JOHN HICKENLOOPER
Governor

ELLEN GOLOMBEK
Executive Director

WILLIAM B. DOWLING
Employment and Training Director

ELISE LOWE-VAUGHN
Workforce Programs, Policy and
Special Initiatives Director

DEPARTMENT OF LABOR AND EMPLOYMENT
WORKFORCE DEVELOPMENT PROGRAMS

633 17th Street, 7th Floor
Denver, Colorado 80202-3627

Category: WIA
Subject: Colorado Flood Recovery Jobs Program – Disaster National Emergency Grant (NEG)
Source: Federal/State
Revise/Replace: N/A
Contact: Workforce Programs, Policy and Special Initiatives Director
Distribution: Managers, Workforce Development Programs Staff, Local Workforce Region Directors, Fiscal
Colorado One-Stop System Policy Guidance Letter#: 13-10-WIA
Date: December 9, 2013

I. REFERENCE(S):

Workforce Investment Act of 1998, 20 CFR 671 for National Emergency Grants; Wagner Peyser Act of 1933, as amended; United States Department of Labor (USDOL) – Employment and Training Administration (USDOL-ETA) Notification of Award/Obligation EM-25201-13-60-A-8 for the National Emergency Grant (NEG) Severe Storms and Flooding September 2013; Federal Technical Employment Guidance Letters (TEGLs), specifically, TEGL 16-03 NEG Policy Guidance and TEGL # 39-11 Guidance on the Handling and Protection of Personally Identifiable Information; and, other Federal and State guidance such as, Colorado Department of Labor and Employment (CDLE) Policy Guidance Letters (PGLs), specifically, # 08-06-WIA - WIA and WP Discretionary Grant Quarterly Reporting and #01-09-WIA1 – WIA Internal and Subcontractor Monitoring.

II. PURPOSE:

To provide policy, information, guidelines, and programmatic requirements for Local Workforce Investment Boards and Local workforce regions to implement the **Colorado Flood Recovery Jobs Program,** funded by a Disaster National Emergency Grant (NEG) following Colorado's severe storms and flooding in September 2013.

III. BACKGROUND:

U.S. Department of Labor (USDOL) awards Disaster NEGs to support disaster clean-up and humanitarian assistance through the creation of temporary jobs for dislocated workers (both those dislocated due to the disaster and those dislocated prior to the disaster, per the WIA definition) and long-term unemployed individuals. Disaster NEGs are discretionary grants awarded by the Secretary of Labor under section 173 of the WIA, as amended.

In September 2013, the state of Colorado experienced disastrous flooding due to severe storms and unprecedented rainfall. The storms caused widespread flooding, mudslides, and extensive damage to buildings, infrastructure, and land across the state, stretching from Colorado Springs up the Front Range north to Fort Collins and east across the plains. Over 26,000 households have been directly affected by the flooding and the full extent of the damage will not be known for some time.

CDLE applied for a $4,609,937 Disaster NEG in partnership with four counties declared eligible for public assistance by the Federal Emergency Management Agency (FEMA). Six additional counties were designated eligible after the initial award. The Colorado Flood Recovery Jobs Program is designed to coordinate a temporary employment program that supports clean-up, restoration and humanitarian assistance efforts. Funding will be initially allocated to the Local Workforce Regions (as grant sub-recipients) which include the ten eligible counties that have been declared eligible. These counties will work collaboratively across public agencies at all levels and with relevant community-based organizations to identify temporary employment opportunities for workers dislocated due to the disaster, as well as long-term unemployed and workers dislocated prior to the disaster. The overall period of performance of the grant is October 1, 2013 to September 30, 2014. The effective start date for Local Workforce Regions may vary based on the execution of their individual grant agreements.

Eligible Counties: The 18 eligible counties include Adams, Arapahoe, Boulder, Clear Creek, Crowley, Denver, El Paso, Fremont, Gilpin, Jefferson, Lake, Larimer, Lincoln, Logan, Morgan, Sedgwick, Washington and Weld. Additional counties may be added as they are declared eligible for public assistance by FEMA.

IV: POLICY/ACTION:

A. County Eligibility and Participation

- Counties automatically become eligible for this grant when they are declared eligible for Public Assistance Category A (PA-A) by the Federal Emergency Management Agency (FEMA).
- Eligible counties have three options for participation in the program:
    a) If an eligible county wishes to participate in the grant, they must submit a local project plan according to the deadlines provided by the State NEG Coordinator.
    b) If an eligible county does not wish to participate in the grant, they must inform the State NEG Coordinator via email that this decision has been made after consultation with the Local Workforce Investment Board (LWIB) and county officials. If grant funds have already been issued, the formal opt out process described below must be followed.
    c) If an eligible county is unable to make a decision at this time because they require more time to assess the recovery needs in the county, a final decision must be made by February 1st.

<u>Formal Opt Out</u>

If a Notice of Funding Availability (NFA) is issued to an eligible county and they choose not to participate, Region Director must discuss their decision with CDLE management and then submit an "Opt Out" letter using **Attachment 1: Opt Out Letter Template.**

- The letter states the county does not need assistance as all clean-up has occurred, or the county chooses not to accept assistance under this program.

- The letter must be signed by the County Commissioner, Local Workforce Region Director, and LWIB Chair.
- The Opt-Out letter must be sent to the Division Director of Employment and Training before an Expenditure Authorization (EA) and/or NEG project plan are submitted by the workforce region.

B. Participant Eligibility

- Participants shall meet one or more of the following criteria to be eligible for temporary job placement:
  a) Workers who have been temporarily or permanently dislocated as a result of the disaster event qualifying for public assistance, pursuant to the date of FEMA Declaration of Eligibility for Public Assistance which occurred on 09/14/2013;
  b) Eligible dislocated workers as defined in WIA Sec. 101 (9); or
  c) Individuals who are long-term unemployed, defined by the state as individuals with previous work history who are actively seeking permanent employment <u>and</u> have been unemployed or underemployed with a documented work search for 13 or more of the last 26 weeks.
- Priority to participate in the grant should first be given to those workers who have experienced temporary or permanent job loss as a result of the covered disaster.
- NEGs are subject to priority of service to veterans and certain spouses. To obtain priority of service, a veteran shall meet the program's eligibility requirements.
- Floor Recovery Jobs Program eligibility does not need to be re-assessed for participants currently enrolled in other workforce programs or grants that require participants to meet WIA Dislocated Worker (DW) eligibility.
- There is no eligibility or selection criteria based on workers' place of residence.
- Dislocated migrant and seasonal farmworkers may be served under this grant.
- Farmers/ranchers could be considered temporarily unemployed due to the effects of the disaster and therefore eligible.

C. Recruitment of Participants

- Priority should be given to workers who have experienced temporary or permanent job loss as a result of the covered disaster.
- CDLE will generate lists of all individuals who have filed for Disaster Unemployment Assistance (DUA) or Unemployment Insurance (UI) and have self-identified as workers dislocated as a result of the disaster. These lists will be provided to the counties as potential program participants.
- Eligible dislocated workers may be co-enrolled in the Flood Recovery Jobs Program as well as other Adult, Youth, DW, and other appropriate discretionary grant programs.

D. Program Activities

- **Temporary Jobs**
  The primary, initial activity under this grant will be the placement of individuals in temporary, subsidized disaster relief jobs to assist the communities to recover from the severe storms and flooding of September 2013 and work on projects that provide humanitarian assistance to disaster victims. The worksite must be located in the geographic area covered by a FEMA declaration eligible for public assistance and have been identified by the state for clean-up.

- **Pre-Employment Activities**
    a) Pre-employment activities will include any requirements/conditions of the temporary job that must be completed prior to starting employment. This includes a physical, tetanus shot, safety training, background check, drug screen, etc. Requirements may vary based on the nature of the temporary job and the individual Worksite.
    b) Pre-employment activities are not considered supportive services under this program.
- **Supportive Services**
  Supportive services are authorized to enable an individual to participate in the grant in a temporary job. They may include reimbursement or payment for child care, transportation to and from the temporary job, etc. In addition, personal protective equipment (boots, respirators, gloves, hard hats, high-visibility clothing) and small equipment (chain saws, hand tools, ropes, chains and other materials needed for debris removal work) are authorized as required tools and materials for employment in temporary jobs related to clean-up.
- **Job-Related Training**
    a) Training required to perform the temporary job may be provided by the employer of record or the local workforce region may make arrangements for such training.
    b) If the employer pays for required training, this will count as time on the job.
    c) If the employer does not pay for the training, this is considered a *pre-employment activity* (see above) and should be recorded and tracked accordingly.
    d) In either case, training required for temporary employment is not considered a WIA training service.
    e) Other training services related to permanent or future employment is not allowable during the clean-up phase.
- **Re-employment Assistance**
    a) It is expected that, after the temporary jobs phase of the grant is completed, Flood Recovery Jobs Program participants will likely require placement or training assistance to become reemployed in unsubsidized employment.
    b) The state may request to modify the grant during the temporary jobs component of the program to expand the scope of the services to include a workforce development phase, which would allow local workforce regions to provide additional services required for re-employment of grant participants. **Re-employment assistance, including core, intensive and/or training services, are not allowable in the current grant as of October 1, 2013.** If there is a later modification of the grant to include workforce development activities, this PGL will be updated to provide the most current guidance.

E. Temporary Job Placements

- Participants may be placed in temporary subsidized jobs that provide the following services:
    a) Disaster clean-up, such as: demolition, clean-up, debris removal, repair, renovation and reconstruction of damaged and destroyed public structures, facilities and lands (such as county, state and federal roads, bridges, culverts, parks, libraries, schools, etc.) that are located in the areas designated by FEMA for Public Assistance under the PA-A category; operating equipment, cleaning out and repairing culverts, rake/shovel/wheelbarrow work, repairing roads, removing sandbags, restoring playgrounds and trails, debris monitoring, supervising crews, etc.

b) Humanitarian assistance, such as: delivering food, clothing, shelter and related services to support humanitarian assistance, including data entry, clerical work and other administrative functions that are specific to the disaster (for example, assisting with building permits related to disaster recovery, helping individuals with Small Business Administration loan applications, answering incoming calls from people seeking assistance with disaster recovery matters, providing case management services to victims, tracking equipment and supplies, collecting/tracking participant information, working at warehouses to manage intake of supplies for victims, etc.).

- These temporary jobs may be integrated into public agencies' response efforts, and can be used to augment staffing to administer this Flood Recovery Jobs Program (under the supervision of a permanent employee), to serve as a safety coordinator for the project, to supervise worksites, or to assist in handling increased demand for public services as a result of the disaster, including services offered by the workforce centers in the FEMA-designated areas.
- Local staff can enter and utilize job orders to match participants with temporary jobs. See *J. Program Enrollment and Activity* for details.

F. Employer of Record

- The Local Workforce Region shall select public sector and/or private nonprofit employers (i.e. State, County, or municipal governments, school districts, public institutions or community-based organizations) within their FEMA-designated disaster area to develop the temporary subsidized job placements.
- An employer-employee relationship must exist. The temporary job placement should not be in a commission-only job or have independent contractor status during the temporary subsidized job placement period.
- Participants shall be provided health benefits at the same level and to the same extent as other employees working a similar length of time and doing the same type of work.
- The Local Workforce Region may subcontract with a for-profit staffing company to handle payroll and benefits for temporary subsidized jobs as long as job placements are with public sector and/or private nonprofit employers for disaster recovery work performed on public lands, facilities and structures or for humanitarian assistance, and all other program requirements are met.
- Participants may work overtime, provided that this is part of the design of the project and regular employees of the employer of record are also working overtime, subject to the limit on duration and level of compensation for workers under this project.
- No contributions to retirement funds may be made on behalf of participants from grant funds. However, if the Employer of Record is required to make contributions to the Public Employees' Retirement Association (PERA) of Colorado for all employees, including temporary employees, then this is an allowable cost if paid in accordance with the policies of the Employer of Record.
- All participants shall be provided fringe benefits according to the Employer of Record's temporary employee policy, which includes Workers' Compensation and unemployment insurance coverage payments.
- Each participant must be covered by Workers' Compensation in accordance with State law.
- Participants in this project will be covered by unemployment insurance compensation.

G. Duration of Employment and Compensation

- No individual shall be employed in a Flood Recovery Jobs Program temporary job for more than 1,040 hours or six months, whichever comes first.
- Participants may receive wages up to $12,000 and fringe benefits up to $3,000, not to exceed a total of $15,000 in wages and benefits per participant.
- Participants must be paid the higher of the Federal, state, or local minimum wage, or the comparable rates of pay for other individuals employed in similar occupations with similar experience, training, and or skills by the same employer.
- In certain instances, a higher wage position that exceeds the $12,000 cap may be justifiable as critical to the project. Per 20 CFR 671.150(b), a waiver may be requested from USDOL, identifying the provision that is requested to be waived, the operational barrier that the waiver will remove, and the effect on the outcome of the project. Local workforce regions wishing to pursue a wage cap waiver must contact the State NEG Project Coordinator to request that the state submits a waiver request on their behalf.

H. Eligible Worksites

- Temporary jobs shall be in public or private non-profit agencies.
- Worksites may be established where authorized clean-up, restoration, and service (humanitarian) efforts are performed related to the covered disaster.
- The worksites must be located in the geographic area(s) designated by FEMA for Public Assistance under the PA-A category and identified by the state for clean-up.
- Worksites for humanitarian assistance jobs may be distribution centers, community-based organizations, or public agency offices, for example.
- CDLE must approve all worksites prior to beginning work. A completed Worksite Approval form (available in the "NEG – Flooding Disaster 2013" team room at https://e-colorado.coworkforce.com) must be submitted to the State NEG Project Coordinator. The State NEG Project Coordinator will respond within 2 business days and the Local Workforce Region will maintain a file for each worksite with this documentation.
- Photos should be taken of each worksite for documentation, before and after work is performed. "Before" photos should be submitted to CDLE with the Worksite Approval form and also be retained in worksite files by the Local Workforce Region.
- The **first priority** type of worksite is for public facilities which have been most severely damaged by the disaster.
- The **second priority** type of worksite is for private nonprofit facilities which have the highest impact on providing needed temporary services and/or restoration of public services. Worksites shall primarily be limited to public and private nonprofit facilities and property where non-participant state and local government employees and employees of applicable nonprofit agencies are employed in the clean-up effort.
- It is recommended that NEG-funded projects are managed separately from FEMA-funded projects to prevent duplication of benefits and other expenditures. Local FEMA contacts should be consulted when determining worksites to ensure coordination and non-duplication of effort. Local Workforce Regions are responsible for coordinating with local FEMA contacts.
- NEG and other WIA funds may not be used to meet the non-federal matching fund requirement on FEMA projects.

- Work on private property may be allowed, under two circumstances:
    a) Clean-up activities on private property may be performed by Flood Recovery Jobs Program participants if workers from units of general local government are also authorized to conduct such work and are performing such work; or
    b) As determined by the extenuating circumstances of the disaster, repair and restoration activities are authorized on the private property of economically disadvantaged individuals who are eligible for the federally-funded weatherization program with priority given to services for the elderly and individuals with disabilities. The Local Workforce Region shall request and receive special approval from the State prior to placing a participant in a temporary subsidized job placement on private property.
- If a Worksite requires passing through privately owned property, the property owner must give permission in writing to pass through prior to the work beginning and the permission form must be kept in the Worksite files. A private property access form template will be available in the "NEG – Flooding Disaster 2013" team room.

I. Coordination of Services with Other Project Partners

- Activities funded under this grant should be coordinated with those funded by and/or performed under the auspices of FEMA in order to ensure non-duplication and maintenance of effort.
- All disaster projects where participants will be entering or impacting natural areas must coordinate with Fish and Wildlife Service (FWS) to ensure that activities are not negatively affecting endangered species or their habitats.
- There may be instances in which a project will operate in multiple local workforce regions covering the same company dislocation. To the extent possible, local projects should be designed and managed to operate under a consistent set of policies and procedures that are agreed upon by all local boards involved.
- The Small Business Administration, Department of Agriculture, Department of Health and Human Services, and other federal programs provide a variety of needed services in disaster-affected communities. Staff should be aware of available services and make appropriate referrals.
- Staff should be able to provide information to participants about temporary transportation services to worksite assignments, as appropriate.

J. Program Enrollment and Activity

- Each participant shall meet grant eligibility requirements prior to the Local Workforce Region expending funds for that participant.
- Pre-employment (**PE**) has been added as a new service code to Connecting Colorado. This code should be used prior to program enrollment when providing any pre-employment services that are required as a condition of temporary employment (physical, tetanus shot, safety training, background check, drug screen).
- Once pre-employment services are delivered and the individual is ready to begin temporary employment, participants should be enrolled in the Flood Recovery Jobs Program in Connecting Colorado using program code **DI** and subprogram code **F+.** The subprogram

code must be entered locally by MIS staff. The date of program enrollment should match the date of the first supportive service or temporary job placement.

- Supportive services are allowable once an eligibility determination has been made and the relevant activity code should be entered in Connecting Colorado.
- Temporary Subsidized Employment (**TE**) has been added as a new service code to Connecting Colorado. This service code should be used when placing a participant in temporary employment. The start and end dates for this service should match the start/end dates of the temporary job.
- In the **TE** service, the following "Obtained Employment" fields must be completed based on the temporary job placement: Date, Employer, and Wage.
- Local staff can enter and use job orders to match participants with temporary jobs under the Flood Recovery Jobs Program. In Connecting Colorado, enter "**subsidized**" for Job Category and "**F**" for subcategory. These jobs will only be available for internal use and won't be seen by the public.

K. Case File and Documentation Requirements

- Required documentation includes verifying age, authorization to work in the U.S., Selective Service status, and Veteran's status (basic WIA requirements). Self-attestation is not allowed for verifying these items.
- Documentation must be provided to determine program eligibility in one of the following categories:
    1. Worker dislocated due to disaster - valid documentation includes a CUBS printout showing a Disaster Unemployment Assistance (DUA) claim, or a regular Unemployment Compensation claim along with a self-attestation that the layoff was due to the disaster.
    2. Dislocated worker (DW) – follows WIA DW documentation requirements.
    3. Long-term unemployed – valid documentation includes CUBS printout that shows the individual has filed for 13 or more weeks of unemployment insurance. Self-attestation is acceptable if no other documentation is available.
- If documentation of program eligibility is difficult to obtain due to circumstances of the disaster, self-attestation is acceptable. Self-attestation is only acceptable for the three categories of program eligibility.
- The local workforce region should have a system in place to verify program eligibility for individuals who are enrolled based on self-attestation once documentation becomes available. As long as such a system is in place, and if a participant is later found to be ineligible, the costs incurred prior to the discovery of ineligibility will not be disallowed by the grant.
- Case files should include documentation and notes for any pre-employment activities and supportive services.

L. Reporting Requirements

<u>Monthly Reporting</u>

- Local workforce regions are required to submit a report on the fifth day of each month according to the Reporting Deadlines table below.
- The report should cover all activity for the preceding month.
- Success stories, testimonials, and best practices should be collected by each local workforce region and submitted under section G. of the narrative report. See **Attachment #2: Monthly Reporting Template**.

- The report should be sent via email to the State NEG Coordinator.

Closeout Report

- A Project Closeout Report shall be submitted to the State within 30 days of the end of the project. A brief narrative outlining the highlights, problems encountered, and any feedback on the program should be included with this final report.
- The report should be sent via email to the State NEG Coordinator.

Reporting Deadlines

Report #	Report Frequency	Report Due to CDLE	CDLE Report Due to USDOL
1	**Monthly**	**N/A**	**November 15th**
2	**Monthly**	**December 5th**	
3	**Monthly**	**January 5th**	
4	**Monthly**	**February 5th**	**February 14th**
5	**Monthly**	**March 5th**	
6	**Monthly**	**April 5th**	
7	**Monthly**	**May 5th**	**May 15th**
8	**Monthly**	**June 5th**	
9	**Monthly**	**July 5th**	
10	**Monthly**	**August 5th**	**August 14th**
11	**Monthly**	**September 5th**	
12	**Monthly**	**October 5th**	
13	**Closeout**	**October 30th**	**November 14th**

M. Performance Requirements

- During the temporary jobs phase of the Flood Recovery Jobs Program, the Local Workforce Region is not required to meet the Federal common measures typically required of WIA National Emergency Grants. Local Workforce Regions will be required to meet the quarterly enrollment, subsidized job creation and placement, and expenditure goals established for their region via the quarterly expenditure and participant charts in their Expenditure Authorizations.
- The State NEG Coordinator will monitor the grant on an ongoing basis to ensure that the grant activities, deliverables, expenditures and performance are in compliance with Federal requirements.
- The reporting and monitoring requirements for the Flood Recovery Jobs Program are designed to help the Project Coordinator to identify technical assistance opportunities and to facilitate the review of grant activities.

N. Other Programmatic Requirements

Statewide Meetings, Training and Technical Assistance

- The State or ETA requires all grant recipients and sub-recipients participate in informational activities related to orientation, financial management and reporting, product dissemination, and other technical assistance throughout the life of the grant.
- The State NEG Coordinator plans to hold weekly or monthly virtual meetings with grant recipients, as needed to provide coordination, training and technical assistance to Workforce Center staff.

O. Outreach, Marketing and Promotional Guidelines, Limitations, Constraints

All outreach activity, marketing, and promotional expenses must be allowable pursuant to OMB Federal accounting principles and applicable circulars, and shall include specific language identified in the current Workforce Development Programs (WDP) Agreement funding provisions. Refer to *PGL# 10-10-WP – Use of Funds for Outreach, Advertising, Public Relations and Informational Activities* for additional information and requirements.

P. Monitoring Responsibilities

Internal and Sub-Contractor Monitoring and Oversight

- Local workforce regions are responsible for internal monitoring and oversight of all aspects of the grant and grant activities, including monitoring and oversight of sub-contractors, participants, worksites, and related activities to ensure consistency with the provisions of applicable Federal statutes, regulations, and the terms and conditions of this grant. Internal monitoring reports are expected annually at a minimum, and should be shared in writing with the LWIB and the appropriate Regional Liaison in Workforce Development Programs.
- The Local Workforce Region shall monitor employer worksites and cleanup activities in order to ensure compliance with the National Environmental Policy Act (NEPA) and the Endangered Species Act (ESA). To protect valuable habitats and endangered species, all disaster projects where participants will be entering or impacting natural areas shall ensure that activities are not negatively affecting endangered species or their habitats. NEPA and ESA require that employers either affirm to FWS that there are no endangered species or habitats within the project area, or that they consult with FWS to mitigate negative impacts where there are endangered species or protected habitats before beginning any work in those areas.
- On-site monitoring must include questionnaires and procedures for interviewing participants, employer(s) of record, and worksite supervisors, and must include on-site visits to worksites. At each review, it must be verified that temporary workers are conducting disaster-related work only.
- The Flood Recovery Jobs Program Operations Manual will provide further guidance and templates for worksite monitoring.
- Local worksite monitoring must be conducted every two months at a minimum to ensure that all worksite, temporary job, and safety requirements are being met.

State Monitoring and Oversight

- Monitoring of grant performance will be conducted by the WDP monitoring staff as part of regional annual compliance monitoring and program reviews. In addition, CDLE will monitor the grant at the state level on an ongoing basis to ensure that the overall grant activities, deliverables, expenditures and performance are in compliance with Federal requirements.
- The Flood Recovery Jobs Program Operations Manual will provide further guidance and templates for state monitoring and oversight.

Q. Allowable Costs

- The Local Workforce Region may be allowed to lease or purchase trucks, transport vans and heavy equipment if justified for debris removal, with prior approval from the United States Department of Labor (USDOL).

- Costs for a subcontract with a for-profit staffing company or payroll service to handle payroll and benefits for temporary subsidized jobs are allowable as long as job placements are with public sector and/or private nonprofit employers for work performed on public lands, facilities and structures. These costs shall be classified as administrative costs.
- The Local Workforce Region may hire additional program staff for the period of grant operations to perform a variety of functions necessary to implement the Flood Recovery Jobs Program, and charge them to the program cost category based on the functions they perform, in accordance with 20 CFR 667.220. Staff salaries are not subject to the time and wage limitations of temporary job placements.
- Local Workforce Region's administrative costs are limited to the percentage of their total actual expenditures stated in the NFA. However, should the Region elect to provide Needs Related Payments, administrative costs are limited to this stated percentage less any costs for the Needs Related Payments (see PGL# 02-18-WIA, Needs Related Payments for Adults and Dislocated Workers under WIA).

R. Exclusions

- During the temporary employment period, funds may not be used for permanent job placement services or for training services unrelated to temporary subsidized job placements.
- Activities performed by the temporary workers and using NEG funds must be related to clean-up and restoration activity – no improvements are allowed.
- Union dues are not an allowable cost.

V. IMPLEMENTATION DATE: Effective immediately.

VI. INQUIRIES:

Please direct all inquiries to the State NEG Coordinator, Mona Barnes, Workforce Development Programs, Mona.Barnes@state.co.us, (303) 318-9253.

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Elise Lowe-Vaughn, Director
Workforce Programs, Policy and Strategic Initiatives

ATTACHMENT(S):
Attachment #1: Opt Out Letter Template
Attachment #2: Monthly Reporting Template