



September 15, 2021

Ms. Jamila Thomas  
Chief of Staff, Office of the Governor  
Washington State  
VIA Email: [Jamila.thomas@gov.wa.gov](mailto:Jamila.thomas@gov.wa.gov)

Dear Ms. Thomas -

On behalf of Washington Workforce Association members, we're reaching out to you to request a conversation regarding the replacement of our statewide workforce development data management and labor exchange systems - Efforts to Outcomes and WorkSourceWA.com.

First, we should all collectively acknowledge the grave importance of having a useable, reliable, and accurate business management and reporting system for the millions of Federal WIOA resources available to the State of Washington. We should also collectively acknowledge the unacceptable failure of the system provided by the Employment Security Department (ESD) and the countless barriers it has caused, both fiscal and in service delivery. Third, we do all applaud ESD for proactively engaging a third-party consultant (The Athena Group) to assist with building a comprehensive accountability and governance structure to oversee this effort. We have all been provided the opportunity to engage with The Athena Group and shared our apprehensions. At this point, we do not find this engagement sufficient, therefore escalating our concerns to you.

As we noted above, we have been down this road before. In fact, we have been down this road twice in the last six years; seeing millions of dollars spent by ESD with no measurable results. Unfortunately, and much to the dismay of our local elected officials, local workforce development board leadership and the businesses and jobs seekers that rely upon this system have been negatively impacted.

ESD continues to fail us, and by extension, the vision Governor Inslee has for a robust economic recovery in our state. We are all confounded and asking, "How are we to build back a better



economy for Washington businesses and job seekers with the solutions currently being offered by ESD?”

As local leaders representing and investing in our local communities across the state, we want to memorialize the current state we collectively find ourselves in:

Current status:

- Department of Labor issued an on-site and desk review of the State of Washington on January 20, 2021, which detailed six (6) findings, and three (3) areas of concern where program policies and operations need to be strengthened to improve administrative and/or program accountability. The Findings are detailed below:
  - Finding 1A: Noncompliant Sanctions Policy-Administrative Sanctions. The state’s sanctions policy, #5406 WIOA Title I Administrative Sanctions does not define a substantial violation of WIOA Title I, does not provide a defined timeline for resolution of compliance issues before sanctions are imposed, allows negotiated rather than defined deadlines, and does not identify specific actions that must be taken when compliance has not been achieved within the given deadlines.
  - Finding 1B: Noncompliant Sanctions Policy-Performance. The sanctions policy does not address sanctions related to failure to meet negotiated performance targets, as is required by WIOA.
  - Finding 2: Superseded functions of Local Workforce Boards. The state must ensure that the local area governance structures in Washington are in full compliance with WIOA regarding Local Board functions.
  - Finding 3: Lack of state funding mechanism policy. The state does not have a policy for the state mechanism for Infrastructure Funding Agreements (IFAs), which was required to be in place by January 1, 2018.
  - Finding 4: The state does not have a data validation policy and procedure in place and has not conducted annual data validation during program year 2019, as required under WIOA and ETA guidance. This leaves the state at risk of reporting erroneous data and undermines confidence in the accuracy of performance reporting.
  - Finding 5A: Noncompliant Wagner-Peyser monitoring plan and self-appraisal report for Wagner-Peyser activities. The state does not have a plan in place to monitor its WIOA Title III Wagner-Peyser Act programs. This is a lost opportunity for a feedback loop that would support compliance and continuous improvement.

- Finding 5B: Noncompliant Wagner-Peyser monitoring plan and self-appraisal report for Wagner-Peyser activities. The state does not conduct all of the required self-appraisal activities, including submitting a self-appraisal report to ETA.
- Finding 6: Noncompliance with “sunshine provision” requirements. The websites for all twelve of Washington’s Local Boards were missing one or more of the six items required to be made available by electronic means. Local Boards are required to conduct business in an open manner by making information available to the public.
- Ability of agency to successfully implement and manage large scale technology projects. Throughout the Workforce Investment Act (WIA), which is the former federal legislation to (WIOA), Washington State lead the nation in outcomes and performance. Currently, Washington State is rounding out the bottom in WIOA outcomes and performance due to lack of data reporting through our ETO. Department of Labor has been working with WA State ESD since April 2021 to correct the ETO database so it can produce accurate performance reporting into the Federal PIRL. This technical assistance has brought to light how broken, inefficient, and poorly constructed the ETO database is. Some examples of this are attaching enrollment to participants three years before they were ever determined eligible; not able to report credential and measurable skills attainment for adults, dislocated workers, and youth; and those that are showing on the federal performance are not accurate nor does it allow for the local workforce boards know who these individuals are to connect them with services.
- Lack of a cohesive and effective policy/process environment that facilitates the successful use of technology
- A one size fits all model for statewide data management that doesn’t rely upon the latest in distributed data management systems thinking
- Lack of reliable Participant Individual Record Layout (PIRL) Data that if not corrected will impact Washington State and Local Workforce Development Boards negatively with sanctions

Our ask:

We would like to meet with you to share and discuss our vision for this effort which would include the following:



- Policy & Financial support for our State Workforce Training and Education Coordinating Board (WTECB) to take an active role in providing oversight and accountability for large scale projects that affect the entire workforce development system, a key role spelled out in WIOA
- Recognize that ETO replacement is not just about the technology. In fact, the technology component is preceded by People and Processes. Without clear attention and improvements to the first two components, the technology effort will fail, again. A concurrent parallel policy tract that addresses the policy and process concerns is necessary
- Build consensus among key stakeholders on what is in scope and out of scope for the project
- Transparent accounting of financial investment with tracking of dollars and time spent. A role we expect the OCIO will play, a critical missing entity when ETO was developed.

Thank you for your consideration to our concerns and looking forward to your involvement in this critical endeavor.

With regards,

A handwritten signature in black ink that reads 'Tiffany A. Scott'.

**Tiffany Scott, Chief Executive Officer**

*Benton-Franklin Workforce Development Council*



BOARD OF DIRECTORS

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**Cheryl Fambles, Chief Executive Officer**

*Pacific Mountain Workforce Development Council*

A handwritten signature in black ink, appearing to read 'Kevin Perkey'.

**Kevin Perkey, Chief Executive Officer**

*Workforce Southwest Washington*

A handwritten signature in black ink, appearing to read 'Dave Peterson'.

**Dave Peterson, Director**

*SkillSource*

A handwritten signature in blue ink, appearing to read 'Amy Martinez'.

**Amy Martinez, Chief Executive Officer**

*South Central Workforce Development Council*

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**Joy Emory, President & CEO**

*Workforce Snohomish on behalf of  
Future Workforce Alliance*

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**Rod Van Alyne, Director**

*Eastern Washington Partnership  
Workforce Development Council*

A handwritten signature in black ink, appearing to read 'Marie Kurose'.

**Marie Kurose, Chief Executive Officer**

*Seattle-King County Workforce Development Council*

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**Tiffany Scott, Chief Executive Officer**

*Benton-Franklin Workforce Development Council*

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**Katie Condit, Chief Executive Officer**

*Workforce Central*

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**Mark Mattke, Chief Executive Officer**

*Spokane Workforce Council*