



COVID-19 Policies & Procedures

Policy: P-1013, Rev. 6

Effective: December 8, 2021

Supersedes: Policy #1013, Rev. 5 released June 3, 2021

PURPOSE:

The purpose of this policy is to communicate **temporary** suspension to, or allowances for, certain WIOA Title I 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:

- Extend waivers for CASAS Basic Skills Deficiency (BSD) through March 31, 2022.
- Extend allowability for verbal self-attestation and remote eligibility documentation and registration requirements through March 31, 2022.
- Extend the allowability of food as a permissible supportive service for individuals enrolled in the WIOA Title I Youth (Young Adult) program through March 31, 2022.
- Eliminate restrictions on the amount of PPE equipment allowed for individuals enrolled in WIOA Title I programs.
- Non-substantive formatting changes and wording changes to align with state policy or for clarity purposes.

The following suspensions or allowances are temporary in nature and will be rescinded at the discretion of the Department of Labor (DOL), the Employment Security Department (ESD), the Workforce Training and Education Coordinating Board (WTECB),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 Title I activities or services that will allow states and Local Workforce Development Boards (LWDBs) to continue to provide uninterrupted and quality WIOA Title I 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 DOL, ESD, and WorkForce Central WIOA Title I program policies remain in effect.

1. CASAS Basic Skills Deficiency (BSD) Documentation Requirement - temporarily suspended

([WIN 0107, Change 5](#))

Expires: The following guidance is in effect until **March 31, 2022**, or until notified otherwise.

[ESD WIN 0107, Change 5](#) 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 WIOA Title I Youth and Adult programs. WIN 0107, Change 5 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:

A. WIOA Title I Youth (Young Adult) 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 the 9th grade (grade 8.9 or lower), or a detailed case note if verified verbally with appropriate entity.

B. WIOA Title I 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 recorded in ETO.
- Self-attestation that the individual lacks a high school diploma or equivalency (GED).

2. Self-attestation, Remote Eligibility Documentation and Registration Requirements During the COVID-19 Emergency

[WIN 0109, Change 5](#), [WIN 0114, Change 3](#), and [WIN 0115, Change 3](#)

Expires: The following guidance is in effect until **March 31, 2022**, or until notified otherwise.

[WIN 0109, Change 5](#), establishes the temporary and minimum documentation and eligibility requirements for registration into WIOA Title I programs when in-person engagement is not possible due to the COVID-19 pandemic. The effective date of this WIN is retroactive from April 29, 2020, to align with the federal guidance from the U.S. Department of Labor.

[WIN 0114, Change 3](#) and [WIN 0115, Change 3](#) address documentation and eligibility requirements for the COVID-19 Disaster Recovery and Employment Recovery Dislocated Worker Grants (DWGs) specifically.

A. Verbal Self-Attestation Documentation Requirements

Per DOL guidance, verbal self-attestation is permissible for documenting WIOA Title I program eligibility for criteria for which self-attestation is not otherwise allowed but should not be used as a first resort. Service providers should first attempt to collect required eligibility source documentation when appropriate health and safety measures, or secure communication technology resources make collecting such documentation possible.

Full verbal self-attestation is allowed if it is clearly documented in case notes recorded in ETO that the applicant is unable to access eligibility source documentation because of a COVID-19 reason (e.g., the applicant is quarantined or in isolation due to COVID-19 exposure and has no virtual or remote means of transmitting eligibility source documents to a case manager; the applicant does not have COVID-19, but the eligibility source documentation is in a location that is inaccessible due to COVID-19 restrictions.)

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 inability to meet in person and/or provide eligibility source documentation for COVID-19 reasons, including the specific circumstances preventing in-person engagement and/or eligibility source documentation transaction.
- 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 Program Data Collection Certification information in Attachment A of [WIN 0109, Change 5](#), 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.
- Case managers must obtain appropriate eligibility source documentation within 30 calendar days after the circumstances that prevented applicants from providing source documents cease to exist.

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 Title I 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 pickup or drop off of paper forms.
- A combination of the above.
- E-mail (can be used in place of signature):
 - For the **WIOA Title I application, Equal Opportunity and Complaint and Grievance Procedures, and data collection certification**, the applicant must reply in the affirmative that he, she or they have 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.

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

- WINs [0114, Change 3](#) and [0115, Change 3](#) require service providers to collect eligibility documentation for individuals determined eligible for COVID-19 DWG programs via verbal self-attestation 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.

- At the time of enrollment, service providers are encouraged to inform individuals who have been determined eligible for WIOA Title I program services 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 individuals who are still actively enrolled in a WIOA Title I program when the one-stop reopens. If they exit prior to re-opening, verbal attestation alone is acceptable.
- If an individual is determined ineligible after documentation is received, costs incurred before the discovery of ineligibility will not be questioned if the individual receives no further services. If eligibility documentation is not collected for such individuals 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.

C. Documentation in ETO

All supporting documentation sent by the applicant via any of the methods described above must be maintained by the service provider/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 securedirectory.

D. Security of Customer Data

- Per the [DOL ETA Coronavirus COVID-19 FAQs](#), the security of data for individuals receiving WIOA Title I services and its transmission, and the ease of access for such individuals 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.
- Please also follow your organizational policies and protocols for securing and protecting computing and telecommunication equipment and PII that may be stored on them.

3. WIOA Youth (Young Adult) Program Only: Food as an Allowable Supportive Service

[WIN 0111, Change 3](#)

Expires: The following guidance is in effect until **March 31, 2022**, or until notified otherwise.

[WIN 0111, Change 3](#) communicates the temporary suspension of the prohibition of food as an allowable supportive service for young adults enrolled in the WIOA Title I Youth (Young Adult) program under the definition of “supportive services” in WIOA Title I Policy 5602, Revision 3, 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 Title I 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 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 Title I funded supportive service:

A. Eligibility and Documentation Requirements:

- All policy and procedural directives outlined in WorkForce Central’s Supportive Service Policy, *with the exception of food as a disallowed purchase*, and ESD WIN 0111, Rev. 3 must be followed.
- The provision of food as a supportive service is not an entitlement and is only available to WIOA Title I enrolled young adults who have a demonstrated and documented need.
- The provision of food must be necessary for the participant to remain engaged in program activities, necessary to successfully complete their employment and training plans as identified on their ISS and pose an immediate need.
 - **Documentation Requirement:** How the provision of food is necessary for program participation must be documented in case notes and/or on the support service request form uploaded into ETO.
- As stated in WIN 0111, Rev. 3, the U.S. Department of Labor (DOL) has an expectation that youth files include documentation of efforts made to first secure food for the youth through federal, state, and community food assistance programs and services and that the immediate need for WIOA Title I funds to be used to purchase food be for the purpose of enabling effective participation in youth program activities.

To that end, the state requires service providers first pursue food assistance that might be available through the Supplemental Nutrition Assistance Program (SNAP), called Basic Food in Washington, and food assistance available through local food banks and at-risk organizations. However, if an urgent need for food exists, WorkForce Central authorizes service providers to purchase food to address the immediate need followed by pursuing food assistance through SNAP and local food banks or at-risk organizations.

- **Documentation Requirement:** When applicable, documentation of immediate need for food and efforts to locate food assistance through SNAP benefits and food banks must be recorded in case notes and/or 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.
- The young adult must create a list of basic food needs and the service provider will make the purchase on behalf of the young adult. The service provider may use their company van so the young adult can accompany the service provider during the shopping trip.
- Service provider and the young adult 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 may be documented in case notes or uploaded separately into ETO in the supportive service touch point.
- Purchased food should accommodate the young adult's immediate storage and cooking capabilities. Consideration must be made if the young adult 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:

- 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 Documentation in ETO:

- Record the supportive service provided to the participant in ETO. The service must be recorded on the day the service was provided or within seven (7) calendar days, per WorkForce Central policy.
- Record a case note in ETO 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 young adults who are in need of food be informed that food as an allowable supportive service is a temporary allowance and will be rescinded by March 31, 2022.
- It is recommended, when appropriate, young adults 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.

4. Purchasing Personal Protective Equipment (PPE)

Personal protective equipment (PPE) is an allowable WIOA Title I expense. The COVID-19 pandemic has resulted in a necessity to furnish individuals enrolled in WIOA Title I programs with PPE when PPE is required to successfully participate in employment and training activities and the individual 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 Title I program activities.

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

2. All items purchased must be tracked for individual distribution.

3. When appropriate, providers should attempt to purchase items online and ship directly to the individual to encourage safe/social distancing.

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 PPE provided to individuals enrolled in WIOA Title I programs must include applicable taxes, with backup documentation to support how the cost per individual was calculated.

Approved:



Katie Condit (Dec 8, 2021 12:06 PST)

Katie Condit, WFC CEO

Dec 8, 2021

Date

EQUAL OPPORTUNITY – EQUAL ACCESS

WorkForce Central is an equal opportunity employer/program.

Auxiliary aids and services are available upon request for individuals with disabilities. Washington Relay Service – 711.