



## Workforce Innovation and Opportunity Act (WIOA) Policies and Procedures

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### COVID-19 Policies & Procedures

**Policy: P-1013, Rev. 11**

**Effective: October 17, 2023**

**Supersedes: Policy #1013, Rev. 10 released February 28, 2023**

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#### **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 Deficient (BSD) through December 31, 2024.
- Extend allowability for verbal self-attestation and remote eligibility documentation and registration requirements through June 30, 2024.

The following suspensions or allowances are temporary in nature and will be rescinded at the discretion of the Department of Labor (DOL), the Employment Security Department (ESD), the Workforce Training and Education Coordinating Board (WTECB),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

**Expires:** The following guidance is in effect until **December 31, 2024**, or until notified otherwise.

[ESD WIN 0107, Change 10](#) 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 10 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 9<sup>th</sup> 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

**Expires:** The following guidance is in effect until **June 30, 2024**, or until notified otherwise.

[WIN 0109, Change 10](#), 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.

### 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 8, 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.

### 3. 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 customers of 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 and distributed to WIOA Title I enrolled customers as needed.

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 \(Oct 17, 2023 10:59 PDT\)](#)

Oct 17, 2023

Katie Condit, WorkForce Central CEO      Date

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