2014	Provisional contract award notifications Contract negotiations
June 2014	Contracts signed
Tuesday, July 1, 2014	Service begins

The Workforce Investment Council reserves the right to make changes to the above timeline.

## Inquiries

The website ([www.wicco.org](http://www.wicco.org)) will be used as the primary mode of communication between the Workforce Investment Council and potential bidders.



- Beginning January 27, 2014 interested parties can download the Request for Proposals from the website.
- Any inquiry related to this RFP must be submitted electronically to [rfp@wicco.org](mailto:rfp@wicco.org).
- Questions will not be answered over the phone.
- A question and answer page on the website will be updated as often as daily, if necessary, through 3:00PM on March 11, 2014.

Bidders are responsible to check the web page frequently to stay connected and apprised throughout the process.

## Bidders' Conference

A Bidders Conference will be held for interested parties on:

DATE: Tuesday, February 18, 2014  
TIME: 1:00-3:00PM  
LOCATION: The Workforce Investment Council  
365 Warner Milne Road, Suite 202  
Oregon City, OR 97045

- All potential bidders are encouraged to attend, but attendance is not mandatory to submit a response.
- Bidders are asked to notify the Workforce Investment Council at [rfp@wicco.org](mailto:rfp@wicco.org) of their intention to attend the conference by 4:00PM on February 14, 2014.
- The Workforce Investment Council staff will take verbal questions during the conference, but may choose to defer answers. Deferred answers will be posted on Workforce Investment Council's website within two days after the conference.



## Internet Links

*Workforce Investment Act Law and Regulations*  
<http://www.doleta.gov/usworkforce/wia/act.cfm>

*Workforce Investment Act Final Rule*  
<http://www.doleta.gov/regs/statutes/finalrule.htm>

*U.S. Department of Labor Training & Employment Guidance Letter #17-05  
Common Measures Policy and Change 2:*  
<http://wdr.doleta.gov/directives/attach/TEGL17-05.pdf>  
<http://wdr.doleta.gov/directives/attach/TEGL17-05c2.pdf>

*State of Oregon WIA Policies and Guidance*  
<http://www.oregon.gov/ccwd/Pages/rap/index.aspx>

*Oregon Business Plan*  
<http://www.oregonbusinessplan.org/>

*Clackamas County Economic Landscape*  
<http://www.clackamas.us/docs/business/planreview.pdf>

*WorkSource Clackamas*  
<http://worksourceclackamas.org/index.asp>

*The Workforce Investment Council Policies*  
<http://www.wicco.org/New%20Policies/>

*The Workforce Investment Council Background and Information*  
<http://www.wicco.org>

*The Columbia-Willamette Workforce Collaborative*  
<http://www.workforcecollaborative.org/>

## Provisions and Disclaimers

1. All solicitations are contingent upon availability of funds.
2. The Workforce Investment Council reserves the right to accept or reject any or all proposals received.
3. The Workforce Investment Council reserves the right to waive informalities and minor irregularities in offers received.
4. This request for proposals does not commit the Workforce Investment Council to award a contract.
5. Proposals should follow the format set forth in the Proposal Response section of the request for proposals and adhere to the requirements specified therein.
6. The Workforce Investment Council reserves the right to request additional data or oral discussion or documentation in support of written offers.
7. Costs for developing the proposals are solely the responsibility of the respondents.
8. Proposals submitted for funding consideration must be consistent with, and if funded, operated according to, the federal WIA legislation, all applicable federal regulations, State of Oregon policies, and the Workforce Investment Council policies.
9. Service provider selected for funding must also ensure compliance with the following, as applicable: U.S. Department of Labor regulations 20 CFR Part 652; 29 CFR Parts 96, 93, 37,2, and 98; Office of Management and Budget (OMB) Circulars A-21, A-87, A-110, A-122, and A-133 OR 48 CFR part 31, whichever is applicable.
10. The Workforce Investment Council reserves the right to modify or alter the requirements and standards set forth in this request for proposals based on program requirements mandated by state or federal agencies.
11. The contract award will not be final until the Workforce Investment Council and the bidder have executed a mutually satisfactory contractual agreement. No program activity may begin prior to final the Workforce Investment Council approval of the award and execution of a contractual agreement between the successful bidder and the Workforce Investment Council.
12. The Workforce Investment Council reserves the right to cancel an award immediately if new state or federal regulations or policy makes it necessary to change the program purpose or content substantially, or to prohibit such a program.
13. The Workforce Investment Council reserves the right to determine both the number and the funding level of contracts finally awarded. Such determination will depend upon overall fund availability and acceptance of final Workforce Investment Council PY14-15 budget. Bids submitted which are over the maximum amount of funds specified for this request for proposals will be rejected.
14. The proposal warrants that the costs quoted for services in response to the request for proposals are not in excess of those that would be charged any other individual for the same services performed by the bidder.
15. Applicants are advised that most documents in the possession of the Workforce Investment Council are considered public records and subject to disclosure under the State of Oregon's Public Records Law.



## 2. BACKGROUND



### Workforce Investment Council of Clackamas County

The Workforce Investment Council of Clackamas County is the Region 15 Local Workforce Investment Board (LWIB). The Workforce Investment Council brings together business and community leaders, appointed by the Board of County Commissioners, to promote and expand workforce development activities to ensure the long-range economic vitality of the region. The Workforce Investment Council Board is the policy and planning body for the workforce development system in Clackamas County and invests funding necessary to operate the system through the Workforce Investment Act (WIA) Adult, Dislocated Worker, and Youth programs. The LWIB is staffed by the Workforce Investment Council.

The Board's oversight responsibility includes selection and monitoring of workforce development service providers, policy development, and establishment of local performance standards.

#### **Our mission:**

To develop a highly skilled workforce that creates sustained economic prosperity in Clackamas County.

#### **Our vision:**

The Workforce Investment Council is a strong organization committed to excellence in service and is supported by multiple funding sources. It serves as a collaborative convener that represents the workforce system in Clackamas County and is a collective voice of public/private partnerships.

The 2012-2014 strategic priorities that support the Workforce Investment Council's mission and vision are as follows:

#### *Create opportunities for jobs and apprenticeships*

- Promote and invest in skill development solutions to fill skill gaps;
- Encourage business mentoring in schools;
- Maintain partnerships with labor;
- Actively participate in attracting, retaining and growing businesses; and
- Promote and support work-based experiences.

#### *Train and/or place jobseekers in high demand occupations*

- Implement and coordinate best practices for skill identification, job seeking and placement;
- Maintain alignment with priority sectors identified by county, region and state;

- Facilitate career readiness, preparation and career pathways; and
- Implement best practices for skill identification and development.



*Attract resources to the county and region*

- Share information and promote communication flow among partners;
- Diversify funding;
- Advocate at the state and federal level for workforce investment funding; and
- Participate in area economic development and chamber of commerce organizations.

*Cultivate and prioritize key industries*

- Align with area economic development organizations;
- Review industry data on a regular basis to inform decisions;
- Connect with and convene industry groups regularly; and
- Actively participate in broad regional collaboration to address industry workforce needs.

Workforce Investment Council staff work closely with neighboring regions to assure quality services throughout the broader region and state. The Columbia Willamette Workforce Collaborative is a formalized group working with employers in prioritized industry sectors throughout the Portland/Vancouver metro area.





## Youth Services

The federal Workforce Investment Act of 1998 (WIA), P.L. 105-220, was implemented in July, 2000 to consolidate, coordinate, and improve employment, training, literacy and vocational rehabilitation programs in the United States. WIA provides the framework for a national workforce preparation system that is flexible, responsive, customer-focused and locally managed.

The primary focus of WIA youth services will be engaging young people in secondary education, skill development and occupational training activities and opportunities through the use of strength-based service delivery practices. The education and training outcomes achieved as a result of the services provided by the selected respondent will increase the number of youth who move into post-secondary education, and support the needs of regional employers by increasing the education and skills of the “emerging workforce.”

Youth services are an important element of the WorkSource Oregon system and are delivered year-round. Youth services are supply-side focused, informed by the needs of business and industry, but preparatory and foundational by nature. Youth services will focus on the basic skills and credentials necessary for occupational skill acquisition through higher education, training or employment to ensure that youth will make a successful transition to self-sufficiency in adulthood.

Services will be provided to youth ages 14 through 21 who meet the regulatory eligibility definitions for WIA Youth formula funds. Directly and through partner relationships, the selected respondent will be responsible for providing outreach, targeted recruitment, assessment, screening, enrollment, career planning and counseling, youth development and leadership opportunities, referral and follow-up services to help youth gain the work readiness, education and occupational skills required to move towards self-sufficiency.

A respondent’s primary service must be the acquisition of secondary credentials and related education services. Alternative education will serve as the foundation for bridge services including soft skills, employment skills, work experience and post-secondary transition services.

*The Workforce Investment Act requires that 10 program elements be made available to all youth who are served by the WIA youth system.*

*These program elements are designed to fill the gaps in the lives of youth who lack the family, educational, and social frameworks to meet their essential needs.*

- 1. Tutoring, study skill and dropout prevention strategies*
- 2. Alternative secondary school offerings*
- 3. Summer employment opportunities linked to academic and occupational learning*
- 4. Paid and unpaid work experience*
- 5. Occupational skill training*
- 6. Leadership development*
- 7. Supportive services*
- 8. Adult mentoring for at least 12 months*
- 9. Comprehensive guidance and counseling*
- 10. Follow-up activities for no less than 12 months after completion of participation*

The Workforce Investment Council strongly encourages providers to leverage resources and build coalitions that result in an innovative and responsive system.

The estimated numbers of participants who will be carried over from PY13 services through transition plans negotiated with the successful respondent are in the table below.



<b>Estimated Number of Carry-In Participants</b>		
<b>In-School (ISY)</b> Youth attending any school at date of enrollment.	<b>Out-of-School (OSY)</b> Youth not attending any school who do not have a diploma or GED; youth with GED/diploma but are basic skills deficient at date of enrollment.	<b>Follow-Up</b> Youth who are in activities to monitor their success during transition to employment and further education for up to 12 months after completion of participation.
175	135	55 ISY and 40 OSY

### **Performance Expectations**

Youth served must meet or exceed the following three common measures the Department of Labor (DOL) has developed for youth services, the goals for which will be set during contract negotiations.

1. *Placement in employment or education (post-exit measure): 72%*  
Defined as: Employment, military service, enrolled in post-secondary education and/or advanced training or occupational skills training.
2. *Attainment of a degree or certificate (post-exit measure): 73%*  
Defined as: Attaining a diploma, GED or certificate.
3. *Literacy and numeracy gains: 53%*  
Defined as: Advancing one or more Adult Basic Education (ABE) or English as a Second Language (ESL) functioning levels.

Performance goals are set by the DOL, State of Oregon, and the Workforce Investment Council annually. Local performance measures may be established as deemed appropriate by the Workforce Investment Council Board. The youth service provider will be held accountable for achieving all measures and targets.

All performance is managed, tracked and reported to the State and DOL through the I-Trac data management system and Oregon Employment Department (OED) wage data. The successful respondent will be contractually required to input data timely into the I-Trac system and maintain required documentation as directed by local and State policy, and will be responsible for the accuracy of this data.

### 3. PROPOSAL RESPONSE

#### Submission Requirements

All proposals must be received by the Workforce Investment Council by 4:00PM (PST) on March 14, 2014. Proposals not received by this time will be automatically disqualified from competition. A postmark will not be accepted if the proposal does not arrive by the deadline. Please mail or deliver hard copies of proposals to:



Workforce Investment Council of Clackamas County  
Youth RFP Response  
365 Warner Milne Road, Suite 202  
Oregon City, Oregon 97045

The submitted proposal package must be in a sealed envelope and include one (1) original copy of the proposal marked “Request for Proposals” and one (1) copy of the documentation required in the Administrative Requirements section. In addition, an electronic copy should be e-mailed to [rfp@wicco.org](mailto:rfp@wicco.org). However, this emailed copy will not serve as the formal proposal submittal.

- Proposals are limited to a maximum of 21 pages, not including the requested documentation in the Administrative Requirements section.
- Include all of the required forms, narrative answers and attachments that pertain to your proposal. Failure to do so will disqualify your proposal from competition.
- Please use 12-point Arial type, 1-inch margins and single spacing.
- Staple your proposal, but do not bind it in any other way or use dividers with tabs.
- All proposals are to be submitted in accordance with the terms, conditions and procedures stated in the RFP.
- Any submitted proposal shall remain a valid proposal for one year after the closing date of the RFP.

#### Withdrawals

A submitted application may be withdrawn prior to the application due date. A written request to withdraw the application must be submitted to the Workforce Investment Council. If a bidder does not withdraw a proposal by the due date, the proposal becomes the property of the Workforce Investment Council and may be subject to public disclosure according to the Freedom of Information Act.

## Appeals

The following process has been established to address appeals:

- The appeal must be due to what the respondent considers a flaw in the Evaluation Committee's funding recommendation process.
- The organization filing the appeal must specify the basis of the appeal and provide an alternative. Proposal rating scores may not be appealed. The mere fact that a proposal was not recommended for funding is also not open to an appeal, nor is a complaint about the amount of funding granted. The appeal must be a violation of the process established for this solicitation.
- The appeal must be submitted in writing to the Workforce Investment Council within 10 calendar days of the contract award notification.
- The Workforce Investment Council will issue a decision on appeals within 7 calendar days of receipt.



**Proposal Cover Page**



Administrative Organization: \_\_\_\_\_

Organization Type:

- Non-profit Organization     Government Organization     For-profit Business  
 Other: Please specify: \_\_\_\_\_

Address: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Contact Person: \_\_\_\_\_

Phone: \_\_\_\_\_

Fax: \_\_\_\_\_

E-mail: \_\_\_\_\_

**BUDGET SUMMARY:**

IN-SCHOOL YOUTH:                      Program    \$ \_\_\_\_\_    \_\_\_\_\_% of total

Number of participants to be served: \_\_\_\_\_

Cost per participant: \_\_\_\_\_

OUT-OF-SCHOOL YOUTH:                      Program    \$ \_\_\_\_\_    \_\_\_\_\_% of total

Number of participants to be served: \_\_\_\_\_

Cost per participant: \_\_\_\_\_

**Proposal Summary:**

*Please summarize your program design in a brief paragraph.*

## Proposal Checklist

It is the bidder's responsibility to make sure that all required elements and forms are included in the proposal. Proposals that do not include the required elements and forms will be automatically disqualified.



Before submitting your proposal, check the following:

- One (1) original copy of the proposal.
- One (1) copy of the required documents.
- One electronic copy of the proposal emailed to [rfp@wicco.org](mailto:rfp@wicco.org).

### Proposal Response Package Requirements

- 1. Proposal Cover Page
- 2. Proposal Checklist
- 3. Statement of Compliance
- 4. Administrative Requirements \* (pass/fail)
- 5. Evidence of Expertise (pass/fail)
- 6. Experience and Past Performance (20 %)
- 7. Program Design (40 %)
- 8. Staffing Plan (15 %)
- 9. Program Cost including Budget Form (25 %)

\* Attachments are not part of the 21 page maximum.

**Statement of Compliance**

As the authorized signatory official for: \_\_\_\_\_  
Submitting Organization



I hereby certify:

- That the above named proposer is legally authorized to submit this application requesting funding under the Workforce Investment Act (the legal signatory for the organization applying).
- That the above-named proposer does hereby agree to execute all work related to this application in accordance with the Workforce Investment Act, U.S. Department of Labor, State of Oregon Community College and Workforce Development Department issuances, Workforce Investment Council of Clackamas County policies and guidelines, and other administrative requirements issued by the Governor of the State of Oregon. The vendor shall notify the Workforce Investment Council within 30 calendar days after issuance of any amended directives if it cannot so comply with the amendments; and
- That the above named proposer will ensure special efforts to prevent fraud and other program abuses, such as but not limited to, deceitful practices, intentional misconduct, willful misrepresentation and improper conduct which may or may not be fraudulent in nature; and
- That the contents of the application are truthful and accurate and the above named proposer agrees to comply with the policies stated in this application and that this application represents a firm request subject only to mutually agreeable negotiations; and that the above named proposer is in agreement that the Workforce Investment Council reserves the right to accept or reject any proposal for funding; and that the above-named proposer has not been debarred or suspended from receiving federal grants, contracts, or assistance; and that the above-named proposer waives any right to claims against the members and staff of the Workforce Investment Council of Clackamas County.

\_\_\_\_\_  
Authorized Representative Signature

\_\_\_\_\_  
Typed Name and Title

\_\_\_\_\_  
Date

**Administrative Requirements**

**Pass/Fail**



- Copy of documentation proving legal entity (for example, certificate of incorporation, 501(c)(3) letter, etc.)
- Provide current job descriptions and resumes for staff in management positions with responsibility for performing key grant functions – at minimum the program manager that will oversee the program proposed through the request for proposals and the fiscal lead responsible for administrative and financial aspects of the subgrant.
- A copy of the organization’s current Financial Administration policies and procedures, or fiscal guidelines.

Organization’s most recent financial information – provide a copy of the highest level documentation applicable to the organization:

- A-133 single audit financial statements and letter to management, and all associated response letters – OR -
- Independently audited financial statements and letter to management report, and all associated response letters – OR -
- Unaudited annual financial statements
- Current cost allocation plans for direct and indirect costs and, if applicable, a copy of the approved federal indirect cost rate.
- Timekeeping policies and procedures that address allocation of employee time by activity and funding source.

Organization’s current insurance coverage for:

- General Liability
- Worker’s Compensation
- Motor Vehicle
- Property and Equipment
- Employee Dishonesty

Include the single-occurrence limits, aggregate limits and deductibles.





- A copy of the organization's current personnel policies and procedures table of contents.
- Assurance of compliance with Federal Civil Rights law, including but not limited to:
  - Title VI – Civil Rights Act of 1964
  - Section 504 – Rehabilitation Act
  - Title IX, Education Amendments Act of 1972
  - Age Discrimination Act of 1975
  - Section 188 of the Workforce Investment Act
- A description of the organization's technological capabilities. The Workforce Investment Council requires minimum capacity at:
  - Business-grade, broadband internet connectivity;
  - Network and workstation virus protection that is fully functional and updated at least weekly;
  - Individual e-mail accounts for staff working with the Workforce Investment Council allowing attachment size of at least 5 Megabytes;
  - PCs with 2 GB RAM or more, and 20 GB or more of available disk space;
  - PCs with one of the following Internet browser programs: Microsoft Internet Explorer version 8 or newer, Google Chrome version 25.0 or newer, or Mozilla Firefox version 20.0 or newer; and
  - Monitor capable of at minimum a 1024 x 768 resolution that is comfortable for the user.



**Pass/Fail**

**Evidence of Expertise (maximum 1 pg)**

**Community References:**

Provide contact information of two community references that can talk about your workforce development experience. Include a contact name, agency name, email, phone number, city and state for each.

**Experience and Past Performance (maximum 3 pgs)**

**20 %**

Demonstrate, in a maximum of three pages, your organization's past experience and qualifications to provide the services requested and the ability to ensure fiscal compliance related to the expenditure of federally granted funds.

1. Explain how this proposal relates to your agency's mission and values.
2. Describe your expertise providing the youth services described in the RFP.
3. What is your past experience meeting and/or exceeding WIA federal, state and local performance measures for youth services?
4. Describe your organization's experience with fiscal management, including use of acceptable accounting practices and controls.
5. Describe additional funding sources your organization manages and the stability of these funding sources.
6. Demonstrate your experience in implementing and maintaining continuous organizational and performance improvement processes.
7. Describe your experience building partnerships and collaborating with other organizations.



**Program Design (maximum 6 pgs)**

**40 %**

Describe, in a maximum of six pages, the design of the program to be provided. If your proposal includes sub-contractors, the respective areas of responsibility for each must be clearly delineated in your answers to these questions.

1. Describe how proposed services and activities will lead to the attainment of the local goals and challenges of Region 15.
2. How will your organization assure that the services you offer will meet industry needs in Region 15? Describe your relationships to businesses in Clackamas County.
3. Provide your organization's strategies to reach out to youth service providers in this area. How do you plan to collaborate with community partners?
4. How do you see your organization partnering and collaborating with WorkSource Clackamas at 506 High Street, Oregon City, OR?
5. Describe how each of the program and service design elements will be provided or made available to youth. Your discussion should demonstrate the capacity to deliver as described.
6. Provide a description of where and how a customer would access the services you are offering to provide.
7. Describe how you plan to engage youth during the summer.
8. Describe your outreach strategies for both in-school and out-of-school youth.
9. Describe how you will assess the youth populations you will serve.
10. How will you ensure your organization's program design will be OSHA compliant?
11. What will you do to meet and/or exceed the performance measures described in this RFP?
12. Explain how you will ensure continuous performance improvement in the program design described in your response.



**Staffing Plan (maximum 2 pages)**

**15 %**

1. Provide a staffing plan for implementation of the proposal. Include the full time equivalent (FTE) you anticipate and the key duties for each position recommended.
2. Describe your staff development plan and how you will assure that the staff delivering these services will have the skills they need to be effective.

**Program Cost (maximum 4 pgs)**

**25 %**

1. Complete Budget Form, in a maximum of one page (available in Excel format on the Workforce Investment Council website), listing anticipated costs by line item. The expectation is no less than 40% of funds will be spent on out-of-school youth.
2. Provide, in a maximum of three pages, a Budget Narrative organized by Budget Form line items which describes the methodology used to arrive at the budget figures. Include a description of in-kind and/or leveraged resources that you will be providing.

**PERFORMANCE CONTRACT #14-15-2  
FOR EMPLOYMENT & TRAINING SERVICES  
under the  
WORKFORCE INVESTMENT ACT of 1998**

This contract is authorized by the Workforce Investment Act of 1998 and is made and entered into between the Workforce Investment Council of Clackamas County (WICCO), an Oregon Nonprofit Corporation, that is exempt from income taxation under Internal Revenue Code Section 501(c)(3), and

Clackamas Education Service District  
13455 SE 97<sup>th</sup> Ave  
Clackamas, Oregon 97015

The purpose of this contract is to provide employment & workforce training services to youth in Clackamas County.

In consideration for the services to be provided by the Contractor for the period beginning **July 1, 2014 through June 30, 2015** the Contractor will be paid an amount up to **\$273,325 for Out of School Youth** and **\$343,675 for In School Youth** and **\$5,000** in state general **Certified Work Ready Communities** funds. All payments will be made on a cost-reimbursement basis.

Total amount of this contract shall not exceed **\$622,000** except as amended.

The parties, by their signatures, agree to comply with all the terms of this contract including those sections and attachments listed below.

Section A - General Provisions  
Section B - Project Description/Scope of Work  
Section C - Fiscal Provisions & Budget  
Section D - Special Provisions  
Section E - Certification Regarding Debarment  
Section F - Certification Regarding Lobbying  
Attachment 1 - Detailed Budget

**Workforce Investment Council of  
Clackamas County**

**Clackamas Education Service District**

---

Signature/Date  
Julie Hugo, Board Chair

---

Signature/Date  
Milt Dennison, Superintendent

Federal ID Number: 93-1246270

Federal ID Number: 93-6000229

**WORKFORCE INVESTMENT COUNCIL OF CLACKAMAS COUNTY CONTRACT**  
**SECTION A**  
**GENERAL PROVISIONS**

**Authority to Contract**

Contractor certifies that it possesses the legal authority under laws of the State of Oregon to enter into this contract by approval of its governing board which has authorized the execution of this contract.

2. **Debarment** 20 CFR 667.200 (e)

The Contractor, as a recipient of any Federal assistance funds, whether all or only a part of the funds are provided by the Workforce Investment Council of Clackamas County (WICCO), certifies by signature of this contract that neither it nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency (see Section E of this contract).

3. **Project Coverage**

The Contractor shall operate the WIA project and services described in Section B.

4. **Compliance**

Contractor will comply with all federal, state and local laws, regulations, executive orders and ordinances applicable to the Work under this Contract. Without limiting the generality of the foregoing, Contractor expressly agrees to comply with: (i) Title IV of the Civil Rights Act of 1964; (ii) section V of the Rehabilitation Act of 1973 (iii) the Americans with Disabilities Act of 1990 and ORS 659A.142; (iv) all regulations and administrative rules established pursuant to the foregoing laws; and (v) all other applicable requirements of federal and state civil rights and rehabilitation statutes, rules and regulations.

Agency's performance under this contract is conditioned upon Contractor's compliance with the provisions of ORS Chapters 279A, 279B, and 279C, which are incorporated by reference herein. Contractor will ensure that the language "equal opportunity employer/program" and "auxiliary aids and services are available upon request to individuals with disabilities" appear on each work product in both English **and Spanish**. Contractor will ensure that it does not discriminate on the basis of any of the protections covered by the Workforce Investment Act and the regulations set forth at 29 CFR part 37.

Additionally the following special terms apply to this contract promulgated by the funding source and cited Federal Code:

- 20 CFR 667.210(g) *Nepotism*. No individual may be placed in a WIA employment activity if a member of that person's immediate family is directly supervised by or directly supervises that individual.
- 20 CFR 667.260 *Construction, purchase and renovation of real property*: Notwithstanding the exceptions listed in subsection 260 (b-d), WIA title I funds provided under this contract must not be spent for construction or purchase of facilities without prior approval from the agency.
- 20 CFR 667.262 *Employment generating activities* WIA funds may not be spent on employment generating activities, economic development activities, investment in revolving loan funds, capitalization of businesses, investment in contract bidding resource centers, and similar activities that are not directly related to training for eligible individuals

- 20 CFR 667.264 *Prohibited activities*: WIA title I funds must not be spent on: (1) The wages of incumbent employees during their participation in economic development activities provided through a Statewide workforce investment system, (WIA sec.181(b)(1).); (2) Public service employment (WIA sec. 195(10)), except to provide disaster relief employment, as specifically authorized in section 173(d) of WIA.; (3) Expenses prohibited under any other Federal, State or local law or regulation. WIA funds must not be used for foreign travel. (WIA sec. 181(e). (4) Drug testing (WIA sec 181(f)
- 20 CFR 667.266 *Limitations on sectarian activities*: WIA title I financial assistance may not be spent on the employment or training of participants in sectarian activities.
- 20 CFR 667.268 *Business relocation service prohibitions*: (1) WIA funds may not be used or proposed to be used for: the encouragement or inducement of a business, or part of a business, to relocate from any location in the United States, if the relocation results in any employee losing his or her job at the original location; (2) no customized training, skill training, or on-the-job training or company specific assessments of job applicants or employees of a business or a part of a business that has relocated from any location in the United States, may be provided until the company has operated at that location for 120 days, if the relocation has resulted in any employee losing his or her jobs at the original location.
- 20 CFR 667.270 *Employee displacement prohibitions* (a) A participant in a program or activity authorized under title I of WIA must not displace (including a partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits) any currently employed employee. (b) A program or activity authorized under title I of WIA must not impair existing contracts for services or collective bargaining agreements. When a program or activity would be inconsistent with a collective bargaining agreement, the appropriate labor organization and employer must provide written concurrence before the program or activity begins.(c) A participant in a program or activity may not be employed in or assigned to a job if: (1) Any other individual is on layoff from the same or any substantially equivalent job; (2) The employer has terminated the employment of any regular, unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy so created with the WIA participant; or (3) The job is created in a promotional line that infringes in any way on the promotional opportunities of currently employed workers.
- WIA sec 195(2) WIA funds shall only be used for activities that are in addition to those that would otherwise be available in the local area in the absence of such funds.
- WIA sec 195 (5) No person or organization may charge a fee to any individual for referral to or placement in training or employment programs

The Contractor agrees to comply with the Uniform Administrative Requirements; 29 CFR Part 97, for State/Local Governments and Indian Tribes; or 29 CFR Part 95, for Institutions of Higher Education, Hospitals and other Non-Profit Organizations and Commercial Organizations.

The Contractor agrees to comply with all applicable Oregon State and Clackamas County laws, rules and regulations, as well as State and WICCO policies, procedures, and regulations.

The Contractor shall comply with the Workforce Investment Act (WIA) as amended and all subsequent amendments thereto and all implementing regulations.

5. **Indemnity Clause** PL 105-220 Sec. 184; 20 CFR Subpart G.

To the extent permitted by the Oregon Constitution, Article XI, Sections 7 and 10, and to the extent permitted by the Oregon Tort Claims Act or provided for in private insurance contracts, Contractor agrees to indemnify, defend, and hold WICCO and Clackamas County harmless from all damages, losses, and expenses including (but not limited to) attorney fees, and to defend all claims, proceedings, lawsuits, and judgments arising out of or resulting from Contractor's negligence in the

performance of or failure to perform under this contract. Either party to this contract shall not be required to indemnify or defend the other party for any liability arising out of wrongful acts of its own officers, employees, or agents.

Any act or omission by Contractor which results in repayment of funds to the funding source shall be the responsibility of Contractor. Contractor agrees to repay such funds and to defend and indemnify WICCO as set forth above.

6. **Records Control** PL 105-220; 29 CFR Parts 37, 95.53, 97.42; ORS Chap. 192, ORS 660.300-660.339; OAR 151-020-0060 – 151-020-0090; CCWD WIA Policy #589-40.4

(A) The Contractor shall establish maintain and safeguard all participant files, records, project records, and documents. Contractor shall ensure confidentiality of participant information as provided in State law and administrative rules. Records must be sufficient to justify all payments claimed and paid under this contract. Contractor and any subcontractor will incorporate into their management systems the following procedures for the management of all WIA records.

1. Retain all records and documents pertinent to the grants, grant agreements, interagency agreements, contracts or any other award, including financial, statistical, or other pertinent records, and supporting documentation, for a period of at least three (3) years after the original submittal by the State of Oregon Department of Community Colleges and Workforce Development (CCWD) of the final expenditure report (closeout) for that funding period to the federal Department of Labor, the awarding agency;
2. Retain all records of non-expendable property for a period of at least three years after final disposition of property;
3. Retain indirect cost records such as computations or proposals, cost allocation plans, and supporting documentation for three years from the date the indirect cost rate package is submitted for negotiation. If not submitted for negotiation, the three-year period identified in (1) above shall apply;
4. Retain all records pertinent to applicants, registrants, eligible applicants/registrants, participants, terminees, employees, and applicants for employment for a period of not less than three years from the close of the applicant program year. Such records must be maintained as whole record system;
5. Retain records regarding complaints and action taken on the complaints for a period of not less than three years from the date of resolution of the complaint;
6. Retain all records beyond the required three years if any litigation or audit has begun or a claim is instituted involving the grant or agreement covered by the records. The records shall be retained until the litigation, audit, or claim has been resolved or the required three years, whichever period is longer.

In the event Contractor or subcontractor is unable to keep their records, Contractor shall notify WICCO who will take custody and be responsible for the maintenance and retention of the records.

**Disposal**

No records addressed in this policy shall be disposed of without instruction from or approval of WICCO. WICCO will provide instructions and timelines for disposing of records. Any records that



are confidential in nature, including participant records, must be shredded, or similarly destroyed. Non-confidential records may be recycled. If there is any outstanding litigation or audit claim begun on records prior to termination of retention, the records will be retained until resolution of litigation or audit claim.

(B) At any time during normal business hours and as often as WICCO shall deem necessary, the Contractor shall make available for examination all its records relating to all matters covered by this contract. WICCO, the Oregon State Workforce Investment Administration, The U.S. Department of Labor, the Comptroller General of the United States, their duly authorized representatives, or representatives of other governmental funding sources contributing through WICCO to activities under this contract shall have the authority to audit, examine, and make excerpts or transcripts from any books, documents, papers, records, files, forms, or other documents of the Contractor which are necessary to permit tracing of participant activity and funds to a level of expenditure adequate to insure that the funds have not been spent unlawfully, and to determine compliance with all applicable rules and regulations, and the provisions of this contract including the proper allocation of costs to this contract.

(C) The Contractor shall provide to WICCO upon request, sufficient staff time necessary to aid in the performance of contract related (a) project research, (b) project evaluation, (c) project monitoring, and (d) completion of project fiscal review and audits.

## 7. **Contracting**

Contractor shall not assign or subcontract in whole or in part any contractual duties unless the Subcontractor agrees to indemnify WICCO and the Clackamas County Board of Commissioners (BCC) in accordance with the terms of paragraph 5, above and:

(A) Section B-Project Description provides for contracting, or

(B) WICCO has provided advance written approval of subcontracting.

## 8. **Termination Clauses**

### (A) Termination for Cause

WICCO retains the right upon written notice of default to suspend funds and activities under this contract and to terminate this contract in whole or in part for cause if Contractor fails to perform in a timely and proper manner its obligations, fails to make sufficient progress towards its objectives, or violates any of the covenants, agreements, or stipulations of this contract, or fails to meet performance standard as outlined in Section B-Project Description of this contract.

Any such termination of this contract shall be without prejudice to any obligations or liabilities of either party already accrued prior to such termination.

### (B) Other Terminations

Either party to this contract may elect to terminate the contract without cause upon providing written notice of intent to terminate to the other party thirty (30) calendar days prior to the date of such termination.

WICCO may terminate this contract effective upon written notice to the Contractor, or at such later date as may be established by WICCO, under any of the following conditions:

- (i) If WICCO's funding from federal, state, or other sources is not obtained and/or sustained at levels sufficient to allow for purchase of services as specified herein, then this contract

may be terminated or modified to accommodate a reduction in funds. All allocable and allowable costs incurred by the Contractor under the terms of this contract shall be reimbursed up to and including the date of notice provided for herein.

- (ii) If federal and state regulations or guidelines are modified, changed, or interpreted in such a way that services are no longer allowable or appropriate for purchase under this contract or WICCO is no longer eligible for the funding proposed for payment as authorized by this contract.
- (iii) If any license or certificate required by law or regulation to be held by the Contractor to provide the services required by this contract is for any reason denied, revoked, or not renewed.

## 9. **Modifications**

- (A) It is a condition for receipt of funding under the terms of this contract that the Contractor agrees to accept unilateral modifications to this agreement whenever there has been a change in any Federal statute, rule, regulation, order, or other relevant authority under which this document is written.
- (B) Contractor may request a modification to this contract, which shall be subject to the approval of WICCO. All requested Contract Modifications must be presented in writing to WICCO no later than fifteen (15) calendar days prior to the beginning of the affected quarter. All Contract Modifications shall be within the sole discretion of WICCO.
- (C) Contractor must receive prior written approval from WICCO for a Contract Modification prior to initiating changes in program design and/or program objectives.
- (D) WICCO may issue Contract Modifications, including unilateral Contract Modifications, under the following circumstances:
  - (i) To incorporate administrative changes into the contract;
  - (ii) When authorized to do so by federal or state law, rule, regulation, or terms of this contract;
  - (iii) When there has been a change in any federal or state statute, rule, regulation, order, or other relevant authority;
  - (iv) As necessary to implement policy.
- (E) Contract Modifications shall not become a part of this contract until they are signed and executed by WICCO. Nothing in this section shall be construed to allow expenditures under this contract to exceed the total dollar amount authorized by this contract. Contract Modifications will follow rules and procedures established by WICCO to comply with U.S. Department of Labor requirements.
- (F) Contractor assures that any and all subcontracts or agreements entered into as a result of this contract shall contain the limitation regarding unilateral modification as set forth in paragraph 9(A), above.

## 10. **Non-discrimination and Accessibility** PL 105-220 Sec. 188; CFR Part 33 & 37; ORS Ch. 659

Contractor will comply with all Federal, state and local laws, regulations, executive orders and ordinances regarding nondiscrimination and equal opportunity provisions applicable to work under this contract. Contractor expressly agrees to comply with the Equal Employment Opportunity provisions in Executive Order (E.O.) 11246, as amended by E.O. 11375 and supplemented by the

requirements of 41 CFR Part 60. Contractor assures that it will comply fully with the nondiscrimination and equal opportunity provisions of the Workforce Investment Act of 1998 (WIA), including the Nontraditional Employment for Women Act of 1991; Title VI of the Civil Rights Act of 1964, as amended; section 504 of the Rehabilitation Act of 1973, as amended; the Age Discrimination Act of 1975, as amended; Title IX of the Education Amendments of 1972, as amended; and with all applicable requirements imposed by or pursuant to regulations implementing those laws, including but not limited to 29 CFR, Part 33 & 37. The United States has the right to seek judicial enforcement of this assurance. Contractor will not discriminate against, nor deny employment or services to any person on the grounds of race, creed, color, religion, sex, national origin, marital status, expunged juvenile record, age (except as provided by WIA regulations), disability, citizenship, or political affiliation or belief.

Additionally, Contractor shall comply with the accessibility provisions of Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act.

**11. Collective Bargaining Agreements**

Contractor certifies that this contract does not violate any collective bargaining agreements to which it is a party.

**12. Reference Documents**

WICCO will provide, within (30) thirty days following execution of this contract, copies of WIA laws, regulations, and other WIA issuances referenced in this document.

**13. Certificates of Insurance:**

As evidence of the insurance coverages required by this contract, Contractor shall furnish a certificate of insurance to WICCO. Any certificate of insurance required under this contract shall specify parties who are Additional Insureds and must include a provision requiring notice to WICCO in the event of cancellation. Insurance coverages required under this contract shall be obtained from insurance companies authorized to do business in the State of Oregon. If Contractor is self-insured under the laws of the State of Oregon, Contractor shall provide appropriate declarations of coverage.

Contractor shall not cancel, materially change, or not renew insurance coverages affecting this contract. Contractor shall notify WICCO, in writing, of any material reduction or exhaustion of aggregate limits. Should any policy be canceled before final payment by WICCO to the Contractor, and should Contractor fail to immediately procure other insurance as specified, WICCO reserves the right to procure such insurance and to deduct the cost thereof from any sum due Contractor under this contract. Failure to maintain the insurance coverages required herein, may result in termination of the contract.

Contractor shall not commence any work until Contractor obtains, at Contractor's own expense, all required insurance as specified below. Such insurance must have the approval of WICCO as to limits, form, and amount. The types of insurance Contractor is required to obtain or maintain for the full period of the contract are as follows:

- (A) Commercial General Liability insurance including contractual liability coverage with limits no less than \$1,000,000 combined single limit;

- (B) Automobile Liability Insurance, comprehensive form, with limits not less than \$500,000 combined single limit when using motor vehicles in performance of actions authorized under this contract;
- (C) Worker's compensation coverage consistent with the laws of the State of Oregon;
- (D) A fidelity or surety bond shall be purchased by the Contractor at Contractor's own expense in an amount to exceed the total amount of cash on hand at any time provided under this contract. The bond shall cover all persons who handle funds provided under this contract and shall extend beyond the contract termination dates to the contract close-out date.
- (E) Additional Insureds Clause. The liability insurance coverages required for the performance of this contract shall be endorsed to name Workforce Investment Council of Clackamas County AND Clackamas County AND the Oregon Department of Community Colleges & Workforce Development, as additional insureds with respect to the activities performed under this contract.

Nothing contained in these insurance requirements is to be construed as limiting the extent of the Contractor's responsibility for payment of damages resulting from Contractor's operation under this contract.

14. **Workers' Compensation** ORS 656.017

The Contractor and its subcontractors, if any, are subject employers under the Oregon Workers' Compensation Law and shall comply with ORS 656.017, which requires them to provide Workers' Compensation coverage for all their subject workers. The Contractor is also an independent contractor for purposes of the Oregon Workers' Compensation Law and is solely liable for Workers' Compensation coverage under this contract.

Unless specified elsewhere, when Contractor places or employs participants in subsidized jobs the participants shall be provided with workers' compensation coverage, benefits, and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work.

15. **Tax Laws, MBE/WBE** ORS 279A.110 and Chapter 305.385

By execution of this contract, Contractor certifies under penalty of perjury that:

- (A) To the best of Contractor's knowledge, Contractor is not in violation of any tax laws described in ORS 305.380(4); and
- (B) Contractor has not discriminated against minority, women, or small business enterprises in obtaining any required contracts.

16. **Drug Free Workplace** (E.O. 12549; Sec. 5151-5160 Public Law 100-690, Title V, Subpart D; 41 U.S.C. 701 *et seq.*) and (29 CFR 98.600).

Contractor certifies that it has adopted and instituted a policy to insure a drug-free workplace in accordance with local, state and federal laws, rules, and regulations.

17. **Responsibility for Taxes, Unemployment Insurance, Workers' Compensation Coverage**  
ORS 30.265, ORS Chapters 279A, 279 B, and 279C

The service or services to be rendered under this contract are those of an independent contractor who is not an officer, employee, or agent (as those terms are used in ORS 30.265) of WICCO or of Clackamas County. Contractor is solely liable for any workers' compensation coverage, social security, unemployment insurance, retirement payments, and federal or state taxes due as a result of payments under this contract. Any subcontractor hired by Contractor shall be similarly responsible.

18. **Conflict of Interest** (ORS Chapter 244) and (29 CFR 95.42 and 29 CFR 97.36(b)(3))

Contractor, its officers, employees or agents, shall avoid all activities, which constitute an improper conflict of interest under local, state or federal laws, rules, or regulations.

19. **Certification Regarding Lobbying** 31 U.S.C. Sec. 1352

Contractor certifies that no Federal appropriated funds have been paid or will be paid, by or on behalf of the Contractor, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, or the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the Contractor shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions (see Section F of this contract).

Contractor shall require that the language of this Certification be included in the award documents for all sub awards at all tiers (including subcontracts, sub grants and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

20. **Publicity and Public Information**

Whenever written, magnetic media, electronic, or verbal information related to the services provided pursuant to this contract is distributed to the media or directly to the general public, another agency or governmental audience, whether such information is solicited or unsolicited, the Contractor shall acknowledge and name the Workforce Investment Council of Clackamas County and the Awarding Agency as providing funding for the services provided through this contract.

All advertisements or recruitment materials must contain the following language: "An equal opportunity employer/program" and "auxiliary aids and services are available upon request to individuals with disabilities" appear on each work product in both English **and Spanish**.

21. **Billings and Payments to Contractor**

WICCO shall reimburse the Contractor, upon submittal and approval by WICCO, of a written invoice. Contractor shall base all costs claimed on allocable, allowable, and reasonable expenses incurred pursuant to this contract as determined under local, state, and federal laws, including applicable Office of Management and Budget Circulars. Payments will be made within thirty (30)

calendar days following receipt of written invoice on forms and with backup documentation as listed in Section C. The invoice format will be provided by WICCO.

At the discretion of WICCO, payments may be suspended, withheld, or disallowed if participant tracking documents, performance reports, or financial reports (including billings and matching share documents) specified in Sections B, C, and D of this contract are not submitted on the proper forms within the agreed upon time frames.

## 22. **Audits**

Unless otherwise directed by WICCO, Contractor shall arrange for the performance of a financial and compliance audit of funds received under this contract in accordance with the Office of Management & Budget Circular A-133 (and the Single Audit Act of 1984, P.L. 98-502, and OMB Circular No. A-128, "Audit Requirements for State and Local Governments,)", 50 Fed. Reg. 19114.

Contractor shall submit the report of such audit to WICCO no later than thirty (30) calendar days after receipt of the report or within one hundred twenty (120) calendar days following the close of the Contractor's fiscal year, whichever is sooner.

## 23. **Equipment Purchase and Tracking**

All purchases must comply with the applicable OMB Circulars, Uniform Administrative Requirements, and WICCO policies. Equipment purchases with an acquisition cost of \$5,000 or more per unit require prior approval from WICCO and Awarding Agency.

Unless otherwise specified, ownership and title of all non-expendable personal property and equipment purchased with funds provided under this contract rests with WICCO and is vested in the U.S. Department of Labor and/or State of Oregon. WICCO may take possession of all such equipment and property at any time during or upon termination of this contract.

Contractor shall maintain a current inventory of all WIA property in its custody with an individual purchase price of \$5000 or more, and shall implement adequate maintenance procedures to keep such property in good condition. Further, Contractor shall conduct an annual inventory of equipment and properties purchased with contracted funds and submit a list of same to WICCO with the final invoice. All such property purchased under this contract shall be returned to WICCO within thirty (30) days after the contract has terminated, unless otherwise authorized by WICCO.

## 24. **Patent and Copyrights**

All patent, copyrights, and other intellectual property pertaining to products produced with funds under this contract shall be the property of the Department of Labor, the State of Oregon, or WICCO as required by local, state, and federal laws, rules, or regulations.

## 25. **Corrective Action**

All activities conducted under this contract will be monitored by WICCO. In addition, the Contractor shall develop and maintain a mechanism for the continuous monitoring of all activities conducted pursuant to this contract.

WICCO may issue a Notice of Corrective Action for any deviations from the contract provisions or the planned performance in Section B. Within fifteen (15) calendar days of receipt of the Notice of Corrective Action, Contractor shall respond by submitting to WICCO a completed written

Corrective Action Plan. WICCO will determine the appropriateness of the Contractor's Corrective Action Plan and notify the Contractor in writing within fourteen (14) calendar days if the plan is not satisfactory. Thereafter, WICCO, at its own option and within its own reasonable discretion, may terminate the contract, establish a Corrective Action Plan on its own accord, or follow the procedures set forth in Section B regarding performance expectations.

WICCO may terminate the contract, in whole or in part, if the Contractor fails to respond to the Notice of Corrective Action within fifteen (15) calendar days after receipt.

26. **Failure to Enforce**

Failure on the part of WICCO to enforce a provision of the contract shall not constitute a waiver of WICCO's rights to enforce such provision in the future or any other provision of this contract.

27. **Program Income**

In the event the program generates any program income, Contractor shall report to WICCO, the program income as a separate line item, by cost category, on the month following accrual. Program income is defined as "income received by the recipient or sub recipient directly generated by a grant or sub grant supported activity, or earned only as a result of the grant or sub grant". Such income is to be applied against the costs of the project.

28. **Implementation of Workforce Investment Act.** (Public Law 105-220)

This contract, its Exhibits, Attachments, Endorsements, Changes, or References incorporated is authorized under the federal Workforce Investment Act of 1998 (Public Law 105-220). The Contractor understands and agrees that modifications to this agreement will be necessary throughout the contract period as federal, state or local laws, rules, regulations or local ordinances necessitate change under this implementation. The Contractor is notified that such changes shall be bilaterally agreed upon or unilateral, as necessary pursuant to Section 9 above.

29. **Notices**

All contract-related notices shall be in writing and delivered by email, personal delivery, facsimile, or mailing postage prepaid to the address in this contract or other email, facsimile number or address either party may indicate pursuant to this section. Any notice given by email is effective upon the sender's receipt of confirmation generated by the recipient's email system. Any notice given by personal delivery is effective when actually delivered. Any notice delivered by facsimile is effective when a transmission receipt is generated if during recipient's normal business hours, or on the next business day, if outside recipient's normal business hours. Any notice mailed is effective three (3) days after mailing.

30. **Veteran's Priority Provisions** PL 107-288 Sec. 188; 20 CFR Part 1010, TEGL No. 10-09

The Jobs for Veterans Act requires priority of service to veterans and spouses of certain veterans for the receipt of employment, training, and placement services in any job training program directly funded, in whole or in part, by DOL. In circumstances where a choice must be made between two qualified candidates for a service, one of whom is a veteran or eligible spouse, the veterans priority of service provisions require that the veteran or eligible spouse be first provided that service. To obtain priority of service, a veteran or spouse must meet the program's eligibility requirements. Contractor agrees to comply with DOL and ETA guidance on implementing priority of service for veterans and eligible spouses.

**WORKFORCE INVESTMENT COUNCIL OF CLACKAMAS COUNTY CONTRACT**  
**SECTION B**  
**PROJECT DESCRIPTION**

**1. Executive Summary**

This contract is between The Workforce Investment Council of Clackamas County (WICCO) and Clackamas Education Service District (ESD) and is funded through Title I of the Workforce Investment Act of 1998 (WIA). Both Acts call for the delivery of workforce development services to in-school and out-of-school youth in Clackamas County.

**2. Relationship to WICCO's Local Unified Plan**

Youth development is the process by which youth make the transition from childhood to adulthood. Preparing a youth to enter employment is important, but it is not enough to assure that he or she will make a successful transition to adulthood; nor will a youth be successful at getting and keeping a job if the other needs in his or her life are not met. WIA requires workforce development systems to recognize the full spectrum of youth needs and to make programs and services available to meet these needs. Youth program elements are specific activities that meet the essential needs of youth.

The goal is to assure that employers will have access to a more highly skilled, better prepared workforce; individuals will be better able to compete for quality jobs; and Oregon will increase its global competitiveness.

**3. Program Overview**

WIA provides a design framework that requires that 10 program elements be made available to all eligible and enrolled youth. These program elements are designed to fill the gaps in the lives of youth who lack the family, education, and social frameworks to meet their essential needs. The network of service providers must ensure that all 10 program elements are available to youth within the county. The specific services each youth receives is based upon the youth's objective assessment and individual service strategy plan. Through the individual service strategy plan, the providers ensure that the youth accesses whichever of the ten program elements he or she requires to be successful.

Workforce services for youth are provided through a coordinated network of providers, under the direction of the Region's youth services contractor, Clackamas ESD. In-school and out-of-school youth receive counseling and case management, including assessment and service planning through staff located throughout the County. Staff are located on-site at local high schools, Clackamas Community College, and at WorkSource Clackamas, and work in conjunction with staff at the Housing Authority of Clackamas County, Community Solutions for Clackamas County, State of Oregon Department of Human Services – Self-Sufficiency, State of Oregon Department of Human Services – Office of Vocational Rehabilitation Services and many other service organizations throughout the Region.

The required program elements are:

1. Adult mentoring for at least 12 months that may occur during and after program participation;
2. Alternative secondary school offerings;



3. Comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth;
4. Follow-up services;
5. Leadership development opportunities, which may include such activities as positive social behavior and soft skills, decision-making, team work, and other activities;
6. Occupational skill training;
7. Paid and unpaid work experiences, including internships and job shadowing,
8. Summer employment opportunities directly linked to academic and occupational learning;
9. Supportive services, and,
10. Tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies.

The Contractor must assure the following major activities in the youth program framework are administered:

- Outreach and Recruitment
- Eligibility Determination
- Objective Assessment
- Individual Service Planning
- Referral and Service Provision
- Follow-Up Services

The Contractor is responsible for marketing of youth programs and services to youth, and is encouraged to utilize the popular avenues for reaching youth at that time. Marketing collateral must be reviewed by the Workforce Investment Council of Clackamas County prior to publication or distribution.

**4. Participant Case Management File**

ESD will be required to use the I-Trac management information system for client tracking. All participant data must be input into the above system within five business days of the activity. ESD must maintain a hard copy and electronic case file for each participant which will detail the service history, including follow up history. Detail shall identify each participant activity by major WIA component, document receipt of a service or a partner service every 90 days or closure of the file. Additionally, information must be maintained in such detail so as to support the expenditure of funds.

**5. Performance Outcomes for Program Year 2014**

Contractor will continue to serve registered In School Youth (ISY) and Out of School (OSY), with a special priority of services provided to veterans and eligible spouses. The number of active youth to be served, with an additional year of follow up services are:

Total Active Youth = 282

Of these youth, 75% must be enrolled by December 31, 2014. 100% of the youth must be enrolled by February 28, 2015.

At the end of each quarter, the Contractor will meet with the Program Manager to review progress, including the number of youth enrolled at each provider site.

In lieu of the establishment of Workforce Investment Act Title 1B Common Measures performance levels with State of Oregon, WICCO is requiring ESD to be accountable to the following levels of

performance for existing regularly-funded WIA in order to provide youth with the knowledge, skills and abilities to get and keep their first job, to advance in a job, and to have the literacy and numeracy skills needed to enter and advance in the workforce. Below are the outcomes that have been established:

<b>Performance Measure</b>	<b>Level</b>	<b>Negotiated Level (80%)</b>
Placement in Employment or Education	72%	57.6%
Attainment of a Degree or Certificate	73%	58.4%
Literacy and Numeracy Gains	53%	42.4%

If performance falls below the negotiated level after the first year, the WICCO will take the following actions with the Contractor:

- When final performance numbers have been issued, report to the WICCO Board which performance measure(s) have been missed/achieved.
- Meet with the Contractor to assess why the performance measure(s) were not met and create a written performance improvement plan.

If performance remains below the negotiated level for a second year in a row, the WICCO will take the following actions with the Contractor:

- When final numbers have been issued, report to the WICCO Board that a performance measure(s) has been missed two years in a row.
- Review historical data and follow the considerations and recommendations of the WICCO Board from the following options:
  - Review historical data and make a determination if course corrections are adequate and grant additional year of the contract under a corrective action plan.
  - Require other appropriate measures designed to improve the performance of the Contractor.
  - Discontinue use of the Contractor due to inability to achieve required performance levels.

## **6. Certified Work Ready Communities**

Oregon’s National Career Readiness Certificate (NCRC) is nationally recognized and transferrable across the country and industries and documents an individual’s skill level in three areas: Applied Mathematics, Reading for Information, and Locating Information. A soft skills component will be incorporated into the product at a later date by the State.

ESD will help the region become a Certified Work Ready Community by working towards the following goals:

- 302 signed letters of support from employers stating they will prefer the NCRC (standard letter from the State to be provided),
- 2155 NCRCs for transitioning workers, and
- 708 NCRCs for emerging workers.

The Workforce Investment Council of Clackamas County is contracting with Clackamas Educational Services District (ESD) to promote and encourage Emerging Workers and Transitioning Workers to take the test when appropriate; and to create more opportunities within the K12 system for testing.

“Emerging Workforce” means:

- High school junior, senior or recent graduate

- College student or recent graduate
- “Transitioning Workforce” means:
- Currently unemployed
  - GED and adult education participant
  - Current or recent active duty military

ESD will assist with increasing the capacity of NCRC assessment system by working with partners from community colleges, high schools, community-based organizations, training providers, and private businesses to offer testing off-site of WorkSource Clackamas. At a minimum, prior to June 1, 2015, ESD will aid in the establishment of new NCRC assessment sites, at a minimum of four additional high schools in Clackamas County.

The assessment sites will offer participants the WIN initial skills review and courseware. The selected high schools must host a free NCRC testing day for high school students during the school year.

ESD will coordinate proctors for testing with the Workforce Investment Council of Clackamas County when a school elects to conduct testing on-site. ESD will be required to share pertinent test taker information with WICCO in order to perform data entry requirements.

ESD will assist on improving participation by various educational programs including but not limited to: K- 12 schools including alternative programs for youth, Adult Basic Education, GED programs, Clackamas Community College, and other local educational organizations. ESD will share strategies and activities used to reach the CWRC goals.

ESD will educate employers about the NCRC, how it can be used to screen for potential employees and ask employers to prefer the NCRC in appropriate job listings. Staff will forward all signed letters to the Workforce Investment Council of Clackamas County.

ESD will submit one job seeker success story annually, using the Guide to Creating Certified Work Ready Community and NCRC Success Stories.

**WORKFORCE INVESTMENT COUNCIL OF CLACKAMAS COUNTY CONTRACT  
SECTION C  
FISCAL PROVISIONS & COST REIMBURSEMENT BUDGET**

**1. The budget for this contract will be divided into three separate budgets:**

- (A) Out of School Youth WIA Services.
- (B) In School Youth WIA Services.
- (C) Certified Work Ready Communities

**2. Allocation of Funding**

The allocation of funds under this contract shall initially be as follows:

Funding Stream	Amount
Out of School Youth	\$273,325
In School Youth	\$343,675
<u>Certified Work Ready Communities</u>	<u>\$5,000</u>
Total:	\$622,000

Additional funding for Program Year 2014 will be incorporated into this contract via amendment.

Program Year 2013 Carry Forward funds will be incorporated into this contract via amendment.

**3. Costs for Which Payment Shall be Made**

Only reasonable, allocable and allowable costs paid out by the Contractor, which are based on benefits received associated with the activities and services delineated in Section B-Project Description shall be reimbursed to the Contractor.

**4. Transfer of Funds**

For the purpose of this contract, the Contractor may request to modify budgeted line item amounts within each WIA funding stream per paragraph 9 below to cover unanticipated over-expended line items.

Such movement of funds shall not exceed 15% of the funding stream's total annual budget and are to be approved in writing **and in advance** by WICCO. Written consent is defined as formal business correspondence submitted by Contractor and signed by the WICCO Executive Director or designee. Funder approval may be required.

Funds may only be moved between the WIA funding streams in paragraph 2 above via contract amendment as permitted by law.

**5. Billings**

Invoices shall be submitted monthly and should include the aggregate of accrued expenditures (cash disbursements plus accruals not yet paid) incurred for allowable costs. The Contractor shall bill WICCO on forms and in a format approved by WICCO within twenty (20) calendar days following the month in which expenses are incurred.

The following Informational Items are to be noted on the invoice but will not be reimbursed under this contract:

- (A) Estimates of incurred expenses for which invoices have not yet been received by the Contractor,
- (B) Program Income earned and expended,
- (C) Stand-In Costs (optional): allowable costs that were actually incurred for the benefit of the ETA-funded program and paid by a non-ETA fund source.

#### **6. Invoices After Contract End**

Upon completion of the Contract, Contractor shall submit a final invoice (marked FINAL), which will be the final accounting of all accrued and actual expenditures under this Contract. Duration of award: July 1, 2014 – June 30, 2016 with option for three annual renewals. All invoices must be received by WICCO within forty-five (45) days of discharge of this award. Any invoice received more than forty-five (45) after said date will be considered null and void, and will not be processed for payment.

#### **7. Expenditure Documentation**

The Contractor shall retain original expense documentation, or a digital image of original expense documentation, including proof of payment or properly posted accrued liabilities. Documentation shall include canceled checks, invoices annotated with date paid, check number and initials, annotated receipts, payroll ledgers, and/or accounts payable ledgers. Documentation shall be annotated with a Project Budget line item reference. Documentation of costs which are allocable to more than one line item and/or which are only partially allocable to the Project Budget shall be annotated with amounts allocated to each source. Reimbursement requests shall be made only within the limits of the Project Budget line items.

#### **8. Authorized Signature List**

The Contractor will submit to WICCO a list of names and signatures of persons authorized to sign agreements, modifications and billings. As changes occur, the Contractor shall file changes with WICCO.

**9. Project Budget** (see Attachment 1 for details)

PY13-14

WIA Youth Funding Stream - Out of School Youth

Budget Line Item	Begin Bal	Change	Total
Personnel	83,320		83,320
Non-Personnel	14,760		14,760
Direct Participant Costs	175,245		175,245
OSY Total	<b>273,325</b>	<b>0</b>	<b>273,325</b>

WIA Youth Funding Stream - **In School Youth**

Budget Line Item	Begin Bal	Change	Total
Personnel	124,980		124,980
Non-Personnel	22,140		22,140
Direct Participant Costs	196,555		196,555
ISY Total	<b>343,675</b>	<b>0</b>	<b>343,675</b>

Grant Funds

Budget Line Item	Begin Bal	Change	Total
State: CWRC	5,000		5,000
	0		0
Grant Funds Total	<b>5,000</b>	<b>0</b>	<b>5,000</b>

**10. Additional Expenditure Restrictions**

Consultant fees paid under this Contract shall be limited to \$585 per day

Salary and Bonus Limitations: In compliance with public Law 109-234 and section 111 of the Department of Labor Appropriation Act 2009 (Public Law 111-8), none of the funds appropriated under the heading "Employment and Training" that are available for expenditure on or after June 15, 2006, shall be used by CONTRACTOR to pay the salary and bonuses of an individual, either as direct costs or indirect costs, at a rate in excess of Executive Level II. The salary and bonus limitation does not apply to vendors providing goods and services as defined in OMB Circular A-133. Reference DOL TEGL 5-06 for further clarification.

Certified Work Ready Communities Funds shall be used solely in a manner that complies with the regulations and cost principles referenced in grant GRNT0987 between the State of Oregon and WICCO.

**WICCO SERVICE PROVIDER CONTRACT  
SECTION D  
SPECIAL PROVISIONS**

1. **Representations and Warranties**

The Contractor represents and warrants to WICCO that (1) the Contractor has the power and authority to enter and perform this contract; (2) this contract, when executed and delivered, shall be a valid and binding obligation of the Contractor enforceable in accordance with its terms; (3) the work under this contract shall be performed accordance with the highest professional standards; (4) the Contractor shall, at all times during the term of this contract, be qualified, professionally competent, and duly licensed to perform the work.

2. **Unused Funds**

All funds provided under this contract, which are unused upon contract discharge, shall be de-obligated and returned to WICCO. Such funds are subject to redistribution or use at the discretion of WICCO. De-obligated funds may be returned to the grantor agency or WICCO, or redirected by WICCO as it deems necessary.

3. **Memorandum of Understanding**

The Memorandum of Understanding and Resource Sharing Agreement, which by this reference is hereby incorporated into and made part of this contract, states that the partners are committed to develop and implement a comprehensive, cooperative workforce development system with services to be delivered via WorkSource Clackamas.

**WICCO SERVICE PROVIDER CONTRACT  
SECTION E  
CERTIFICATION REGARDING DEBARMENT**

---

Certification Regarding  
Debarment, Suspension, Ineligibility and Voluntary Exclusion  
Lower Tier Covered Transactions

This certification is required by the regulations implementing Executive Order 12549, Debarment and Suspension, 29 CFR Part 98, Section 98.510, Participant's responsibilities. The regulations were published as Part VII of the May 26, 1988 Federal Register (pages 19160-19211).

(BEFORE COMPLETING CERTIFICATION, READ ATTACHED INSTRUCTIONS  
WHICH ARE AN INTEGRAL PART OF THE CERTIFICATION)

- (1) The prospective recipient of Federal assistance funds certifies, by submission of this document, that neither it nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
- (2) Where the prospective recipient of Federal assistance funds is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Print Name and Title**

**(Instructions on following page)**



## INSTRUCTIONS FOR DEBARMENT CERTIFICATION

1. By signing and submitting this document, the prospective recipient of Federal assistance funds is providing the certification as set out below.
2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective recipient of Federal assistance funds knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the Department of Labor (DOL) may pursue available remedies, including suspension and/or debarment.
3. The prospective recipient of Federal assistance funds shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective recipient of Federal assistance funds learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
4. The terms "covered transaction," "debarred", "suspended", "Ineligible", "lower tier covered transaction", "participant", "person", "primary covered transaction", "principal", "proposal", and "voluntarily excluded", as used in this clause, have the meanings set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
5. The prospective recipient of Federal assistance funds agrees by submitting this document that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the DOL.
6. The prospective recipient of Federal assistance funds further agrees by submitting this document that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transactions," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required, to check the List of Parties Excluded from Procurement and Nonprocurement Programs.
8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
9. Except for transactions authorized under paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the DOL may pursue available remedies, including suspension and/or debarment.

**WICCO SERVICE PROVIDER CONTRACT  
SECTION F  
CERTIFICATION REGARDING LOBBYING**

---

**Certification Regarding Lobbying  
Lower Tier Covered Transactions**

---

This certification is required by the regulations implementing The Department of the Interior and Related Agencies Appropriations Act for Fiscal Year 90, Section 319 of which amended Title 31, United States Code by adding a new section 1352, entitled "Limitation on use of appropriated funds to influence certain Federal contracting and financial transactions." The regulations were published as Part III of the February 26, 1990 Federal Register (pages 6736-6756).

**The undersigned certifies, to the best of his or her knowledge and belief, that:**

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the Federal grant, contract, loan, or cooperative agreement funding this contract, the undersigned shall complete and submit Standard Form--LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
3. The undersigned shall require that the language of this certification be included in the award documents for all subawards to all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Print Name and Title**

F-18 Please complete/submit the attached WIA funded non expendable inventory/equipment list (in an Excel spreadsheet format) for items whose purchase price was \$5,000 or more. (Revised)

F-18 Revised by requiring that the entity submit the non-expendable inventory equipment list in an Excel spreadsheet format.

WICCO has no equipment with a purchase price of \$5,000 or more.

F-19 Please provide a copy of your inventory policy used by management for all equipment purchased using WIA funds. (CCWD Policy 589-10.12)

PY 2013 response is still applicable. Deb Zang

See attached policy F-07 Property Management Standards.



**POLICY #:** F-07  
**Property Management Standards**

**ISSUED:** January 17<sup>th</sup>, 2013

**PURPOSE:**

To provide procedures for management, control, transfer and safeguarding of property procured using Workforce Investment Act (WIA) or other grant funds.

**REFERENCES:**

- Title 20 Code of Federal Regulations (CFR) 667.200
- Title 29 CFR 95.34, 35
- Title 29 CFR 97.32, 33
- CCWD 589-10.12

**DEFINITIONS:**

Property: Real and tangible products having a useful life of more than one year.

**POLICY:**

Workforce Investment Council and its Contractors will maintain accountability for all property in accordance with the requirements set forth in 29 CFR Parts 95 and 97.

Prior approval must be obtained from Workforce Investment Council and CCWD for the purchase of equipment with a per-unit acquisition cost of \$5,000 or more.

Contractors must ensure adequate safeguards to prevent loss, damage, or theft of property, maintain property in good condition, and provide sufficient insurance coverage. Any loss, damage, or theft of property with a unit acquisition cost of \$5,000 or more must be investigated, fully documented and immediately reported to Workforce Investment Council. In the case of possible theft, a copy of the report made to local law enforcement authorities must be provided.

Tracking property with a unit acquisition cost of \$4,999.99 or less will be the responsibility of Contractors, conducted in accordance with their respective policy.

Property with a unit acquisition cost of \$5,000 or more must be tagged in a manner that will identify the equipment as WIA or grant fund-based, and the records maintained by Workforce Investment Council as well as by Contractor.

Property records will contain the following:

1. Description of property
2. Identification number or serial and model numbers

3. Source of funds
4. Authorizing documents to purchase non-expendable property
5. Acquisition date and cost
6. Percent of federal participation in the cost of the property
7. Location, use, condition, and date information was reported
8. Date of disposal, including selling price and method used to determine fair market value if applicable

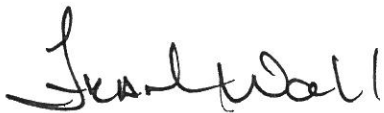
Disposition or transfer of property with a FMV of \$4,999.99 or less will be the responsibility of Contractor. It may be given to participants to further their training and/or employability, transferred to other activities (federal or non-federal), or sold without further obligation to the awarding agency. If it is sold, the local procedures of the organization must be applied.

Disposition or transfer of property with a FMV of \$5,000 or more will require prior approval of Workforce Investment Council and CCWD.

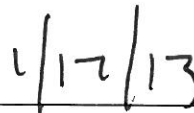
The WIA regulations at 20 CFR 667.200(a)(8) allow for the use of grant purchased equipment for non-federal activities with the condition that such use will not interfere with services provided to WIA participants. In those instances where equipment is used for such purposes a use fee must be charged and the proceeds from this activity will be treated as program income. In all other instances, WIA purchased property must be used for allowable activities under the terms of the contract, grant or other agreement.

Monitoring of property will include a review of contractor office procedures and policy for compliance with federal regulations, state and Workforce Investment Council policies. Contractor will provide an inventory list of property valued in excess of \$500 to Workforce Investment Council annually and at grant closeout.

Approved:



Workforce Investment Council Chair



Date

F-20 When was the last inventory conducted?

PY 2013 response is still applicable. Deb Zang

The last inventory was conducted March 12, 2013.

F-21 Please complete the separation of duties worksheet (follows).

Worksheet has been completed anticipating Board approval of resolutions granting signature authority to Executive Director Bridget Dazey at the meeting on October 16, 2014. Prior to this time, signature authority rested with Board Chair Julie Hugo, and Board Treasurer Jerry Smith.



F- 22 Identify by location WIA office space / # of WIA staff in space in use at the end of last year's program year vs. office space / staff occupancy currently in use.  
(Revised)

WICCO has office space at 365 Warner Milne Rd Ste 202 in Oregon City. In June 2013 there were 5 full time and one part time staff in this office, and there are 4 full time and two part time staff currently.

C-TEC Youth Services has office space at Clackamas Community College, McLoughlin Hall, Room 113 in Oregon City. In June 2013 there were 6 staff in this office, and there are 6 staff currently. In addition, in June 2013 there was a .05 FTE position with office space at Clackamas ESD, 13455 SE 97<sup>th</sup> Ave, Clackamas, and this position continues currently.

Clackamas Community College Workforce Development has offices in the Family Resource Center on campus. In June 2013 there were 15.8 FTE, and currently there are 13.8 FTE.

WICCO has space designated for WIA staff at Worksource Clackamas. In June 2013, 4.2 FTE CCC staff were based there, and there are 4.2 FTE currently. IRCO provided .5 FTE staff in June 2013 and currently. C-TEC provided .1 FTE staff in June 2013 and currently.

IRCO has office space at 10301 NE Glisan in Portland. They had .5 FTE staff in June 2013 and have .5 FTE staff currently.

Community Solutions has office space at 108 and 112 11<sup>th</sup> St., Oregon City. In June 2013 they had 3 FTE, and currently they have 3 FTE.

F-23 Identify generic types of mechanisms used to provide employees and participants with remuneration and accompanying policies, procedures and/or written descriptions of unwritten practices, e.g. gift cards, gas cards, bus passes, bus tickets, incentive payments, cash, etc. (CCWD Policy 589-30.12, WIA Title 1B Policy Statewide Supportive Services)

WICCO has no policies, procedures or guidelines regarding “cash like” cards or payments. WICCO paid directly for no “cash like” cards with WIA funds in PY14.

See attached Gas Card and Bus Pass and Gift Card procedures for Adult/DW service provider CCC.

See attached Participant Support Policies and Procedures for Adult/DW service provider Community Solutions.

Youth service provider provides gift cards as participant incentives. See attached.

## GIFT (CASH-LIKE) CARD PROCESS

Effective July 2012

### Purchase

- ❖ Per the Support Service WFDS Policy 001, “support service may be provided to an individual to address barriers to their participation in WIA services and activities that will transition the client into self-sufficiency”. To this end, gift (cash-like) cards can be provided to participants to allow for the purchase of food or clothing for interviews and/or employment.
  - a. Determination of need for assistance is made by the Workforce Advisor, based on information provided by the participant.
  - b. If the Workforce Advisor has identified the need for assistance, the advisor will submit an Individual Employment Plan (IEP) – if the participant does not have a current IEP – or a forecast update. (*Refer to the Department’s Desktop Tool, IEP Development section for the complete process outline.*) The IEP provides information regarding the participant’s educational/training/job search goals and will explain how the support being requested will assist the participant in accomplishing the stated plan/goals.
  - c. When the IEP or forecast update has been completed (or if the participant has a current IEP that includes or relates to the expense), the Workforce Advisor must then create a support service justification (SSJ) request. (*Refer to the Department’s Desktop Tool, Fiscal Document Development section for the complete process outline.*) The SSJ will state the type of assistance being requested, the justification for the assistance, the dollar amount of the gift (cash-like) card and the vendor where it is to be purchased. (The gift (cash-like) cards are usually purchased from and for use at Fred Meyer due to the variety of merchandise available.)
  - d. The SSJ request is saved in the designated folder on the Department’s I drive by the author.
  - e. The support service justification request is reviewed for accuracy (particularly the account number and justification), printed, and, when available matched with back up documentation by administrative staff. The request is routed to an authorized signer (Director, Operations Manager, Compliance Officer or Leads) for signature.
  - f. Following the approval of the request for the gift (cash-like) card, the card can be purchased by a WIA staff member using a Department credit card from the designated merchant. (Note: Unlike the gas cards, WFDS does not maintain a supply of gift (cash-like) cards.)

### Recording

- ❖ After the card has been purchased and returned to the WFDS office.
  - a. The card is then logged on the gift/cash card tracking spreadsheet on the Department’s I drive. The date of purchase, amount and vendor are noted, in addition to the participant’s name, eligibility date and fund.
  - b. The card number is also written on the bottom of the support service justification request.

## Distribution

- ❖ Once the card has been recorded on the tracking spreadsheet and on the SSJ request, the Workforce Advisor and/or the participant is notified regarding the availability of the card.
  - a. There are two methods of distribution for the gift (cash-like) cards:
    - Pick Up
    - Delivery
      - i. Pick up: The card is attached to the support service justification request, and when the card is picked up the participant signs the original SSJ request.
      - ii. Delivery: Cards are sometimes delivered by Workforce Advisors to participants; this is often the case for cohort participants. Cards are prepared for pick up, however a signing sheet is also created for each card. Upon delivery, the WIA staff member will obtain the participant's signature on the corresponding signing sheet. The signing sheets are returned to administrative staff and a notation is made on the support service justification that the card was delivered, by whom and the date. (The signing sheet is attached to the SSJ request.)

**\*\*Note: Cards remain locked in a file cabinet after purchase and prior to pick up or delivery.\*\***

- Also distributed with each card is the following memo:

*"As you may know, the Workforce Investment Act (WIA) is a federally funded program designed to help job seekers find employment; and if needed supply short term training. As a federal program we have many rules, regulations and procedures to follow, as well as partner agencies helping us serve the citizens of Clackamas County.*

*This program is designed to meet the needs of individuals that meet the criteria that is set forth by the Federal Government.*

*This is not an entitlement program and our funding decisions are made on a case by case basis taking into consideration the needs of our participants and what is required for them to complete their current plan.*

*You have received a gift (cash-like) card from the WIA program. The program may require that you provide proof that the gift (cash-like) card was used for its intended purpose. Please retain receipts from purchases made using the card, and provide them to your Workforce Advisor. Failure to comply may affect future services provided by the program."*

- b. After each card is distributed, administrative staff will enter an administrative case note in I-Trac documenting that the support service was provided to the participant.

## Payment

- a. Following the purchase of the gift (cash-like) card, the receipt is matched with the support service justification request.
- b. The charge is coded in WORKS after receiving the email regarding the use of the department credit card.
- c. Once the card has been distributed, a request for payment (RFP) is created. The RFP is signed by the originator and matched with the SSJ request, receipt, and any other back up documentation.
- d. The RFP packet is submitted to the Director or Operations Manager for signature.
- e. After the RFP is signed, two copies (one yellow, one pink) of the RFP and back up documentation are made. The three copies are paper clipped together and filed in the appropriate credit card folder.
- f. Documentation for credit card expenditures is due to the business office once a month (around the fifteenth). The credit card statement is printed from WORKS and matched with the transactions from the file.
- g. The packet is submitted to the Director or Operations Manager for signature of the statement.
- h. A pink copy is made of the signed statement and is matched with the pink RFP copies, and filed in the corresponding credit card file. The original statement is attached to the original RFPs (white); and the yellow copies of the RFP are placed in the transaction file for the month. The yellow copies are reconciled against the GLTB reports.
- i. The original statement and RFPs are delivered to the business office for processing.

## GAS CARD PROCESS

-FROM PURCHASE TO RECONCILIATION-

Effective July 2012

### Purchase

There are two methods for purchasing gas cards:

- Inventory order
- As needed purchases from local retailers

#### 1. Inventory order:

As necessary the Department will maintain an inventory of gas cards, these orders are placed with SVM. (Note: SVM requires a minimum order of \$250. There are shipping charges assessed to each order (minimum charge is \$10.95)).

- a. To place an order for cards with SVM, complete the order form and either fax (1-847-553-9222) or email to the sales representative, Brad Bolyard ([brad.bolyard@svmcards.com](mailto:brad.bolyard@svmcards.com)). Order form needs to specify type of card (Texaco), quantity and denominations (\$25 and/or \$50).
- b. Following the receipt of the order, an invoice will be provided to WFDS by SVM.
- c. The invoice is then processed for payment. (SVM will not ship the order of gas cards until payment has been received.)
- d. Invoice is coded to be paid from WIA Adult (1A) funds. Based upon eligibility rules, all WIA enrolled participants are eligible to be assisted using Adult funds.
- e. A Request for Payment (RFP) is created and submitted for signature by an authorized signer (Director, Operations Manager, Compliance Officer or Leads). A copy is made of the signed RFP and the invoice.
- f. RFP and invoice are submitted to the Business Office for payment. The copy of the RFP and invoice are filed in the monthly fiscal activity folder in the Department office.
- g. The copy of the RFP is reconciled against the general ledger trial balance (GLTB) after the end of the month it is created/submitted.

#### 2. As needed purchases:

It is not always necessary for the department to maintain an inventory of gas cards, as cards are needed purchase can be made from local retailers (Haggen and Fred Meyer). These cards are purchased after a support service justification (SSJ) request has been signed. Authorized personnel purchase the cards using a Department credit card.

- a. Following the purchase of the gas card(s), the receipt is matched with the support service justification request.
- b. The charge is coded in WORKS after receiving the email regarding the use of a Department credit card.
- c. A RFP is created, matched with the SSJ request, receipt, and any other back up documentation.

- d. The RFP packet is submitted to the Director or Operations Manager for signature.
- e. After the RFP is signed, two copies (one yellow, one pink) of the RFP and back up documentation are made. The three copies (original, yellow, pink) are paper clipped together and filed in the appropriate credit card folder.
- f. Documentation for credit card expenditures is due to the business office once a month (around the fifteenth). The credit card statement is printed from WORKS and matched with the transactions from the file.
- g. The packet is submitted to the Director or Operations Manager for signature of the statement.
- h. A pink copy is made of the signed statement and is matched with the pink RFP copies, and filed in the corresponding credit card file. The original statement is attached to the original RFPs (white); and the yellow copies of the RFP packet are placed in the transaction file for the month. The yellow copies are reconciled against the GLTB reports.
- i. The original statement and RFPs are delivered to the business office for processing.

#### Recording of Gas Cards

- Gas card identification numbers are recorded in the appropriate gas card Excel workbook, located on the Department's I drive.
- The date of purchase of the cards is also noted. The batches of purchased cards are tracked separately. This aids in the reconciliation of the cards.
- After the gas card identification numbers are recorded, a label is added to each card. The label reads "To be used for fuel and oil only. No food, alcohol or tobacco purchases".

#### Storage of Gas Cards

- Following the purchase and recording of the gas cards, they are stored in a locked file cabinet.
- Based on the distribution procedure for the gas cards, cards are accessed only by WIA administrative staff.

#### Distribution of Gas Cards

1. Support Service Request for transportation assistance (gas card):
  - ❖ Per the Support Services WFDS Policy 001, "support service may be provided to an individual to address barriers to their participation in WIA services and activities that will transition the client into self-sufficiency".
    - a. Determination of need for assistance is made by the Workforce Advisor, based upon information provided by the participant.
    - b. If the Workforce Advisor has identified the need for assistance, the advisor will submit an Individual Employment Plan (IEP) – if the participant does not have a current IEP – or forecast update that provides for this type of assistance. (*Refer to the Department's Desktop Tool, IEP Development section for the complete process outline.*) The IEP will provide information regarding the participant's educational/training/job search goals and will explain how the support being

requested will assist the participant in accomplishing the stated plan/goals. (Note: To be eligible to receive gas cards, the Workforce Advisor must verify and document in i-Trac that the participant possesses a valid driver's license and current automobile insurance. Additionally, a copy of the participant's license and insurance is to be supplied to administrative staff or placed in the participant's file, depending upon the documentation requirements of the participant's fund.)

- c. When the IEP is complete, the Workforce Advisor must then write a Support Service Justification (SSJ) request. (*Refer to the Department's Desktop Tool, Fiscal Document Development section for the complete process outline.*) The SSJ will state the type of assistance requested, the justification for the assistance and the dollar amount of assistance. The SSJ is also required to include details regarding the distance traveled, number of trips per week and whether travel is for training or job search purposes. Gas cards are available in \$25 and \$50 denominations. Requests can be written for up to 3 months (one term) at a time, if the participant is enrolled in training. If the participant is not enrolled in training, support must be requested on a monthly basis.
- d. The support service justification request is saved in the designated folder on the Department's I drive by the author.
- e. The support service justification request is reviewed for accuracy (particularly the account number and justification), printed, and, when provided, matched with back up documentation by administrative staff. The request is routed to an authorized signer (Director, Operations Manager, Compliance Officer or Leads) for signature.
- f. Once the request has been signed the gas card can be issued. The gas cards are removed from the locked cabinet and the gas card tracking spreadsheet on the department's I drive is opened. Admin staff verifies that the card being used is the next card in the sequence on the spreadsheet and the last four numbers of the gas card identification number are noted at the bottom of the support service request. The gas cards are then returned to the locked cabinet. Cards for pick up: Per Department policy, gas cards are to be picked up by participants at the Workforce office. On the support service justification the last four digits of the card number are noted and a label for signature is affixed to the request. The card is attached to the support service request and they are placed in the gas card folder in a locked file drawer in the Workforce office. The folder is only accessed by staff members when participants arrive at the office to retrieve their gas card. The participant signs the support service request at the time of pick up. Gas cards are available for pick up on the first working day of the new month (if the participant is receiving monthly gas card support). Delivered cards: On occasion staff will deliver cards to participants; this is often the case for cohort participants. Cards are prepared for pick up, however a signing sheet is also created. Upon delivery the WIA staff member will obtain the participant's signature on the signing sheet. Following delivery of the cards, the signing sheet is returned to administrative staff. A notation is made on the support service justification that the card was delivered, by whom and the date.



(The signing sheet is returned to administrative staff. The signing sheet is then matched with/stapled to the support service justification request.)

- Also distributed with each card is the following memo:

*“As you may know, the Workforce Investment Act (WIA) is federally funded program designed to help job seekers find employment; and if needed supply short term training. As a federal program we have many rules, regulations and procedures to follow, as well as partner agencies helping us serve the citizens of Clackamas County.*

*This program is designed to meet the needs of individuals that meet the criteria that is set forth by the Federal Government.*

*This is not an entitlement program and our funding decisions are made on a case by case basis taking into consideration the needs of our participants and what is required for them to complete their current plan.*

*You are currently receiving gas cards from the WIA program and are required by this program to show proof of: 1) valid driver’s license and 2) valid insurance. This program will require you to show this proof at least once every three months. Additionally, we require that if you lose your insurance or driver’s license for any reason; you must inform us within 24 hours.”*

- g. After each card has been picked up or delivered, administrative staff will enter an administrative case note in I-trac documenting that the support service was provided to the participant.
- h. Following the documentation of the support service the support service justification request is filed in the gas card folder (if the request is for multiple months). The processes described in Steps f and g will be repeated each month until the request has been exhausted. Once the request has been fulfilled, one copy (yellow) is made of the request. The yellow copy is placed in the support service request folder in the data entry drawer in the Admin office. Data entry staff will enter the request expense in the expense tracker spreadsheet and also in i-Trac. The copy is then filed in the support service file drawers in the Admin office. The original document is filed in the gas card binder located in a locked file cabinet in the Workforce office.

### Reconciliation

- ❖ After each purchase batch of gas cards has been provided to participants, the tracking spreadsheet, the support service requests and workshop/event tracking spreadsheets must be reconciled. Reconciliation is required to create a journal entry to correctly charge each fund.

- a. The portion of the gas card tracking spreadsheet containing the batch of cards for reconciling is printed, and the original support service requests are pulled from the gas card binder.
- b. The participant's names, eligibility dates, funds and gas card numbers are verified on the support service justification requests and the gas card tracking spreadsheet.
- c. Following the reconciliation, any necessary adjustments are made to the gas card tracking spreadsheet. The updated version of the spreadsheet is printed and copies are made of the support service requests corresponding to the batch of cards reconciled. The spreadsheet and copies are used as back up for the journal entry.
- d. The journal entry is prepared. Since the gas cards were purchased using WIA Adult (1A) funds, the journal entry is required to correctly charge the various participant funds utilized by the department.
- e. The journal entry is submitted for signature to the Director or Operations Manager. A copy of the journal entry and all pertinent back up documentation is filed in the monthly fiscal activity folder in the department office.
- f. The original journal entry and back up documentation is delivered to the Grant Accountant in the Business Office for processing.
- g. The department copy of the journal entry is reconciled against the general ledger trial balance (GLTB) after the end of the month that the journal entry was created.
- h. The original support service justification requests are filed by fiscal year in a locked file cabinet in the WIA office.

*Note: Gas cards purchased from local retailers using the department credit card do not need to be reconciled or journal entried as the purchase can be coded accurately in WORKS following the purchase.*

## Bus Pass/Bus Ticket Process

Effective July 2012

### Request

- ❖ Per the Support Service WFDS Policy 001, “support service may be provided to an individual to address barriers to their participation in WIA services and activities that will transition the client into self-sufficiency.” To this end, public transportation assistance may be provided to participants to alleviate a barrier to training and/or job search.
  - a. Determination of need for assistance is made by the Workforce Advisor, based on information provided by the participant.
  - b. If the Workforce Advisor has identified the need for assistance, the advisor will submit an Individual Employment Plan (IEP) – if the participant does not have a current IEP – or forecast update that provides for this type of assistance. (*Refer to the Department’s Desktop Tool, IEP Development section for the complete process outline.*) The IEP provides information regarding the participant’s educational/training/job search goals and will explain how the support being requested will assist the participant in accomplishing the stated plan/goals.
  - c. When the IEP or forecast update has been completed (or if the participant has a current IEP that includes or relates to the expense), the Workforce Advisor must then create a support service justification (SSJ) request. (*Refer to the Department’s Desktop Tool, Fiscal Document Development section for the complete process outline.*) The SSJ will state the type of assistance being requested, the justification for the assistance and the type of public transportation assistance. Public transportation assistance is available in the form of monthly bus passes or bus tickets. Requests for public transportation assistance can be written for up to 3 months (one term) at a time, if the participant is enrolled in training. If the participant is not enrolled in training, support must be requested on a monthly basis.
  - d. The support service justification request is saved in the designated folder on the department’s I drive by the author.
  - e. The support service justification request is reviewed for accuracy (particularly the account number and justification), printed, and, when provided, matched with back up documentation by administrative staff. (There will rarely be back up documentation for public transportation requests.) The request is routed to an authorized signer (Director, Operations Manager, Compliance Officer or Leads) for signature.
  - f. Once the request has been signed the bus pass or tickets can be purchased then issued to the participant.

### Purchase

- ❖ Bus passes and tickets are purchased at the CCC Bookstore. Passes and tickets are purchased as they are needed. An inventory is not maintained in the Workforce Development office.
  - a. To purchase bus passes or tickets a Bookstore Requisition form (3-part form) must be completed.

- Separate bookstore requisition forms will need to be completed for each funding stream (account number).
  - List the number (and type – ie. Adult All Zone or Honored Citizen) of cards or tickets and the cost (for current rates refer to Tri-Met pricing chart available at: <http://trimet.org/fares/index.htm> ). The month that the pass is for should also be listed on the requisition.
  - The bottom portion of the bookstore requisition also must be completed prior to purchase:
    - Name of administrative staff member completing the form should be entered on the “ordered by” line
    - Add the account number listed on the support service justification in the account number section of the requisition
    - On the pink copy of the requisition only, record the name of the participant or participants that the passes or tickets are being purchased for
- b. After the information listed above has been added to the form, the form is routed to an authorized signer for signature.
  - c. Once signed, the requisition can be taken to the Bookstore for purchase of the passes/tickets.
  - d. The requisition is given to a Bookstore employee. The Bookstore employee will sign the requisition form on the “Processed by” line. The Bookstore retains the white and yellow copies of the requisition. The register receipt from the purchase is stapled to the pink copy of the requisition. The receipt and pink copy are given to the WIA staff member along with the appropriate bus passes and/or tickets.
  - e. The pink copy of the requisition form is filed in the monthly fiscal activity folder in the Department office. It will be reconciled against the general ledger trail balance (GLTB) after the end of the month it was created/submitted/processed.

### Distribution

- a. Following the purchase of the bus pass or tickets, they are matched with the support service justification request.
- b. Participant information, including name, eligibility date, and fund designation is added to the bus pass/bus ticket tracking Excel spreadsheet on the Department’s I drive. The type of public transportation assistance being provided should be selected from the drop down menu.
- c. After tracking information has been recorded, support can be made available to participants. There are two methods of distribution for the bus passes/bus tickets:
  - i. Pick up: Per Department policy bus passes and tickets are to be picked up by participants at the Workforce office. (Bus passes are available prior to the beginning of a new month.) A label is placed on the support service justification request for the participant to sign at the time of pick up.
  - ii. Delivery: On occasion Workforce staff will deliver passes/tickets to participants; this is often the case for cohort participants. Passes/tickets are prepared for pick up, however a signing sheet is also created. Upon delivery the WIA staff member will obtain the participant’s signature on the signing sheet.

Following the delivery of the pass/tickets, the signing sheet is returned to administrative staff. A notation is made on the support service justification request that the card was delivered, by whom and the date. (The signing sheet is matched with/stapled to the support service justification.)

**\*\*Note: Passes and tickets remain locked in a file cabinet after purchase and prior to pick up or delivery.\*\***

- Also distributed with passes and tickets is the following memo:

*“As you may know, the Workforce Investment Act (WIA) is a federally funded program designed to help job seekers find employment; and if needed supply short term training. As a federal program we have many rules, regulations and procedures to follow, as well as partner agencies helping us serve the citizens of Clackamas County.*

*This program is designed to meet the needs of individuals that meet the criteria that is set forth by the Federal Government.*

*This is not an entitlement program and our funding decisions are made on a case by case basis taking into consideration the needs of our participants and what is required for them to complete their current plan.*

*You are receiving public transportation assistance from the WIA program. The program may require that you provide proof of your attendance/involvement in training activities and/or your job search activities. Failure to comply may affect future services provided by this program.”*

- d. After each pass or tickets have been picked up or delivered, administrative staff will enter an administrative case note in i-Trac documenting the support service was provided to the participant. Also, any additional documentation necessary is added to the tracking spreadsheet.
- e. Following the documentation of the support service, the SSJ request is filed in the bus pass folder (if the request is for multiple months). The process described above will be repeated each month until the request has been exhausted. Once the request has been fulfilled, one copy (yellow) is made of the request. The yellow copy is placed in the support service requests folder in the data entry drawer in the Admin office. Data entry staff will enter the request expense in i-Trac and the Department’s expense tracker spreadsheet. The yellow copy is then filed in the support service file drawer in the Admin office. The original document is filed in the bus pass/bus ticket folder located in the locked file cabinet in the Workforce office.

Reed 7/31/14  
Team Foreman F

## GAS CARD PROCESS

### -FROM PURCHASE TO RECONCILIATION-

#### Purchase

There are two methods for purchasing gas cards:

- Inventory order
- As needed purchases from local retailers

1. Inventory order:

- a. During FY13, Workforce Development Services did not maintain an inventory of gas cards.

2. As needed purchases:

It is not always necessary for the department to maintain an inventory of gas cards, as cards are needed purchase can be made from local retailers (Haggen and Fred Meyer). These cards are purchased after a support service justification (SSJ) request has been signed. Authorized personnel purchase the cards using a Department credit card.

- a. Following the purchase of the gas card(s), the receipt is matched with the support service justification request.
- b. The charge is coded in WORKS after receiving the email regarding the use of a Department credit card.
- c. A RFP is created, matched with the SSJ request, receipt, and any other back up documentation.
- d. The RFP packet is submitted to the Director or Operations Manager for signature.
- e. After the RFP is signed, two copies (one yellow, one pink) of the RFP and back up documentation are made. The three copies (original, yellow, pink) are paper clipped together and filed in the appropriate credit card folder.
- f. Documentation for credit card expenditures is due to the business office once a month (around the fifteenth). The credit card statement is printed from WORKS and matched with the transactions from the file.
- g. The packet is submitted to the Director or Operations Manager for signature of the statement.
- h. A pink copy is made of the signed statement and is matched with the pink RFP copies, and filed in the corresponding credit card file. The original statement is attached to the original RFPs (white); and the yellow copies of the RFP packet are placed in the transaction file for the month. The yellow copies are reconciled against the GLTB reports.
- i. The original statement and RFPs are delivered to the business office for processing.

### Recording of Gas Cards ( for inventory purchases)

- Gas card identification numbers are recorded in the appropriate gas card Excel workbook, located on the Department's I drive.
- The date of purchase of the cards is also noted. The batches of purchased cards are tracked separately. This aids in the reconciliation of the cards.
- After the gas card identification numbers are recorded, a label is added to each card. The label reads "To be used for fuel and oil only. No food, alcohol or tobacco purchases".

### Storage of Gas Cards

- Following the purchase and recording of the gas cards, they are stored in a locked file cabinet.
- Based on the distribution procedure for the gas cards, cards are accessed only by WIA administrative staff.

### Distribution of Gas Cards

- I. Support Service Request for transportation assistance (gas card):
  - ❖ Per the Support Services WFDS Policy 001, "support service may be provided to an individual to address barriers to their participation in WIA services and activities that will transition the client into self-sufficiency".
    - a. Determination of need for assistance is made by the Workforce Advisor, based upon information provided by the participant.
    - b. If the Workforce Advisor has identified the need for assistance, the advisor will start the Individual Employment Plan (IEP) development process. Support services can only be provided if an IEP service and case note are recorded in the participant's i-Trac record. The IEP development process will provide information regarding the participant's educational/training/job search goals and will explain how the support being requested will assist the participant in accomplishing the stated plan/goals. (Note: To be eligible to receive gas cards, the Workforce Advisor must verify and document in i-Trac that the participant possesses a valid driver's license and current automobile insurance. Additionally, a copy of the participant's license and insurance is to be supplied to administrative staff or placed in the participant's file, depending upon the documentation requirements of the participant's fund.)
    - c. When IEP development has started; the Workforce Advisor must then write a Support Service Justification (SSJ) request. (The process detailed on Expense Approval and Processing Flow Chart should be followed when submitting fiscal requests.) The SSJ will state the type of assistance requested, the justification for the assistance and the dollar amount of assistance. The SSJ is also required to include details regarding the distance traveled, number of trips per week and whether travel is for training. Gas cards are available in \$25 and \$50 denominations. Requests can be written for up to 3 months (one term) at a time, if the participant is enrolled in training. When an SSJ for fuel is supporting job

search purposes Transportation support for job search plan cannot be provided more frequently than one month at a time. The initial case note for this service will be titled, "Job Search Plan – Support Service Justification" and all subsequent case notes regarding job search plan that include fuel support will be titled "Job Search Plan Update – (Month) Support Service Justification:" \*The word "month" in the case note title "Job Search Plan Update – (Month) Support Service Justification:" will be capturing the next month/period of time the support service is planned for, the case note and SSJ will include dates of service. As the job search plan adjusts, the transportation need may adjust, Advisors will add that information into case notes. The case notes will serve as the backup needed for admin staff to approve the SSJ.

- d. The support service justification request is saved in the designated folder on the Department's I drive by the author.
- e. The support service justification request is reviewed for accuracy (particularly the account number and justification), printed, and, when provided, matched with back up documentation by administrative staff. The request is routed to an authorized signer (Director, Associate Director, Compliance Officer Rapid Response Coordinator-Lead, or Workforce Advisor Lead.)
- f. Once the request has been signed the gas card can be issued. The gas cards are removed from the locked cabinet and the gas card tracking spreadsheet on the department's I drive is opened. Admin staff verifies that the card being used is the next card in the sequence on the spreadsheet and the last four numbers of the gas card identification number are noted at the bottom of the support service request. The gas cards are then returned to the locked cabinet. Cards for pick up: Per Department policy, gas cards are to be picked up by participants at the Workforce office. On the support service justification the last four digits of the card number are noted and a label for signature is affixed to the request. The card is attached to the support service request and they are placed in the gas card folder in a locked file drawer in the Workforce office. The folder is only accessed by staff members when participants arrive at the office to retrieve their gas card. The participant signs the support service request at the time of pick up. Gas cards are available for pick up on the first working day of the new month (if the participant is receiving monthly gas card support). Delivered cards: On occasion staff will deliver cards to participants; this is often the case for cohort participants. Cards are prepared for pick up, however a signing sheet is also created. Upon delivery the WIA staff member will obtain the participant's signature on the signing sheet. Following delivery of the cards, the signing sheet is returned to administrative staff. A notation is made on the support service justification that the card was delivered, by whom and the date. (The signing sheet is returned to administrative staff. The signing sheet is then matched with/stapled to the support service justification request.)

- Also distributed with each card is the following memo:



*“As you may know, the Workforce Investment Act (WIA) is federally funded program designed to help job seekers find employment; and if needed supply short term training. As a federal program we have many rules, regulations and procedures to follow, as well as partner agencies helping us serve the citizens of Clackamas County.*

*This program is designed to meet the needs of individuals that meet the criteria that is set forth by the Federal Government.*

*This is not an entitlement program and our funding decisions are made on a case by case basis taking into consideration the needs of our participants and what is required for them to complete their current plan.*

*You are currently receiving gas cards from the WIA program and are required by this program to show proof of: 1) valid driver's license and 2) valid insurance. This program will require you to show this proof at least once every three months. Additionally, we require that if you lose your insurance or driver's license for any reason; you must inform us within 24 hours.”*

- g. After each card has been picked up or delivered, administrative staff will enter an administrative case note in I-trac documenting that the support service was provided to the participant.
- h. Following the documentation of the support service the support service justification request is filed in the gas card folder (if the request is for multiple months). The processes described in Steps f and g will be repeated each month until the request has been exhausted. Once the request has been fulfilled, one copy (yellow) is made of the request. The yellow copy is placed in the support service request folder in the data entry drawer in the Admin office. Data entry staff will enter the request expense in the expense tracker spreadsheet and also in i-Trac. The copy is then filed in the support service file drawers in the Admin office. The original document is filed in the gas card binder located in a locked file cabinet in the Workforce office.

### Reconciliation

- ❖ After each purchase batch of gas cards has been provided to participants, the tracking spreadsheet, the support service requests and workshop/event tracking spreadsheets must be reconciled. Reconciliation is required to create a journal entry to correctly charge each fund.
  - a. The portion of the gas card tracking spreadsheet containing the batch of cards for reconciling is printed, and the original support service requests are pulled from the gas card binder.

- b. The participant's names, eligibility dates, funds and gas card numbers are verified on the support service justification requests and the gas card tracking spreadsheet.
- c. Following the reconciliation, any necessary adjustments are made to the gas card tracking spreadsheet. The updated version of the spreadsheet is printed and copies are made of the support service requests corresponding to the batch of cards reconciled. The spreadsheet and copies are used as back up for the journal entry.
- d. The journal entry is prepared. Since the gas cards were purchased using WIA Adult (1A) funds, the journal entry is required to correctly charge the various participant funds utilized by the department.
- e. The journal entry is submitted for signature to the Director or Operations Manager. A copy of the journal entry and all pertinent back up documentation is filed in the monthly fiscal activity folder in the department office.
- f. The original journal entry and back up documentation is delivered to the Grant Accountant in the Business Office for processing.
- g. The department copy of the journal entry is reconciled against the general ledger trial balance (GLTB) after the end of the month that the journal entry was created.
- h. The original support service justification requests are filed by fiscal year in a locked file cabinet in the WIA office.

*Note: Gas cards purchased from local retailers using the department credit card do not always require reconciliation, as the purchase can be coded accurately in WORKS following the purchase. If a journal entry is required to correct account codes, a similar process to the one outlined above is followed.*



REC'D 7/30/14  
from Bryan

## GIFT (CASH-LIKE) CARD PROCESS

### Purchase

- ❖ Per the Support Service WFDS Policy 001, “support service may be provided to an individual to address barriers to their participation in WIA services and activities that will transition the client into self-sufficiency”. To this end, gift (cash-like) cards can be provided to participants to allow for the purchase of food or clothing for interviews and/or employment.
  - a. Determination of need for assistance is made by the Workforce Advisor, based on information provided by the participant.
  - b. If the Workforce Advisor has identified the need for assistance, the advisor will submit an Individual Employment Plan (IEP) – if the participant does not have a current approved IEP that provides for this type of assistance – to the Operations Manager, Rapid Response Coordinator- Lead, and/or the Workforce Advisor Lead for approval. The IEP provides information regarding the participant’s educational/training/job search goals and will explain how the support being requested will assist the participant in accomplishing the stated plan/goals.
  - c. If/When the IEP has been approved (or if the participant has a previously approved IEP that approves the expense), the Workforce Advisor must then create a support service justification (SSJ) request. (The Expense Approval and Processing Flow Chart should be followed when submitting fiscal requests.) The SSJ will state the type of assistance being requested, the justification for the assistance, the dollar amount of the gift (cash-like) card and the vendor where it should be purchased. (The gift (cash-like) cards are usually purchased from and for use at Fred Meyer due to the variety of merchandise available.)
  - d. The SSJ request is saved in the designated folder on the department’s I drive by the approver.
  - e. The support service justification request is reviewed for accuracy (particularly the account number and justification), printed, and, when available matched with back up documentation by administrative staff. The request is routed to an authorized signer (Operations Manager, Rapid Response Coordinator-Lead, or Workforce Advisor Lead) for signature.
  - f. Following the approval of the request for the gift (cash-like) card, the card can be purchased by a WIA staff member using a department credit card from the designated merchant. (Note: Unlike the gas cards, the department does not maintain a supply of gift (cash-like) cards.)

### Recording

- ❖ After the card has been purchased and returned to the WFDS office.
  - a. The card is then logged on the gift/cash card tracking spreadsheet on the Department’s I drive. The date of purchase, amount and vendor are noted, in addition to the participant’s name, eligibility date and fund.
  - b. The card number is also written on the bottom of the support service justification request.

## Distribution

- ❖ Once the card has been recorded on the tracking spreadsheet and on the SSJ request, the Workforce Advisor and/or the participant is notified regarding the availability of the card.
  - a. There are three methods of distribution for the gift (cash-like) cards:
    - Pick Up
    - Delivery
    - Mailing
      - i. Pick up: The card is attached to the support service justification request, and when the card is picked up the participant signs the original SSJ request.
      - ii. Delivery: Cards are sometimes delivered by Workforce Advisors to participants; this is often the case for cohort participants. Cards are prepared for pick up, however a signing sheet is also created for each card. Upon delivery, the WIA staff member will obtain the participant's signature on the corresponding signing sheet. The signing sheets are returned to administrative staff and a notation is made on the support service justification that the card was delivered, by whom and the date. (The signing sheet is attached to the SSJ request.)
      - iii. Mailing: (Note: Approval for mailing gift (cash-like) cards must be granted by the Department's Operations Manager.) If the Workforce Advisor has requested for the card to be mailed to the participant, the date that the card is mailed is added to the SSJ request along with the gift (cash-like) card number.

**\*\*Note: Cards remain locked in the WIA office vault and/or a lockable file cabinet after purchase and prior\*\*  
\*\*to pick up, delivery, or mailing.\*\***

- Also distributed with each card is the following memo:

*"As you may know, the Workforce Investment Act (WIA) is a federally funded program designed to help job seekers find employment; and if needed supply short term training. As a federal program we have many rules, regulations and procedures to follow, as well as partner agencies helping us serve the citizens of Clackamas County.*

*This program is designed to meet the needs of individuals that meet the criteria that is set forth by the Federal Government.*

*This is not an entitlement program and our funding decisions are made on a case by case basis taking into consideration the needs of our participants and what is required for them to complete their current plan.*

*You have received a gift (cash-like) card from the WIA program. The program may require that you provide proof that the gift (cash-like) card was used for its intended*

*purpose. Please retain receipts from purchases made using the card, and provide them to your Workforce Advisor. Also, if this assistance was mailed to you please contact your Workforce Advisor within 48 hours to confirm receipt. Failure to comply may affect future services provided by the program.”*

- b. After each card is distributed, administrative staff will enter an administrative case note in I-trac documenting that the support service was provided to the participant. Further case noting is required by the Workforce Advisor when the participant confirms receipt, if the assistance was mailed.

### Payment

- a. Following the purchase of the gift (cash-like) card, the receipt is matched with the support service justification request.
- b. The charge is coded in WORKS after receiving the email regarding the use of the department credit card.
- c. Once the card has been distributed, a request for payment (RFP) is created. The RFP is signed by the originator and matched with the SSJ request, receipt, and any other back up documentation.
- d. The RFP packet is submitted to the Operations Manager or Rapid Response Coordinator for signature.
- e. After the RFP is signed, two copies (one yellow, one pink) of the RFP and back up documentation are made. The three copies are paper clipped together and filed in the appropriate credit card folder.
- f. Documentation for credit card expenditures is due to the business office once a month (around the fifteenth). The credit card statement is printed from WORKS and matched with the transactions from the file.
- g. The packet is submitted to the Operations Manager or other authorized signer for signature of the statement.
- h. A pink copy is made of the signed statement and is matched with the pink RFP copies, and filed in the corresponding credit card file. The original statement is attached to the original RFPs (white); and the yellow copies of the RFP are placed in the transaction file for the month. The yellow copies are reconciled against the GLTB reports.
- i. The original statement and RFPs are delivered to the business office for processing.



REED 7/31/14  
From Bryan F

## Bus Pass/Bus Ticket Process

### Request

- ❖ Per the Support Service WFDS Policy 001, “support service may be provided to an individual to address barriers to their participation in WIA services and activities that will transition the client into self-sufficiency.” To this end, public transportation assistance may be provided to participants to alleviate a barrier to training and/or job search.
  - a. Determination of need for assistance is made by the Workforce Advisor, based on information provided by the participant.
  - b. If the Workforce Advisor has identified the need for assistance, the advisor will submit an Individual Employment Plan (IEP) – if the participant does not have a current approved IEP that provided for this type of assistance – to the Operation Manager, Rapid Response Coordinator-Lead, and/or the Workforce Advisor Lead for approval. The IEP provides information regarding the participant’s educational/training/job search goals and will explain how the support being requested will assist the participant in accomplishing the stated plan/goals.
  - c. If/When the IEP has been approved (or if the participant has a previously approved IEP that approves the expense), the Workforce Advisor must then create a support service justification (SSJ) request. (The Expense Approval and Processing Flow Chart should be followed when submitting fiscal requests.) The SSJ will state the type of assistance being requested, the justification for the assistance and the type of public transportation assistance. Public transportation assistance is available in the form of monthly bus passes or bus tickets. Requests for public transportation assistance can be written for up to 3 months (one term) at a time, if the participant is enrolled in training. If the participant is not enrolled in training, support must be requested on a monthly basis. The SSJ request is submitted to the Operations Manager, Rapid Response Coordinator-Lead, and/or Workforce Advisor Lead for approval.
  - d. The support service justification request is saved in the designated folder on the department’s I drive by the approver.
  - e. The support service justification request is reviewed for accuracy (particularly the account number and justification), printed, and, when provided, match with back up documentation by administrative staff. (There will rarely be back up documentation for public transportation requests.) The request is routed to an authorized signer (Operations Manager, Rapid Response Coordinator-Lead, or Workforce Advisor Lead) for signature.
  - f. Once the request has been signed the bus pass or tickets can be purchased then issued to the participant.

### Purchase

- ❖ Bus passes and tickets are purchased at the CCC Bookstore. Passes and ticket are purchased as they are needed. An inventory is not maintained in the Workforce Development office.
  - a. To purchase bus passes or tickets a Bookstore Requisition form (3-part form) must be completed.



- Separate bookstore requisition forms will need to be completed for each funding stream (account number).
  - List the number (and type – ie. Adult All Zone or Honored Citizen) of cards or tickets and the cost (for current rates refer to Tri-Met pricing chart available at: <http://trimet.org/fares/index.htm> ). The month that the pass is for should also be listed on the requisition.
  - The bottom portion of the bookstore requisition also must be completed prior to purchase:
    - Name of administrative staff member completing the form should be entered on the “ordered by” line
    - Add the account number listed on the support service justification in the account number section of the requisition
    - On the pink copy of the requisition only, record the name of the participant or participants that the passes or tickets are being purchased for
- b. After the information listed above has been added to the form, the form is routed to an authorized signer for signature.
  - c. Once signed, the requisition can be taken to the Bookstore for purchase of the passes/tickets.
  - d. The requisition is given to a Bookstore employee. The Bookstore employee will sign the requisition form on the “Processed by” line. The Bookstore retains the white and yellow copies of the requisition. The register receipt from the purchase is stapled to the pink copy of the requisition. The receipt and pink copy are given to the WIA staff member along with the appropriate bus passes and/or tickets.
  - e. The pink copy of the requisition form is filed in the monthly fiscal activity folder in the Department office. It will be reconciled against the general ledger trail balance (GLTB) after the end of the month it was created/submitted/processed.

### Distribution

- a. Following the purchase of the bus pass or tickets, they are matched with the support service justification request.
- b. Participant information, including name, eligibility date, and fund designation is added to the bus pass/bus ticket tracking Excel spreadsheet on the Department’s I drive. The type of public transportation assistance being provided should be selected from the drop down menu.
- c. After tracking information has been recorded, cards can be made available to participants. There are three methods of distribution for the bus passes/bus tickets:
  - i. Pick up: Per Department policy bus passes and tickets are to be picked up by participants at the Workforce office. (Bus passes are available prior to the beginning of a new month.) A label is placed on the support service justification request for the participant to sign at the time of pick up.
  - ii. Mailing: (Note: Approval for mailing bus passes and/or bus tickets must be granted by the Department’s Operations Manager.) If the Workforce Advisor has requested for the bus pass or tickets to be mailed to the participant, the date of mailing is added to the support service justification. If the bus pass or tickets

are prepared for mailing in advance of the mailing date, the passes/tickets remain locked in the vault until the day they are placed in outgoing mail.

- iii. Delivery: On occasion Workforce staff will deliver passes/tickets to participants; this is often the case for cohort participants. Passes/tickets are prepared for pick up, however a signing sheet is also created. Upon delivery the WIA staff member will obtain the participant's signature on the signing sheet. Following the delivery of the pass/tickets, the signing sheet is returned to administrative staff. A notation is made on the support service justification request that the card was delivered, by whom and the date. (The signing sheet is matched with/stapled to the support service justification.)

*\*\*Note: Passes and tickets remain locked in the WIA office vault and/or a lockable file cabinet \*\*  
\*\*after purchase and prior to pick up, mailing or delivery.\*\**

- Also distributed with each card is the following memo:

*“As you may know, the Workforce Investment Act (WIA) is a federally funded program designed to help job seekers find employment; and if needed supply short term training. As a federal program we have many rules, regulations and procedures to follow, as well as partner agencies helping us serve the citizens of Clackamas County.*

*This program is designed to meet the needs of individuals that meet the criteria that is set forth by the Federal Government.*

*This is not an entitlement program and our funding decisions are made on a case by case basis taking into consideration the needs of our participants and what is required for them to complete their current plan.*

*You are receiving public transportation assistance from the WIA program. The program may require that you provide proof of your attendance/involvement in training activities and/or your job search activities. Additionally, if this assistance has been mailed to you, please contact your Workforce Advisor within 48 hours to confirm receipt. Failure to comply may affect future services provided by this program.”*

- d. After each pass or tickets have been picked up, mailed or delivered, administrative staff will enter an administrative case note in i-Trac documenting the support service was provided to the participant. Also, any additional documentation necessary is added to the tracking spreadsheet. Further case noting is required by the Workforce Advisor when the participant confirms receipt, if the assistance was mailed.
- e. Following the documentation of the support service the SSJ request is filed in the bus pass folder (if the request is for multiple months). The process described above will be repeated each month until the request has been exhausted. Once the request has been fulfilled, one copy (yellow) is made of the request. The yellow copy is placed in the support service requests folder in the data entry drawer in the Vault. Data entry staff

will enter the request expense in i-Trac and the Department's expense tracker spreadsheet. The yellow copy is then filed in the support service file drawers in the Vault. The original document is filed in the bus pass/bus ticket folder located in the locked file cabinet in the Workforce office.

B-6

PARTICIPANT SUPPORT POLICIES AND PROCEDURES  
FOR  
COMMUNITY SOLUTIONS FOR CLACKAMAS COUNTY  
CLACKAMAS COUNTY FUND #245  
(UPDATED 7/17/13)

When paying for various participant support costs, there are three main ways that these situations should be handled:

**A. Clackamas County Check**

1. Program staff will work individually with participants to determine the type of support needed.
2. Program staff will submit to a supervisor or manager an internal form requesting funds, such as a Request for Funds (RFF) or Authorization for Purchase (AFP), as well as backup documentation that states all the appropriate information; such as vendor information (name, address, phone number and federal tax ID), date, amount due, and materials or services received. Examples of these would be a tuition invoice, rental agreement, utility bill, etc. Supervisor and/or manager will review these requests and, if approved, forward to fiscal staff for payment.
3. Fiscal staff will review documentation for accuracy and prepare a Clackamas County payment voucher. This voucher will be reviewed and approved by a manager with proper signature authority and then sent on to Clackamas County Finance for a check to be issued. Finance issues checks each Monday for payment vouchers that are received the prior week.
4. Once the check is received from County Finance by fiscal staff, a copy of it will be saved with the vendor file. Based on recommendations from program staff, the live check will either be mailed to the vendor with a copy of the appropriate backup documentation, or given to the participant to take to the vendor.

## **B. Clackamas County Purchase Order**

1. Program staff will work individually with participants to determine the type of support needed.
2. Currently, Community Solutions has accounts with two local vendors that accept County purchase orders: Fred Meyer and Sears. If materials or supplies, such as work clothes, interview clothes, tools, etc, are needed by the participant and can be purchased at one of these vendors then program staff will submit an internal form (RFF or AFP) to a supervisor or manager requesting a purchase order. After review, if the request is approved by supervisor/manager, it will be forwarded on to fiscal staff for a purchase order to be prepared. This request will document the maximum amount authorized and list specific types of items to be purchased.
3. Fiscal staff will prepare the purchase order according to the request and give to the program staff. Purchase order will include the fiscal staff contact information in case the vendor has questions during the purchase process.
4. Program staff will give participant the purchase order as well as instructions on how to use it. These instructions also inform the participant to return to Community Solutions any receipts or other paperwork received from the vendor at the time of use. When receipts are returned the items purchased are reviewed by program staff.
5. When vendor submits an invoice for the purchase order it will be attached to the purchase order and sent to County Finance for a check to be issued and sent directly to the vendor.

## **C. Clackamas County Procurement Card**

1. A procurement card purchase is to be used when a County check or purchase order either cannot be made in an efficient and reasonable manner. Procurement cards can be used for online purchases, such as food handler's cards or orders for specific materials from online vendors, and are also usually used for support services such as bus passes, bus tickets, gas gift cards and retail store gift cards.

2. Program staff will work individually with participants to determine the type of support needed.
3. Program staff will submit an internal form (RFF or AFP) to a supervisor or manager for review and approval. If the request is approved by supervisor/manager it will be forwarded on to fiscal staff to review the request and determine if payment by a procurement card is necessary.
4. If a procurement card is to be used for an online purchase, fiscal staff will go online and make the appropriate purchase and print out receipts and backup documentation for the procurement card file. If the online purchase is made for materials, they will be shipped to Community Solutions for the participant to pick up.
5. If a procurement card is to be used for a store purchase of materials, fiscal staff will go directly to the store and purchase the materials and return them to Community Solutions for the participant to pick up. Receipts and backup documentation will be placed in the procurement card file.
6. If a procurement card is to be used for support services such as gift cards, bus passes, etc, then fiscal staff will purchase these items from a local store. These type of support services usually have a number associated with them, so fiscal staff will prepare a sign out sheet showing the participant's name, type of item, value of item, and corresponding item number. Program staff will issue the item to the participant and have them sign the sign out sheet stating that they have received the support service. This sign out sheet, along with the purchase receipt, will be used as backup documentation in the procurement card file.
7. Occasionally, certain support services that are needed on a reoccurring basis, such as gas cards or bus tickets, may be bought in bulk. In this instance, fiscal staff will purchase these items and keep the inventory in a secure location until they are requested by program staff. Once requested, fiscal staff will issue to program staff the appropriate amount of support services by creating a sign out sheet and following the procedure described in line #6 above.



**C-TEC Youth Services**  
*An Equal Opportunity Employer Program*

19600 Molalla Ave. M113, Oregon City, OR 97045  
Phone 503.594.3964 ~ Fax 503.722.5868

## **CASAS INCENTIVE AGREEMENT**

I, \_\_\_\_\_, have taken a CASAS Pre-Assessment with C-TEC Youth Services and plan to work with my service provider to increase my skills. I plan to take a Post-Assessment within the next year. If my score increases by at least one level, I will receive a \$25 gift card (or equivalent) from C-TEC Youth Services. My C-TEC service provider has discussed options with me for gaining these skills, such as classes, tutoring, worksheets, etc.

\_\_\_\_\_  
Participant Signature

\_\_\_\_\_  
Date

---

---

### **Congratulations!**

You have increased your skills at least one level. Please sign below acknowledging that you have received a \$25 gift card (or equivalent) from C-TEC Youth Services.

\_\_\_\_\_  
Participant Signature

\_\_\_\_\_  
Date

F-24 Identify staff responsible for completing Recipient Share (10j – 10n and 11). Additional Expenditure Data Required portions of US DOL 9130 reports including descriptions of entries made in these section.

PY 2013 response is still applicable. Deb Zang

Fiscal Director completes the US DOL 9130. Entries in the Recipient Share section include stand in costs and leverage reported to WICCO by service providers on their monthly reimbursement request.



F-25 During current program year did your organization purchase property/equipment with a per unit acquisition cost of \$5,000 or more? If yes, provide description of purchase and whether you requested and received CCWD prior approval for the purchase? (CCWD Equipment Policy 589-10.12)

PY 2013 response is still applicable. Deb Zang

Region 15 made no purchases with a per unit acquisition cost of \$5,000 or more

F-26 Has your physical location and phone number changed since last year's monitoring visit? If yes, please provide the new address and phone number.

PY 2013 response is still applicable. Deb Zang

There has been no change in WICCO physical location or phone number

F-27 Using the worksheet provided, please list purchases (including contracts for services) made during the current program year and last program year (if the products/services were to be delivered in current program year) that exceed \$25,000.

- Please code purchases with the following notations: 1 = competitive proposal; 2 = non-competitive proposal; 3 = competitive sealed bid.

**PROCUREMENT  
(\$25,000+ for PY 2014)**

<b>Description of Purchase or Service</b>	<b>Vendor Name</b>	<b>Date/Type* Of Procurement</b>
Youth Services	Clackamas Education Service District	1/27/2014 #1

\*1 = Competitive Proposal; 2 = Non-competitive Proposal; 3 = Competitive Sealed Bid

**SEPARATION OF DUTIES**

<b>Function</b>	<b>Employee Name</b>	<b>Employee Title</b>
1. Accounts for undelivered checks	Deb Zang	Fiscal Director
2. Approves:		
a) Invoice & vouchers for payment	Bridget Dazey	Executive Director
b) Journal entries	Deb Zang	Fiscal Director
c) Personnel actions	Bridget Dazey	Executive Director
d) Participant registration	Service Provider Staff	
e) Participant intake forms	Service Provider Staff	
f) Participant termination forms	Service Provider Staff	
g) Petty cash replenishment	N/A	
h) Petty cash vouchers	N/A	
i) Purchase Orders	N/A	
j) Vendor invoice payment	Bridget Dazey	Executive Director
k) Bank reconciliations	Bridget Dazey	Executive Director
l) Approve cash draw request	Bridget Dazey	Executive Director
3. Certifies payrolls for:		
a) Accuracy	Deb Zang	Fiscal Director
b) Authenticity of payee	Deb Zang	Fiscal Director
c) Correct wage rate	Deb Zang	Fiscal Director
4. Certifies attendance reports for staff	Bridget Dazey	Executive Director
5. Certifies attendance reports for registrants	Service Provider staff	
6. Collects time and attendance reports	Deb Zang	Fiscal Director
7. Custodian of:		
a) Blank checks	Deb Zang	Fiscal Director
b) Equipment inventory records	Deb Zang	Fiscal Director
c) Mechanical check signer	N/A	
d) Petty cash fund	N/A	
e) Supplies inventory	Amy Oakley	Executive Assistant
f) Undelivered checks	Deb Zang	Fiscal Director
8. Delivers payroll checks to:		
a) Participants for wages	Service Provider Staff	
b) Staff for salaries	Deb Zang	Fiscal Director
9. Makes deposits in bank accounts:		
a) Cash	We do not accept cash	
b) Checks	Amy Oakley	Executive Assistant

<b>Function</b>	<b>Employee Name</b>	<b>Employee Title</b>
10. Opens:		
a) Bank statements	Bridget Dazey	Executive Director
b) Mail	Amy Oakley	Executive Assistant
11. Posts leave earned and taken to cumulative leave records	Deb Zang	Fiscal Director
12. Prepares:		
a) Initial payroll authorization for participants	Service Provider Staff	
b) Initial payroll authorization for staff	Deb Zang	Fiscal Director
c) Monthly trial balances	Deb Zang	Fiscal Director
d) Personnel actions	Deb Zang/Bridget Dazey	Fiscal Dir/Executive Dir
e) Bank reconciliations	Deb Zang	Fiscal Director
f) Cash draw requests	Deb Zang	Fiscal Director
13. Receives cash on-site	We do not accept cash	
14. Records receipts in books of account (label, e.g. cash receipt journal, etc.)	Deb Zang	Fiscal Director
15. Records disbursements in books of account (label, e.g. cash disbursement journal, etc.)	Deb Zang	Fiscal Director
16. Reviews time and attendance reports in payroll section.	Bridget Dazey	Executive Director
17. Signs:		
a) Checks	Bridget Dazey	Executive Director
b) Receiving documents	All Staff	
18. Prepares contracts	Deb Zang	Fiscal Director
19. Approves contracts	Bridget Dazey	Executive Director
20. Prepares contract modifications	Deb Zang	Fiscal Director
21. Approves contract modifications	Bridget Dazey	Executive Director
22. Data processing:		
a) Fiscal data input	Deb Zang	Fiscal Director
b) Participant data input	Service Provider Staff	
c) Fiscal data output	Deb Zang	Fiscal Director
d) Participant data output	Service Provider Staff	

<b>Function</b>	<b>Employee Name</b>	<b>Employee Title</b>
e) Programming fiscal programs	Deb Zang	Fiscal Director
f) Programming participant programs	Worksystems, Inc staff with work order from Jan Filgas	Program Director
g) Access to terminals for:		
i) Fiscal applications	Deb Zang	Fiscal Director
ii) Participant applications	Service Provider Staff Jan Filgas Amy Evans	Program Manager Program Manager
iii) Other (e.g. word processing, etc.)	All Staff	

F-28 Please complete the Staff Turnover/Layoff Table (follows). In the event of an Executive Director Termination please complete the Director Termination Review Program (follows).

Please note: Executive Director termination review was included in PY13 monitoring.

F-29 Please attach a copy of your PY2013 Board Approved Budget for WIA Title 1B Formula Funds.

See attached.



Workforce Investment Council of Clackamas County  
Budget July 2013 - June 2014

REVENUE PROJECTION	TITLE 18 FUNDS											Other Grants			
	TOTAL	YOUTH	ADULT	DISLOCATED WORKER	ADMIN	NCRRC	Back To Work Oregon	Foundation	CleanTech	Metro Step	Housing Works	Solutions to Work	JIAC	CCBA	
															9/2015
NEW ALLOCATION For FY13/14	\$ 2,435,865	\$ 680,228	\$ 666,458	\$ 709,707	\$ 228,486	\$ 57,992	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 49,348	\$ 43,646	
FY12/13 WTCCO CARRY FORWARD	\$ 742,170	\$ 75,561	\$ 136,161	\$ 141,305	\$ 192,368	\$ 16,276	\$ -	\$ 4,339	\$ 46,039	\$ 30,926	\$ 99,197	\$ -	\$ -	\$ -	
FY12/13 PROVIDER CARRY FORWARD	\$ 2,030,707	\$ 62,000	\$ 57,700	\$ 58,300	\$ -	\$ -	\$ -	\$ 6,102	\$ 384,680	\$ 287,000	\$ 1,120,000	\$ -	\$ -	\$ -	
<b>TOTAL FY12/13 REVENUE PROJECTION</b>	<b>\$ 5,208,742</b>	<b>\$ 817,789</b>	<b>\$ 860,319</b>	<b>\$ 909,312</b>	<b>\$ 420,854</b>	<b>\$ 74,268</b>	<b>\$ -</b>	<b>\$ 65,366</b>	<b>\$ 430,719</b>	<b>\$ 317,926</b>	<b>\$ 1,219,197</b>	<b>\$ 49,348</b>	<b>\$ 43,646</b>		
<b>PLANNED EXPENDITURES:</b>															
<b>Program Services</b>															
Service Provider Contracts	\$ 1,821,820	\$ 678,600	\$ 507,600	\$ 572,400	\$ 44,500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 18,720	\$ -	
Service Provider Contracts (small providers)	\$ 305,000	\$ -	\$ 147,600	\$ 157,400	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Service Provider Contracts (carry-forward)	\$ 1,268,470	\$ 62,000	\$ 57,700	\$ 58,300	\$ -	\$ -	\$ -	\$ 30,513	\$ 192,340	\$ 147,617	\$ 720,000	\$ -	\$ -	\$ -	
<b>TOTAL PROGRAM SERVICES</b>	<b>\$ 3,395,290</b>	<b>\$ 740,600</b>	<b>\$ 712,900</b>	<b>\$ 788,100</b>	<b>\$ 44,500</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 30,513</b>	<b>\$ 192,340</b>	<b>\$ 147,617</b>	<b>\$ 720,000</b>	<b>\$ 18,720</b>	<b>\$ -</b>	<b>\$ -</b>	
<b>Personnel</b>	\$ 356,780	\$ 20,250	\$ 37,313	\$ 155,310	\$ 11,368	\$ -	\$ -	\$ 1,305	\$ 13,285	\$ 9,022	\$ 42,346	\$ 1,631	\$ 27,636	\$ 8,932	
Payroll Taxes & Benefits	\$ 114,022	\$ 6,472	\$ 11,925	\$ 49,636	\$ 3,633	\$ -	\$ -	\$ 417	\$ 4,246	\$ 2,883	\$ 13,533	\$ 521	\$ 8,932	\$ -	
<b>Materials &amp; Services</b>	\$ 19,104	\$ 342	\$ 1,180	\$ 14,802	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 547	\$ -	\$ 1,053	\$ -	
Travel & Mileage	\$ 5,175	\$ 1,940	\$ 2,058	\$ 2,058	\$ 1,074	\$ 79	\$ -	\$ 9	\$ 92	\$ 62	\$ 293	\$ 11	\$ 731	\$ -	
Board & Staff Development	\$ 8,408	\$ 136	\$ 251	\$ 1,045	\$ 76	\$ 76	\$ -	\$ 9	\$ 89	\$ 61	\$ 285	\$ 11	\$ 186	\$ -	
Professional Services	\$ 2,400	\$ 31	\$ 56	\$ 235	\$ 17	\$ 17	\$ -	\$ 2	\$ 20	\$ 14	\$ 64	\$ 2	\$ 112	\$ -	
General Office Supplies	\$ 610	\$ 600	\$ 3,900	\$ 2,190	\$ 18,880	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Postage	\$ 3,900	\$ 6,000	\$ 13,000	\$ 11,000	\$ 2,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Computer Hardware/Software	\$ 3,000	\$ 3,500	\$ 3,500	\$ 4,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Food for Meetings	\$ 18,880	\$ 392	\$ 722	\$ 722	\$ 3,004	\$ 220	\$ -	\$ 25	\$ 257	\$ 174	\$ 819	\$ 32	\$ 534	\$ -	
Accounting & Audit Services	\$ 30,000	\$ 57	\$ 1,000	\$ 1,320	\$ 500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
MLS Participant Data	\$ 12,500	\$ 189	\$ 349	\$ 1,451	\$ 1,501	\$ -	\$ -	\$ 4	\$ 37	\$ 25	\$ 119	\$ 5	\$ 77	\$ -	
Legal Services	\$ 4,000	\$ 259	\$ 478	\$ 7,117	\$ 146	\$ 146	\$ -	\$ 17	\$ 170	\$ 116	\$ 543	\$ 21	\$ 877	\$ -	
Regional Collaborative	\$ 10,000	\$ 2,300	\$ 4,237	\$ 4,237	\$ 17,637	\$ 1,291	\$ -	\$ 148	\$ 1,509	\$ 1,025	\$ 4,809	\$ 185	\$ 3,138	\$ -	
Telephone	\$ 6,900	\$ 624	\$ 624	\$ 624	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Advertising	\$ 500	\$ 57	\$ 105	\$ 435	\$ 32	\$ 32	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Marketing & Outreach	\$ 3,320	\$ 189	\$ 349	\$ 1,501	\$ 1,501	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Printing & Duplication	\$ 1,000	\$ 259	\$ 478	\$ 7,117	\$ 146	\$ 146	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Liability Insurance	\$ 3,333	\$ 2,300	\$ 4,237	\$ 4,237	\$ 17,637	\$ 1,291	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Equipment Lease	\$ 1,501	\$ 5,000	\$ 5,000	\$ 5,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Equipment Repairs & Maint	\$ 10,222	\$ 478	\$ 478	\$ 478	\$ 7,117	\$ 146	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Office Furniture & Equipment	\$ 2,000	\$ 2,300	\$ 4,237	\$ 4,237	\$ 17,637	\$ 1,291	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Office Rental	\$ 40,516	\$ 478	\$ 478	\$ 478	\$ 7,117	\$ 146	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Storage Facilities Rental	\$ 624	\$ 4,250	\$ 4,250	\$ 4,250	\$ 18,141	\$ 75	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Worksource Clackamas Rental	\$ 8,501	\$ 5,000	\$ 5,000	\$ 5,000	\$ 500	\$ 500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Dues & Memberships	\$ 18,141	\$ 5,000	\$ 5,000	\$ 5,000	\$ 500	\$ 500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Publications & Subscriptions	\$ 75	\$ 5,000	\$ 5,000	\$ 5,000	\$ 500	\$ 500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Filing Fees	\$ 500	\$ 5,000	\$ 5,000	\$ 5,000	\$ 500	\$ 500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Reserve for Recession	\$ 15,000	\$ 5,000	\$ 5,000	\$ 5,000	\$ 500	\$ 500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
<b>WTCCO PLANNED EXPENDITURES:</b>	<b>\$ 700,912</b>	<b>\$ 47,467</b>	<b>\$ 90,424</b>	<b>\$ 88,425</b>	<b>\$ 312,552</b>	<b>\$ 16,968</b>	<b>\$ -</b>	<b>\$ 1,948</b>	<b>\$ 19,829</b>	<b>\$ 13,466</b>	<b>\$ 63,753</b>	<b>\$ 2,434</b>	<b>\$ 43,646</b>		
<b>TOTAL PLANNED EXPENDITURES</b>	<b>\$ 4,096,202</b>	<b>\$ 788,067</b>	<b>\$ 803,324</b>	<b>\$ 876,525</b>	<b>\$ 312,552</b>	<b>\$ 61,468</b>	<b>\$ -</b>	<b>\$ 32,461</b>	<b>\$ 212,169</b>	<b>\$ 161,083</b>	<b>\$ 783,753</b>	<b>\$ 21,154</b>	<b>\$ 43,646</b>		
<b>Planned for future periods</b>	<b>\$ 1,112,540</b>	<b>\$ 29,721</b>	<b>\$ 56,995</b>	<b>\$ 32,786</b>	<b>\$ 108,302</b>	<b>\$ 12,800</b>	<b>\$ 0</b>	<b>\$ 32,906</b>	<b>\$ 218,550</b>	<b>\$ 156,843</b>	<b>\$ 435,444</b>	<b>\$ 28,194</b>	<b>\$ 0</b>		

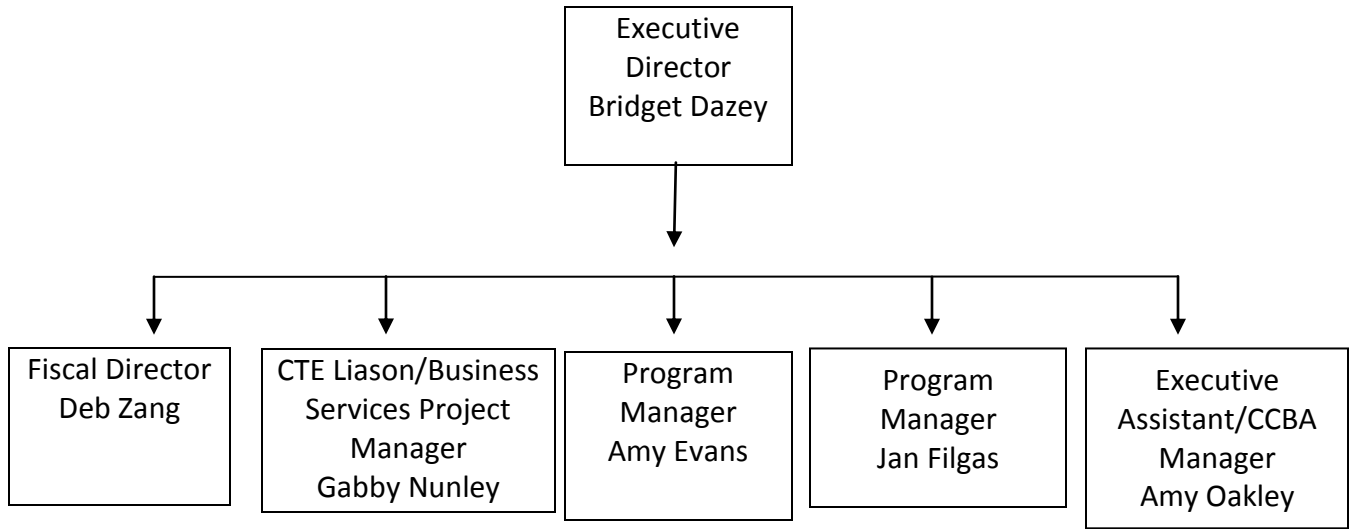
Balance Non-Federal Unrestricted Funds: \$11,716



F-30 Please submit your entity's latest organizational chart with names and job titles for each position. (New)

See attached.

## Workforce Investment Council Organizational Chart



F-31 Please submit your entity's current personnel policies. (New)

See attached.

**STAFF TURN OVER/LAYOFF TABLE**

Position	Staff Name	Vacancy Date	Position	Staff Name	Hire Date
Executive	Kim	12/30/13	Manufacturing	Gabby	3/24/14
Director	Parker		CTE Liason	Nunley	
Position	Staff Name	Layoff Date	Position Assigned Responsibilities	Staff Name	Date of Assigned Resp.

Please attach for current program year an organizational chart of staff names and positions/functions.

See F30



Workforce Investment  
Council of  
Clackamas County

365 Warner Milne Road  
Oregon City, OR 97045  
(503) 657-6644

**Employee Handbook**

Effective Date: September 2009<sup>1</sup>

## **Workforce Investment Council of Clackamas County Employee Handbook**

### **Welcome**

### **WORKFORCE INVESTMENT COUNCIL History Introduction**

#### **A Employment Guidelines**

- A-1 Equal Employment Opportunity
- A-2 Employment
- A-3 Confidentiality Statement

#### **B Personnel Guidelines**

- B-1 Employment Classifications
- B-2 Personal Information Change
- B-3 Personnel Files and Records
- B-4 Release of Employee Information

#### **C Employee Benefits**

- C-1 Paid Time Off
- C-2 Holidays
- C-3 Medical Leave
- C-4 Bereavement Leave
- C-5 Personal Leave of Absence
- C-6 Jury Duty
- C-7 Short & Long Term Disability
- C-8 Medical, Dental & Vision
- C-9 Cafeteria Plan
- C-10 Retirement/403(b)(7)
- C-11 Education & Staff Development

#### **D Employee Benefit Laws**

- D-1 Benefits Continuation (COBRA)
- D-2 Military Leave (USERRA)
- D-3 HIPAA
- D-4 Workers' Compensation Insurance

#### **E Salary & Performance Guidelines**

- E-1 General Salary Program



- E-2 Performance Reviews
- E-3 Merit Increases
- E-4 Voluntary Termination
- E-5 Disciplinary Action
- E-6 Criminal Background Checks

**F Pay Guidelines**

- F-1 Work Schedule
- F-2 Attendance and Call-In Policy
- F-3 Recording Hours Worked
- F-4 Payment of Wages
- F-5 Direct Deposit
- F-6 Overtime
- F-7 Rest and Meal Periods

**G Administrative Guidelines**

- G-1 Emergency Closing/Inclement Weather
- G-2 Personal Appearance
- G-3 Computer, Internet & Email Usage
- G-4 Mileage Reimbursement/Proof of Automobile Insurance

**H Business Conduct**

- H-1 Code of Conduct
- H-2 Violence in the Workplace
- H-3 Weapons in the Workplace
- H-4 Drug Free Workplace
- H-5 Harassment
- H-6 Safety and Health

**Conclusion**

# Workforce Investment Council of Clackamas County Employee Handbook

## Welcome

Welcome to the Workforce Investment Council. You are a valuable member of this team and your work is critical to meeting our mission. The Workforce Investment Council is a dynamic organization with staff who are highly professional and passionate about the community, the importance of workforce development, and working with our board and partners to make a difference.

*Our vision:* A strong organization committed to excellence in service and is supported by multiple funding sources. It serves as a collaborative convener that represents the workforce system in Clackamas County and is a collective voice of public/private partnerships. .

*Our mission* is to develop a highly skilled workforce that creates sustained economic prosperity in Clackamas County.

*Our job* is to act as a:

- Scanner: identifying the workforce needs/gaps/opportunities in Clackamas County;
- Convener: bringing together the right people to have the conversation that addresses these issues/recognizes these opportunities and leads to action;
- Resource manager: bringing in and managing resources (grants, contracts, etc.) toward meeting the needs/opportunities. Leveraging partners (public and private) to build a more comprehensive set of solutions; and
- Evaluator: identifying and publicizing what is and what is not working.

Our team members are knowledgeable and skilled, and are expected to take a high level of responsibility for their work, while always supporting the needs of the organization and the team.

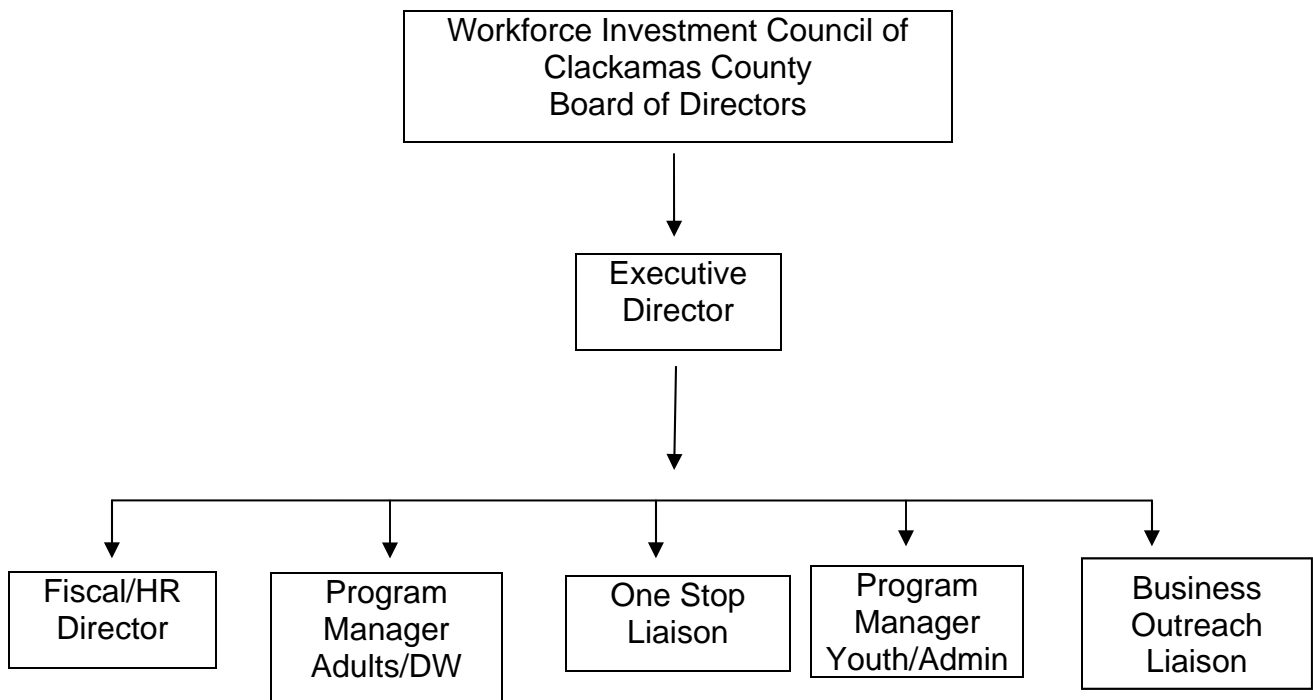
## Workforce Investment Council of Clackamas County History

The Workforce Investment Council has been designated as the federally recognized Workforce Investment Board for Clackamas County. The Workforce Investment Council has the responsibility of developing a local plan to help coordinate and leverage federal, state, and local investments for workforce development activities based on the analysis of community and economic development needs. The Workforce Investment Council oversees federal workforce development investments.

The Workforce Investment Council contracts with various organizations for the provision of services to job seekers and employers funded with the federal Workforce Investment Act (WIA).

The graphic below shows the Workforce Investment Council organizational structure.

### Workforce Investment Council Organizational Chart



## **Introduction**

The Workforce Investment Council reserves the right to revise, modify, delete, or add to any and all policies, procedures, work rules, or benefits stated in this handbook or in any document at any time. Any written changes to this handbook will be distributed to all employees so employees will be aware of the new policies and/or procedures. The policies and procedures described herein are for general reference only and may not be applicable in all cases. This handbook supersedes any other written or oral provisions, descriptions or understanding of the Workforce Investment Council's policies and procedures in relation to employees.

The Workforce Investment Council also reserves full discretionary authority to interpret and apply, in its sole judgment, all company policies and procedures summarized in this handbook, and reserves the authority to determine how those policies and procedures apply to specific issues and circumstances.

This handbook will guide you through the employment policies of our organization and is a summary of the Workforce Investment Council's current procedures and benefits in effect at the time of publication. However, nothing in this employee handbook or any other personnel document creates or is intended to create a promise or representation of continued employment for any employee or to limit the Workforce Investment Council's freedom to make changes or terminate a person's employment at-will. The employment at-will policy is described in Employment Guidelines.

## A-Employment Guidelines

<b>A. 1 Equal Employment Opportunity</b>	<b>Effective Date: Sept 17 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council is an equal opportunity employer and follows all Americans with Disability Act laws. The Workforce Investment Council will not discriminate against qualified employees or applicants because of, and will take affirmative action to ensure that employees and applicants are treated equally and without regard to:

- race,
- color,
- religion,
- gender,
- national origin,
- ancestry,
- marital status,
- sexual orientation,
- age,
- physical or mental disability (unrelated to ability to perform the essential functions of the job with or without reasonable accommodations),
- disability from AIDS, HIV, or any other medical condition (including cancer),
- request for pregnancy leave, family care leave or medical disability leave,
- past, present or future membership in a uniformed service of the United States, including status as a disabled veteran or Vietnam era veteran, or
- other legally protected categories.

If you feel you have been discriminated against or have a question about any type of discrimination at work, talk with the Executive Director or a member of the board Executive Committee. The Workforce Investment Council will not retaliate against you for asking questions or filing a complaint and will not knowingly permit retaliation by management, employees or your co-workers. If we find out that anyone was illegally discriminating, that person will be subject to disciplinary action, up to and including termination of employment.

<b>A. 2 Employment</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council reserves the right to employ at will. This means that employment can be terminated, with or without cause, and with or

without notice, at any time, at the option of the Workforce Investment Council or at the option of the employee.

The policies in this handbook are not to be construed as a contract of employment. The Workforce Investment Council reserves the right to change, add to, or delete policies at any time. Changes will be effective on dates determined by the Workforce Investment Council, and you may not rely on policies that have been superseded.

<b>A. 3 Confidentiality Statement</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

Employment with Workforce Investment Council requires a relationship of trust and confidence with respect to information. Employees must comply with all rules and regulations under the Workforce Investment Act (WIA) title 1B and Oregon Administrative Rules (OAR).

The Workforce Investment Council employees may not disclose, divulge, or make accessible confidential information belonging to, or obtained through their affiliation with the Workforce Investment Council to any person, including relatives, friends, and business and professional associates, other than to persons who have a legitimate need for such information and to whom the Workforce Investment Council has authorized disclosure.

Employees shall use confidential information solely for the purpose of performing services as a trustee or employee of the Workforce Investment Council. This policy is not intended to prevent disclosure where disclosure is required by law.

Employees, volunteers and contractors must exercise good judgment and care at all times to avoid unauthorized or improper disclosures of confidential information. Conversations in public places, such as restaurants, elevators, and public transportation, should be limited to matters that do not pertain to information of a sensitive or confidential nature. In addition, employees should be sensitive to the risk of inadvertent disclosure and should for example, refrain from leaving confidential information on desks or otherwise in plain view and refrain from the use of speaker phones to discuss confidential information if the conversation could be heard by unauthorized persons.

Upon the termination of an employee's, volunteer's or contractor's relationship with the Workforce Investment Council, he or she shall return, at the request of the Workforce Investment Council, all documents, papers, and other materials, regardless of medium, which may contain or be derived from confidential information, in his or her possession.

## B-Personnel Guidelines

<b>B. 1 Employment Classifications</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Fair Labor Standards Act requires all employees to be classified according to the overtime provisions of the law. For the purpose of paying any compensation, all employees are classified as either “Exempt” or “Non-Exempt” from overtime compensation. The Workforce Investment Council complies with Fair Labor Standards Act definitions for purposes of wage and hour administration as follows:

- **Non-exempt employees** are employees whose wage and hour standards are regulated by the Fair Labor Standards Act.
- **Exempt employees** are employees who are specifically excluded from the wage and hour standards as regulated by the Fair Labor Standards Act. These employees (usually management, professional or administrative) are excluded from overtime pay.

Exempt and non-exempt classifications are determined by the Workforce Investment Council based on legal guidelines.

The Workforce Investment Council’s employment categories are defined as follows:

### REGULAR FULL-TIME

An employee who is regularly scheduled to work 40 hours a week. Such employees may be “exempt” or “nonexempt” as defined above.

### REGULAR PART-TIME

An employee who is regularly scheduled to work less than 40 hours a week. Such employees may be “exempt” or “nonexempt” as defined above.

### TEMPORARY EMPLOYEE

An employee who is filling a temporary labor shortfall and/or being evaluated for offer of regular employment.

<b>B. 2 Personal Information Change</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

It is the responsibility of all employees to promptly notify the Plan Administrator of any change in personal status. This includes any change in name, address,

telephone number, marital status, dependents and individuals to be contacted in the event of an emergency.

<b>B. 3 Personnel Files and Records</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

Personnel files will be maintained for each employee during their employment by the Workforce Investment Council and retained for a period of five (5) years after termination of service. Employees may inspect their main personnel file with advanced notice during regular business hours, in the presence of an official who has the authority to access personnel files and records. Employees may request copies of any documents contained in their main personnel file. Employees may take notes, but may not remove, mark, destroy or otherwise deface any documents.

<b>B. 4 Release of Employee Information</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Executive Director will handle requests from outside the Workforce Investment Council for personnel-related information about current and former employees. When a request for information about an employee is received, the following information will be released:

- Date of hire
- Job title(s) held
- Employment status (e.g., regular full-time, regular part-time or temporary), and
- Date of separation (if applicable)

Salary information will be released only if an employee or former employee provides the Executive Director with written authorization to release this information. Employees are not authorized to offer verbal or written employment information or opinions concerning another employee's time and performance at the Workforce Investment Council unless the employee has authorized the individual, in writing, to act as a reference.



## C - Employee Benefits

This section of the handbook is a guide to benefits provided by the Workforce Investment Council. General information about plan administration, enrollment and highlights of each plan will be provided at the time of hire and upon any plan changes, typically annually.

The descriptions of benefits in this handbook are for informational purposes only. We have attempted to write them clearly and accurately. However, benefit plans are governed by master insurance policies, contracts and/or plan documents. The Workforce Investment Council will periodically review benefit programs and will make modifications as necessary to the condition of the organization. The Workforce Investment Council reserves the right to modify, add or delete the benefits it offers.

All regular full-time and regular part-time employees working a minimum of thirty (30) hours per week are eligible for all Workforce Investment Council benefits. It is the responsibility of employees to manage their benefits, to communicate and work with each carrier with regards to claims process. Plan Administrator will be available if an employee needs assistance.

If general information about benefit plans is needed, please contact the Plan Administrator.

<b>C. 1 Paid Time Off</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

All regular full-time and regular part-time employees begin to accrue paid time off (PTO) from the date of hire. The amount of PTO that accrues each pay period depends upon an employee's length of service, as follows:

<u>Length of Service</u>	<u>Monthly Accrual</u>	<u>Annual Accrual</u>
0 through 5 <sup>th</sup> calendar year	12 hours	18 days
5 <sup>th</sup> + calendar years	13.34 hours	20 days

Employees working less than 40 hours per week will accrue PTO on a pro-rated basis, proportionate to their regularly scheduled hours.

### Unused PTO

PTO may be carried over year to year with a maximum of 80 hours (10 days). Upon termination of employment for any reason, the employee's PTO accrual balance will be paid out at their current regular hourly rate of pay.

PTO When on Leave of Absence

An employee who is on a leave of absence does not accrue PTO. PTO hours will resume accrual upon the employee’s return to work.

<b>C. 2 Holidays</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

If you are a regular full-time or regular part-time employee, you will be entitled to certain paid holidays. Employees receive a personal day or “floating holiday” each year.

In addition, the Workforce Investment Council has nine (9) paid holidays each year.

- New Year’s Day;
- Martin Luther King Day;
- Memorial Day;
- Fourth of July;
- Labor Day;
- Veteran’s Day;
- Thanksgiving Day;
- Day after Thanksgiving Day;
- Christmas Day.

When a holiday falls on a Saturday or Sunday, it will be observed on the preceding Friday or following Monday, whichever the Workforce Investment Council chooses.

When on Leave of Absence

Employees are not eligible for holiday pay when on a leave of absence.

<b>C. 3 Medical Leave</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

It is the Workforce Investment Council’s policy to provide leaves of absence to all eligible employees on a nondiscriminatory basis in compliance with federal and state laws governing leaves of absence.

Illness or Injury (Including Maternity) Leave

As noted in the Short-Term Disability section of this handbook (C-7), if you are disabled for fourteen or more consecutive days due to illness, injury, or pregnancy, you may be eligible for benefits under the Short-Term Disability (STD) policy.

Continuation of Benefits

If an employee is enrolled in any sponsored group health plan at the time the leave begins, the employee may elect to continue coverage under the plan. During such continuation, the employee must pay their health care premiums on the first day of each month for that coverage period, unless otherwise approved by the Executive Director and/or Board Chair. Under this agreement, the company will continue to coverage employee. Arrangements for premium payments must be made in advance of the leave. Non-medical benefits are not eligible for continuation under federal and state leave laws. If an employee’s health care premium payment is more than 10 days late, the Workforce Investment Council will notify employee in writing. Health care coverage will cease if an employee’s premium payment is more than 30 days late.

Should the employee not return at the end of the requested leave period, the Workforce Investment Council will bill the employee to the extent permitted by law for the cost of the group health insurance (less employee contributions, if any) paid on behalf of the employee.

Return to Work

When returning from a leave of absence longer than five days due to the employee’s own medical illness or condition, or to care for a sick child, spouse, domestic partner, parent, parent-in-law, or parent of a domestic partner, the employee must present a statement from the treating physician verifying the employee’s ability to return to work, or that the employee’s sick child, spouse, domestic partner, or parent, parent-in-law, or parent of a domestic partner required home care.

<b>C. 4 Bereavement Leave</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council provides all regular full-time and regular part-time employees paid time off from work for bereavement due to death of an immediate family member. “Immediate family” is defined as employee’s current spouse and/or partner, parent, child, brother, sister, grandparent, grandchild, stepchild, step-parent, current parent-in-law, and current sibling-in-law.

If there is a death in your immediate family, you will be excused with pay for one (1) day. Exceptions can be made to this policy at the discretion of the Executive Director.

<b>C. 5 Personal Leave of Absence</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

An employee may request an unpaid personal leave in writing if he or she expects to be absent for fourteen or more consecutive calendar days and the condition does not fall under any other leave policy. An Unpaid Leave of Absence for personal reasons will be granted at the discretion of the Executive Director and/or the Board Chair and will be evaluated on an individual basis.

While an employee is on a leave of absence, he/she will be required to use all accrued PTO. Employees on a personal leave of absence are not entitled to accrue PTO and are not eligible for holiday pay during the leave. If an employee is granted and takes a personal leave of absence, his/her other benefits may be affected. (See D-2 Continuation of Benefits).

Failure to report back to work on the first day after expiration of the leave of absence will be considered a voluntary termination of employment.

<b>C. 6 Jury Duty</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council recognizes that participation as a juror is a civic responsibility. All regular full-time and regular part-time employees are eligible for full pay when called upon for compulsory court duty. Employees are required to provide a copy of the jury summons or subpoena to appear. An employee must notify the Executive Director in advance, when they plan to be absent due to jury duty. Should any day/week of jury duty end early, you should contact the Executive Director to discuss whether you should report to work for the remainder of the work day/week.

<b>C. 7 Short &amp; Long Term Disability</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date: February 17, 2011</b>

In general, if you are an active full-time employee, you are eligible for coverage under the Short-Term Disability (STD) policy and the Long-Term Disability (LTD) plan on the first working day of a new month after a waiting period of 30 days. At the time of hire your Plan Administrator will provide you with the benefits and plan summary descriptions. All accrued PTO must be exhausted prior to STD or LTD disability leave commencing. Employees on STD or LTD are not eligible to accrue PTO and are not eligible for holiday pay. An employee is not eligible for salary increase consideration while on a leave of absence.

<b>C. 8 Medical, Dental &amp; Vision</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date: February 17, 2011</b>

All regular full-time and regular part-time employees working at least 30 hours per week are eligible for medical, dental, vision and life insurance on the first working day of a new month after a waiting period of 30 days. At the time of hire your Plan Administrator will provide you with costs and various plan summary descriptions available. As funding allows, financial support for dependent care coverage may be offered with board approval.

<b>C.9 Cafeteria Plan</b>	<b>Effective Date: February 17, 2011</b>
	<b>Revision Date:</b>

The Workforce Investment Council may offer employees the opportunity to utilize a tax-deferred cafeteria plan for allowable medical and dependent care expenses.

<b>C. 10 Retirement / 403(b)(7)</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council provides eligible employees with a qualified 403(b)(7) plan that enables you to save for your retirement on a pre-tax basis through a variety of investment options.

Employees who are at least 21 years of age and work at least 1,000 hours each year are eligible to participate in the 403(b)(7) plan upon the next enrollment date. Enrollment periods are at the beginning of each month.

Employee contributions are made with before-tax dollars and are 100% vested upon receipt. After three months of employment employer match is available. The Workforce Investment Council will match the first 8% of salary contributed. Under current Federal laws, any taxes on the employee's account are deferred until savings and earnings are withdrawn from the account. Employees may move money to a Vanguard 403(b)(7) account by rolling over other retirement plans or transferring money from an existing 403(b)(7).

For more detailed information on the 403(b)(7) plan, refer to the written plan available in the fiscal office.

<b>C. 11 Education &amp; Staff Development</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council encourages personal, professional growth and development. For active, regular full-time and active, regular part-time employees who work 30 hours or more per week, tuition reimbursement is available if budget and allocations allow for approved job related courses and seminars to employees who have completed six months of service.

## D - Employee Benefit Laws

<b>D. 1 Benefits Continuation (COBRA)</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

In accordance with State law, most employers sponsoring group medical plans are required to offer employees and their families the opportunity for a temporary extension of medical coverage.

Employees and their families have the right to choose the continuation coverage if medical coverage is lost because of a reduction in force of employment or termination of employment (for any reason other than gross misconduct on the employee's part).

An employee's spouse or dependent children also have the right to choose continuation coverage under the company's group medical coverage if he or she would lose group medical coverage because of qualifying events. (See your Plan Administrator for qualifying events).

Under the law, the employee or family member must inform the company's plan administrator of a divorce, legal separation or loss of dependent status within 60 days after the occurrence of the event.

When the plan administrator is notified that one of these events has happened, the plan administrator will notify the qualified individual of the right to choose continuation coverage. The individual has 60 days from the date coverage would be lost because of the events described above to inform the plan administrator that coverage continuation is desired.

***If continuation coverage is not chosen, the employee's group medical insurance coverage will end.***

<b>D. 2 Military Leave</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council provides unpaid time off for employees with an obligation to actively serve in the military, reserve military service, or summer encampment while maintaining the individual's employment status and benefits in full accordance with both federal and state laws. Should you have the need for this leave, you should consult your Executive Director as soon as possible. If allowed, please provide the notification you received regarding your active duty assignment to the Executive Director.

<b>D. 3 HIPAA</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council shall abide by the Health Insurance Portability and Accountability Act. Title IV of HIPAA is a safeguard ensuring the protection of privacy of your medical information. The confidentiality, integrity, availability, and security of electronic protected health information will be ensured via appropriate safeguards as specified under HIPAA's security rule. The final security rule requires all covered entities, including employer-sponsored health plans, to implement reasonable physical, administrative, and technical safeguards to prevent the unauthorized access, alteration, deletion, to transmission of EPHI. If there are any questions regarding HIPAA or your right to privacy, please see the Executive Director.

<b>D. 4 Workers' Compensation Insurance</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council provides workers' compensation insurance to its employees. If an employee experiences a work-related injury or illness, that employee needs to report the situation immediately to the Executive Director. If the situation is serious, the employee shall seek medical assistance immediately and report the incident to the Executive Director as soon as possible. Employees who are injured on the job may be eligible for wage-replacement and medical benefits through the Workforce Investment Council's workers compensation program.



## E - Salary & Performance Guidelines

<b>E. 1 General Salary Program</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council endeavors to maintain competitive salaries and wage rates, given the economic conditions of the Workforce Investment Council. We generally review these on an annual basis. In a review of your performance, we consider current rates paid, survey data, your performance level, and work record.

<b>E. 2 Performance Reviews</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

Our performance management system is designed to align individual efforts with the Workforce Investment Council goals. Ideally, our performance management system will:

- Foster your understanding of a commitment to the Workforce Investment Council's goals.
- Provide you an opportunity to contribute to the goal-setting process.
- Effectively monitor and reward your progress toward reaching these goals.
- Encourage your professional development in support of higher performance in your field.

Your performance is evaluated informally on a day to day basis. Formal evaluations are conducted annually.

<b>E. 3 Merit Increases</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Executive Director and/or the Board Chair will determine the frequency of merit increases based on the individual's performance evaluation and availability of funding in the annual budget planned for salary increases.

The Workforce Investment Council staff will also receive a cost of living adjustment (COLA) at the beginning of each calendar year pending funding availability.

<b>E. 4 Voluntary Termination</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

If you choose to leave the Workforce Investment Council, you are required to notify the Executive Director in writing, at least two weeks prior to the date of your departure. Proper notice allows the Workforce Investment Council sufficient time to prepare your final paycheck and secure your replacement.

Exit interviews with the Executive Director are normally scheduled for departing employees. The purpose of the exit interview is to review eligibility for benefit continuation and conversion, to ensure that all required forms are completed and to collect any Workforce Investment Council property in the employee's possession (e.g., keys, cell phones).

All benefits will be discontinued at the time of termination/resignation.

<b>E. 5 Disciplinary Action</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

Disciplinary action shall be progressive and corrective, and may include first corrective notice, second corrective notice, suspension or demotion, and finally dismissal. Disciplinary action taken will depend on the seriousness of the offense as well as the number and the frequency of previous acts of misconduct. It will be necessary for all disciplinary actions to be approved by the Executive Director. Job performance factors that warrant disciplinary action and may lead to dismissal shall include but not be limited to the following:

1. Conviction of a felony;
2. Conviction of a misdemeanor which is related to the position held by the employee;
3. The use of alcoholic beverages or narcotics during working hours which affects the employee's performance or judgment;
4. Partaking of intoxicating beverages, or being intoxicated while on duty;
5. Insubordination or disloyalty;
6. Inefficiency or incompetence;
7. Inattention to duty, tardiness, indolence, carelessness, or damage to or negligence in the care and handling of the Workforce Investment Council property;

8. Misconduct in the performance of employee duties;
9. Willfully giving false information or withholding information with intent to deceive when making application for employment;
10. Willfully soliciting or accepting gratuities, favors, or anything of monetary value from contractors or potential contractors;
11. Any other action on the part of an employee that is not in the best interest of the employer as determined by the employee's manager.

Progressive discipline has the following levels of severity, however, discipline may commence at any level:

**Oral Reprimand:** An oral reprimand is a warning rather than a punitive action and serves to caution the employee that corrective conduct is necessary to avoid a more severe form of discipline.

**Written Reprimand:** A written reprimand is a formal warning action and places the employee on official notice that failure to correct conduct will result in more severe discipline.

**Suspension With or Without Pay:** A suspension with or without pay may be imposed following an oral or written reprimand. In the case of severe misconduct, an immediate suspension with pay may be imposed; however, in most cases suspension will follow due process provisions. A suspension without pay shall not exceed 30 days at any one time. A suspended employee shall be notified in writing of the reasons for suspension. No paid time off may be accrued by an employee during the period of suspension.

**Demotion:** Demotion, both in pay and in class, may be used as a form of discipline when discharge is not warranted or when the Executive Director believes the employee has the potential for correcting conduct. As with dismissals, or in the case of suspensions or demotion, the Executive Director will ensure the employee's due process rights are met.

**Dismissal:** The Executive Director shall give an employee written notice containing:

1. A statement that dismissal is being considered as a possible sanction for improper conduct, inadequate performance, or other stated cause;
2. A statement of the time within which the employee may respond to the notice.
3. An employee may be dismissed if:
  - A. The employee has responded to the statements in the notice that dismissal is under consideration and the employee's response has been received and reviewed by the appointing authority; or
  - B. The employee has not responded to the statements in the notice of proposed dismissal within the stated time. Dismissal shall be by

written notice to the employee setting forth the cause for dismissal. Dismissal may be effective upon delivery of this notice to the employee or upon any stated time thereafter. The Executive Director may suspend an employee with pay during the time allowed to respond to this notice if the good of the Workforce Investment Council requires the immediate separation of the employee from the employee's assignment.

**Removal of Discipline:** Written discipline, placed in an employee's personnel file, shall be removed after three years when requested by the employee, or when discovered by other authority, provided there has been no recurrence of the type or kind of conduct which lead to the disciplinary action. No written record of disciplinary action shall be deemed official unless it is dated and included in the employee's personnel file.

<b>E. 6 Criminal Background Checks</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

A criminal background check will be conducted on all job applicants as part of the final screening process. Supervisors are responsible for ordering background checks through the Oregon State Police and then notifying the Executive Director that a report has been ordered. (If findings indicate activity in other states, a more extensive background check may be ordered by the Executive Director). Pending receipt of the report, applicants selected for employment may begin work but may be limited to strictly supervised job duties. Results of all background checks will be sent directly to the Executive Director for review. If there is a history of criminal convictions, the Executive Director will determine next steps regarding hiring, retention, or termination. Factors used in making a decision will be those issued by the EEOC, in conjunction with agency considerations. If the decision is made to terminate employment or retract a job offer based on the criminal background check, the new or potential employee will be contacted by the Executive Director.

Criminal background check results will be filed in the Personnel Office in a file separate from individual personnel files.

## F - Pay Guidelines

<b>F. 1 Work Schedule</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council's normal business hours are 8:00 a.m. to 5:00 p.m. Monday through Friday. Full-time employees are expected to be available and accessible during normal business hours; part-time employees, during their normally scheduled work time. A flexible schedule may be requested and must have prior approval of the Executive Director to be implemented.

<b>F. 2 Attendance and Call-in Policy</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

Regular attendance is of primary importance for every position at the Workforce Investment Council. You are expected to arrive for work on time and be ready to start work at the beginning of your scheduled arrival time. You are also expected to complete your work day as scheduled. Changes in work schedule or flexible schedules must be approved by the Executive Director in advance.

If you are going to be late or absent, you must call in and notify your supervisor prior to the beginning of your scheduled start time. If you do not report as scheduled and if you have not spoken to your supervisor in advance to explain your absence, disciplinary action may result.

If you are not on an approved leave, you must call and notify your supervisor each day prior to your scheduled shift. If you are out on an approved leave of absence, you must call in accordance with the Call-In policy. Failure to report and call-in as required for two consecutive days will be considered a voluntary resignation.

You must receive pre-approval to leave prior to the end of your scheduled work day. Attendance requirements specific to your position are outlined in your job description. If you are having difficulties meeting the requirements of your schedule, please contact your supervisor.

Excessive tardiness and/or absenteeism may result in disciplinary action, up to and including termination of employment.

If you are away from work because of an on-the-job injury or other medical leave, you must call in at least weekly on the day designated by your supervisor to report your status, any changes in your condition, and, to receive any necessary information associated with your job. Failure to call in may be grounds for termination.

<b>F. 3 Recording Hours Worked</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

Employees must track their time by the activities they perform in order for the Workforce Investment Council to allocate salaries to the appropriate budgetary categories. These are based on the work activities of each employee. At the start of each fiscal year (fiscal years runs from July 1 through June 30 of each year), a time allocation plan will be established for each employee. Employees will utilize a time sheet to document their time against the allocation plan.

Employees are to update their timesheets bi-monthly and print, sign, date and submit a hard copy to the Executive Director by noon on the last day of that work period. Employees away on business travel on the last working day of the pay period are to make arrangements to manage the submission of their timesheets in advance. Timesheets may not be submitted after their deadlines.

It is your responsibility to ensure the accuracy of all time recorded. No one may record time on behalf of another employee. If you find that you have forgotten to complete your timesheet on a given day, or have otherwise made an error in reporting your time, it is your responsibility to immediately notify your supervisor.

Altering, falsifying, tampering with time records, or recording time for another employee may result in disciplinary action, up to and including termination of employment.

<b>F. 4 Payment of Wages</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

Paydays are twice monthly, on the 5<sup>th</sup> and 20<sup>th</sup> of the month. When payday falls on a week-end, payment will occur on the preceding Friday.

Various payroll deductions are made each payday to comply with federal and state laws pertaining to taxes and insurance. Deductions will be made for the following:

- Federal and State Income Tax Withholding
- Social Security (FICA)
- Medicare
- Workers' Compensation Insurance
- Other items designed and authorized by you in writing
- Other items required by law, such as wage garnishments.

At the end of each calendar year, you will be supplied with your Wage and Tax Statement (W-2) form. This statement summarizes your income and deductions

for the year. If you have any questions regarding these deductions, please contact the Executive Director.

<b>F. 5 Direct Deposit</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

Direct deposit is available once you complete the necessary paperwork and provide information about your banking institution.

<b>F. 6 Overtime</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

Non-exempt employees are eligible to receive overtime pay of one-and-one-half times their regular hours worked over 40 hours in a workweek. For overtime purposes, our workweek is 12:00 a.m. Sunday through 11:59 p.m. Saturday. Because overtime is based upon actual hours worked, compensated time off falling within the regularly scheduled workweek is not considered "time worked" for the purpose of calculating overtime.

The Executive Director must authorize all overtime work in advance. All overtime worked must be reported on your timesheet.

Due to the nature of our business, overtime may be required. When operating requirements or other business needs cannot be met during regular working hours, employees may be scheduled to work overtime hours. You are expected to work overtime when requested.

<b>F. 7 Rest and Meal Periods</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

Each non-exempt employee is provided with a paid 10 minute rest break for every four hours worked. Employees working shifts of six hours or more will also be provided an unpaid 30 minute meal break. Please schedule your breaks with your supervisor.

Rest and meal periods are mandatory and may not be combined or used to shorten the workday.

## G - Administrative Guidelines

<b>G. 1 Emergency Closing/ Inclement Weather</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

During severe inclement conditions, employees are generally expected to report to work unless doing so would risk personal safety or the Workforce Investment Council declares an emergency closing. During such weather conditions you will be notified by telephone and/or email if the office is closed. If the office is open, you are also expected to advise the Executive Director prior to the beginning of your shift in the event that you will be late to work or unable to report to work.

Non-Exempt employees who arrive at the office within one hour of their regular start time will receive pay for their entire shift.

Employees who are unable to report because of weather conditions will be granted an authorized unpaid absence and may be given a chance to make up missed time, if work schedules and conditions permit. Available PTO may also be used.

<b>G. 2 Personal Appearance</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

When you are working, you are representing the Workforce Investment Council. Our standards for personal appearance are an important part of our success. Dress, grooming, and personal ornamentation must be appropriate for your job. While casual attire is acceptable at times, a professional image must be maintained at all times.

If you have questions regarding the application of our personal appearance standards, please ask the Executive Director.

<b>G. 3 Computer, Internet &amp; Email Usage</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The electronic communications systems provided by the Workforce Investment Council, including, but not limited to Internet access, software, e-mail, web-logs, text messages, and voice-mail, are owned by the Workforce Investment Council. These systems are provided for employee use to promote efficient work performance. Use of the systems is limited to employees and others expressly authorized by the Workforce Investment Council.



Occasional personal use of the systems is permitted. However, all use of these systems must be in keeping with the Workforce Investment Council standards for confidentiality, courtesy, and professionalism in communications and must not adversely affect employee productivity. Broadcast, internally or externally, of personal views on social, political, religious, or other non-business related matters is not permitted. Examples of forbidden transmissions include: sexually-explicit messages, cartoons or jokes; gender-specific comments or unwelcome propositions; and ethnic and racial slurs.

Any posting to a public forum, such as e-mails, web-logs (blogs), or on-line journals, whether for personal use or if hosted by the Workforce Investment Council, must be consistent with the Workforce Investment Council's policies and standards regarding confidentiality, discrimination, harassment, courtesy and professionalism. Examples of conduct which may result in disciplinary action up to and including termination include: disclosing confidential Workforce Investment Council information or information which creates a conflict of interest.

Use of Workforce Investment Council systems for personal commercial ventures or gain is prohibited. Use of the systems to harass or to perpetuate gossip is prohibited. Use of the systems to disseminate confidential information or to improperly access or use copyrighted information is prohibited.

#### Security and Workforce Investment Council Access

At their discretion, Workforce Investment Council management may monitor the use of the Workforce Investment Council systems and equipment. All computer records, files, software, email and voice-mail messages created, sent, received, or stored on the Workforce Investment Council systems are considered Workforce Investment Council records. Management retains unrestricted access to these records. Likewise, the content of all records may be disclosed by management at its discretion. Therefore, the contents of records created, sent, received or stored on the Workforce Investment Council's systems are not private. Employees should be aware that even erased and deleted records may remain accessible.

To help ensure the security of Workforce Investment Council systems:

1. No software shall be loaded on any system without express approval of the Executive Director.
2. Downloading of data from the Internet which does not have a clear business purpose is completely prohibited.
3. Removal of electronic data or equipment from the premises requires approval from the Executive Director.

Passwords are maintained for security purposes. All system passwords and encryption keys must be made available to management on request. Employees are prohibited from the unauthorized use of the passwords or encryption keys of other employees.

<b>G. 4 Mileage Reimbursement/Proof of Automobile Insurance</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

Workforce Investment Council staff is frequently required to travel on company business. The Workforce Investment Council compensates staff for appropriate job related travel expenses at the federal per diem rates. Travel reimbursements must be submitted within one month of the incurred expense and approved by the Executive Director.

It is critical that staff adhere to the federal guidelines as travel reimbursements are often reviewed during federal and state fiscal audits.

Due to the nature of the Workforce Investment Council 's business, regular driving is a part of every employee's job. Therefore, the Workforce Investment Council requires each employee to provide a copy of their current Oregon driver license and current proof of insurance on their vehicle from the time they are hired and on an annual basis throughout their employment. While driving on Workforce Investment Council business, unsafe driving will not be tolerated. Employees are required to follow all traffic rules, drive courteously, and practice defensive driving techniques. They must report any and all traffic infractions, convictions, and accidents immediately to the Executive Director, regardless if these occurred during working or non-working hours, as well as any changes to your driver license or insurance status.

## H- Employee Conduct

<b>H. 1 Code of Conduct</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

This Code of Conduct (Code) serves as a guide to ethical conduct for all employees of the Workforce Investment Council. It covers areas of business conduct when working with customers, partners, board members, the public, and other employees. It also addresses conflict of interest, which could arise between the personal conduct of employees and their positions with the Workforce Investment Council.

Employees are expected to act fairly and honestly when conducting business on behalf of the Workforce Investment Council, maintain the Workforce Investment Council's high ethical standards, and obey all applicable laws. On an annual basis, employees will be asked to review and sign a statement acknowledging that they have read, understood, and agree to comply with the code.

Violations of the Code and applicable laws or failure to cooperate with an internal investigation may constitute grounds for corrective action, up to and including immediate dismissal. The Executive Director is responsible for enforcing this policy, with assistance from the Fiscal Director.

Safeguarding Confidential Information: When conducting business, Workforce Investment Council employees may become privy to confidential information. Employees who possess such confidential information must understand that it has been given to them for an express business purpose, may be disclosed only in compliance with applicable state, federal laws and Workforce Investment Council policies, and must be used only for a proper business purpose.

Confidential information acquired by an employee is not to be communicated in any way to persons outside the Workforce Investment Council or even to other employees without a clear and job-related need to know, approved by the Executive Director. Confidential information includes, but is not limited to contact information, unique identifiers, demographic information, or any other personal data of those served by Workforce Investment Council funded programs.

Breach of this policy can result in legal action against the employee and the Workforce Investment Council, and may be cause for discipline. Breach of this policy may also be a violation of the provisions of state and federal regulations related to the privacy of individual records.

<b>H. 2 Violence in the Workplace</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

No employee of the Workforce Investment Council shall engage in any violent acts, including physical, verbal, or other, on Workforce Investment Council property or any property being utilized by the Workforce Investment Council. All employees are expected and required to treat one another, as well as our customers, partners, and board members, in a courteous and respectful manner at all times. Any employee found to be acting in a violent manner will be immediately and appropriately disciplined.

<b>H. 3 Weapons in the Workplace</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

To help ensure the safety and security of employees and guests all weapons are prohibited on Workforce Investment Council property. Additionally, employees are prohibited from carrying weapons of any kind while away from the property on Workforce Investment Council businesses.

Workforce Investment Council property includes, but is not necessarily limited to the Workforce Investment Council office and all Workforce Investment Council equipment utilized by employees. Weapons are also prohibited in personal vehicles parked at the Workforce Investment Council place of business.

<b>H. 4 Drug Free Workplace</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council is strongly committed to:

- providing a safe and productive working environment for all employees;
- producing products of the highest possible quality; and
- providing excellent service to our customers.

The Workforce Investment Council expects and requires the support of all its employees in meeting their commitments to safety, quality and service. The Workforce Investment Council recognizes that employees who are unable to do their best work in a safe manner, due to the effects of alcohol or drug use, interfere with these commitments.

Each employee is expected and required to report for work on time and in appropriate mental and physical condition to work safely and effectively.

Illegal and Controlled Substances: The use, sale, transfer, or possession of any illegal substance or unauthorized controlled substance on the Workforce Investment Council premises and in personal vehicles parked at the Workforce Investment Council 's place of business, or while conducting Workforce Investment Council business off the Workforce Investment Council premises is prohibited. Reporting for work, working or engaging in any activity on the Workforce Investment Council's behalf under the influence of, or with, an illegal substance or unauthorized controlled substance in your system, is prohibited.

Each employee must report to the Executive Director the use of any prescription or over-the-counter medication which may inhibit the employee's ability to safely and effectively perform job duties. It is the employee's responsibility to determine whether any prescribed drug or other medication may impair job performance. Employees are also required to provide a medical authorization to work, upon request.

Alcohol: The unauthorized use, sale or possession of alcohol on the Workforce Investment Council's premises and in personal vehicles parked at the Workforce Investment Council's place of business is prohibited. Reporting for work, working or engaging in any activity on behalf of the Workforce Investment Council under the influence of intoxicating liquor is prohibited.

Employees must report any conviction under a federal criminal drug statute for violations occurring on or off Workforce Investment Council premises while conducting Workforce Investment Council business. The report of such conviction must be made within five days of the conviction.

Violations of these rules will subject an employee to disciplinary action up to and including termination.

Testing: Drug and Alcohol testing may be required in the following situations:

1. When there is reasonable suspicion, as determined by the Workforce Investment Council, that an employee may be in violation of this policy;
2. When an employee has been determined by the Workforce Investment Council to have caused or contributed to an accident or injury.

Each employee is required to submit to drug or alcohol testing as directed, to complete related paperwork, and to participate and cooperate fully in specimen collection procedures. Failure to do so may result in disciplinary action, up to and including termination.

Disciplinary action may be imposed when there is a positive test for the presence of drugs or alcohol in violation of this policy. If eligible for continued employment, an employee will be required to sign and follow as a condition of continuing employment, a "Last Chance" Agreement.

Treatment: If you think you may have a problem with drugs or alcohol, we encourage you to share your concerns with the Executive Director, who will assist you in the process of obtaining an evaluation. No employee coming forward voluntarily for such help will be subject to disciplinary action solely as a result of seeking assistance. If you are referred for treatment requiring time away from work, you may be asked to sign and follow a “Return to Work” Agreement.

<b>H. 5 Harassment</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

All employees are expected and required to treat one another, as well as our customers, partners, and board members in a courteous and respectful manner at all times. Harassment of any kind is prohibited. This specifically includes sexual harassment and other harassment based upon characteristics protected under local, state, and federal discrimination regulations. This form of misconduct undermines morale and the integrity of the employment relationship, and interferes with productivity.

Sexual Harassment: Unwelcome sexual advances, requests for sexual favors, or sexually suggestive conduct or statements are sexual harassment when:

- Submission to the advance is either an explicit or implicit term or condition of employment;
- Submission to or rejection of the advance affects the basis of employment decisions for the employee; or
- Such conduct or statements have the purpose or effect of interfering with the employee's work performance or creating an intimidating, hostile, or offensive working environment.

Examples of harassment which may violate this policy also include:

- Verbal harassment such as epithets, derogatory comments or slurs, demeaning, or sexually explicit jokes;
- Physical harassment such as assault, impending or blocking movement, unauthorized touching or any physical interference with normal work or movement when directed at any individual;
- Visual forms of harassment such as derogatory, offensive, or sexually suggestive posters, cartoons, pictures, or drawings displayed in the workplace; and
- Behavioral forms of harassment such as suggestive facial expressions or noises, leering or obscene gestures.

Retaliation against employees for complaints regarding behaviors described above or other conduct addressed by this policy will not be tolerated.

Please contact your supervisor immediately if:

- You feel you have been the victim of harassment by vendors, visitors, customers, co-workers, or supervisors, or others;
- You observe or hear of conduct which may be harassment prohibited by this policy; or
- You feel you have been retaliated against in any way by anyone for raising concerns under this policy.

If you are uncomfortable speaking to your supervisor, you may bring your concerns to a Workforce Investment Council Board Officer (President, President Elect, Past President, or Treasurer). Confidential investigations will be conducted promptly. Appropriate corrective actions will be taken upon completion of the investigation. Employees found to be harassing other employees will be immediately and appropriately disciplined, up to and including immediate termination of employment.

**The WORKFORCE INVESTMENT COUNCIL will not tolerate harassment.**

<b>H. 6 Safety and Health</b>	<b>Effective Date: Sept 17, 2009</b>
	<b>Revision Date:</b>

The Workforce Investment Council is committed to providing its employees with a safe and healthy workplace. It is the responsibility of all employees to create and maintain a healthy work environment for themselves and their coworkers. All employees shall work in as safe a manner as possible. If an accident does occur, the employee is responsible for reporting the accident immediately to the Executive Director. In response, immediate action will be taken to correct the situation.

## **CONCLUSION**

The Workforce Investment Council strives to provide a supportive, team-oriented work environment. Each employee's contribution to the success of the organization is valued. We encourage you to share your thoughts, suggestions, complaints, and compliments with the Executive Director.

The continued success of the Workforce Investment Council depends upon the commitment of all employees to support our customer service standards, values and mission. The information in this Handbook outlines best business practices to ensure success for you and for the Workforce Investment Council.

Once again, the Workforce Investment Council welcomes you to our team. We look forward to a prosperous and rewarding future together.



## ACKNOWLEDGEMENT & CODE OF CONDUCT

I acknowledge that I have received, read, and understand the Workforce Investment Council Employee Handbook. I agree to conform to the rules, policies, and procedures of the Workforce Investment Council. I understand that neither spoken nor written representations, including this Handbook, create any express or implied contract of employment between the Workforce Investment Council and me. I agree that unless otherwise specified in a formally executed written contract signed by the Executive Director, my employment is voluntary or at-will so that I have the right to terminate my employment at any time for any reason and that the Workforce Investment Council has the same right.

I understand and agree that the provisions of this Handbook may be amended or revised at any time, without notice, at the Workforce Investment Council 's discretion, and that this Handbook is not an exhaustive statement of Workforce Investment Council rules, policies, or procedures.

I also agree to the rules of the Code of Conduct (H.1) and the Confidentiality Statement (A.3) as described in this employee handbook.

Dated: \_\_\_\_\_

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Complete and return to \_\_\_\_\_ by \_\_\_\_\_.