

**WORKFORCE DEVELOPMENT COUNCIL OF SEATTLE-KING COUNTY**  
**MEMORANDUM**

DATE:	April 4, 2024
TO:	Full Board
FROM:	Michael Davie, Director of Programs
SUBJECT:	Address State Monitoring – Exception to Policy Approval

**BACKGROUND:**

**Monitoring Comments:**

During Monitoring of QUEST, Employment Security Department (ESD) was unable to validate all Work Experience (WEX) wage expenditures were allowable. Local policy has a maximum of \$14,000 in wages and maximum of 480 hrs. Contracted WEX wages and hours exceed the local policy amounts and there are no record of individual exception requests submitted by the provider and approved by the WDC before the funds were expended.

**Approach:**

In partnership with Employment Security Department (ESD), the Workforce Development Council of Seattle-King County (WDC) was allocated \$3,189,231 under QUEST - Disaster Recovery National Dislocated Worker Grants (DWG) to support employment equity and individual, community, and industry resilience as the region prioritizes economic and employment recovery from the COVID-19 pandemic.

During implementation phase, in order to address equity and access challenges, the WDC reviewed local policy that might inhibit effective and responsive service delivery. Similar to the DOL Performance Partnership Pilot (P3), where DOL offers policy waivers at the federal level, the WDC intended to initiate and communicate a broad local policy waiver specific to the QUEST to address equity, access and effective service delivery for participants that provided local flexibility on maximum hours and wages connected to work experience versus individual exception requests which might be administrative onerous. However, during monitoring, ESD found no evidence of individual exception request by the provider and approved by the WDC before the funds were expended.

**Response:**

To provide clarity, on February 2, 2024, the WDC brought an addendum to Full Board for review and approval which described the existing waiver communicated and flexibilities in wages and hours specific to the QUEST grant and included an integration clause that represents and embodies the entirety of the agreement which ultimately is a retroactive application between the parties and in effect until closeout of the grant.

In order to respond to ESD monitoring finding, the WDC is bringing an exception to policy request to Full Board regarding the excess amount over the work experience policy limits.

**ACTION REQUESTED:**

The WDC staff recommends the following exceptions to policy more than local work experience policy limits to be reviewed and approved by Full Board on April 4, 2024.

**Exception Detail:**

	Service Provider:	Participant Initials:	Excess to Policy:	
1	YWCA	Z.A.	\$29,739	
2	YWCA	A.A.	\$17,165	
3	TRAC	E.S.	\$25,831	
4	YWCA	M.I.	\$6,624	
5	TRAC	I.A.	\$25,612	
6	TRAC	A.G.	\$18,685	
7	YWCA	W.R.	\$17,400	
8	TRAC	B.D	\$26,000	
9	PA	M.A	\$2,672	
10	NH	A.S.	\$995	
11	NH	S.Y.	\$3,197	
12	YWCA	N.A	\$6,157	
			\$180,076	Total Cumulative Amount

**Recommendation:** WDC staff recommends the exceptions to policy above be accepted for final approval on April 4, 2024. WDC staff will provide response to ESD to address monitoring.