INVEST	INNOVATE	IMPACT
○ Focus on data to prioritize investments. ○ Optimize ROI through resource management. ○ Increase resources for workforce development.	○ Pursue practices & programs that can be scaled up. ○ Develop strategic partnerships. ○ Lead efforts that result in employment and advancement.	○ Mobilize opportunities that support industry sectors. ○ Foster development of career pathways. ○ Educate communities about workforce services available.

AGENDA
JOINT MEETING
BOARD OF DIRECTORS
&
CONSORTIUM BOARD

In Person

John Gumm Building and Civic Center
251 St. Helens Street
St. Helens, OR. 97051

Zoom

Meeting ID: 816 7780 7696
Passcode: 293162
Computer:
https://us02web.zoom.us/j/81677807696?pwd=RIvYwODScMacumCDqeMAWp42CY39aA.1

October 25, 2024 – 10:00am and 12:00pm

This meeting has been properly noticed and posted to the Northwest Oregon Works website for public posting in accordance with the Oregon Public Posting Laws.

This Agenda is also available at www.nworegonworks.org.

Those wishing to speak should sign the "Public Comment" sign-in sheet

1. **CALL TO ORDER, CONFIRMATION OF POSTING, and ROLL CALL**
   a. NOW Board
   b. Consortium Board

2. **REVIEW and APPROVE AGENDA**
   Inclusion of any emergency items, or deletion of any items
   a. NOW Board
   b. Consortium Board

3. **PUBLIC COMMENT SESSION**
   Please clearly state your name and address for the record. Each public comment will be limited to three (3) minutes at the Chair's discretion.

4. **DISCUSSION and POSSIBLE ACTION: CONSORTIUM BOARD**
   Accept Staff's recommendation to RE-appoint the following (five) NOW Board Members – The terms of these Board Members will be October 31, 2025 – November 1, 2028. (10 minutes)
   a. Greg Morrill – Business Representative – Bergerson Construction
   b. Heather Taksdal – Business Representative – Zwald Transportation
   c. Terre Cooper – Economic Development Representative
   d. John Hawkins – Labor Representative

5. **CONSENT CALENDAR**
   - **NOW BOARD –**
     - Accept Staff's recommendation to approve the Minutes of the June 27, 2025 Board meeting.
     - Accept Staff's recommendation to approve adjustments made to the following policies:
       - A02 Grievance Process
       - A03 Incident Reporting
       - P01 WIOA Adult-DW Eligibility
       - P03 Equal Opportunity Non Discrimination
       - P06 Monitoring
       - P12 Youth Eligibility Additional Assistance
       - P16 Records Retention
       - P20 Basic Skills Deficient
       - P25 Personal Identifiable Information
   - **CONSORTIUM BOARD –**
     - Accept Staff's recommendation to approve the Minutes ofthe June 30, 2025 Consortium Meeting.

6. **DISCUSSION and POSSIBLE ACTION: NOW BOARD THEN CONSORTIUM BOARD** – Jason Swain, NOW CFO
   Accept the Staff's recommendation to approve the finalized Annual Budget (10 minutes)
   a. NOW Board
   b. Consortium Board

7. **INFORMATION** – Vero Reeves, Internship Coordinator, PCC Oregon Manufacturing and Innovation Center
   OMIC Updates (15 minutes)

8. **INFORMATION** – Paul Vogel, Executive Director, Columbia Economic Team (15 minutes)

9. **INFORMATION** – Shaun Barrick, Economist, OED
   Oregon Employment Department Economic Update (25 minutes)

10. **INFORMATION** – Mike Barter, Talend Development Specialist, Equus
    Equus Updates (15 minutes)

11. **INFORMATION** – Sandra Huitt, Operations Manager, Equus
    OSO Updates (15 minutes)

12. **BOARD CHAIR REPORT** – Tony Erickson, Chair

13. **CHIEF LOCAL ELECTED OFFICIAL REPORT** – Commissioner Wev

14. **EXECUTIVE DIRECTOR REPORT –** Heather DeSart, NOW Executive Director

15. **BOARD ROUNDTABLE –** Board Member Comments

16. **PUBLIC COMMENT SESSION**

    Please clearly state your name and address for the record. Each public comment will be limited to three (3) minutes at the Chair's discretion.

17. **ADJOURN**

Northwest Oregon Works meetings are open to the public and conform to Oregon Public Meetings Laws. A request for an interpreter for the hearing impaired or other accommodations for persons with disabilities, should be made at least 72 hours in advance of the meeting to our office at (541) 921—9241, or info@nworegonworks.org. TTY is available at 711 or (800) 735-2900

MINUTES

NORTHWEST OREGON WORKS
BOARD OF DIRECTORS
MEETING

June 27, 2025

Port of Astoria, Astoria OR and ZOOM

Present:
Board:
Tony Erickson, Oregon AERO, Chair; **Todd Simmons**, Tillamook Peoples' Utility District; **Angeline Chan-Pepper**, Oregon Employment Dept.; **Eric Sherman**, IBEW Local 932; **Kirstin Salmi**, WCT Marine; **John Hawkins**, Service Employees International Union; **Mario Calderon**, Local 737; **Carrie Norris,** Samaritan Health Service; **Greg Morill,** Bergson Construction Inc.; **Gabe Gurule**, Corvallis Fire Department; **Heather Taksdal,** Zwald Transport Inc.; **Paul Davis**, JBT Lektro; **Terre Cooper,** Tillamook County Economic Development; **Whitey Forsman**, Pacific Oyster;

Excused: Lauren Smith, DHS, Vocational Rehabilitation; **Zach Poole**, Pig' n Pancake, Vice Chair/Secretary; **Ann Buchele**, Linn-Benton Community College; **Linda Dugan**, Linda Dugan Insurance; **Lisa Avery,** Linn-Benton Community College; **Than Tussing**, Fast Lube and Oil;

Consortium Guests:
Pamela Wev, Benton County Commissioner; **Casey Garrett**, Columbia County Commissioner;

Staff:
Heather DeSart, Executive Director; **Jason Swain**, NOW CCO; **Katrina Sturgeon**, Workforce Benefit Navigator; **Emily Richter**, Accounting Technician; **Aylee Rhea,** Program Director; **Kortnie Williams**, Behavioral Health Program Manager; **Ferdinand Richter**, Youth Program Data Manager

1. **CALL TO ORDER, CONFIRMATION OF POSTING, and ROLL CALL**
   Chairman Erickson called the Meeting to order at 10:06am.
   Chairman Erickson asked for confirmation of the public posting of the meeting; Ms. Richter confirmed; Roll Call taken, quorum was established.

2. **REVIEW and APPROVE AGENDA**
   Heather DeSart announced a change in the Agenda. Kevin Leahy will be presenting with Jarrod Hogue for the Clatsop Community College update to give an update on CEDR and the Clatsop SBDC
   MOTION: Greg Morrrill SECOND: Eric Sherman MOTION CARRIED.

3. **PUBLIC COMMENT SESSION**
   No public comments were made.

4. **CONSENT CALENDAR**
    - Accept Staff's recommendation to approve the Minutes of the April 25, 2025, Board Meeting.
    - Accept Staff's recommendation to approve the new and revised to the following policies:
        - A03 Incident Reporting and Attachments I & II (REVISION),
        - F01 Procurement Policy (REVISION),
        - F07 Equipment Management (REVISION),
        - F08 Cost Allocation Plan and Attachment A (REVISION),
        - P03 Equal Opportunity and Non-Discrimination (REVISION)
        - P10 Self-Employment Training (REVISION)
        - P13 Incumbent Worker (REVISION)
        - P16 Records Retention (REVISION)
        - P22 WIOA Title 1 Adult, Dislocated Workers, and Youth Follow-Up Services (REVISION)
        - P24 Measurable Skills Gain (NEW)
        - P25 Personally Identifiable Information (NEW)

    MOTION: Angeline Chan-Pepper SECOND: John Hawkins MOTION CARRIED.

5. **DISCUSSION and POSSIBLE ACTION** – Jason Swain, NOW CFO/CCO and Kirstin Salmi, NOW Treasurer
   Review and approve PY25-26 forecasted annual budget.
   Ms. Salmi presented the forecasted annual budget. Discussion around current administration budget changes and how that could affect NOW. Mr. Swain announced that NOW had procured for WIOA service providers and One-Stop-Operator. The board officers had conducted and completed the evaluations and awarded Equus Workforce Solutions as NOWs WIOA service provider and One-Stop-Operator.

   MOTION: Carrie Norris SECOND: Eric Sherman MOTION CARRIED.

6. **INFORMATION** – Matt McGrath, Port of Astoria Deputy Director
   Port update and funding updates with potential impacts to the community.

7. **INFORMATION –** Aylee Rhea, NOW Program Director
   NOW subrecipient monitoring reports and website update
   Presented a summary on monitoring subrecipients and that there were no findings or recommendations present. After, she shared the current state of the new website.

8. **INFORMATION** – Jarrod Hogue, Clatsop Community College President
   Clatsop Community College updates along with CEDR, Clatsop works, and Clatsop SBDC updates.

9. **INFORMATION** – Katrina Sturgeon, NOW Workforce Benefits Navigator, Paula Bartheld, El Centro, and Ricardo Contreras, ANDARES
   Workforce Benefits Navigator updates and current programs El Centro and ANDARES are offering the Hispanic communities in NOW's local area.

10. **INFORMATION** – Rebecca Donley, Oregon Hospitality Foundation
    White paper update presentation

11. **INFORMATION** – Shaun Barrick, Oregon Employment Department

Oregon Employment Department Economic update without presentation. Overall, unemployment has increased slightly in the region from last year.

12. **BOARD CHAIR REPORT** – Tony Erickson, Chair
    Chair Erickson asked Mrs. Sturgeon for an update on Tongue Point Job Corps. She announced that for now they were able to continue their work.

13. **EXECUTIVE DIRECTOR'S REPORT** – Heather DeSart, NOW Executive Director
    Ms. DeSart thanked Ms. Richter and Ms. Rhea for putting together the board meeting while Ms. Lane was on leave. Announced that the WORKing Together conference was taking place in Salem in October and invited board members to attend.

14. **BOARD MEMBER COMMENTS** – Roundtable
    No board member comments

15. **SECOND PUBLIC COMMENT SECTION**
    No public comments.

16. **ADJOURN**
    Meeting adjourned at 12:08

NORTHWEST OREGON WORKS	**POLICY A02: GRIEVANCE PROCESS**
	Effective Date:10/24/2025

PURPOSE

This policy establishes the procedures for participants and other interested parties to file grievances and complaints related to potential violations of Title I of the Workforce Innovation and Opportunity Act (WIOA).

This policy does not apply to complaints of discrimination under the nondiscrimination and equal opportunity provisions of WIOA. Procedures for discrimination complaints are outlined in NOW Northwest Oregon Works Policy-205: Equal Opportunity and Nondiscrimination.

POLICY

Northwest Oregon Works (NOW) and its service providers shall ensure that all participants and other interested parties are provided with information on these WIOA Title I grievance and complaint procedures. Reasonable efforts must be made to ensure that this information will be understood by affected participants and other individuals, including youth, and those who are limited-English speaking individuals. Those efforts must comply with the requirements at 29 CFR Part 38.9 regarding language assistance.

Participants and other interested parties affected by the local workforce development system may file a grievance or complaint alleging violation of WIOA Title I requirements by contacting Northwest Oregon Works' EOO Officer at:

Katrina Sturgeon
Equal Opportunity Officer
Northwest Oregon Works
Phone: 541-921-4420
Email: katrina@nworegonworks.org www.nworegonworks.org

The complaint must be in writing and must include the name and contact information of the complainant, the name of the person or organization the complaint is against, a statement of the allegation and date of occurrence, the provision of WIOA Title I that is believed to have been violated, and the satisfaction being sought.

Northwest Oregon Works will acknowledge receipt of the written complaint, and that acknowledgement will include assurance that the complaint will be resolved and a decision rendered within 60 days. Individuals involved in employment and training activities or employees alleging displacement or labor standards violations in those circumstances may submit a grievance or complaint utilizing this process, or to other binding arbitration procedures if a collective bargaining agreement is

involved. NOW staff will assist in confirming those circumstances and provide appropriate assistance and oversight.

Northwest Oregon Works will utilize a structured, informal process to investigate the allegation by interviewing parties and gathering information. These processes will lead to a resolution and written decision provided to the complainant within 60 days of receipt of the complaint.
In the event that no decision is reached within 60 days, or either party is dissatisfied with the decision, a written appeal may be filed with the Higher Education Coordinating Commission Office of Workforce Investments, 3225 25th Street SE, Salem OR 97302. The written appeal must be submitted via physical letter as provided in HECC-OWI's Grievance Procedure Policy.

If OWI does not provide a decision within 60 days, or if either party is dissatisfied with the decision, an appeal may be submitted to the Secretary, US Department of Labor, 200 Constitution Avenue NW, Washington DC 20210, Attention ASET. A copy of the appeal must be simultaneously provided to the ETA Regional Administrator, and the opposing party.

REFERENCES
Code of Federal Regulations 20 CFR 683.600 and 683.610
WIOA Sec. 181 (c)
29 CFR Part 38.9
Higher Education Coordinating Commission Office of Workforce Investments Grievance Procedure Policy

NORTHWEST OREGON WORKS	**POLICY A03: INCIDENT REPORTING**
	APPROVED: 10/28/2016 **REVISION: 7/8/2024** **APPROVED BOARD REVISION:10/24/2025**

PURPOSE

This policy establishes expectations, procedures, and guidance for reporting allegations, suspicions, or knowledge of fraud, program abuse, or criminal misconduct involving recipients, subrecipients, or contracts under federal awards from ETA, in accordance with the procedures set forth in Training and Employment Guidance Letter (TEGL) No. 15-23. In compliance with 20 CFR 683.620, it details the requirements for the immediate reporting of information and complaints involving criminal fraud, waste, abuse, or other criminal activity.

POLICY

It is the policy of Northwest Oregon Works that they and their subrecipients will immediately report known or suspected fraud, waste, abuse, gross mismanagement, misuse of program funds, or criminal activity, in accordance with the procedures set forth below. All incidents of suspected fraud and/or abuse must be reported to the Office of Inspector General (OIG) and the Employment and Training Administration (ETA). Such incidents may be reported anonymously as outlined in following paragraphs. All staff, contractors, subcontractors, entities responsible for providing WIOA services and other federal awards from the ETA, board members, and members of the public have the right to report an incident.

PROCESS

Allegations, suspicions, and complaints involving possible fraud, program abuse and criminal misconduct must be documented immediately.

The process of reporting incidents consists of two steps:

1. Reporting allegations of fraud, waste and abuse, criminal and other illegal or improper activities in ETA-funded grant programs and operations to the Office of Inspector General (OIG); and
2. Reporting the same to ETA, using the process described below.

Grantees and subrecipients must promptly disclose whenever, in connection with the federal award (including any activities or subawards thereunder), it has credible evidence of the commission of a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code, or a violation of the civil False Claims Act (31 U.S.C. 3729–3733).

While all incidents should be reported as expeditiously as possible, situations involving imminent health or safety concerns, or the imminent loss of funds exceeding an amount larger than $50,000 are considered emergencies and must immediately be reported to the OIG and ETA no later than one working day after the emergency was discovered.
Reporting the Incident to the OIG Hotline Portal – Incidents and allegations involving ETA recipients and programs should be reported to the OIG by completing the relevant fields contained in the OIG Hotline Portal (https://www.oig.dol.gov/hotline.htm).

When submitting an incident to the OIG Hotline Portal, please note the following:
Screenshots or photos must be taken of each of the three OIG Hotline Portal screens (Your Information, Alleged Violator Information, and Allegation Information) prior to clicking the "Next" button to be able to complete Step ii of the process (reporting the incident to ETA). This is important, as once the "Submit" button is clicked, the OIG Hotline Portal does not allow users to go back and review/capture what was submitted, nor print or download a copy of the incident report for the submitter's records.

The Your Information screen contains a field requesting the submitter's social security number (SSN). This is not a required field, and it is recommended that the submitter not provide it. However, if you decide to provide your SSN to the OIG, please ensure it is redacted before providing the screenshots or photos to ETA via email.

Attachment II provides step-by-step instructions on how to submit an incident report in the OIG Hotline Portal and capture and submit the screenshots or photos to ETA.
To ensure proper identification of your submission as an incident report, in the Allegation Description box on the Allegation Information screen, please start by entering "ETA Incident Report - " and then go on to describe the allegation.

Reporting the Incident to ETA – ETA takes allegations of any type of improper activity seriously and needs to have the same information that is being submitted to the OIG Hotline Portal for developing its oversight and monitoring strategies. Therefore, the individual filing the incident report should send the screenshots or photos taken of each of the three OIG Hotline Portal screens to ETA via email at ETAIncidentReporting@dol.gov.

The subject line of the email should contain: ETA Incident Report Oregon for easy identification of the ETA Regional Office that needs to be provided the information to evaluate as part of ETA's overall grant monitoring and oversight responsibilities.

Prohibition and Reprisals – No action should be taken against any individual for providing information in accordance with these procedures or disclosing information concerning criminal

or improper activities or making an incident report to proper authorities. Individuals reporting incidents may remain anonymous if they so choose.

Incident Referrals – When the OIG receives an incident report from any source, the OIG determines whether the allegations have merit and, when appropriate, conducts or arranges for an investigation and/or audit. However, in instances where the OIG determines that the incident report does not have investigative or audit merit, the incident report is referred to ETA for resolution. In these instances, depending on the circumstances, ETA will either forward the incident report to the recipient to research and report back, or ETA will work with the recipient to analyze and report on the incident. When an incident report is referred to a recipient, the recipient must prioritize this activity, so ETA can report the resolution to the OIG in a timely manner.

Reporting procedures do not supersede the responsibility to safeguard WIOA funds by taking prompt and appropriate corrective action. Whenever the entity reporting the allegation of an incident believes that immediate action to prevent further financial loss or other damage is necessary, or recovery of funds or property may be impeded if immediate action is not taken, the reporting entity has the responsibility to take any action it deems appropriate, including contacting the local law enforcement agency.

ATTACHMENTS

Attachment II – Quick Reference Guide

REFERENCES

Higher Education Coordinating Commission Office of Workforce Investments (HECC OWI) Incident Reporting Policy
Workforce Innovation and Opportunity Act
20 Code of Federal Regulations Part 683.620
Training and Employment Guidance Letter No. 15-23

NORTHWEST OREGON WORKS	**POLICY P01: WIOA ADULT AND DISLOCATED WORKER ELIGIBILITY**
	Effective Date: 6/24/2024
	☐ **NEW** ☒ **REVISED**

Purpose and Policy for WIOA Title 1 Adult and Dislocated Worker Programs

Purpose: This policy aims to provide clear guidance on determining participant eligibility for enrollment in the Workforce Innovation and Opportunity Act (WIOA) Title 1 Adult and Dislocated Worker (DW) Program. The guidance is anchored in WIOA legislation, U.S. Department of Labor (DOL) regulations, and State of Oregon policies.

Policy: Northwest Oregon Works establishes the policy that contracted WIOA Adult and DW Service Provider(s) must ascertain the eligibility of applicants before offering WIOA-funded individualized or training services. Service Providers are obligated to adhere to the criteria outlined in this eligibility policy. It is incumbent upon the Service Provider to maintain a robust eligibility certification system, ensuring that ineligible individuals are not served to avoid disallowed costs. Additionally, the WIOA Service Provider must implement the priority of service, as mandated by Northwest Oregon Works.

ELIGIBILITY PROCESS

Applicants in need of WIOA funded Individualized Career or Training Services must be determined eligible *prior* to the provision of such services. The eligibility process includes:

1) Conduct eligibility determination based on one or more of the criteria defined above;
2) Collect required eligibility documentation at the time of eligibility determination (see Attachment B - Documentation Requirements Table);
3) Provide applicant with a copy of Grievance Policy;
4) Have applicant sign the Media Release Form;
5) Complete the i-Trac application as required by the funding source for which the applicant will be enrolled and follow all required i-Trac data entry protocols (established in the i-Trac Management Information Data System);
6) Documents may also be uploaded to i-Trac following the document management protocols.

Documentation: Mandatory documentation will be collected during the eligibility determination process and recorded in I-trac. In cases of co-enrollment, where eligibility has been verified by another local area, NOW and its Service Provider(s) will accept the documentation secured by the other local area for co-enrollment purposes. Any responsibility or consequences arising from documentation issues or findings by State or Federal monitors will remain with the local area that collected the eligibility documents.

ELIGIBLE PARTICIPANTS

WIOA Adult

Adults must meet the following WIOA eligibility criteria to move from Basic Career Services to Individualized Career Services and/or Training Services.

Adult eligibility criteria:

- Age 18 Years or older;
- Meets Selective Service registration requirements (if applicable);
- Must be assessed for priority of service:
    - **Priority of Service:**
      Services are to be provided to eligible participants in the following priority order:
    - Veterans and eligible spouses receive statutory priority for WIOA Adult formula funding.
    - Non-veterans or eligible spouses meeting statutory priorities for WIOA Adult formula funding: a. Recipients of public assistance, including Temporary Aid for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), General Assistance or Refugee Cash Assistance, or Supplemental Security Income (SSI).
    - Low-income individuals, defined as those receiving or having received public assistance through SNAP, or having a family income below the Federal Poverty Line or 70% of the Lower Living Standard Income Level (LLSI). An individual with a disability, even if the family doesn't meet income criteria, may be considered low-income for priority of services.
    - Basic skills deficient: An individual who is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society.

WIOA Dislocated Worker

The following categories outline the requirements within which an applicant may be defined as a Dislocated Worker. Dislocated Workers must meet the eligibility criteria to move from Basic Career Services to Individualized Career Services and/or Training Services if funded through the WIOA Dislocated Worker Formula Fund.

Dislocated Worker Categories:

- Terminated or Laid-off Worker
- Laid off due to Business Closure or Substantial Lay-Off
- Self-Employed Business Closure
- Displaced Homemaker
- Displaced Military Spouse
- Separating Service Member

ELIGIBILITY DETERMINATION PROCESS

Adult Eligibility and Determination

1) Verify date of birth of the applicant. Applicant must be age 18 or over to be eligible for

WIOA Adult funded services.

2) Verify applicant is in compliance with Selective Service Registration requirement.
3) Assess for the applicant's Priority of Service status.

Dislocated Worker Eligibility Determination

1) Verify date of birth of the applicant.
2) Verify applicant is in compliance with Selective Service Registration requirement.
3) Assess for the applicant's dislocated worker status.

Policy definitions for each of the Dislocated Worker eligibility elements are:
To determination eligibility under the Terminated or Laid-Off Worker category, an individual must meet **each** of the follow categories:

- Has been terminated or laid off, or has received a notice of termination or layoff, from employment, including a separation notice from active military service (refer to Separating Service Member for additional information); and
- Is either eligible for or has exhausted their unemployment insurance compensation or has been employed for a period of at least three months to show attachment to the workforce, but is not eligible for unemployment insurance compensation due to insufficient earnings or having worked for an employer that is not covered under the State unemployment compensation law; and
- Is unlikely to return to their previous industry or occupation. This can be due to any of the following circumstances:
    - Because of negative economic conditions or sudden economic impact on industries or occupations (such as the pandemic).
    - Because there is a decline in the previous occupations in the local market.
    - Because of circumstances that cause significant barriers to employment, such as criminal background, lack of high school diploma or GED, disability, homelessness, cultural or language barriers, older worker (55+) or deficient in basic skills.
    - Because their previous industry or occupation has been eliminated or the applicant has been unable to secure a position at a compensation level comparable to their previous occupation.
    - Because they exhausted their unemployment benefits and have been unable to find a job in their previous industry or occupation.
    - Because they were seasonally employed and unlikely to return because of mechanization or significant variance to normal seasonal employment patterns, resulting in uncertain return-to-work duties.

  Determination by a Service Provider staff that an individual's likelihood of returning to their previous industry or occupation is unlikely due to circumstances that cause significant barriers to employment. Barriers to employment include:
    - Offender

- High school dropout
- Homeless
- Cultural or language barrier
- Older worker (55+)
- Basic skills deficient
- Lack of necessary skills to become reemployed due to the current requirements of the industry or occupation (to be identified by an assessment of the individual's current skills and abilities and compared to current labor market demands, or rejection letters from employers for lack of necessary skills)
    - Because a WIOA-funded assessment cannot be conducted until after WIOA Dislocated Worker eligibility has been established, a self-assessment by the individual, or a prior assessment of the individual's skills, abilities and experiences by another qualified entity must be used.

Laid off due to Business Closure or Substantial Lay-Off

The applicant must meet one of the following requirements:

- Has been terminated or laid off from employment, or has received notice of termination or layoff, because of the permanent closure of, or any substantial layoff (defined as 10 or more affected workers) at the company (includes a plant, facility, military installation, or business enterprise); or
- Is employed at a company where the employer has made a general announcement that the company or location will close within 180 days. A general announcement may include media coverage, filing of a Worker Adjustment and Retraining Notification (WARN) with the State, corporate written notice of intent to close within 180 days (written notice includes email communication, employer website and/or social media postings).

Self-employed Business Closure

The applicant must meet the following requirement:

- Was self-employed (including employment as a farmer, rancher, fisherman, or an independent contractor or consultant not technically an employee of a firm or agency) but is unemployed because of general economic conditions in the community in which the individual resides or because of natural disasters.

Additional Guidance for Determining Self-Employed Business Closure:
To assist an applicant in determining if they meet this Dislocated Worker definition, consider the following.

A person is self-employed when they meet one of the following conditions:

- Files taxes as self-employed for their business on their personal taxes:
- Is considered an independent contractor by the business:
- Meets all the following criteria:
    - Is not required by the business to complete an IRS W-4 form:
    - Is not required to pay federal income tax or FICA payments from their paycheck(s):
    - Liability or workers' compensation insurance for the individual is not paid by the business:
    - Either creates or provides the products or services they sell, or sets the price for the products or services they sell:
    - Is responsible for the business expenses and losses: and
    - Receives profits from the business.

Economic conditions are defined as the present situation in the overall economy of the area where the individual resides. When a local economy contracts or is weakened, it may impact self-employed individuals. Examples include recession, impacts of pandemic, impacts of major employers that support a high percent of employment and local purchasing power, such as:

- Failure of one or more businesses to which the self-employed individual supplied a substantial portion of products or services;
- Failure of one or more businesses from which the self-employed individual obtained substantial portion of products or services;
- Substantial layoffs from, or a permanent closure of, one or more plants or facilities that support a significant portion of the local economy;
- Unemployment rate for the county exceeds the State overall unemployment rate; or
- Depressed prices or markets for articles produced by the self-employed individual.

Displaced Homemaker Eligibility: An individual qualifies as a WIOA Displaced Homemaker, a status synonymous with Dislocated Worker eligibility, under the following circumstances:

- The applicant has been contributing unpaid services to their family at home and was previously reliant on another family member's income, which they no longer receive support from.

OR

- The applicant, providing unpaid services to their family at home, is the dependent spouse of an Armed Forces member on active duty. Their family income has significantly diminished due to deployment, a call or order to active duty, a permanent change of station, or the service-connected death or disability of the service member.

OR

- The applicant, engaged in unpaid family services at home, is unemployed or underemployed and encounters challenges securing or advancing in employment.

Moreover, an applicant may also satisfy the criteria for other Dislocated Worker eligibility types, indicating that Displaced Homemaker status is not mutually exclusive.

Displaced Military Spouse Eligibility: An applicant qualifies under the WIOA Displaced Military Spouse category by meeting one of the following requirements:

- The individual is the spouse of an Armed Forces member on active duty and has experienced job loss directly resulting from relocation to accommodate a permanent change in the duty station of the service member.

OR

- The individual is the spouse of an Armed Forces member on active duty, currently unemployed or underemployed, and faces challenges in obtaining or advancing employment.

Separating Service Member Eligibility: To qualify as a Separating Service Member, the applicant must meet the following requirement, and documentation with a DD-214 is mandatory:

- The individual is a member of the Armed Forces separating from service to enter or re-enter the civilian labor force (being discharged). The discharge is for any reason other than dishonorable.

This delineation provides clarity on the eligibility criteria for Displaced Homemakers, Displaced Military Spouses, and Separating Service Members, facilitating a smoother application process for individuals seeking assistance under the Workforce Innovation and Opportunity Act.

MANDATORY PROCEDURE

Service providers funded by Northwest Oregon Works must adhere to this policy when assessing participant eligibility for enrollment in a WIOA funded service. This policy remains in effect from the date of issuance until a revision becomes necessary.

Other Eligibility Criteria Definitions

Priority of Service

WIOA Individualized Career and Training services shall be provided to eligible participants in the following priority order:

1. Veterans and eligible spouses who are included in the groups given statutory priority for WIOA Adult formula funding (see 2.).
2. Individuals who are not veterans or eligible spouses and who meet one of the statutory priorities for WIOA Adult formula funding:
    a. Individuals who are recipients of public assistance
    b. Individuals who are low income
    c. Individuals who are basic skills deficient
    d. English language learners

3. Veterans and eligible spouses who are not included in WIOA's priority groups.
4. Priority populations established by the Governor and/or the local workforce development board.
5. Non-covered persons outside the groups given priority under WIOA.

The characteristics for Veteran Status, Public Assistance Recipient and Basic Skills Deficient must be documented to report as a characteristic and to receive priority of service benefits. *Lack of documentation does not preclude participants from receiving Individualized Career or Training services* but does eliminate the priority of service benefit. Documentation may come after enrollment.

Selective Service Registration Requirements

Compliance with the Selective Service registration requirements must be documented for participants who are required to register – defined as:

- Sex-assigned male at birth;
- AND a US Citizen OR immigrant residing in the US between the ages of 18 and 25;
- AND are age 18 or older;
- AND were born on or after January 1, 1960.

If documentation under one of the categories outlined below cannot be collected, the participant is not eligible to enroll. Participants who would like additional information regarding Selective Service registration may be referred to this website: Register : Selective Service System

Selective Service Exempt

Participants exempt from Selective Service registration:

- Sex-assigned female at birth;
- OR born before 1960;
- OR currently under the age of 18 (will be required to register within 30 days of 18th birthday);
- OR are a seasonal agricultural worker on a H-2A visa;
- OR are a lawful non-immigrant on a current non-immigrant visa;
- OR were incarcerated/hospitalized/institutionalized continuously between 18th and 26th birthdays;
- OR were not living in the United States between 18th and 26th birthdays;
- OR was on active US Military, Coast Guard duty or a student in an Officer Procurement Program continuously between 18th and 26th birthdays.

Not Required/Exempt Documentation Requirements
Sex assigned female at birth; participant currently under age 18; participant born before 1960 – Customer attestation.

Non-Immigrant/Immigrant Status – Regardless of current U.S. Citizenship status, some immigrants may be exempt from registration:

- Participants sex-assigned male at birth and holding a valid seasonal agricultural worker H-2A visa must provide a copy of the visa.

- Participants sex-assigned male at birth who are between the ages of 18 and 26 may be exempt if they are on a current non-immigrant visa. Acceptable forms of supporting documentation can be found at this website Non-Immigrant/Immigrant Allowable Documents.

- Participants who are sex-assigned male at birth and came into this country for the first time after their 26th birthday are not required to register for Selective Service. Acceptable forms of supporting documentation that establish first date of entry into the United States can be found at this website Non-Immigrant/Immigrant Allowable Documents. The appropriate supporting document must show an entry date after the participant's 26th birthday.

Incarceration, Hospitalization, Institutionalization:
Participants obligated to register but able to furnish documentation proving their incarceration, hospitalization, and/or institutionalization from their 18th to 26th birthday are exempt from registration. It's essential to emphasize that if, at any point between their 18th and 26th birthdays, the participant was not incarcerated, hospitalized, or institutionalized, registration was obligatory, and the exemption does not apply. Non-registration requires adherence to the documentation guidelines outlined under "Required to Register and Did Not."

Military Service:
Participants engaged in US Military, Coast Guard, or Officer Training between their 18th and 26th birthday are exempt from registration, with their DD-214 Military Separation Record serving as documentation. However, it is crucial to note that if, at any juncture between their 18th and 26th birthdays, the participant was not involved in the US Military, Coast Guard, or Officer Training, registration was mandatory, and the exemption is not applicable. Failure to register necessitates adherence to the documentation requirements specified under "Required to Register and Did Not."

Required to Register and Did Not
Participants who are required to be registered, who are over age 26, and cannot document that they are registered through one of the means listed above must complete the Selective Service System's *Request for Status Information Letter* and attach copies of the documentation required for their reason for non-registration.

Subrecipients receiving WIOA funding are empowered to assess cases labeled as "not knowing and willful." A duplicate of the letter and accompanying documents may be forwarded to NOW and stored in I-Trac. Following scrutiny, the Director of Workforce Programs holds the authority to ascertain, based on a preponderance of evidence, whether the participant's failure to register was not knowing and willful. Upon such a determination, the Request for Status Information Letter, and accompanying documents, along with other eligibility documentation, should be archived with the Director of Workforce Programs' approval signature.

Participants are to be directed to submit the letter and documents according to the form's instructions for an official assessment by the Selective Service System. It is important to note that there is no obligation for staff to follow up to ensure submission or to return and file the Selective Service System's response. The WIOA program is duly authorized to make the determination during the WIOA documentation process.

Request Submitted/Selective Service Response Received – If the participant already completed the Request for Status Information Letter process with the Selective Service and has their Status Information Letter determination returned from Selective Service which says that they are found to be exempt from the requirement, a copy of the Response Letter is to be maintained as documentation.

Self-Sufficiency Definition

20 CFR 680.210 supports training services being made available to employed Adults and Dislocated Workers where staff determine that all these elements apply:

- The participant is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services;
- They need training services to obtain or retain employment leading to self-sufficiency or wages comparable to or higher than wages from previous employment; and
- They have the skills and qualifications to participate successfully in training services.

Under-Employed Definition

TEGL 19-16 (section 11 Employment Status Clarification) encourages local policy development to define under-employed for purposes of supporting the provision of training services to employed participants. The TEGL provides under-employed examples as follows:

- Individuals employed less than full-time who are seeking full-time employment;
- Individuals who are employed in a position that is inadequate with respect to their skills and training;
- Individuals who are employed who meet the definition of a low-income individual in WIOA section 3 (36); or

- Individuals who are employed, but show their current earnings are not sufficient compared to their previous earnings from their previous employment.

Determining Low Income

Concerning individualized career services and training services funded through WIOA adult funds, the establishment of priority of service is imperative during eligibility determination for recipients of public assistance, other low-income individuals, and those who are identified as basic skills deficient. The assignment to a priority of service category remains constant throughout the participation period. It's crucial to note that the Adult priority of service does not extend to the Dislocated Worker population.

Veterans and eligible spouses meeting the WIOA Adult program eligibility criteria are granted priority of service among all eligible individuals. However, they must still satisfy the specific criteria outlined in the WIOA adult program eligibility.

Low-Income status is defined by meeting one of the following criteria:

- Receiving, or in the past six months has received, assistance through SNAP, TANF, supplemental security income program, or state or local income-based public assistance.
- In a family with a total income not exceeding the higher of the poverty line or 70 percent of the Lower Living Standard Income Level (LLSIL).
- A homeless individual.
- An individual with a disability whose own income doesn't surpass the income requirement but is part of a family whose total income does.

The low-income and poverty guidelines serve to establish low-income status for WIOA Title I programs. Northwest Oregon Works utilizes the LLSIL to ascertain priority of service eligibility for WIOA Adult applicants. Income received in the six months preceding the individual's application for WIOA-funded services is considered for income determination. A comparison is made between the applicant's actual family income during this period and the figures on the Oregon Workforce Innovation and Opportunity Act Income Eligibility Table to determine eligibility (Exhibit A – Oregon Income Eligibility Table).

National Dislocated Worker Grant

- Refer to Dislocated Worker Grant eligibility –National Dislocated Worker Grant (DWG) Eligibility Policy.

HOUSEHOLD INCOME CALCULATION METHODOLOGY

Calculating household income methodology includes the following:

1) Establish Household Size:
    - To determine total family income, intake staff must calculate income received by all members of the individual’s family for the previous six months prior to WIOA

participation. (Household members include all individuals in the household related by blood or marriage as defined by WIOA.)

- To determine total income for an individual with a disability, an intake staff must calculate income received by the individual (only) for the previous six months prior to WIOA participation, regardless of the income level of his/her family.

2) Computing and Documenting Family Income:
   - Documentation should be provided for each applicable included and excluded income source received by the applicant, and each family member, for the six-month income period immediately preceding the application and eligibility determination date.
   - An applicant or family member who claims little or no income must submit an applicant statement that attests that little or no income was received during the past six months, and/or that they were unemployed for that period.
     a. In this situation, they should be included as a family member and $0 income may be listed.
   - The following items should be documented, verified, computed, and included with the eligibility documentation:
     a. Eligibility determination period: Enter dates of the six-month period.
     b. Family Members: List all family members (as defined by WIOA) and the income they have received within the last six months prior to application. In addition to documentation of family size, additional documentation may be required to establish that the family is living in a single residence.
     c. Dates: List the dates of receipt of the income. The whole determination period should be covered. During periods when no income was received, means of support must be explained and verified (e.g., applicant has been supported by parent(s) or friend(s) or living on savings from previous earnings, etc.).
     d. Source of Income: Indicate how the income was earned, and/or the source that generated the income.
     e. Amount of Income: Indicate the dollar amount received during the six-month period. This may require adding up several pay stubs submitted for that period to arrive at the six-month amount;
     f. Documents Inspected: Indicate the document(s) submitted to verify the source of income. The document(s) must be photocopied, and a copy retained in the individual's file.

Sources of includable income are:

- Child Support Payments
- Monetary compensation for services, including wages, tips, salary, commissions, or fees before any deductions, and including overtime pay, bonuses, etc.

- Net receipts from non-farm self-employment (receipts from a person's own un-incorporated business, professional enterprise, or partnership, after deductions for business expense)
- Net receipts from farm self-employment (receipts from a farm which one operates as an owner, renter, or sharecropper, after deductions for farm operating expenses)
- Regular payments from railroad retirement, strike benefits from union funds, worker's compensation, and training stipends (e.g., California Conservation Corp)
- Alimony, active military family allotments directly received, or other regular support from an absent family member or someone not living in the household, but included in the family size
- Private pensions, government employee pensions (including military retirement pay)
- Regular insurance or annuity payments (including state disability insurance)
- College or university scholarships grants, fellowships, and assistantships (not needs-based)
- Net gambling or lottery winnings
- Severance payments
- Terminal leave pay
- Social Security Disability insurance payments
- Unemployment Insurance
- Generally, if an income source is not listed in the “Excluded Income” categories below, then it must be considered as “Included Income.”

Sources of excluded income are:

- WIOA Title I – OJT Wages
- Foster care payments
- Need-based Public Assistance payments (including TANF, Supplemental Security Income Emergency Assistance, and non-federally funded general assistance or general relief money payments)
- Social Security Old Age and Survivors' Insurance benefit payments
- Financial assistance under Title IV of the Higher Education Act, i.e., Pell Grants, federal Supplemental Educational Opportunity Grants and Federal Work Study (needs-based)
- Needs-based scholarship assistance
- Loans
- Veterans Benefits
- Income earned while the veteran was on active military duty and certain other Veterans benefits, i.e., compensation for service-connected disability, compensation for service- connected death, vocational rehabilitation, and education assistance
- Capital gains

- Any assets drawn down as withdrawals from a bank, the sale of property, a house, or a car
- Tax refunds, gifts, loans, lump-sum inheritances, one-time insurance payments, or insurance compensation for injury
- Non-cash benefits such as employer paid or union-paid portion of health insurance or other fringe benefits, food or housing received in lieu of wages
- The value of food and fuel produced and consumed on farms
- The imputed value of rent from owner occupied non-farm or farm housing
- Medicare, Medicaid, food stamps, school meals, and housing assistance
- Allowances, earnings, and payments to individuals participating in programs under this Act.

Methods of Calculating Income:
When calculating income, any one of the following methods may be used as appropriate. (These examples are illustrative only.)

Straight Pay or Salary Method Under the Straight Pay Method
Under the straight pay method:

- The participant supplies a sample of pay stubs covering the most recent three to four months (out of the six months) of family income.
- Upon reviewing the pay stubs, the eligibility worker determines that the wages on the pay stubs are the same, with no variations.
- The worker will calculate the income based upon the wages indicated on one of the pay stubs, since there are no variations in the gross income on any of the pay stubs.
- Based upon the length of the pay period represented by the pay stubs, (weekly, bi-weekly, or monthly) the gross income is multiplied by the number of pay periods in a year. That is 52 x gross wages, 26 x gross wages, or 12 x gross wages, respectively.
- The result will be the annual income.
- Divide the annual income by 2 to determine the six-month income used to determine WIOA low-income eligibility.

Example: Five (5) pay stubs are provided indicating gross wages of $548.00 each. The pay stubs are sporadic and cover a period of (3) months. The pay frequency is bi-weekly (13 pay periods in 6 months). An eligibility staff would multiply the gross wages indicated on the pay stubs by the frequency occurrence.
Multiply: 13 x $548 = $7,124. This is the six-month income used to determine WIOA low-income eligibility.

Average Pay Method Under the Average Pay Method
Under the average pay method:

- A sample of six pay stubs are submitted which show variations in the gross earnings.

- The variations may result from overtime, lost time, or working for different employers.
- In calculating the six-month income, the eligibility staff must determine the average gross earnings based upon the number of pay stubs provided.
- To determine the average gross earnings, the eligibility staff must total the gross earnings of all the pay stubs provided and divide the result by the number of pay stubs.
- The result will be the average gross earnings per pay period.
- After determining average gross earnings per pay period, the eligibility staff will then determine the pay frequency and multiply the gross average earnings by the number of pay periods in the six-months.

Example:

- Participant provides eligibility staff with six (6) pay stubs with gross earnings of $534, $475, $398, $534, $498, and $534.
- The pay frequency is weekly.
- The eligibility staff should do the following:
    - Add: $534 + $475 + $398 + $534 + $498 + $534 = $2973.00.
    - Divide: $2973/6 (6 is the number of pay stubs provided) = $495.50 – This is the average gross earnings per weekly pay period.
    - Multiply: $495.50 x 26 (there are 26 weekly pay days in a six-month period) = $12,883. This is the six-month income amount used to determine WIOA low-income eligibility.

<u>Year-To-Date Method</u>

Under the Year-To-Date Method of calculating six-month gross income:

- The participant provides recent pay stubs with cumulative year-to-date gross earnings indicated on the pay stub.
- The cumulative year- to-date gross earnings indicate the gross earnings up to the date of the pay period ending date, on the pay stub.
- To compute the six-month income, the eligibility staff counts the number of pay periods that have occurred in the year-to-date period and divides that number into the gross year-to-date earnings indicated on the pay stub to get the amount of each paycheck.
- The result of this computation (average gross income per pay period) is then multiplied by the number of pay periods in a six-month period to determine the six-month gross earnings.

  Example:
    - Participant provides the eligibility staff with a recent pay stub showing the year-to-date earnings were $25,200 for the 14 pay-periods so far that year.
    - The date of the pay stub provided was July 3 for $1800. The gross earnings each pay period is the same. The pay frequency is bi-weekly, every other Friday.
    - There are 13 pay periods for the six (6)-month period counting back from July 3.
    - Calculation of the gross annualized income would be done as follows:

- Multiply: $1800 by 13 (No. of pay periods in 6 months) = $23,400. $23,400 is the 6-month income figure for this individual or family member.

Intermittent Employment Verification Approach

In instances where an applicant has experienced irregular employment with one or more employers, they are encouraged to provide as many pay stubs as possible. Additionally, they should complete an Applicant Statement detailing any missing pay stubs and periods of non-employment within the preceding six months. In such cases, the eligibility worker computes the total wages over the six-month period. If the applicant reports minimal or no includable income, they are requested to specify the resources relied upon to support expenses during the same period in the Applicant Statement. These resources may encompass unpaid debts, gifts, loans, unemployment compensation, among others.

References:

- Code of Federal Regulations 20 CFR 680-681, Code of Federal Regulations 1010.200-250
- Training and Employment Guidance Letter 10-09; 19-16; 14-18; 26-13
- WIOA Sec. 3 (5); (50); (53); (36)(a), WIOA Sec. 134 (c)(3)(E)

EXHIBIT A
Oregon Income Eligibility Table
Combined 70% LLSIL and HHS Poverty Income Guidelines

Applicable Federal Register notices, LLSIL tables, and HHS poverty levels are available at:

Policies and Guidance - WIOA: WORKFORCE INNOVATION AND OPPORTUNITY ACT - OREGON (wioainoregon.org)

Attachment B

DOCUMENTATION REQUIREMENTS

Category	Element	Allowable Documents
WIOA Adult Eligibility and Enrollment	Date of Birth	Baptismal Record Birth Certificate DD-214/Report of Transfer or Discharge Paper Driver's License Family Bible Government Issue ID, including Tribal ID Hospital Record of Birth Passport Public Assistance/Social Service Records School Records or ID Card Self-Attestation
	Selective Service Registration	See below
WIOA Dislocated Worker Eligibility and Enrollment	Date of Birth	Baptismal Record Birth Certificate DD-214/Report of Transfer or Discharge Paper Driver's License Family Bible Government Issue ID, including Tribal ID Hospital Record of Birth Passport Public Assistance/Social Service Records School Records or ID Card
	Selective Service Registration	See below
	Separating Service Member	DD-214
Priority of Service	Veteran Status	DD-214 Crossmatch with Dept. of Defense Records Crossmatch with Veterans Service database A letter from the Veterans' Administration
	Public Assistance Recipient TANF SNAP SSI/SSDI Other Public Assistance	Verification letter Crossmatch with public assistance records
	Deficient in Basic Skills	Assessment by staff Assessment test results Education institution records
Selective Service Required to Register	Registered	Selective Service Registration Acknowledgement Letter

		Selective Service Registration Card Stamped Post Office Receipt of Registration
	Not Registered – Not willful	Request for Status Information Letter and Supporting documentation Selective Service Status Information Letter
	Not Registered – Chose not to register	Not eligible
Selective Service Not Required/Exempt	Not Required to Register	Applicant Attestation (Age/Sex at Birth) DD-214 Military Separation Record Immigrant/Non-Immigrant Allowable Documents Records of Incarceration, hospitalization or institutionalization

PROCEDURE

This policy is for the provision of information as to the types of WIOA funded services available to adults and dislocated workers seeking services through the local workforce service delivery system. Staff shall ensure that participants meet the eligibility requirements for enrollment in Individualized Career Services and/or Training Services prior to the provision of such services.

REFERENCES

Northwest Oregon Work's eligibility certification process is based on the Department of Labor and State of Oregon official source documents.

- DOL Final Rules and Resources: Laws | U.S. Department of Labor (dol.gov)
- Policies and Guidance - WIOA: WORKFORCE INNOVATION AND OPPORTUNITY ACT - OREGON (wioainoregon.org)
- DOL Training and Employment Guidance Letters (TEGLs): ETA Advisories | U.S. Department of Labor

NORTHWEST OREGON WORKS	**POLICY P03: EQUAL OPPORTUNITY AND NON-DISCRIMINATION**
	Effective Date: 10/24/2025
	❑ **NEW** ☒ **REVISED**

PURPOSE

This policy provides implementation requirements and procedures to ensure compliance with the nondiscrimination and equal opportunity provisions of the Workforce Innovation and Opportunity Act (WIOA) Title I for the Northwest Oregon Works (NOW) local area.

POLICY

Section 188 of WIOA prohibits discrimination against any individual in the United States on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the WIOA, on the basis of the individual's citizenship status or participation in any WIOA Title I-financially assisted program or activity.

NOW has designated an Equal Opportunity Officer to coordinate the organization's obligations, and the officer's name and contact information is included in the *Equal Opportunity is the Law Notice* (Attachment A). The Equal Opportunity Officer also serves as the liaison with the Civil Rights Commission.

Service providers in NOW's local area must provide the *Equal Opportunity is the Law Notice* to WIOA Title I participants during enrollment processes. The Notice must also be included in the participant's file, as required at 29 CFR Part 38.6(a)(4).

Service providers are also required to ensure that *Equal Opportunity is the Law Posters* are posted prominently, in reasonable numbers and places, in available and conspicuous physical locations, as required at 29 CFR Part 38.36(a)(1). Service providers are to contact NOW to request additional posters if needed.

NOW will ensure that any brochures, handouts, and other materials that are ordinarily distributed or communicated in written and/or oral form, electronically and/or on paper, will indicate that the WIOA Title I-financially assisted program or activity in question is an "equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities."

Mechanisms are established in NOW operations and WIOA Title I programs and activities that ensure equal opportunity data is collected and maintained for applicants, registrants, eligible applicants and registrants, employees, and applicants for employment. Records denoting race/ethnicity, sex, age, and where known, disability status, limited English proficiency, and preferred language are to be maintained and stored in ways that ensure confidentiality. These records will be maintained for at least three years from the close of the applicable program year. Records related to discrimination complaints are to be retained no less than three years from the date of final action related to resolution of the complaint.

Subrecipient monitoring and oversight activities for WIOA Title I programs and service in the NOW area are conducted by NOW staff. Those activities include processes to ensure that nondiscrimination and equal opportunity obligations are being satisfied, and that reviews of policies are conducted to ensure that they are nondiscriminatory.

NOW's Workforce & Community Development Manager serves as the Equal Opportunity Officer and has established a discrimination complaint process provided at Attachment B. The discrimination complaint process provides for investigation and resolution of written complaints that any person or the person's representative believes they have been or are being discriminated against or has been or is being retaliated against. The complaint process ensures confidentiality for all individuals involved.

REFERENCES

WIOA Section 188
29 CFR Part 38.9
Code of Federal Regulations 29 CFR Part 38

Attachments

- **Attachment A** – Equal Opportunity is the Law Notice
- **Attachment B** – Discrimination Complaint Processing Procedures

Attachment A

EQUAL OPPORTUNITY IS THE LAW

It is against the law for this recipient of Federal financial assistance to discriminate on the following bases: against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief; and against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the WIOA, on the basis of the individual's citizenship status or participation in any WIOA Title I–financially assisted program or activity.

The recipient must not discriminate in any of the following areas: deciding who will be admitted, or have access to, any WIOA Title I–financially assisted program or activity; providing opportunities in, or treating any person with regard to, such a program or activity; making employment decisions in the administration of, or in connection with, such a program or activity.

Recipients must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. Upon request and at no cost, appropriate auxiliary aids and services will be provided to qualified individuals with disabilities. Language assistance is also available for individuals with limited English proficiency at no cost.

WHAT TO DO IF YOU BELIEVE YOU HAVE EXPERIENCED DISCRIMINATION

If you think that you have been subjected to discrimination under a WIOA Title I–financially assisted program or activity, you may file a complaint within 180 days from the date of the alleged violation with either: the recipient's Equal Opportunity Officer (or the person whom the recipient has designated for this purpose);

Katrina Sturgeon
Equal Opportunity Officer
Northwest Oregon Works
Phone: 541-921-4420
Email: katrina@nworegonworks.org
www.nworegonworks.org

OR
Director, Civil Rights Center (CRC)
U.S. Department of Labor
200 Constitution Avenue NW, Room N-4123
Washington, DC 20210 or electronically as directed on the CRC website at www.dol.gov/crc

Filing with Civil Rights Center:

If you file your complaint with the recipient, you must wait either until the recipient issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center (see address above). If the recipient does not give you a written Notice of Final Action within 90 days of the day on which you filed your complaint, you may file a complaint with CRC before receiving that Notice. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with the recipient). If the recipient does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution, you may file a complaint with CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.

A proud partner of the American Job Center network.

Northwest Oregon Works is an equal opportunity employer/program and is funded through the U.S. Department of Labor, and the Oregon Higher Education Coordinating Commission. WorkSource Oregon is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Language assistance is available to individuals with limited English proficiency at no cost.

worksource | OREGON

Attachment B

Northwest Oregon Works (NOW)
Procedure for processing discrimination complaints

Any person who believes that he or she or any specific class of individuals has been or is subjected to discrimination prohibited by the nondiscrimination and equal opportunity provisions of the WIOA Title I may file a written complaint. Any person who believes that he or she or any specific class of individuals has been or is being retaliated against for filing a complaint, participating in the investigation, or furnishing information relating to, or assists in, an investigation, may file a complaint.

Discrimination complaints may be filed with NORTHWEST OREGON WORKS (NOW)'s Equal Opportunity Officer or the Civil Rights Center Director.

NORTHWEST OREGON WORKS (NOW)'s Equal Opportunity Officer can be reached at
Katrina Gasser-Sturgeon, *Workforce & Community Development Manager*
Northwest Oregon Works
cell 541-921-4420
katrina@nworegonworks.org

Complaints filed with the Director should be sent to The Director, Civil Rights Center (CRC), US Department of Labor, 200 Constitution Avenue NW, Room N-4123, Washington DC 20210, or electronically as directed on the CRC website at www.dol.gov/crc.

If complaints are filed with NORTHWEST OREGON WORKS (NOW), the complainant must wait either until NORTHWEST OREGON WORKS (NOW) issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center. If NORTHWEST OREGON WORKS (NOW) does not issue a written Notice of Final Action within 90 days of the day on which the complaint is filed, the complainant may file a complaint with CRC before receiving that Notice. However, the complainant must file the CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which the complainant filed the complaint with NORTHWEST OREGON WORKS (NOW)). If NORTHWEST OREGON WORKS (NOW) does issue a written Notice of Final Action, but the claimant is dissatisfied with the decision or resolution, the claimant may file a complaint with CRC. The claimant must file the CRC complaint within 30 days of the date on which the Notice of Final Action was received.

Generally, discrimination complaints must be filed within 180 days of the alleged discrimination or retaliation. The Director may extend the filing time for good cause.

Discrimination complaints must be filed in writing, either electronically or in hard copy, and must contain the following information:

- The complainant's name, mailing address, and if available, email address (or another means of contacting the complainant).
- The identify of the respondent (the individual or entity that the complainant alleges is responsible for the discrimination).
- A description of the complainant's allegations. This description must include enough detail to allow NORTHWEST OREGON WORKS (NOW) or the Director, as applicable, to decide whether:

    - The CRC or NORTHWEST OREGON WORKS (NOW), as applicable, has jurisdiction over the complaint;
    - The complaint was filed in time; and

    - The complaint has apparent merit: in other words, whether the complainant's allegations, if true, would indicate noncompliance with any of the discrimination and equal opportunity provisions of WIOA or 29 CFR Part 38.
- The written or electronic signature of the complainant or the written or electronic signature of the claimant's representative.

Both the complainant and the respondent have the right to be represented by an attorney or another individual of their choice.

When NORTHWEST OREGON WORKS (NOW) receives a discrimination complaint, it will issue a written Notice of Final Action within 90 days of the date on which the discrimination complaint was filed.

When a discrimination complaint is received, NORTHWEST OREGON WORKS (NOW) will issue an initial, written notice to the claimant which contains the following elements:

- An acknowledgement that NORTHWEST OREGON WORKS (NOW) has received the complaint
- Notice that the complainant has the right to be represented in the compliant process;
- Notice of and a copy of the Equal Opportunity is the Law Notice (38.35); and
- Notice that the complainant has the right to request and receive, at no cost, auxiliary aids and services, language assistance services, and that this notice will be translated into the non-English languages as required in 38.4(h), and (i), 38.34, and 38.36.
- A written statement and information listing the issues raised in the complaint, and for each issue, a statement whether or not NORTHWEST OREGON WORKS (NOW) will accept the issue for investigation or reject the issue, and the reason for each rejection.
- Establishment of a period for fact-finding or investigation of the circumstances underlying the complaint, and confirmation that alternative dispute resolution (ADR) opportunities are available.
- Establishment of a time period during which NORTHWEST OREGON WORKS (NOW) attempts to resolve the complaint.
- Confirmation that NORTHWEST OREGON WORKS (NOW) will issue a written Notice of Final Action to the complainant within 90 days of the date on which the complaint was filed.

Resolution may be initiated utilizing alternative dispute resolution (ADR) at any time after the complainant has filed a written discrimination complaint with NORTHWEST OREGON WORKS, but before a Notice of Final Action has been issued. The complainant has the choice whether to use ADR, or the structured, informal resolution process employed by NORTHWEST OREGON WORKS (NOW). A party to the agreement reached under ADR may notify the Director, Civil Rights Center in the event the agreement is breached. In such circumstances, the non-breaching party may notify the Director, Civil Rights Center within 30 days of the date on which the non-breaching party learns of the alleged breach. The Director, Civil Rights Center must evaluate circumstances to determine whether the agreement has been breached. If the Director, Civil Rights Center determines that the agreement has been breached, the complaint will be reinstated and processed in accordance with NORTHWEST OREGON WORKS (NOW)'s procedures. If the parties do not reach agreement under ADR, the complainant may file a complaint with the Director, Civil Rights Center.

If NORTHWEST OREGON WORKS (NOW) determines that it does not have jurisdiction over a discrimination complaint, it will notify the claimant within five business days of making such a determination. The Notice of Lack of Jurisdiction will include a statement of the reasons for the determination and notice that the complainant has a right to file a complaint with the Civil Rights Center within 30 days of the date on which the complainant receives the Notice of Lack of Jurisdiction.

Once NORTHWEST OREGON WORKS (NOW) completes the fact-finding and information gathering related to the discrimination complaint, a written Notice of Final Action will be issued to the complainant. This Notice of Final Action

will be issued within 90 days of the date on which the discrimination complaint was filed. The Notice of Final Action will include:

- For each issue raised in the discrimination complaint, a statement of either:
    - NORTHWEST OREGON WORKS (NOW)'s decision on the issue and an explanation of the reasons underlying the decision; or
    - A description of the way the parties resolved the issue; and
- Notice that the complainant has a right to file a complaint with the Civil Rights Center within 30 days of the date on which the Notice of Final Action is received if the complainant is dissatisfied with NORTHWEST OREGON WORKS (NOW)'s final action on the discrimination complaint.

If NORTHWEST OREGON WORKS (NOW) issues the Notice of Final Action before the 90-day period ends, but the complainant is dissatisfied with NORTHWEST OREGON WORKS (NOW)'s decision on the complaint, the complainant or the complainant's representative may file a complaint with the Director, Civil Rights Center, within 30 days after the date on which the complainant receives the Notice of Final Action.

If NORTHWEST OREGON WORKS (NOW) fails to issue the Notice of Final Action by the end of 90 days from the date on which the complainant filed the complaint, the complainant or the complainant's representative may file a complaint with the Director, Civil Rights Center, within 30 days of the expiration of the 90-day period. In other words, the complaint must be filed with the Director, Civil Rights Center, within 120 days of the date on which the complaint was filed with NORTHWEST OREGON WORKS (NOW).

NORTHWEST OREGON WORKS	**POLICY P06: MONITORING**
	Effective Date: 10/24/2025
	☐ **NEW** ☒ **REVISED**

PURPOSE
The purpose of this policy is to outline guidance regarding monitoring by Northwest Oregon Works (NOW) for subawards creating an assistance agreement with the intention for subrecipients to carry out or achieve a public purpose.

POLICY
Northwest Oregon Works (NOW) will conduct annual monitoring of all subrecipients and contractors to ensure compliance with WIOA requirements and NOW's rules and regulations. This process will include a desk audit and one onsite review at one of our 6 centers. To be rotated annually. A comprehensive report summarizing the results of all subrecipient monitoring will be submitted annually to the Northwest Oregon Works Board.

Northwest Oregon Works (NOW) will notify subrecipients and contractors approximately one month prior to an onsite monitoring visit to confirm the date and time. During this 30-day period, subrecipients and contractors will be asked to complete the monitoring guide. At the same time, NOW will conduct a site audit at one center, reviewing the contract scope of work, budget activity, and participant data.

The onsite monitoring will begin with an entrance conference with the subcontractor/contractor's program administrator and fiscal manager to outline the purpose of the visit and review specific tasks to be completed. A facility tour will evaluate health and safety conditions, accessibility for individuals with disabilities, overall comfort, adequacy of training equipment and materials, and other factors impacting program compliance.

During the visit, reviewers may examine documentation such as administrative records, contract files, financial records, and participant files. Interviews may also be conducted with provider staff, participants, and employers to gather insight into program administration, operations, and the quality and effectiveness of training. The review will assess contractual compliance and identify any areas of non-performance.

At the conclusion of the visit, NOW will hold an exit conference with the program administrator and fiscal manager to discuss preliminary results, outline any required corrective actions, and provide technical assistance as appropriate.

Monitoring Report:
A final monitoring report will be issued within 30 calendar days of the review to Northwest

Oregon Works Board . Subrecipients and contractors will then have 30 days from the exit conversation to respond to or appeal any findings. NOW's Executive Director, will issue a written final decision on any appeal. Corrective action plans may also be issued as a result of monitoring findings, with clear timelines and compliance parameters specified in separate corrective action documents.

REFERENCES

Code of Federal Regulations 29 CFR 683.410 WIOA Sec. 183

NORTHWEST OREGON WORKS	**POLICY P12: YOUTH ELIGIBLITY AND ADDITIONAL ASSISTANCE**
	Effective Date: 10/24/2025
	☐ **NEW** ☒ **REVISED**

PURPOSE

To convey expectations for the enrollment of eligible youth into services funded by WIOA under Title I of the Workforce Innovation and Opportunity Act (WIOA) Section 129.

POLICY

As outlined in WIOA, Oregon Northwest Workforce Investment Board doing business as Northwest Oregon Works (NOW) expects sub-recipients/contractors funded with WIOA resources to make every effort to integrate and align services to eligible youth as part of a broader youth vision to leverage other Federal, state, local, and philanthropic resources to support in-school youth (ISY) and out-of-school youth (OSY). Participants must also comply with Selective Service registration requirements and legal work requirements. Register here: Register : Selective Service System. Eligibility requirements are applied equally to all applicants in a program to avoid discrimination.

NOW investments into youth services are intended to assure that disadvantaged youth are able to become employed and continue along career paths that lead to greater self-sufficiency.

Out-of-School Youth (OSY)

- Sub-recipients/contractors shall use at least 75% of WIOA Title I Youth program resources available after administrative costs have been deducted to serve OSY as defined by WIOA.
- NOW expects that at least 75% of participants enrolled as youth will be enrolled as OSY.
- NOW defines OSY who require "additional assistance" as youth who meet the OSY enrollment criteria, are low income and can benefit from the provision of any of the required 14 youth program elements described at 20 CFR 681.310 in order to enter or complete an educational program or to secure or hold employment. The required program elements include:
    A. tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential;
    B. Alternative secondary school services, or dropout recovery services, as appropriate;

C. Paid and unpaid work experiences that have as a component academic and occupational education, which may include—
    i. Summer employment opportunities and other employment opportunities available throughout school year;
    ii. Pre-apprenticeship programs;
    iii. Internships and job shadowing; and
    iv. On-the-job training opportunities;
D. Occupational skill training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials aligned with in demand industry sectors or occupations in the local area involved, if the local board determines that the programs meet the quality criteria described in section 123;
E. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
F. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;
G. Supportive services;
H. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;
I. Follow-up services for not less than 12 months after the completion of participation, as appropriate;
J. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;
K. Financial literacy education;
L. Entrepreneurial skills training;
M. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
N. Activities that help youth prepare for and transition to postsecondary education and training. (WIOA Sec. 129 (c) (2).

- Sub-recipients/contractors are expected to prioritize OYS identified via WorkSource Centers.

In-School Youth (ISY)

- Sub-recipients/contractors must not expend more than 25 percent of WIOA Title I Youth program resources available after administrative have been deducted to serve ISY as defined by WIOA.
- NOW expects no more than 25% of participants enrolled as youth will be enrolled as ISY.

- NOW defines ISY who require “additional assistance” as youth who meet the ISY enrollment criteria, are low income and can benefit from the provision of any of the required 14 youth program elements described at 20 CFR 681.310 in order to enter or complete an educational program or to secure or hold employment (a complete list of the 14 elements is provided in the OSY section of this policy).

Who does the low-income eligibility requirement apply to? Per CFR 681.250

(b) All ISY must be low-income to meet the ISY eligibility criteria, except those that fall under the low-income exception.

(c) WIOA allows a low-income exception where five percent of all WIOA youth participants may be participants who ordinarily would be required to be low-income for eligibility purposes and who meet all other eligibility criteria for WIOA youth except the low-income criteria. A program must calculate the five percent based on the percent of newly enrolled youth in the local area’s WIOA youth program in a given program year

References
20 CFR 681.310
20 CFR 681.250
WIOA Sec. 129 (c) (2)

NORTHWEST OREGON WORKS	**POLICY P16: RECORDS RETENTION**
	EFFECTIVE DATE: 3/21/2020
	☐ **NEW** **X REVISED**

PURPOSE:
This policy establishes records retention requirements for sub-recipients of WIOA Title I funds to ensure compliance with federal, state, and local guidelines, including the Oregon WIOA Record Retention Schedule.

POLICY:
Northwest Oregon Works (NOW) and its WIOA Title I sub-recipients must maintain complete and accurate records for required timeframes and ensure secure storage and appropriate disposal in accordance with:

- Workforce Innovation and Opportunity Act (WIOA) Section 184
- 2 CFR Part 200 and 2 CFR Part 2900
- Oregon WIOA Record Retention Schedule
- NOW's monitoring and compliance expectations

REQUIREMENTS
Sub-recipients must implement systems and procedures to ensure the following:

1. **General Records Retention**
   All WIOA-related records must be retained for **a minimum of three (3) years** from the latest of the following:
   - Final grant closeout date
   - Final disposition of property
   - End of the program year in which the record was created
   - Date of resolution of any litigation, audit, or claim involving the records
2. **Specific Record Types** :
   Sub-recipients must follow the retention periods by record type, including but not limited to:

   Participant Files (Youth, Adult, Dislocated Worker): 3 years from the end of the program year of exit
   Eligibility Documentation: 3 years from program year closure
   Fiscal and Financial Records: 3 years from grant closeout
   Contracts, MOUs, and Agreements: 3 years from expiration or termination
   Property and Equipment Records: 3 years from final disposition
   Grievances/Complaints: 3 years from date of resolution
   OJT/IWT Contracts: 3 years from program year of contract completion
   Procurement Documentation: 3 years from award or final payment

3. **Indirect Cost Records**
   Retain indirect cost proposals, cost allocation plans, and supporting documentation for three (3) years from the date the indirect cost rate is finalized.
4. **Extended Retention Requirements**
   Records must be retained beyond the standard three years if any litigation, audit, investigation, or claim involving those records is unresolved. Records must be kept until all matters are fully resolved.
5. **Access and Custody**
   - Sub-recipients must allow NOW staff access to all records upon request.
   - In the event a sub-recipient is unable to maintain records, NOW will assume custody and responsibility for maintenance and retention.

Disposal

- Confidential records (e.g., participant files) must be shredded or otherwise securely destroyed.
- Non-confidential records may be recycled. No records may be destroyed without written approval from NOW. Sub-recipients must submit a disposal request, and will receive written authorization, approval, or rejection.

Compliance

- Sub-recipients must describe their records retention and disposal procedures annually in response to NOW's monitoring guide.
- NOW will conduct periodic reviews to ensure records are retained and disposed of according to this policy and the state retention schedule.
- Monitoring procedures will be confirmed by NOW's annual sub-recipient risk assessment.

REFERENCES

WIOA Sec. 116(i), Sec. 184
2 CFR 200.333
2 CFR Parts 200 and 2900

NORTHWEST OREGON WORKS	**POLICY: Basic Skills Deficient**
	Effective Date: 10.24.25
	☒ **Revised**

Purpose

This policy establishes the criteria for determining basic skills deficiency within the Northwest Oregon Works (NOW) region. Its purpose is to clearly outline expectations for identifying, assessing, and documenting basic skills deficiencies when serving youth and adults funded under Title I of the Workforce Innovation and Opportunity Act (WIOA).

Definition

Basic Skills Deficiency is defined as:

A youth or adult with English reading, writing, or computing skills at or below the 8th grade level on a generally accepted, standardized assessment; or

A youth or adult unable to compute or solve problems, or read, write, or speak English at a level necessary to function effectively on the job, within their family, or in society.

All youth and adults seeking services funded under WIOA Title I will be assessed at the point of eligibility determination and enrollment. Adults identified as Basic Skills Deficient will also receive priority of service under WIOA.

Policy

A reliable, valid, and appropriate assessment must be used to determine Basic Skills Deficiency. Staff will select the assessment tool most suitable for the participant's abilities and career goals. Acceptable options include:

- Comprehensive Adult Student Assessment System (CASAS)
- Test of Adult Basic Education (TABE)
- Quick Screen Reading Assessment
- National Career Readiness Certificate (NCRC) less than 3
- Basic Skills Screening Tool
- Recent school documentation (e.g., Individualized Education Program (IEP), Individual Learning Plan, or records showing performance below the 8th grade level)
- Other assessments approved by NOW Program Director

Indicators of Basic Skills Deficiency

In addition to formal assessments, Basic Skills Deficiency may be determined through staff engagement and observation during the enrollment process. Indicators include, but are not limited to:

Enrollment in a Title II Adult Education and Family Literacy Act program (including English as a Second Language).

Limited English proficiency, as observed through difficulty completing forms, service strategies, or participating in group discussions.

Low GPA (at or below "D") documented within the previous six (6) months.

Qualification for Special Education services or possession of an Individual Education Program (IEP).

Inability to achieve a score of 3 or higher on the Initial Skills Review in any category.

Staff make observations of deficient functioning in completing forms, assisting in the development of a service strategy, or behaviors in group discussion settings.

Assessment Administration: Conduct the selected assessment at eligibility determination or use valid results from within the past six months. Document both pre-test and post-test results in iTrac.

Case File Requirements: Place documentation of the assessment (scores, reports, or school documentation) uploaded in participant's file.

Providers can enter a case note describing staff observations when deficiency is identified through engagement.

Co-Enrollment: For participants who are co-enrolled across Oregon workforce areas, NOW will accept Basic Skills Deficient determination from another local workforce area contractor.

REFERENCES

WIOA Section (3)(5)
WIOA Regulation Section 680.600 and 681.290
TEGL 19-16 and TEGL 21-16

NORTHWEST OREGON WORKS	**POLICY: P25 Personal Identifiable Information (PII)**
	Effective Date: 10.24.25
	☒ **NEW**

PERSONALLY IDENTIFIABLE INFORMATION POLICY (PII)

Purpose

As part of grant activities, staff may have access to program participant or staff Personally Identifiable Information (PII). This information is generally found in personnel files, participant data sets, performance reports, program evaluations, grant and contract files, or other sources. Federal law and federal policies require that PII and other sensitive information be secured and protected at all times. All subrecipient's have a PII policy

Affected Parties

This policy applies to all Board staff, contractor staff, grantees, sub-grantees, and any other individuals or groups involved in the handling and protecting of Personally Identifiable Information (PII) for programs serving participants who receive Workforce Innovation and Opportunity Act (WIOA).

Definition of Key Terms

"Personally Identifiable Information" (PII) is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

"Sensitive Information": Any unclassified information whose loss, misuse, or unauthorized access to or modification of could adversely affect the interest or the conduct of Federal programs or the privacy to which individuals are entitled under the Privacy Act.

The Department of Labor has defined two types of PII, "protected PII" and "non-sensitive PII." The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the "risk of harm" that could result from the release of the PII.

1. "Protected PII" is information that if disclosed could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include, but are not limited to, social security numbers (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial information, and computer passwords.

2. "Non-sensitive PII" is information that if disclosed, by itself, could not reasonably be expected to result in personal harm. It is standalone information that is not linked or closely associated with any protected or unprotected PII. Examples of non-sensitive PII

include information such as first and last names, e-mail addresses, business addresses, business telephone numbers, general education credentials, gender, or race. However, depending on the circumstances, a combination of these items could potentially be categorized as protected or sensitive PII. To illustrate the connection between non-sensitive PII and protected PII, the disclosure of a name, business e-mail address, or business address most likely will not result in a high degree of harm to an individual. However, a name linked to a social security number, a date of birth, and mother's maiden name could result in identity theft. This demonstrates why protecting the information of our program participants is so important.

Eligibility Requirements

PII from all participants and potential participants must be protected at all times. There is no eligibility requirement.

Policy

Subrecipient's have a PII policy and subrecipients must recognize and safeguard personally identifiable information (PII) except where disclosure is allowed by prior written approval or by court order. Contractors must have a written policy in compliance with NOW's PII Policy providing safeguards to protect personally identifiable information in compliance with 20 CFR 683.220.
Additional DOL/ETA Guidance can be found in TEGL 39-11 here:
https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2012/TEGL_39_11.pdf

All parties must ensure the privacy of all PII obtained from participants and to protect such information from unauthorized disclosure. All parties must ensure that PII used during their grant has been obtained in conformity with applicable Federal and state laws and policies governing the confidentiality of information. All PII transmitted via e-mail or stored on external drives must be encrypted.

All PII stored onsite must be kept safe from unauthorized individuals at all times and must be managed with appropriate information technology (IT) services. Accessing, processing, and storing of PII data on personally owned equipment at off-site locations (e.g. employee's home, and non-grantee managed IT services, e.g. Yahoo mail, Gmail, etc.) is strictly prohibited.

All parties who will have access to sensitive/confidential/proprietary/private data must be advised of the confidential nature of the information, the safeguards with which they must comply to protect the information, and that they may be liable to civil and criminal sanctions for improper disclosure.

Access to any PII obtained through the grant must be restricted to only those employees of the grant recipient who need it in their official capacity to perform duties in connection with the scope of work in the grant agreement.

All PII data must be processed in a manner that will protect the confidentiality of the records/documents and is designed to prevent unauthorized persons from retrieving such records by computer, remote terminal, or any other means.

Grantees must permit Northwest Oregon Works to make onsite inspections during regular business hours for the purpose of conducting audits and/or conducting other investigations to assure that the grantee is complying with the confidentiality requirements described above. In accordance with this responsibility, grantees must make records applicable to this agreement available to authorized persons for the purpose of inspection, review and/or audit.

Grantees must retain data received Northwest Oregon Works only for the period of time required to use it for assessment and other purposes, or to satisfy applicable Federal and Northwest Oregon Works records retention requirements, if any. Thereafter, the grantee agrees that all data will be destroyed, including deletion of electronic data

Additional Requirements:

1. Before collecting PII or sensitive information from participants, have participants sign releases acknowledging the use of PII for grant purposes only.

2. Whenever possible, use unique identifiers for participant tracking instead of SSNs. While SSNs may initially be required for performance tracking purposes, a unique identifier could be linked to each individual record. Once the SSN is entered for performance tracking, the unique identifier would be used in place of the SSN for tracking purposes. If SSNs are to be used for tracking purposes, they must be stored or displayed in a way that is not attributable to a particular individual, such as using a truncated SSN.

3. Use appropriate methods for destroying sensitive PII in paper files (i.e. shredding) and securely deleting sensitive electronic PII.

4. Do not leave records containing PII open and unattended.

5. Store documents containing PII in locked cabinets when not in use.

6. Immediately report any breach or suspected breach of PII.

REFERENCES

OAR 589-020-0330
TEGL 39-11;20
CFR 683.220; 2
CFR 200.303

MINUTES

NORTHWEST OREGON WORKS
CONSORTIUM BOARD
MEETING

June 30, 2025

Zoom

Consortium Present:
Pamela Wev, Clatsop County Commissioner; **Casey Garrett**, Columbia County Commissioner; **Casey Miller**, Lincoln County Commissioner; **Gabe Shepherd,** Benton County Commissioner; **Paul Fournier**, Tillamook County Commissioner

Staff Present:
Heather DeSart, Executive Director; **Emily Richter;** Accounting Technician; **Jason Swain,** CFO/CCO;

1. **CALL TO ORDER, CONFIRMATION OF POSTING, and ROLL CALL**
   Chair Wev called the Meeting to order at 11:04am.
   Chair Wev asked for confirmation of the public posting of the meeting; Ms. Richter confirmed; Roll Call taken, quorum was established.

2. **REVIEW and APPROVE AGENDA**
   Agenda required zero modifications.
   MOTION: Gabe Shepherd **SECOND: Casey Garrett** **MOTION CARRIED.**

3. **PUBLIC COMMENT SESSION**
   No public comment was made.

4. **CONSENT CALENDAR**
   - Accept Staff's recommendation to approve the Minutes of the April 11, 2025 Consortium Meeting

   MOTION: Casey Garrett **SECOND: Gabe Shepherd** **MOTION CARRIED.**

5. **DISCUSSION and POSSIBLE ACTION – Jason Swain**, NOW CFO/CCO
   Accept the Staff and Board Treasurer's recommendation to approve the forecasted PY2025-26 Annual Budget
   Mr. Swain presented the budget and answered questions around funding and carry-over amounts.

   MOTION: Paul Fournier **SECOND: Casey Garrett** **MOTION CARRIED.**

6. **CHIEF LOCAL ELECTED OFFICIAL REPORT** – Pamela Wev, Chair

Commissioner Wev thanked the Commissioners for taking the time to quickly meet before July 1 so NOW would stay in compliance with having their forecasted budget approved before the new program year.

7. **EXECUTIVE DIRECTOR'S REPORT** – Heather DeSart, NOW Executive Director
   Ms. DeSart thanked the Commissioners as well and let the Consortium know that the WORKing Together conference was coming up in October and being held in Salem. Ms. Richter provided the registration link in the Zoom chat.

8. **CONSORTIUM MEMBER COMMENTS** – Roundtable

9. **SECOND PUBLIC COMMENT SECTION**
   No public comment was made.

10. **ADJOURN**
    Commissioner Wev adjourned the meeting at 11:33 Am.
    The meeting was concluded, and the zoom call was closed and ended.

NOW Annual Budget
Program Year 25-26

Line #		PY24-25 Carry Over	PY25-26 Awarded
	Federal Funding		
1	DOT Workforce Ready Manufacturing	925,000	-
2	DOL Workforce Innovative Opportunity Act (Youth)	133,397	615,427
3	DOL Workforce Innovative Opportunity Act (Adult)	94,536	503,451
4	DOT Future Ready Navigator	587,143	
5	DOL Workforce Innovative Opportunity Act (DW)	46,507	331,331
6	HHS American Rescue Plan P10k	424,240	-
7	DOL/HECC Apprenticeship Expansion	-	400,000
8	DOL Dislocated Worker Disaster Recovery	174,570	-
9	DOL Reentry Employment	97,500	-
10	DOL Rapid Response	-	69,000
11	DOL High Concentration Youth	8,800	-
12	**Total Federal Funding**	2,491,693	1,919,209
	State Funding		
13	HECC Maritime Workforce	-	805,000
14	HECC Oregon Youth Employment	-	601,000
15	HECC Workforce Strategy Board Support	-	352,000
16	ODE Youth Reengagement Opportunity	-	-
17	HECC Work Experience	-	186,343
18	HECC Industry Engagement	-	141,550
19	ODE Youth Development Reengagement	-	-
20	**Total State Funding**	-	2,085,893
	Local/Other Funding		
21	IHN HealthCare Supplement	115,000	393,500
22	Unrestricted	53,500	-
23	**Total Local Funding**	168,500	393,500
24	**Total Funding**	**$2,660,193**	**$ 4,398,602**
			Budgeted Expenses
	Operating Payroll Expenses		
25	Wages		249,298
26	Employee Health Insurance		35,865

27	Payroll Taxes	23,596
28	PTO	25,611
29	Employee Retirement Plan	14,958
30	**Total Operating Payroll Expenses**	349,328
	Operating General Expenses	
31	Travel	25,500
32	Audit & Legal Services	35,500
33	Memberships	26,000
34	Staff Training/Development	8,000
35	Phone & Internet	28,000
36	Professional Services *(Other)*	9,500
37	Processing Fees	14,850
38	Office Lease	1,200
39	Insurance	11,000
40	Supplies/Postage/Meetings	8,400
41	Office Equipment/Software	9,850
42	Depreciation	-
43	**Total Operating General Expenses**	177,800
44	**Total Operating Expenses**	527,128
	Program Payroll Expenses	
45	Wages	624,387
46	Employee Health Insurance	82,576
47	Payroll Taxes	58,988
48	PTO	58,712
49	Employee Retirement Plan	27,727
50	**Total Program Payroll Expenses**	852,390
	Program General Expenses	
51	Outreach Awards/Services	906,661
52	WSO Leases	43,450
53	I-Trac Database	37,000
54	WSO Phone & Internet	19,232
55	WSO Business Services	10,000
56	Outreach Professional Services	7,000
57	**Total Program General Expenses**	1,023,343
	Program Subrecipient Expenses	
58	Workforce Innovation Opportunity Act	1,110,000
59	Workforce Ready Manufacturing	730,925
60	Future Ready Oregon P10K	356,000
61	Workfoce Navigator Benefits	249,000
62	Quest Dislocated Worker	148,000

63	Reentry Employment Funds	89,500
64	Work Experience	77,800
65	WIOA Maritime	40,000
66	WIOA One Stop Operator	25,000
67	High Concentration Youth	8,800
68	**Total Subrecipient Expenses**	2,835,025
69	**Total Program Expenses**	4,710,758
70	**TOTAL EXPENSES**	**$ 5,237,886**
71	***NET FUNDING & EXPENSES***	

ram Year 25-26		
ADJ	**Total Funding**	**%**
(5,502)	919,498	12.3%
(1,425)	747,399	10.0%
(2,522)	595,465	8.0%
(15,585)	571,558	7.7%
112,541	490,379	6.6%
17,066	441,306	5.9%
-	400,000	5.4%
(18,564)	156,006	2.1%
(1,469)	96,031	1.3%
-	69,000	0.9%
18	8,818	0.1%
84,558	**4,495,460**	60%
70,852	875,852	11.8%
(974)	600,026	8.1%
24,296	376,296	5.1%
300,000	300,000	4.0%
12,637	198,980	2.7%
9,640	151,190	2.0%
100,000	100,000	1.3%
516,451	**2,602,344**	35%
(213,811)	294,689	4.0%
230	53,730	0.7%
(213,811)	**348,419**	5%
$ 387,198	**$ 7,446,223**	100%

ADJ	**Total Expenses**	**%**
(51,762)	197,536	3.5%
(8,901)	26,964	0.5%

(4,899)	18,697	0.3%
(7,151)	18,460	0.3%
(3,106)	11,852	0.2%
(75,819)	**273,509**	4.9%

-	25,500	0.5%
-	35,500	0.6%
-	26,000	0.5%
-	8,000	0.1%
-	28,000	0.5%
-	9,500	0.2%
-	14,850	0.3%
-	1,200	0.0%
-	11,000	0.2%
-	8,400	0.2%
-	9,850	0.2%
-	-	0.0%
-	**177,800**	3%

(75,819)	**451,309**	**8%**

(54,168)	570,219	10.2%
(8,901)	73,675	1.3%
(5,127)	53,861	1.0%
(8,157)	50,555	0.9%
(3,250)	24,477	0.4%
(79,603)	**772,787**	14%

458,258	1,364,919	24.4%
(151)	43,299	0.8%
-	37,000	0.7%
(84)	19,148	0.3%
-	10,000	0.2%
-	7,000	0.1%
458,023	**1,481,366**	27%

50,000	1,160,000	20.8%
(5,136)	725,789	13.0%
-	356,000	6.4%
-	249,000	4.5%
-	148,000	2.6%

238	89,738	1.6%
3,741	81,541	1.5%
-	40,000	0.7%
-	25,000	0.4%
18	8,818	0.2%
48,861	**2,883,886**	52%
427,281	**5,138,039**	**92%**
$ 351,462	**$ 5,589,348**	
	$ 1,856,875	

DEPARTMENT OF LABOR FUNDS (DOL)

WORKFORCE INNOVATION OPPORTUNITY ACT (WIOA)

- WIOA ADMIN funds are used for NOW's internal operational costs.

- WIOA ADULT funds are used for OJT's (On-the Job-Training), ITA's (Individual Training Accounts), and Work Experience for adults aged 18 and up.

- WIOA YOUTH funds are used for career exploration, pre-employment training, re-engagement in education, comprehensive guidance and counseling, financial literacy, job search assistance, follow-up services, support services, tutoring, occupations skills training, contextualized education, leadership development, adult mentoring, work experience (summer employment opportunities, pre-apprenticeship programs, internships, job shadowing, and on-the-job training opportunities) for youth aged 16-24 (out-of-school youth) and 16-21 (in-school-youth) with a minimum of 75% of youth participants meeting out-of-school eligibility requirements.

- WIOA DISLOCATED WORKER (DW) funds are used for OJT's (On-the-Job Training), ITA's (Individual Training Accounts), and Work Experience for dislocated workers, aged 18 or older and meeting one of the following criteria:

    - General dislocation
    - Dislocation from facility closure/substantial layoff
    - Self-employed dislocation
    - Displaced homemaker
    - Dislocated separating military service members
    - Spouses of military service members

- WIOA HIGH CONCENTRATION OF YOUTH FUNDS (HCY) funds are used to provide additional assistance to local areas that have high concentrations of eligible youth.

- WIOA RAPID RESPONSE FUNDS (RR) in Oregon provide immediate assistance to workers and employers during layoffs or business closures, helping mitigate the impact on employees. This program offers services such as job search assistance, retraining, and access to unemployment benefits, while supporting businesses in managing workforce transitions effectively.

- WIOA DISLOCATED WORKER GRANT - QUEST FUNDS (DWG) support disaster recovery efforts by providing targeted workforce training and employment services in areas affected by natural disasters. These funds help individuals gain new skills, find employment opportunities, and assist in rebuilding efforts, fostering both economic recovery and community resilience.

- REENTRY EMPLOYMENT FUNDS provide support to individuals transitioning from incarceration back into the community, helping them overcome barriers to employment and reintegration. The program offers job training, education, and support services, promoting successful reentry and reducing recidivism through stable employment and personal development opportunities.

DEPARTMENT OF TREASURY (DOT)

- WORKFORCE NAVIGATOR BENEFITS funds support the creation of workforce "navigators" who help job seekers and businesses access workforce development services. These navigators assist individuals in overcoming barriers to employment by connecting them with training, education, and support resources, while also helping employers find and retain skilled workers.

- PROSPERITY 10K funds provide financial support to communities recovering from the economic impacts of the pandemic. These funds are used to address public health needs, support small businesses, invest in workforce development, and improve infrastructure to promote long-term economic recovery and resilience.

- WORKFORCE READY (Manufacturing) funds provide financial support to expand training programs in manufacturing with a focus on underserved communities. Connecting individuals, particularly those facing barriers, with education and training opportunities increasing access to high-quality apprenticeships.

HIGHER EDUCATION CORRDINATING COMMISSION (HECC)

- BOARD SUPPORT WORKFORCE STRATEGIES (WFS) funds are used to provide financial resources to the grantee to assist with the general costs of running a Local Workforce Development Board (LWDB).

- INDUSTRY ENGAGEMENT (IE) funds support workforce development by fostering partnerships between businesses, education providers, and workforce organizations. These funds aim to address skill gaps and meet the evolving needs of industries by investing in training and upskilling workers to align with employer demand.

- WORK EXPERIENCE (WEX) funds provide individuals with short-term, practical job placements to help them gain hands-on experience and develop essential workplace skills. This program connects participants with employers, giving them the opportunity to build a strong work history and improve their chances of securing long-term employment.

- MARITIME WORKFORCE funds are dedicated to supporting the growth and sustainability of the maritime industry by addressing workforce needs. These funds focus on training and upskilling workers to meet industry demands, promoting career opportunities, and ensuring the long-term viability of Oregon’s maritime sector.

- OREGON YOUTH EMPLOYMENT PROGRAM (OYEP) funds provide young people with meaningful work experience, skills training, and career exploration opportunities. This program focuses on preparing youth for the workforce by connecting them with local employers, fostering job readiness, and supporting long-term career development.

- UNRESTRICTED GENERAL funds are used to cover other NOW internal operating costs without program or timing restrictions.

OREGON DEPARTMENT OF EDUCATION (ODE)

- YOUTH DEVELOPMENT OPPORTUNITY funds support youth in continuing education/career journeys providing wraparound support for basic and educational needs with a focus on incentives for GED test completions, tuition costs for transitioning students from GED or high school education.

- YOUTH DEVELOPMENT REENGAGEMENT funds provide financial support to individuals seeking to transition into new careers or industries, particularly in high-demand fields. This grant helps cover the cost of education, training, and certifications, empowering individuals to gain the skills needed for sustainable, long-term employment.

INTERCOMMUNITY HEALTH NETWORK (IHN)

- Focuses on integrating behavioral health services with healthcare to provide comprehensive support for individuals facing mental health and substance use challenges. This program enhances access to coordinated care, connecting people with the resources they need to achieve overall well-being and improve their quality of life.