



## COVID-19 Policies & Procedures

**Policy: 1013, Rev. 3**

**Released: 1-15-21**

**Supersedes: Policy #1013, Rev. 2 released 11-23-20**

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### PURPOSE:

The purpose of this policy is to communicate **temporary** suspension to, or allowances for, certain WIOA policies and/or procedures as a result of the COVID-19 pandemic that would otherwise be required or considered unallowable prior to the pandemic.

The purpose of the policy revision is to update the eligibility documentation requirements for individuals enrolled via verbal self-attestation in the Disaster Recovery Dislocated Worker Grant programs.

The following suspensions or allowances are temporary in nature and will be rescinded at the discretion of the Department of Labor (DOL), the WA State Employment Security Department (ESD), WTECB, or WorkForce Central. This policy will be updated and reposted to the WorkForce Central website as new COVID-19 policy guidance is provided.

### BACKGROUND:

In response to the COVID-19 pandemic, DOL and ESD have issued policies and guidance that speak to the suspension or allowance of certain WIOA activities or services that will allow states and Local Workforce Development Boards (LWDBs) to continue to provide uninterrupted and quality WIOA services. A complete list of COVID-19 guidance and Frequently Asked Questions (FAQs) can be found at:

- **ESD COVID-19 Guidance:** <https://wpc.wa.gov/policy/state/and/federal/COVID-19/guidance>
- **DOL COVID-19 FAQs:** <https://www.dol.gov/agencies/eta/coronavirus#WioaGen>

### POLICY:

Unless specified below, all other ESD and WFC WIOA program policies remain in effect.

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### **CASAS Basic Skills Deficiency (BSD) documentation requirement - temporarily suspended** ([WIN 0107, Change 2](#))

**Expires:** The following guidance is in effect until **May 18, 2021**, or until notified otherwise.

[ESD WIN 0107, Change 2](#) communicates the temporary suspension of the requirement that the CASAS must be used to verify Basic Skills Deficiency (BSD) when BSD is being established as an eligibility criterion in the Title I Youth and Adult programs. WIN 0107, Change 2 allows for the use of documentation other than the CASAS to validate an individual's BSD status.

The State is committed to exercising as much flexibility as possible to LWDBs and their service providers to establish BSD as an eligibility or priority of service criterion in WIOA Title I Youth and Adult programs. In lieu of the CASAS pre-test, WorkForce Central will allow for the following methods when documenting

BSD as an eligibility criterion. The method of documenting the BSD eligibility criterion must be uploaded in ETO (when applicable) and recorded in case notes:

- **Youth Program:**
  - Transcript with a failing grade in math or reading during the most recent academic year (or a detailed case note if verified verbally with appropriate entity).
  - School records showing test scores from a generally accepted standardized test within the last year showing grade level below 9<sup>th</sup> grade (grade 8.9 or lower) (or a detailed case note if verified verbally with appropriate entity).
- **Adult Program:**
  - Verification of enrollment in a Title II adult education program (or a detailed case note if verified verbally with appropriate entity).
  - Staff observation of deficient functioning, such as observing the applicant is not able to read or complete an application form or observing that applicant does not have basic computer literacy. This observation must be documented in case notes.
  - Self-attestation that the individual lacks a high school diploma or equivalency (GED).

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### **Self-attestation and remote eligibility documentation and registration requirements during the COVID-19 emergency** (WINs [0109, Rev. 2](#); [0114, Change 2](#); and [0115, Change 2](#))

**Expires:** The following guidance is in effect until **May 18, 2021**, or until notified otherwise.

[WIN 0109, Rev. 2](#) establishes the temporary and minimum documentation and eligibility requirements for registration into WIOA Title I-B programs when in-person engagement is not possible due to the COVID-19 pandemic. The effective date of this WIN is retroactive from March 23, 2020 to align with the Governor's *Stay Home, Stay Healthy* order.

WINs [0114, Change 2](#) and [0115, Change 2](#) address documentation and eligibility requirements for the COVID-19 Disaster Recovery Grants (DWGs) specifically.

#### **A. Verbal Self-Attestation Documentation Requirements:**

Verbal self-attestation is an allowable form of documenting WIOA program eligibility but must not be used as a first resort. Service providers are required to first attempt to collect required eligibility source documentation when appropriate health and safety measures or secure communication technology resources make collecting such documentation possible.

**Case noting verbal self-attestation:** The following must be documented in case notes recorded in ETO when using verbal self-attestation for eligibility documentation purposes:

- The method by which the service provider received the individual's verbal self-attestation, such as phone, computer via ZOOM, Teams, Skype or other verbal communication platform.
- Verbal self-attestation was necessary due to the WorkSource office closure caused by COVID-19.
- Each eligibility and priority of service criterion to which the applicant is self-attesting, with a statement that reads, *"I attest that [applicant name] verbally self-attested to the eligibility and priority of service criteria cited above."*
- That the case manager has provided to the applicant the Equal Employment Opportunity and Complaint and Grievance Procedures and WIOA Title I-B Program Data Collection

Certification information in Attachment A of ESD WIN 0109 verbally or in hard copy and that the applicant verbally acknowledged understanding the information by a statement that reads, *“I attest that I provided the Equal Employment Opportunity and Complaint and Grievance Procedures and WIOA Title I-B Program Data Collection Certification statements to [applicant name] on [date] and [applicant name] attested to understanding the information.”*

**Recording DOL reporting data into ETO via verbal self-attestation:**

- The service provider will record information verbally obtained from the applicant into the appropriate ETO data fields for DOL reporting requirements.
- The service provider must document in a case note that this information was obtained verbally from the participant.

**COVID-19 Disaster Recovery Dislocated Worker Grants (DWG) program enrollments only:**

- WINs [0114, Change 2](#) and [0115, Change 2](#) require documentation for COVID-19 DWG participants enrolled via verbal self-attestation be collected within 30 calendar days of the date the WorkSource One- Stop Center officially reopens.
- Collection of eligibility documentation may be received via remote or virtual eligibility process.
- Eligibility must be validated based on the collected information.
- The date the eligibility documentation is collected must be recorded in case notes.
- No additional verification is required for participants deemed eligible through remote or virtual eligibility documentation.
- Providers are required to instruct their service providers to, at the time of enrollment, inform participants determined eligible via verbal self-attestation that they are required to provide eligibility documents either in person or virtual/remote means after the one-stop reopens and need to be prepared to do so upon receiving such notice from service providers.
- Documentation only needs to be collected from participants who are still actively enrolled when the one-stop reopens. If they exit prior to re-opening, verbal attestation alone is acceptable.
- If any participants are determined ineligible after documentation is received, costs incurred before the discovery of ineligibility will not be questioned if they receive no further services. If documentation is not collected for such participants and they continue to receive services, they will be assumed ineligible and any costs incurred from that point forward for provision of services will be questioned.

**B. Remote or Virtual Eligibility Documentation**

Eligibility determination is a critical and non-waivable element of DOL-funded programs. Service providers are required to maintain minimally acceptable eligibility documentation, including verbal self-attestation described above.

**Application Process:** Application for services may occur:

- Verbally by phone,
- By other platforms such as e-mail, text, chat, Teams, Skype, Zoom or WebEx, or
- A combination of the above.

During the process, the case manager and applicant initiate the WIOA Eligibility Application Touchpoint in ETO while performing applicable assessments.

**Verification of Eligibility Documentation:** Supporting eligibility and priority of service documentation

may be obtained and verified:

- By electronic means (e-mailed or texted attachments, scans, digital photographs, electronic signature platforms such as DocuSign or Verisign).
- Through copies of documents sent via postal pickup or mail drop-off at local centers.
- Through a combination of the above in order to safeguard Personally Identifiable Information (PII).

**Signature Collection and Alternatives:** Required signatures for eligibility documentation (including WIOA eligibility application, Equal Opportunity and Complaint and Grievance Procedures, data collection certification, etc.), may be obtained via:

- Electronic document signing platforms (e.g., DocuSign, Verisign).
- Electronically transmitted digital photos of signed documents.
- Postal mail pick up or drop off of paper forms.
- E-mail (can be used in place of signature)
  - For the **WIOA application, Equal Opportunity and Complaint and Grievance Procedures, and data collection certification**, the applicant must reply in the affirmative that he, she or they has read and understood the information and that he, she or they certify the information is true and accurate.
  - The response and date stamp on the e-mailed reply indicates completion of the form.
- A combination of the above.

**C. Documentation in ETO:** All supporting documentation sent by the applicant via any of the methods described above must be maintained by the case manager in a manner that allows the information to be made available for future local, state, or federal monitoring or audit reviews. Examples include, but are not limited to:

- Uploads into the ETO management information system.
- Printed documents maintained in a physical file.
- Storage in electronic folders in secured directory.

**D. Security of Participant Data:**

- Per the [DOL ETA Coronavirus COVID-19 FAQs](#), the security of participant data and its transmission as well as ease of participant access must be considered.
- WorkForce Central and its subrecipients and contractors must maintain appropriate information security. Privacy must be maintained to avoid disclosing Personally Identifiable Information (PII) through the transmission of documents from personal computers, tablets, or cell phones if they are not encrypted.
- PII may be mailed through the U.S. Postal Service, including the Affidavit of Immigration. See Training and Employment Guidance Letter [\(TEGL\) 39-11](#) for additional guidance.
- Social Security Numbers (SSNs) may not be emailed, texted or entered in video conference chats and may only be verbally provided or delivered through an encrypted and secure e-mail or document collection method.

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## Food as an allowable supportive service for WIOA Youth (Young Adult) program participants only (WIN 0111, Change 1)

**Expires:** The following guidance is in effect until **May 18, 2021**, or until notified otherwise.

[WIN 0111, Change 1](#) communicates the temporary suspension of the prohibition of food as an allowable supportive service for WIOA Youth (Young Adult) program participants under the definition of “supportive services” in WIOA Title I Policy 5602, Supportive Services and Needs-Related Payments, due to the COVID-19 emergency.

Due to the COVID-19 crisis, food may be provided as a supportive service to WIOA Youth (Young Adult) program participants on a limited basis and in certain situations.

Food may be provided to eligible young adults when it will assist or enable them to participate in allowable youth program activities and reach their employment and training goals. The use of WIOA Title I-B grant funds for food should be limited to reasonable and necessary purchases.

WorkForce Central requires the following procedures be followed when authorizing food as a WIOA-funded supportive service:

### Eligibility and Documentation of food as a supportive service:

- All policy and procedural directives outlined in WFC’s Supportive Service Policy, *with the exception of food as a disallowed purchase*, and ESD WIN 0111, Change 1 must be followed.
- The provision of food as a supportive service is not an entitlement and is only available to WIOA enrolled young adults who have a demonstrated and documented need.
- Food support services must only be provided when no other food/financial resources are available.
  - **Documentation Requirement:** Outcomes of non-WIOA resources researched, including food banks and SNAP benefits, must be documented in case notes and on the support service request form uploaded into ETO.
- The provision of food must be necessary for the participant to remain engaged in program activities and necessary to successfully complete their employment and training plans as identified on their ISS.
  - **Documentation Requirement:** How the provision of food is necessary for participation must be documented in case notes and on the support service request form uploaded into ETO.
- The purchase of food is limited to the eligible program participant.
- **The purchase of food is not allowed for:**
  - Family members/relatives/children,
  - Roommates, or
  - Anyone other than the participant.
  - Mainly junk food.
  - Alcohol.
  - Pet food.
  - Non-food items.

- Participant will create a list of basic food needs and service provider will make the purchase on behalf of the participant. Service provider may use their company van to bring participant along for the grocery shopping.
- Service provider and the youth participant will collaborate in the development of an action plan that identifies strategies to address the young adult's food inadequacies. The plan may include identifying community resources, financial planning/budgeting, meal planning, healthy eating options, etc.
  - **Documentation Requirement:** This plan must be documented in case notes and if documented separately, the document must be uploaded into ETO in the supportive service touch point.
- Buy food that accommodates the young adult's immediate storage and cooking capabilities. Consideration must be made if the participant has access to a freezer, refrigerator, dry storage, oven, microwave, or other adequate food storage and meal preparation facilities. Takeout orders may be an option if the young adult lacks adequate storage or cooking facilities.

**B. Maximum funding amount:**

- Food supportive services count against the participant's supportive service limit of \$2,000 as stated in WorkForce Central's Supportive Service policy.
- The maximum amount allowable and frequency of the purchase of food is dependent on the needs of each young adult and will be at the discretion of the service provider.

**C. Recording and uploading of documentation for the supportive service in ETO:**

- Record the supportive service provided to the participant in ETO. The service must be recorded on the day the service was actually provided or within seven (7) calendar days, per WorkForce Central policy.
- Record a case note that identifies steps to address the youth's food inadequacies, as described above in section A.
- Upload the following in the supportive service touch point in ETO:
  - Supportive service request form,
  - Copy of youth's budget, and
  - Copy(s) of **legible** itemized receipts.

**D. Recommendations:**

- It is recommended participants who are in need of food be informed that food as an allowable supportive service is a temporary allowance and will be rescinded by May 18, 2021.
- It is recommended, when appropriate, youth be made aware of and referred to SNAP benefits. If applicable, the notice of information and/or referral to SNAP benefits, and outcome of the referral, must be documented in case notes.

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## Purchasing Personal Protective Equipment (PPE)

Personal protective equipment (PPE) is an allowable WIOA expense. The COVID-19 pandemic has resulted in a necessity to furnish eligible WIOA participants with PPE when PPE is required to successfully participate in employment and training activities and the participant does not previously own any PPE and the PPE is not being provided by other parties.

### Purchasing PPE:

#### 1. Service providers may purchase:

- Disposable masks,
- Disposable gloves,
- Protective eyewear,
- Washable/Reusable masks, and
- Any other PPE required by WIOA program activities.

These items will be stored at the WorkSource Center in a locked cabinet or office, to distribute to participants who have an immediate need for these items.

#### 2. Participants may receive a maximum of:

- One (1) box of gloves,
- One (1) box of disposable masks OR two (2) washable/reusable masks (customer choice), and
- One (1) protective eyewear (if applicable).

#### 3. All items purchased must be tracked for individual distribution.


#### 4. Providers should attempt to purchase items online and ship directly to participant, when time allows, to encourage safe/social distancing for both staff and participant.

### Reimbursement Requests for PPE Purchases:

The following documentation must be submitted to WorkForce Central when requesting reimbursement for PPE purchases:

- Approved supportive service request for item.
- Invoice for items purchased.
- **Legible** itemized receipt of items purchased, to include method and date of payment. If the items were part of a bulk order, the reimbursement request must include:
  - Cost per item, for each item provided to the customer,
  - Date of bulk purchase, and
  - Copy of **legible** invoice showing method of payment.
- Total cost for each participant must include applicable taxes, with backup documentation to support how the cost per participant was calculated.

**Revision Approved:**

  
Katie Condit (Jan 15, 2021 15:01 PST)

Jan 15, 2021

WorkForce Central CEO

Date

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