

**RETREAT
AGENDA**

June 29, 2023 • 12:00 – 4:00
Clover Park Technical College
4500 Steilacoom Blvd., Building 3 Rotunda

Lunch & Introductions	12:00 – 12:10
State of the Workforce - Josh Stovall	12:10 – 12:30
Pierce County Workforce Vision - County Upskill-Reskill Report	12:30 – 12:40
Good Jobs, Great Cities – Mayor Woodards, Blaine Wolfe, Nathe Lawver - Earn and Learn	12:40 – 12:50
Pierce County Common Referral System – Penni Belcher, United Way	12:50 – 1:10
Recruitment & Retention Roundtable – Board	1:10-1:30
WDB Governance: 20 mins • April 2023 minutes (vote) • Program Year 2023 Budget (vote) • Extend site certifications – Dave and Dona	1:30-1:50
BREAK	1:50-2:00
Palmer Pathways Impact – Jonathan Jackson, Palmer Scholars	2:00 – 2:30
WorkForce Central Staff Roles – WFC Staff	2:30 – 3:00
WDB Business • Governance Structure & Bylaws • Board terms and roles • PY22 WIOA Management Letter	3:00-3:30
Good of the Order	3:30-4:00

Attachments

- April 2023 Minutes
- PY23/FY24 Budget
- Bylaws
- WIOA Management Letter

MINUTES

April 13, 2023 • 3:00 – 4:30
Virtual via Zoom

Attendees: April Lynne, Dale King, Patty Rose, Taliesha Garrett, Bruce Kendall, Norton Sweet, Nathe Lawver, Jolita Perez, Robin Baker, Dave Shaw, Lynn Strickland, Rachael Pease, Dona Ponepinto, Irene Reyes, Jenna Pollock

Staff: Katie Condit, Jan Adams, Karen Downing, Steve Grimstad, Deborah Howell, Tamar Jackson

Guests: Efran Davis

- **Welcome**

April called the meeting to order at 3:03 p.m. Efran Davis introduced himself and let us know what he does.

- **Public Comment**

None.

- **Consent Agenda (Board Vote)**

- **February 2023 Minutes**

- **Finance Report February 2023**

Motion to approve the Consent Agenda made by Nathe; seconded by Dale. Approved.

- **Reporting Incidents of Fraud, Program Abuse, and Criminal Misconduct Policy – Karen Downing**

Karen gave a reminder of who she is and her role at work for Central as the Senior Director of Contracts and Compliance, noting her primary responsibility is to ensure that WorkForce Central and all that those we contract with remain in compliance with rules and regulations. And as a part of that, because we are federally funded, we are monitored by the government. Part of their monitoring of us is to ensure our policies are also up to date and that we are sharing them appropriately within the system. As our governance board, it is important to keep apprised of our policies. Karen introduced Reporting Incidents of Fraud Program Abuse and Criminal Activity Policy. The policy is important as it relates to our Workforce Innovation Opportunity Act (WIOA). She noted that anytime an individual suspects that those funds are being abused, there is a process to report those allegations, and those processes are spelled out in this policy. It's important to know that any individual who does report an allegation remains anonymous. If you do suspect any alleged fraud or misconduct, you fill out the Incident Reporting form found via a link within the policy. Once filled out, you submit the form to the Department of Labor's Office of Inspector General (OIG) and the Washington State Employment Security Department (ESD). Their contact information is embedded in this policy as well. Really important to know is that if there are any situations involving the imminent health or safety of individuals or the loss of over \$50,000, that is considered an emergency and must be reported immediately. The policy provides some descriptions of different categories of alleged misconduct that you would use this incident reporting form for, such as fraud, misapplication of funds, gross mismanagement, employee or participant misconduct, or any other concerns you might have. Once the OIG receives this allegation, they then determine if it has merit, and if so, they will follow it with an investigation or an audit. If they don't find that the allegation has merit, they will refer it to the Department of Labor's Employment and Training Administration for resolution. No questions were posed.

- **Budget Draft & Progress – Steve Grimstad**

April reminded everyone of our budgeting process, and there will be a new budget to approve at the June meeting. Steve has been providing drafts throughout the spring to ensure there is ample time for board input.

Steve explained the three documents in the packet, which are related to the first draft of the budget, a narrative page that speaks to some of the significant line items, the first draft of the budget compared to the program year 2022 approved budget, and the first draft of the budget. He shared that while this is the first draft, staff will continue to meet periodically,

review strategies and investment areas, and prioritize final plans. Overall, the budget will be approximately \$1.2 million less, primarily related to our projected carry-in of our WIOA annual formula funds. Those funds are awarded on an annual basis, but we have two years to expend those funds. Steve highlighted a couple of lines under system and internal professional development, noting we are making an investment in a couple of conferences, our first ever WorkSource Partnership Conference getting together all system partners, and also Community Engagement will be hosting the Lens Of Equity Conference.

Katie did a quick walk-through for newer board members who are less familiar with our funding. She noted we are funded primarily by the Department of Labor federal funds. Investment areas, those direct services WIOA annual formula contracts, and other funding contracts all go into our system providers who do direct service for job seekers like job coaching - Career Team is the bulk of those funds.

Patty asked if we were fully staffed. Katie explained that she is so proud of the culture on our team that we have had relatively little turnover over the last three years. She explained we are possibly looking at adding an additional Data Analyst next year.

- **Formula Funding Overview – Katie Condit**

Katie shared the flow of funds, noting that most of our funding comes from the US Department of Labor (DOL), through ESD to the local workforce development boards. We allocate the funds to several areas, including the One-Stop Center, Service Providers, and Business Solutions. Katie discussed the three areas we fund, including Job Seeker Solutions, Business Solutions and Regional Alignment. She noted we are required by DOL to contract out the Job Seeker Solutions. The Business Solutions is provided in-house as well as the Regional Alignment. Katie discussed the difference between WorkForce Central and WorkSource Pierce. She explained that WorkSource Pierce is not an organization but a network and a brand. Bruce thanked Katie for the explanation and asked what our answer is when asked who we work for. Katie clarified that we work for the Workforce Development Board of Pierce County. She noted we are currently revising the interlocal agreement to clarify whom we work for.

- **Behavioral Health Workforce Consortium – Katie Condit & Board**

Katie noted that this is an opportunity for you all to provide feedback. We've been convening a group of 15 to 20 behavioral, mental health provider partners in the region for over a year because it's difficult to find workers in that field as in many fields and it's really hard for the community members who are seeking mental health services to find people to help them. We were asked to play that regional alignment role to pull together these behavioral health providers. So that group crafted a plan over the last year, not knowing that the county was going to put out a \$28 million RFP in the last couple weeks to support behavioral health for the opportunity to create a sector strategy essentially around behavioral health workforce so that we can have an aligned strategy. So, over the next couple of years, if we are funded, we'll be able to bring on an expert to facilitate and be the backbone of that sector table and strategy work. Katie then asked for feedback or insight so we could be as informed as possible moving forward. Board members shared their experiences and suggestions. Katie asked the board members to reach out with thoughts, ideas, or questions as we move forward in this and noted we will obviously keep everyone posted.

- **Lens of Equity Summit – Tamar Jackson**

Tamar explained that the summit was created almost three years ago now by the Pierce County Community Engagement Task Force to be able to sit and talk. It started as a miniseries because we didn't know what to do. We knew that our community was going through a lot of hurt with the George Floyd incident, and we all got to see that. But then we started to talk about DEI, diversity, equity, and inclusion. I recognized with our team that it's really a watered-down way to sit and say that we need to change as human beings. The summit is really just promoting transparent conversation around diversity, equity, access, and inclusion. Through these discussions, we aim to elevate the understanding of how organizations and our communities can build the framework to truly implement equitable work in our region. The Lens of Equity Summit is for us to be people together. It's going to be a hard day, but we are going to celebrate at the end. But we will all work out to be better people. The Lens of Equity Summit is. May 18th, McGavick Center from 8:00 to 5:00. Again, this is powered by Workforce Central. It was put together by the Pierce County Community Engagement Task Force, which is built by the community and for the community, but it is the outreach arm of this Workforce Development Board. Tamar noted the summit sold out in two weeks, and we have a wait list of about 70 people.

- **NAWB Takeaways – Board Members**

April and other board members shared their experiences from the 2023 NAWB Forum held in Washington DC on March 25-28th.

- **Good of the Order & Adjourn**

Katie shared that the Washington Workforce Association will be having their annual conference sometime in November and this year will be held in Tacoma. She explained it is a local version of the NAWB Forum and encouraged everyone to attend. She will send out an invite when the dates have been confirmed.

Motion to adjourn made by Nathe; seconded by Dave. The meeting was adjourned at 4:10 p.m.

WorkForce Central Program Year 2023/Fiscal Year 2024 BUDGET

- The June meeting packet includes a comparison of the Program Year 2023 budget to the Program Year 2022 budget approved by the Workforce Development Board and Executive Board and the Program Year 2023 budget. The comparison of the Program Year 2023 budget to the Program Year 2022 approved budget includes a column for “Projected Expenditures to June 30, 2023”.
- This is the third version of the Program Year 2023 budget with previous versions provided for review and feedback in April and May.
- The Program Year 2023 budget presents an overall decrease of approximately \$921,000 compared to the Program Year 2022 approved budget.
- The Program Year 2023 budget is presented assuming an increase in Workforce Innovation and Opportunity Act (WIOA) annual formula funding of approximately \$413,000 from the prior program year. This increase is based on the Program Year 2023/Fiscal Year 2024 WIOA annual formula allocations and other communications received from the Employment Security Department.
- The Program Year 2023 budget reflects a decrease of approximately \$2,076,000 in projected carry in of WIOA annual formula funding awarded in the current year available to expend in the next program year.
- Other funding represents funding awarded or expected to be awarded that will continue into the next program year. Other funding primarily includes Economic Security for All, Disaster Recovery National Dislocated Worker Grant, funding from Pierce County for the Stabilization Training and Employment Program, cohorts, and Behavioral Health, and funding from City of Tacoma for cohorts and healthcare career mapping tool.
- WorkForce Central staff for Business Solutions budgeted at 6 FTEs in Program Year 2023, no increase in FTEs from the Program Year 2022 budget.
- Investment in common referral system to fund an additional workforce system navigator utilizing Disaster Recovery National Dislocated Worker Grant funding.
- Other investments due to evaluation of priorities, staff capacity, and strategic initiatives currently planned for Program Year 2023. Prioritized investing in and maintaining initiatives with direct impact for job seekers and businesses.
- WorkForce Central staff (not including Business Solutions) budgeted for Program Year 2023 at 21 FTEs compared to 21.5 FTEs budgeted in Program Year 2022.
 - a. Current WFC staff at 21.5 FTEs that include all WorkForce Central management, fiscal, and program staff.
 - b. A management staff member plans to retire during the year, management currently does not plan to hire a replacement for this position.
 - c. Management currently has no plans to hire additional staff in Program Year 2023, plan to utilize current WorkForce Central staff to support strategic initiatives and to continue to move work forward.
- Reserve represents WIOA annual formula funding available for Program Year 2023 that will be used to maintain services such as when a continuing resolution is delayed, there is a government shutdown, or there is a delay in the awarding of Program Year 2024 WIOA annual formula funding. This allows for a period of time for continuation of services while the budget is negotiated and finalized. The reserve can also be used to leverage WIOA formula funding as other funding opportunities or initiatives come up during Program Year 2023.

- WorkForce Central has accumulated unencumbered cash reserves from prior years due to performance-based contracts that allowed for revenues that exceeded actual costs. These funds are used for unexpected expenses such as litigation fees, unexpected invoices from previous funding sources that have closed, or other unanticipated occurrences that require payment to reconcile.

WorkForce Central
Program Year 2023 Proposed Budget vs.
Approved Program Year 2022 Budget

Budget Line Item	Proposed PY23 Budget	Approved PY22 Budget	Difference	Projected Expenditures to June 30, 2023
Revenue:				
WIOA Annual Formula Funding	6,888,871	6,476,056	412,815	
Projected Carry-In WIOA Annual Formula Funds	3,002,996	5,078,599	(2,075,603)	
Other Funding	3,754,800	3,012,600	742,200	
Total Funds Available	<u>13,646,667</u>	<u>14,567,255</u>	<u>(920,588)</u>	<u>12,127,720</u>
Investment Areas:				
Jobseeker Solutions:				
Projected Carry-In Obligation	523,500	608,335	(84,835)	150,263
Direct Services - WIOA Annual Formula Contracts	3,024,900	3,930,000	(905,100)	3,681,236
Direct Services - Other Funding Contracts	2,037,913	2,134,060	(96,147)	2,292,767
Business Solutions:				
Business Solutions WorkForce Central Staff	828,723	780,228	48,495	785,555
Industry Cohort Trainings	1,066,830	1,860,250	(793,420)	737,308
Employer Reskill Upskill Fund	100,000	100,000	-	39,139
Job Fairs and Events	50,000	50,000	-	45,000
Pierce County Behavioral Health	239,000	-	239,000	-
Regional Alignment:				
System and Internal Professional Development	85,000	118,000	(33,000)	118,000
Common Referral System	215,500	197,750	17,750	91,041
Pierce WorkSource One-Stop Center	328,700	321,075	7,625	265,823
Workforce System Connection Site	45,000	50,000	(5,000)	38,700
Community Engagement	42,500	25,000	17,500	25,000
Service Delivery via Technology	194,000	199,500	(5,500)	187,100
Communications	62,500	61,000	1,500	54,000
Data and Research	31,500	55,500	(24,000)	39,800
Total Investments	<u>8,875,566</u>	<u>10,490,698</u>	<u>(1,615,132)</u>	<u>8,550,731</u>
WorkForce Central Staff	3,045,705	3,085,921	(40,216)	3,106,989
WorkForce Central Operational Expenses	522,000	530,000	(8,000)	470,000
Reserve	1,203,396	460,636	742,760	-
Total Budget Need	<u>13,646,667</u>	<u>14,567,255</u>	<u>(920,588)</u>	<u>12,127,720</u>
Surplus/(Deficit)	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>

Notes:

Certain amounts in the Approved PY22 Budget column have been reclassified to be consistent with the presentation in the proposed PY23 Budget. These reclassifications had no effect on the amount of Total Funds Available or Total Budget Need presented in the approved PY22 budget.

**WorkForce Central
Program Year 2023 Other Funding**

Funding Awarded or Expected to be Awarded:

Description	Amount
Economic Security for All	1,558,000
QUEST Disaster Recovery National Dislocated Worker Grant	1,191,200
Pierce County Reskill-Upskill Initiative	255,700
Pierce County Stabilization Training and Employment Program	204,400
Pierce County Behavioral Health	375,400
City of Tacoma	148,600
Community Engagement	21,500
 Total Other Funding	 <u>3,754,800</u>

Other Pending Funding in Progress:

Description	Amount
Employment and Training Administration Building Pathways to Infrastructure Jobs H1B Grant Program	1,750,000
Pierce County Reskill-Upskill Initiative	950,000
Department of Commerce Community Reinvestment	1,000,000
 Total Other Pending Funding in Progress	 <u>3,700,000</u>

		ADULT	DW	YOUTH	OTHER FUNDING	ADMIN	Total
REVENUE							
WIOA Annual Formula Funding		\$ 2,076,234	\$ 2,039,655	\$ 2,084,096		\$ 688,886	\$ 6,888,871
Projected PY22/FY23 WIOA Annual Formula Carry-in Funds		\$ 1,137,929	\$ 895,347	\$ 664,985		\$ 304,735	\$ 3,002,996
Other Funding					\$ 3,754,800	\$ -	\$ 3,754,800
Total Funds Available		\$ 3,214,163	\$ 2,935,002	\$ 2,749,081	\$ 3,754,800	\$ 993,621	\$ 13,646,667
INVESTMENT AREAS							
Job Seeker Solutions							
PY22/FY23 Carry-in Obligations - Projected (Detail Below)		\$ 185,000	\$ 126,500	\$ 212,000		-	\$ 523,500
Direct Services:							
WIOA Adult Annual Formula		\$ 1,136,500					\$ 1,136,500
WIOA Dislocated Worker Annual Formula			\$ 879,400				\$ 879,400
WIOA Youth Annual Formula				\$ 1,009,000			\$ 1,009,000
Economic Security for All					\$ 1,197,913		\$ 1,197,913
QUEST Disaster Recovery National Dislocated Worker Grant					\$ 840,000		\$ 840,000
Business Solutions							
WorkForce Central Staff	6 FTEs	\$ 218,921	\$ 242,740	\$ 152,694	\$ 214,367		\$ 828,723
Industry Cohort Trainings		\$ 307,988	\$ 231,111	\$ 59,431	\$ 468,300		\$ 1,066,830
Employer Reskill Upskill Fund		\$ 50,000	\$ 50,000	\$ -			\$ 100,000
Job Fairs and Events		\$ -	\$ -	\$ 50,000			\$ 50,000
Pierce County Behavioral Health		\$ -	\$ -	\$ -	\$ 239,000		\$ 239,000
Regional Alignment							
System and Internal Professional Development		\$ 28,188	\$ 31,006	\$ 25,806			\$ 85,000
Common Referral System		\$ 41,619	\$ 45,780	\$ 38,102	\$ 90,000		\$ 215,500
Pierce WorkSource One-Stop Center		\$ 93,893	\$ 101,412	\$ 72,395	\$ 61,000		\$ 328,700
Workforce System Connection Site		\$ 14,923	\$ 16,415	\$ 13,662			\$ 45,000
Community Engagement		\$ 6,964	\$ 7,660	\$ 6,376	\$ 21,500		\$ 42,500
Service Delivery via Technology		\$ 64,335	\$ 70,767	\$ 58,898			\$ 194,000
Communications		\$ 12,436	\$ 13,679	\$ 11,385	\$ 25,000		\$ 62,500
Data and Research		\$ 10,446	\$ 11,491	\$ 9,563			\$ 31,500
WorkForce Central Staff (not including Business Solutions)	21 FTEs	\$ 636,735	\$ 698,472	\$ 630,656	\$ 501,811	578,032	\$ 3,045,705
WorkForce Central Operational Expenses		\$ 94,754	\$ 102,635	\$ 86,480	\$ 95,908	\$ 142,223	\$ 522,000
Reserve		\$ 311,461	\$ 305,933	\$ 312,634	\$ -	\$ 273,367	\$ 1,203,396
Total Budget Need		\$ 3,214,163	\$ 2,935,002	\$ 2,749,081	\$ 3,754,800	\$ 993,621	\$ 13,646,667

DETAIL CARRY-IN OBLIGATIONS - PROJECTED

Career Team PY22 WIOA Youth Annual Formula	-	-	161,000	161,000
Palmer Scholars PY22 WIOA Youth Annual Formula	-	-	51,000	51,000
Career Team PY22 WIOA Adult Annual Formula	185,000	-	-	185,000
Career Team PY22 WIOA Dislocated Worker Annual Formula	-	126,500	-	126,500
TOTAL	185,000	126,500	212,000	523,500

June 9, 2023

Katie Condit, Chief Executive Officer
WorkForce Central
3640 South Cedar Street, Suite E
Tacoma, WA 98409

RE: PY22 WIOA Management Letter

Dear Katie Condit:

Employment Security Department's Workforce Monitoring Unit (ESD's Monitoring Unit) completed the compliance review of WorkForce Central, regarding the oversight and administration of the Workforce Innovation and Opportunity Act (WIOA) for Federal Program Year 2022 (PY22). The purpose of this letter is to describe the scope of the review and communicate any findings, items to address, or questioned or disallowed costs, if applicable, in the administrative/fiscal and programmatic operations WorkForce Central.

The review included the following:

WIOA Title I Formula Program Review

WIOA Program Policies

- Eligibility Guidelines and Documentation Requirements (ESD Policy 1019, Rev. 6)
- Supportive Services and Needs-Related Payments (ESD Policy 5602, Rev. 3)
- All other policies and/or procedures, memos, technical assistance guides, etc., developed for the implementation of your WIOA formula and/or discretionary grants edited or published since the last state review

WIOA Adult and Program

- Eligibility
- Priority of Service
- All Direct Participant Costs
- MIS/ETO-Data Element Validation

WIOA Dislocated Worker Program

- Eligibility
- Program Enrollment
- Basic and Individualized Services
- All Direct Participant Costs
- Training Services
- Outcomes
- Program Completion

- Follow-up Services
- Self-Attestation
- MIS/ETO- Data Element Validation
- Case Notes
- TAA/DW Co-enrollment

WIOA Youth Program

- Eligibility
- All Direct Participant Costs
- MIS/ETO-Data Element Validation

Statewide Discretionary Contracts Program Review

Federal and State Economic Security for All (EcSA)

- Eligibility
- Program Enrollment
- Basic and Individualized Services
- All Direct Participant Costs
- Training Services
- Outcomes
- Program Completion
- Follow-up Services
- Self-Attestation
- MIS/ETO
- Case Notes

WIOA Title I Formula Administrative and Fiscal Review

- Design and governance of the LWDB including sunshine provisions
- MOU/IFA
- Policies/Procedures
- Administrative controls and monitoring (Subrecipient/Contractor and Pass-Through Entity)
- Internal controls
- Cash and financial management
- Procurements & Contracts including One-Stop Operator, if applicable
- Cost allocation plan or rate
- Single audit
- Personnel
- Grievance and complaint
- Incumbent Worker, if applicable

Statewide Discretionary Contracts Administrative and Fiscal Review

Federal and State Economic Security for All; COVID-19 Disaster Recovery Dislocated Worker Grant, and COVID-19 Employment Recovery Dislocated Worker Grant.


- Cash and financial management
- Administrative controls (Sub-recipient monitoring)
- Procurements & Contracts
- Personnel Activity Reports and Cost Allocation

If applicable, the monitoring review included any elements from the PY21 monitoring cycle identified in your PY21 Daily Observation Reports required to be included in your next round of monitoring.

There was one finding but no questioned or disallowed costs. The items to address that were identified during the review are listed below with their status.

On behalf of ESD's Monitoring Unit, I would like to thank you and your staff for the courtesy you showed us during our review. Please let me know if you have any questions.

Sincerely,



Greg Ferland
Director, Workforce Monitoring

cc: Dan Zeitlin, Director of Employment System Policy and Integrity, Employment Security Department

WIOA Program Policies Review

Support Services Policy

Items to Address

Policy P-1003, Revision 7, lacks clarity for the purchase of junk food which could lead to an inconsistent application of the local policy. TEGL 09-22 requires consistent application of standards when providing supportive services.

“Local areas should have written policies and procedures in place for purchasing and distributing food to ensure consistent treatment of these types of expenses.”

Specifically, the current local policy allows “junk food” to be purchased for Youth participants as a supportive service if the purchase does not consist of “mainly” junk food. The lack of definition as to the term “mainly” as well as what constitutes “junk food” leaves it to the discretion of the case manager to determine what is an allowable purchase and could lead to inconsistent treatment across participants.

Actions Required

1. WorkForce Central must update their Policy P-1003, Revision 7, to eliminate ambiguity and ensure consistent treatment of expenses for the purchase of food for participants.
2. WorkForce Central will provide the ESD Monitoring unit with the updated policy by 5/31/2023.
3. WorkForce Central will notify their service providers of the updated policy and provide documentation of this to the ESD Monitoring unit by 5/31/2023.

WorkForce Central Response

On 5/4/2023, Karen Downing emailed:

"Good morning, Greg and Team, please find attached WFC's revised Supportive Service policy and the email communicating the updated policy and reason for the policy revision delivered to Career Team and Palmer Scholar staff this morning. This corrective action was due to you by 5/31/23. Crossing this first one off my list. Thank you again for your valuable feedback. It was very much appreciated."

Status – Resolved

No additional actions required.

WIOA Adult Program Review

MIS

Items to Address

Five (5) of ten (10) records reviewed had services entered in ETO beyond the allowable timeframes.

Actions Required

1. WorkForce Central will provide the ESD Monitoring unit with a plan by 5/31/2023 on how they will ensure their subrecipients are entering timely, accurate data in ETO.
2. WorkForce Central must include this element in their ongoing monthly monitoring.
3. During the PY23 monitoring review, WorkForce Central will provide the ESD monitoring unit with documentation of their review outcomes, including any additional corrective actions, of their subrecipients, if applicable.

WorkForce Central Response

On 5/31/2023, Karen Downing emailed:

"WFC CAP: Career Team is an experienced WIOA Title I provider of Adult services and has been WFC's Adult provider for 5 years. This is the first-year late services have been identified as an issue in ESD monitoring. After ESD brought this to our attention, we reassessed Career Team's timeliness of ETO service entries and recognized a drop from a high of 98% of timeliness at the beginning of the program year (July 1, 2022) to 91% of services recorded within 7-days as of January 2023. WFC determines a percentage below 95% requires corrective action. WFC addressed the issue of late service entries with Kendall King, Career Team's Exec Director on 4/12/23 and asked Career Team to provide us with an action plan that describes how they will ensure services are recorded within 7-days. CT provided WFC with the following action plan: CT CAP: Over the course of Q2 and Q3 during PY22, CT did experience a decline in timeliness in ETO entries. This was largely due to turn over experienced, and the time needed to onboard and train qualified candidates. Going forward, during periods of staff transition, CT will prioritize not only continuation of quality participant service, but emphasis on documenting service in real time. To support the team on an ongoing basis, we have also reintroduced the Late Services Report, which will be shared and reviewed on a monthly basis. WFC's monitoring of real-time ETO data entry (within 7-day policy) is documented on the Adult Expenditure/Invoice Review template and on a Monthly Observation Report (MOR). On a monthly basis, using the ETO Local Reporter Report, we identify how many services are recorded in ETO from the start of the program year (July 1st) to the date of the ETO review. We divide the number of timely services by the total of services recorded in ETO and determine the percentage of records recorded within our 7-day policy. WFC has now determined that if the percentage of timely data entry across all services recorded in ETO from the beginning of the program year to the date of the review remains 95% or above there are no issues with the provider complying with our 7-day policy. If the percentage falls below 95%, we will now require an action plan from the provider, which is also documented on the Adult Expenditure/Invoice Review template, MOR, and through email communications. We will continue to provide real time technical assistance if we observe concerns in the integrity of data recorded in ETO and ensure the provider is implementing corrective action if required. Failure to improve timeliness or accuracy of data in ETO may lead to increased monitoring, increased corrective actions, renegotiation of the provider's contract or termination."

Status-Plan Received; Ongoing actions required.

WIOA Dislocated Worker Program Review

MIS

Items to Address

Five (5) of ten (10) records reviewed had inaccurately recorded data and services.

Actions Required

1. WorkForce Central will provide the ESD Monitoring unit with a plan by 5/31/2023 on how they will ensure their subrecipients are entering accurate data in ETO.
2. WorkForce Central must include this element in their ongoing monthly monitoring.
3. During the PY23 monitoring review, WorkForce Central will provide the ESD monitoring unit with documentation of their review outcomes, including any additional corrective actions, of their subrecipients, if applicable.

WorkForce Central Response

On 5/31/2023, Karen Downing emailed:

"WFC CAP: WFC brought the issues ESD identified to Career Team's attention on 4/19/23 and asked Career Team to provide an action plan for how they will ensure data is correctly recorded in ETO. Career Team provided the following plan:

CT CAP: Career Team will provide retraining to all Career Advisors (CAs) who serve DW participants on MSG and CAR obtainment with specific focus on documentation requirements. We will review recording of outcomes on a monthly basis, and provide feedback to CAs and their leads from this internal review. We will also ask for and review corrections to be made. For support service dates, we have updated our internal process and all CAs have been trained on this process so that going forward, support services will be entered on the date they're provided, or within 7 days of service per local policy. We will continue to review support service entry on a monthly basis, identify corrections needed, and communicate and follow up on those corrections.

WFC will monitor Career Team's CAP by reviewing ETO records on a minimum monthly basis and address issues/concerns in real time. WFC will also check in on Career Team's progress with their CAP during monthly meetings. WFC will document our monitoring of accurate ETO data entry on the DW Expenditure/Invoice Review template, Monthly Observation Report (MOR) and through email communications."

Status-Plan Received; Ongoing actions required.

TAA/DW Co-enrollment Review

Items to Address

All three (3) files reviewed were found to not be compliant with local policy and procedure for TAA / DW Co-enrollment.

Actions Required

1. WorkForce Central will provide the ESD Monitoring unit with a plan by 5/31/2023 on how they will ensure their subrecipients are following local policy and procedure for co-enrollment or declination of co-enrollment of TAA participants into the Dislocated Worker program.
2. WorkForce Central must include this element in their ongoing monthly monitoring.
3. During the PY23 monitoring review, WorkForce Central will provide the ESD monitoring unit with documentation of their review outcomes, including any additional corrective actions, of their subrecipients, if applicable.

WorkForce Central Response

On 5/31/2023, Karen Downing emailed:

"WFC CAP: WFC will monitor the following action plan submitted by Career Team during monthly meetings with Career Team and monthly review of applicable ETO records to ensure compliance with WFC TAA-DW co-enrollment policy:

Career Team CAP:

Retraining of the TAA/DW co-enrollment policy was provided to CT Specialist on 5/4/2023. During this time, we reviewed previous records and identified and completed corrections needed to bring record into compliance with policy. New internal guidance was established to create more accountability in chain of communication. Policy, clarification, and internal guidance were shared with CT Specialist, CT Program Manager and CAs in writing. Going forward, QA team will review referral tracker and records on a quarterly basis to ensure guidance is being followed."

Status-Plan Received; Ongoing actions required.

WIOA Youth Program Review

MIS

Items to Address

Seven (7) of ten (10) files had inaccurately recorded support services entered in ETO. The services do not align with the definitions in the service catalog.

Actions Required

1. WorkForce Central will provide the ESD Monitoring unit with a plan on how they will ensure their service provider(s) are recording services correctly in ETO by 5/31/2023.
2. WorkForce Central will include this element in their ongoing monthly monitoring.
3. During the PY23 monitoring review, WorkForce Central will provide the ESD monitoring unit with documentation of their review and the outcome, including any additional corrective actions, of their subrecipient, if applicable.

WorkForce Central Response

On 5/31/2023, Karen Downing emailed:

"Youth EMAP services (incorrectly recorded as supportive services and change to youth guidance and counseling):

WFC provided technical assistance to Career Team on 3/30/23 via email and followed up during regularly scheduled meetings in April to ensure understanding of the change in recording the EMAP referral in ETO from supportive services to youth guidance and counseling. WFC will monitor EMAP services in ETO on a monthly basis to ensure the correct service is recorded in ETO.

Career Team action plan: This change has been communicated to CT Young Adult Career Advisors verbally and in writing. CT CAs understand this change should be applied to all records going forward. QA team will review record to ensure accurate service is utilized as part of their post-enrollment review."

Status-Plan Received; Ongoing actions required.

Items to Address

Two (2) of the three (3) files for Palmer Scholars had inaccurately recorded data and/or late data entry in ETO.

Actions Required

1. WorkForce Central must provide ESD Monitoring Unit with a plan by 5/31/2023 that includes, at a minimum:
 - a. Identifying all the corrective actions that will be taken to resolve this issue and due dates associated with each task.
 - b. Continue providing staff with technical assistance training on timely data entry in ETO.
 - c. Identifying the frequency, number of files and the timeframes when WorkForce Central will be monitoring this element.
2. WorkForce Central must ensure implementation of their corrective action plan by 6/30/2023.
3. WorkForce Central must provide the ESD Monitoring Unit during the PY23 ESD monitoring review, documentation this element was included in their reviews and the results of monitoring this element, including any corrective actions implemented, if applicable.

WorkForce Central Response

On 5/31/2023, Karen Downing emailed:

"Late services: Corrective actions that will be taken to resolve this issue and due dates associated with each task:

1. *During the months of March-May 2023, WFC spoke with both WIOA Title I youth providers-Career Team and Palmer Scholars about the ongoing issues with late*

service entries in the youth program observed during ESD monitoring over the past few years. Due to the fact the issues were identified primarily in Palmer Scholars youth records this year, WFC asked Palmer Scholars to provide WFC with their corrective action plan to ensure services are recorded within WFC's 7-day timeline. Palmer Scholars submitted the following action plan:

Palmer Pathways Corrective Action Plan: to ensure services are recorded within 7 days, per WFC policy.

Weekly Outlook Calendar invites have been scheduled as a reminder for navigators to submit their case notes to the enrollment coordinator to enter the database. Weekly Outlook Calendar invites have been scheduled as a reminder for the Enrollment Coordinator and Department Head. An ETO Case Note Tracker has been developed. The ETO Case Note Tracker is attached.

Internal staff process:

- 1. PPPA staff must ensure that all their weekly scholar check-ins are added to the ETO case note tracker by Thursday at the close of business.
 - a. An Outlook calendar reminder has been sent out reminding the navigators to submit their case notes.*
 - b. Mondays PPPA staff will meet to discuss upcoming events and projections for the coming weeks' ETO touchpoints.**
- 2. PPPA Staff have dedicated time on Wednesdays and Fridays for ETO data entries.
 - a. The enrollment coordinator and the department head have scheduled Outlook meetings time to complete all ETO entries.**
- 3. Team meetings are held every Monday to ensure all communications and touchpoints have been discussed and addressed and added to the ETO case note tracker.*
- 4. An ETO Case Note Tracker has been developed.
 - a. Individual scholar tabs have been created to keep the case notes as weekly check-in case notes. If the services provided during the weekly check-in do not meet the WorkSource Catalog definition of any of the 14 youth elements, that information will be entered as a stand-alone case note.*
 - b. By-week tabs have been added to ensure weekly entries are being added per cohort week phase
 - i. i.e. Week 1 see example below.***
- 5. During our review, it appeared that several of the standalone case notes entered were updates to the PPPA. Updates regarding the WEX should be entered in the WEX Pre-apprenticeship TP. i.e. certificates earned, any challenges that come up, and the steps taken to overcome those challenges.*
- 6. To reduce the amount of data entry staff will complete; Updates regarding the WEX will be completed at the end of phases 1 and 2.*
- 7. If the young adult decides to end their WEX early, then those notes will be entered in real-time and the WEX TP would be closed at that time.*

WFC will monitor Palmer's progress in implementing their new process described above through ETO reviews and during regularly scheduled meetings with Palmer staff.

Frequency, number of files and the timeframes when WorkForce Central will be monitoring this element:

2. *WFC will continue to monitor timely ETO data entries on a monthly basis by pulling reports from ETO. WFC communicates ETO data entry observations via email during our monthly invoice/ETO review, followed by ongoing communication and technical assistance to address deficiencies."*

Status-Plan Received; Ongoing actions required.

State EcSA Program Review

MIS

Items to Address

Four (4) of five (5) records reviewed had services entered in ETO beyond the allowable timeframes. Three (3) of five (5) had inaccurately recorded services.

Actions Required

1. WorkForce Central will provide the ESD Monitoring unit with a plan by 5/31/2023 on how they will ensure their subrecipients are entering timely, accurate data in ETO.
2. WorkForce Central must include this element in their ongoing monthly monitoring.
3. During the PY23 monitoring review, WorkForce Central will provide the ESD monitoring unit with documentation of their review outcomes, including any additional corrective actions, of their subrecipients, if applicable.

WorkForce Central Response

On 5/31/2023, Karen Downing emailed:

"WFC CAP: WFC will continue to monitor real time data entry during the monthly invoice/ETO reviews and address deficiencies (if applicable) with Career Team during regularly scheduled meetings or sooner if necessary. Career Team provided WFC with the following action plan to address late entries:

Career Team CAP:

CT will communicate our team wide late service entry and individual late service entry on a monthly basis. We have communicated to CAs that the expectation, both on the team level and on the individual level is that no more than 5% of services are recorded late each month. If we notice and increase above 5%, or other concerning trend, QA will work with leadership and appropriate CAs to determine the reason for the change and address the issue."

Status-Plan Received; Ongoing actions required.

Administrative / Fiscal Review

1.1 Design and Governance

Finding(s)

The draft Interlocal Agreement between the City of Tacoma and Pierce County includes language that allows the Executive Council (Body made up of 2 elected representatives of the City of Tacoma, 2 elected representatives of Pierce County, and the Chair of the Pierce County Workforce Development Board) to confirm or reject the appointment by the Pierce County WorkForce Development Board the Director of WorkForce Central who also serves as the Director of the Pierce County Workforce Development Board. In addition, the Executive Council is given authority to terminate the WorkForce Central Director. This is inconsistent with federal requirements at WIOA Section 107(f)(1)-(2) and 20 CFR 679.400(a)-(d).

Actions Required

WorkForce Central must work with its chief elected officials to revise the existing interlocal agreement to address items of non-compliance with the Workforce Innovation and Opportunity Act. WorkForce Central is required to share the revised interlocal agreement with the Monitoring Unit, once it is complete.

WorkForce Central Response due August 31, 2023.

1.2 MOU/IFA

Item to Address

The current MOU that runs through June 30, 2024, is missing some requirements that were added to state policy since the original MOU was adopted.

Actions Required

When WorkForce Central develops the MOU for the period beginning July 1, 2024, it must ensure that all the elements within State Policy 1013 (rev 4) WorkSource Memorandum of Understanding are included.

WorkForce Central Response due June 30, 2024.

1.4 Administrative Controls and Monitoring

Item to Address

WorkForce Central took action to recertify all its one-stops in May through July 2022. The certifications were awarded for two-year periods. WorkForce Central policy WFC CQI Policy 2017 establishes a very thorough process for recertification of one-stops that includes site visits for centers seeking certification. Due to concerns about the pandemic WorkForce Central did not follow the requirements in its policy that certification include site visits.

Actions Required

WorkForce Central must develop a plan to ensure that future one-stop certification processes follow the policy adopted by the Pierce County Workforce Development Council and if the policy cannot be followed there is notification to the Pierce County Workforce Development Council at a public meeting and such notification is recorded in the minutes of the meeting. The plan is due to the Monitoring Unit by August 31, 2023.

WorkForce Central Response due August 31, 2023.

**BY-LAWS
OF PIERCE COUNTY
WORKFORCE DEVELOPMENT COUNCIL**

Amended June 1st, 2021

**ARTICLE I
NAME**

The Name of the organization shall be Pierce County Workforce Development Council (WDC).

**ARTICLE II
PURPOSE**

The WDC, in partnership with the Chief Local Elected Officials (CLEOs, dba the Executive Board), shall plan and oversee the Workforce Development System of Pierce County.

The specific objectives and purpose of this organization shall be:

- Strategic planning and oversight of the WIOA services
 - Development of WIOA Local Plan
- Operational alignment and service delivery design
 - Selection of One-stop service delivery providers
 - Identification of training providers
 - Negotiation of local performance measures with the State Workforce Development Board
 - Monitoring of local WIOA performance
- Setting policy for the local area
- Develop budget consistent with the local plan
- Oversight of WIOA funds to include appropriate use and management
- Assist in development of a labor market information system
- Promoting participation of private sector employers in the WIOA system

**ARTICLE III
MEMBERS**

SECTION 1. APPOINTMENT/TERMS. Membership on the WDC shall be by appointment of the Executive Board in accordance with criteria established by the Governor. Members shall be elected for two (2) year terms or such other terms as may be established by the Executive Board. WDC members may serve up to 6 terms. To ensure only a portion of membership expires in any given year, the Executive Board will stagger new appointments from the date of these amended bylaws so that no more than 1/3 board members will turn over in any given year, and so that the WDC does not experience a majority of private sector representatives within that turnover. This will be regulated through intentional appointments that occur by the Executive Board. Renewal of terms shall be approved by the Executive Board.

SECTION 2. GENERAL POWERS. All business and policy affairs of the WDC shall be governed by its Members.

SECTION 3. NUMBERS AND COMPOSITION. The number of WDC Members shall be determined by the Executive Board. A majority of the WDC Members shall be representatives of businesses in the local area. At a minimum, at least two members must represent small businesses. The balance of the memberships, as defined by WIOA, shall be comprised of the following: local educational entities; labor organizations; economic development agencies; community-based organizations (including organizations representing individuals with disabilities and veterans); “One-Stop” partners; and such other organizations designated by the Executive Board. The Executive Board and the WDC will use its best efforts to assure representation of the entire Tacoma-Pierce County region.

SECTION 4. VOTING. Each Member, except for a Member Emeritus, shall be entitled to one vote. Members in emeritus status shall not have voting privileges. Proxy voting will be permitted only when a Member is unavailable to attend a meeting due to illness, travel, or other mitigating circumstances as approved by Executive Board. Proxies must be executed in writing or be submitted electronically to the WDC Chair, WorkForce Central CEO/Designee and must specify the date the proxy shall expire. No Member may designate more than three proxies in any twelvemonth period.

Voting may occur through electronic means when deemed necessary to assure reasonable timelines to accomplish work as determined by the WorkForce Central Chief Executive Officer.

SECTION 5. EMERITUS STATUS. A Member who has left the WDC in good standing and has demonstrated outstanding service during his/her membership is eligible for nomination as an Emeritus. Any WDC member may submit nominations for consideration to the Executive Board of CLEOs. The CLEOs will take action to approve or deny the recommendation. An Emeritus shall serve a term without limit. While this position is non-voting with regard to official actions of the WDC, an Emeritus may be invited to participate in all WDC meetings and functions, be eligible to be appointed by the Chairperson to serve on any of the WDC’s committees and may be called upon to assist the WDC on matters where the individual’s interest, experience and expertise will best serve the WDC. The number of such positions is discretionary with the WDC, however the honor will be reserved for individuals with a record of distinguished service.

SECTION 6. REMOVAL. At the discretion of the WorkForce Central Executive Board, any Member may be removed for cause. The WDC Chairperson and WorkForce Central Chief Executive Officer (CEO) may recommend to the WDC the removal of a Member from the WDC. Members are expected to attend all scheduled WDC meetings with the exception of three excused absences. When possible, proxies can be designated (as referenced in Article 3, Section 4). WDC members will actively participate in WDC committees and taskforce groups as opportunities arise and maintain good standing in the community. Failure to meet these expectations shall warrant removal from the WDC. Upon the approval of the WDC, the recommendation for removal of the member will be forwarded to the WorkForce Central Executive Board which is comprised of the CLEOs and the WDC

Chairperson. The WDC Chairperson and WorkForce Central Chief Executive Officer may recommend an exception to the WorkForce Central Executive Board.

SECTION 7. VACANCIES. A vacancy on the WDC shall be filled by the Executive Board if deemed necessary and appropriate. Each successor Member shall complete the term vacated and shall stand for reappointment at the end of the term. The WDC Chair or WorkForce Central CEO will notify the Executive Board on vacancies. When deemed necessary, the Chief Local Elected Officials and CEO will work diligently to ensure the WDC promptly has the seat filled. This process will include an immediate request for recommendations from WDC members and local business leaders, outreach and meeting between the WDC chair and/or CEO and potential candidates and vetting of potential members to meet criteria set for the vacant seat.

SECTION 8. REMUNERATION. Members shall not receive any compensation for attendance at regular or special meetings.

SECTION 9. RESIGNATION. Any Member may resign at any time by delivering written notice of resignation to the Chairperson. Upon receipt and acknowledgement by the Chairperson, such resignation shall be effective on the date set forth in the notice.

ARTICLE IV **MEETING OF MEMBERS**

SECTION 1. REGULAR MEETINGS. Regular meetings of the Members shall be held at least six times a year at such time and place as WDC members shall determine. Video conferencing technology will be used to facilitate participation of members who cannot physically travel to the meeting location. Video conferencing will be used in place of physical meeting location whenever necessary. The WFC CEO, WDC Chair and WDC members shall set the agenda for the regular meetings of the WDC. Such meetings shall be open to the public and shall be conducted in accordance with Robert's Rules of Order. The public shall have access to virtual meetings through a link posted on the WorkForce Central website. The WDC will accommodate participation by the public through open invitation on the website and through use of accessible, virtual meeting platforms, video recordings, and safe and welcoming physical meeting space.

SECTION 2. SPECIAL MEETINGS. Special meetings of the WDC may be called by request of the Chairperson or any three (3) Members.

SECTION 3. MEETING LOCATION. Meetings of the WDC shall be conducted within Pierce County, Washington. Should they be held virtually, the link will be available and made public to all interested in attending through the WorkForce Central website.

SECTION 4. QUORUM. Fifty-one percent (51%) of the total number of Members shall constitute a quorum. If fifty-one percent results in a fractional number, the fraction shall be rounded upward to indicate the number of Members required for a quorum. The act of the majority of the Members present at the meeting at which a quorum is present shall be the act of the Members unless otherwise specially required by law or by the bylaws. If a quorum is not present at the meeting of the Members, the Members present may adjourn the meeting.

SECTION 5. FAILURE TO HOLD MEETING. The failure to hold any meeting of the Members whether special or regular shall in no way suspend or invalidate the business of the WDC.

ARTICLE V **OFFICERS**

SECTION 1. OFFICERS. The Officers of the WDC shall be the Chairperson and Vice-Chairperson. Each Officer shall be elected for a term of two years.

SECTION 2. ELECTIONS. The Officers shall be elected by the WDC Members and may serve up to four terms. When an officer term is coming to a close, the Chair will call for recommendations from the WDC and recommend a slate of officers to serve during the following year.

SECTION 3. VACANCIES. Vacancies shall be filled at any meeting of the Members. Officers so elected shall serve until the next election of officers. Process for filling vacancies is determined in the WorkForce Central WDC recruitment process approved by the CLEOs and WDC and will be implemented promptly upon notice of a vacancy to ensure seats do not remain empty for prolonged periods.

SECTION 4. CHAIRPERSON. WDC members shall elect the Chairperson from among the business representatives on the WDC. The Chairperson shall preside at the meetings, supervise and control the business and affairs of the WDC, and shall see that orders and resolutions of the Members are carried into effect. The Chairperson may not serve more than three consecutive terms.

SECTION 5. VICE-CHAIRPERSON. The Vice-Chairperson shall act for the Chairperson in their absence and perform such other duties as the Chairperson may direct. Should the Vice-Chairperson also be absent from a meeting, they may designate a WDC member to act as Chairperson for that meeting.

ARTICLE VI **WIOA ADMINISTRATIVE ENTITY**

As designated by the Executive Board, the Tacoma-Pierce County Employment and Training Consortium, doing business as WorkForce Central, is the official Administrative Entity that serves as the local WIOA grant recipient and fiscal agent for the distribution of the funds. Any WorkForce Central staff assigned to support the WDC or its committees shall be ex-officio members of the council or committee.

ARTICLE VII **COMMITTEES**

SECTION 1. COMMITTEES. The committees of the WDC shall be established through priorities set by the WDC and Executive Board of Chief Local Elected Officials. Committees may be standing or limited to a defined period and should be established in

response to workforce development needs and strategies that require more concentrated leadership from a committee of the WDC.

SECTION 2. COMMITTEE MEMBERSHIP. Membership of the committees will be a combination of WDC Members and non-WDC Members. Non WDC members who are appointed shall be individuals who have demonstrated experience and expertise in accordance with the purpose of the committee. The appointment of non-WDC members to the committees shall be determined by the WDC committee.

SECTION 3. COMMITTEE MEETINGS. The committees shall determine the frequency of their meetings based upon the work that must be done. Each committee, with WorkForce Central staff, shall determine the meeting dates and the agenda as needed or directed.

ARTICLE VIII **CONFLICT OF INTEREST**

No Member or ex-officio Member of the Workforce Development Council (whether compensated or not) shall engage in any activity, including participation in the selection, or award of a sub-grant or contract supported by WIOA formula funds if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when the Member, or any member of his/her immediate family, a partner or an organization which employs, or is about to employ, any of the above, has a financial or other interest in the firm or organization selected for award. A WDC Member shall declare when a conflict of interest, real or apparent, could occur. The minutes of the meeting shall reflect that a disclosure was made and an abstention from voting or discussing during the meeting shall occur. Members or ex-officio Members of the WCD will neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors or parties to sub-agreements. Each Member is entitled to one vote, unless prohibited by a declared conflict of interest.

ARTICLE IX **MISCELLANEOUS PROVISIONS**

SECTION 1. WorkForce Central may enter into contracts and agreements that are in accord with the goals and objectives of the Executive Board, the WDC and WIOA. All such contracts must be executed by the WorkForce Central CEO based upon local, state, and federal laws, regulations, and ordinances.

SECTION 2. FISCAL YEAR AND PROGRAM YEAR. The fiscal year of the WDC and WorkForce Central shall begin on the first day of January in each year and shall end on the last day of December in each year. The program year of the WDC and WorkForce Central shall be the first day of July in each year and shall end on the last day of June each year.

SECTION 3. NONDISCRIMINATION. The WDC shall comply with all applicable federal, state, and local laws, regulations, and ordinances. The WDC shall adhere to a policy of equal opportunity for all people, regardless of race, color, religion, sex, (including

pregnancy, childbirth, and related medical conditions, transgender status, and gender identity) national origin (including limited English proficiency), age, disability, political affiliation or belief, citizenship status, or participation in any WIOA Title I financially assisted program or activity. WorkForce Central is an equal opportunity employer.

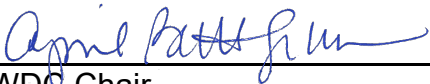
SECTION 4. BOOKS AND RECORDS. The WorkForce Central shall keep correct and complete books and records of account and minutes of the meetings of the council and its committees. All books and records of the WDC may be inspected by any Member or Officer for any proper purpose at any reasonable time. These files will be kept in WorkForce Central's virtual cloud storage space when feasible, and in hard copy format in WorkForce Central filing and record retention office space.

ARTICLE X
AMENDMENTS

These bylaws may be amended or repealed at any meeting of the members at which a quorum is present, by the affirmative vote of two-thirds (2/3) of the members present at such a meeting provided that any proposed amendment shall be submitted in writing to the members in advance of their next meeting.

CERTIFICATION

I do hereby certify that the foregoing bylaws, consisting of six (6) pages, are a true and correct copy of the bylaws of the Pierce County Workforce Development Council as adopted by its members on October 15th, 2020.



WDC Chair

6/10/21

Date