

Washington State WorkSource Information Notice (WIN)

WIN Number: 0081, Change 4

WIN Title: WIOA Title I and III procedures for creating accounts in Efforts to Outcomes (ETO) when individuals do not provide Social Security Numbers

Date: September 1, 2021

Expiration: N/A

Purpose:

To communicate state policy on the collection of Social Security Numbers (SSN) from individuals seeking services through programs funded by the U.S. Department of Labor under the Workforce Innovation and Opportunity Act of 2014, including procedures for creating accounts in ETO when individuals refuse or are unable to provide SSN as well as to communicate a standard process to create seeker records and record services for eligible individuals who are unable or refuse to provide SSN.

This fourth revision updates the attached procedure to align with steps described in WIN 0120, Adding Participants to ETO When Individuals Are Unable to create a WSWA account. WIN 0081 Change 4 outlines record creation steps in ETO for job seekers who don't provide an SSN, while WIN 0120 outlines record creation steps in ETO for job seekers who provide an SSN.

Action Required:

Local Workforce Development Boards and their contractors must distribute this guidance broadly throughout the system to ensure that WorkSource System staff are familiar with its content and requirements.

Content:

Organizations that provide services to individuals under Titles I and III of the Workforce Innovation and Opportunity Act (WIOA) of 2014 must request Social Security Numbers from those individuals because matching SSNs against quarterly UI wage records remains the most timely, effective, and accurate way to ensure that performance data is available to the one-stop system, and WIOA statutes direct states to use UI wage records for this purpose.

Those same organizations, however, cannot require individuals to provide SSNs as a condition of program participation or receipt of services. Eligible individuals who do not provide SSNs must be provided all categories and types of services for which they qualify, subject to priority of service and resource availability considerations that

otherwise apply to all eligible individuals.

There is one exception. The U.S. Department of Labor (DOL) has stated that U.S. Internal Revenue Service (IRS) rules take precedence over WIOA rules. Therefore, individuals who do not want to provide a SSN must decide whether or not to continue to withhold that information when the service would require reporting to the U.S. Internal Revenue Service (i.e., reportable income and wages). If those individuals choose to continue withholding their SSN, Local Workforce Development Boards (LWDBs) and their service providers may subsequently withhold those specific services.

The WorkSource System is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Language assistance services for limited English proficient individuals are available free of charge.

Services and case notes connected to individuals who do not provide SSNs must be recorded and tracked in ETO. That is done by staff with Department Head permissions in ETO using procedures outlined in [Attachment A – Efforts to Outcomes \(ETO\) No Social Security Number Procedure](#).

TEGL 10-16, Change 1, states that the two employment outcome measures (second and fourth quarters after exit) must be captured through supplemental information for individuals who do not provide SSN (or are self-employed) since matches cannot be done against Unemployment Insurance, Wage Record Interchange System (WRIS), and federal government and military employment data.

TEGL 10-16, Change 1, also states that supplemental wage information needs to be captured for the median earnings outcome measure (second quarter after exit) for those who do not provide SSN (or are self-employed).

TEGL 26-16 provides guidance on (1) acceptable supplemental wage information and (2) how it should be obtained.

Acceptable forms of supplemental wage information include, but are not limited to, the following: Tax documents, payroll records, and employer records such as:

- Copies of quarterly tax payment forms to the Internal Revenue Service (e.g., IRS Form 941 (Employer's Quarterly Tax Return)) from the reference quarters
- Copies of pay stubs (minimum of two) from the reference quarters
- Signed letter or other information from employer on official letterhead attesting to an individual's employment status and earnings during the reference quarters

Other supplemental wage records:

- Follow-up survey (self-reported) of participants during the reference quarters
- Income earned from sales commissions or similar positions during the reference quarters
- Detailed case notes verified by employers and entered by case managers during the reference quarters
- Administrative records from other partners' automated database systems for which data sharing agreements exist, including current records of eligibility for programs with income-based eligibility (e.g., Temporary Assistance for Needy

Families (TANF) or Supplemental Nutrition Assistance Program SNAP) from the reference quarters

- Self-employment worksheets (that reflect income after expenses during the reference quarters) signed and attested to by participants

Where wage matches are not possible and local areas choose not to pursue supplemental wage information, participants are still included in the denominator for performance, which means they count as negatives (0 in the numerator) for the second and fourth quarter employment indicators and are excluded from median earnings calculations.

Service delivery staff must explain to participants who receive services without providing SSN that they and possibly their future employers will be contacted in the future and asked about their employment and earnings outcomes. To that end, staff must ensure that full and extensive contact information is collected from such participants (primary and secondary phone numbers, e-mail addresses, mailing addresses, including the same for alternative and secondary contacts) and instruct such participants to provide updated contact information if anything changes. In following up with participants, staff should contact them as close as possible to the end of the second and fourth quarters after exit.

Upon receiving supplemental wage information, staff must take the Program Outcome TouchPoint in ETO to record the employment and wage information (use the OMB wage conversion chart provided in Attachment 3 of TEGL 10-16, Change 1, if necessary, to convert figures into quarterly wages required for federal reporting).

Definitions:

Department Head - An ETO user role with a higher level of system access than those assigned "Staff" role. They have the ability to make data corrections related to the Participant Individual Record Layout (PIRL) and deleting services and program enrollments that were entered in error. This role is generally assigned to WDA MIS personnel, Supervisors and Administrators.

References:

- [Public Law 113-128, Workforce Innovation and Opportunity Act \(WIOA\) of 2014, Section 116\(j\)\(2\)](#)
- [Federal Register, Volume 81, No. 161, August 19, 2016](#), Page 55838; 20 CFR 677.175(a)(2)
- [Public Law 93-579, Privacy Act of 1974](#), Section 7(a)(1)
- [Training and Employment Guidance Letter \(TEGL\) 10-16, Change 1](#)
- [Training and Employment Guidance Letter \(TEGL\) 22-15](#), Attachment A
- [Training and Employment Guidance Letter \(TEGL\) 26-16](#)
- [WorkSource Services Catalog](#)

Website:

[Workforce Professionals Center](#)

Direct Policy Inquiries To:

*Employment System Administration and Policy
Employment System Policy and Integrity Division
Employment Security Department
P.O. Box 9046
Olympia, WA 98507-9046
SystemPolicy@esd.wa.gov*

Direct Technical Inquiries To:

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Information Technology Services Division
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Attachments:

- [Attachment A – Efforts to Outcomes \(ETO\) No Social Security Number Procedure](#)

Attachment A

Efforts To Outcomes (ETO) No Social Security Number Procedure

This procedure is for staff possessing the ETO Department Head role to create a record and document services provided to individuals in the case management system, Efforts To Outcomes (ETO), without entering an SSN. To add those individuals to ETO the following steps must be completed.

NOTE:

if the participant wants to add their SSN to their ETO record at a later date, the WSS Team can add the participant's SSN into the individual ETO record. The WSS Team will reach out to you to verify you have viewed the seeker's identification before the addition is made. Submit a remedy ticket for action. *Do not include the SSN in the ticket.*

ADDING A NEW PARTICIPANT IN ETO

Start by logging into ETO to see if the participant has an existing account.

To search for an existing account, change the office assignment in the quick search bar to WorkSource and begin a seeker search by name, date of birth, address, and other information the individual is willing to provide. If no existing account is located, continue to add a new participant account.

Prior to this process, first you must ask if the participant is legally entitled to work in the United States.

- If yes, continue with step 1 to add participant.
- If no, **do not add to ETO**; refer job seeker to available resources on WorkSourceWA.com, or resources offered through your local office or area.

IMPORTANT: A remedy ticket must be submitted to the ETO/WorkSourceWA system support team immediately if a record was created on the view/edit page for a participant who is not entitled to work in the U.S.

The requirement that individuals must be eligible to work in the United States originates from WIOA section 188(a)(5), which states:

PROHIBITION ON DISCRIMINATION AGAINST CERTAIN NONCITIZENS.

Participation in programs and activities or receiving funds under this title shall be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized by the Attorney General to work in the United States.

Per previous discussions with the Department of Labor (DOL), if individuals are not entitled to work in the U.S., it is not productive to provide them with services that are designed to help them find work in the U.S.

STEPS TO ADD A PARTICIPANT:

The screenshot shows the 'Add New Participant' form in the WorkSource ETO system. The interface includes a left-hand navigation menu, a top search bar, and a main content area. Red callout boxes with numbers 1 through 6 are overlaid on the form to indicate key steps:

- 1:** Points to the 'eto' logo in the top left corner.
- 2:** Points to the 'Participants' menu item in the left sidebar, which is expanded to show 'Add New Participant'.
- 3:** Points to a red banner message asking if the participant is legally entitled to work in the U.S.
- 4:** Points to a 'Data Sharing' message explaining that information will be shared with other partner programs.
- 5:** Points to the 'First Name', 'Last Name', and 'DOB' fields in the participant information section.
- 6:** Points to the 'Save' button at the bottom of the form.

1. From the left side of your staff dashboard, click the drop-down menu.
2. Select “Participants” from the menu and click the “Add New Participant” option.
3. Review the “Entitled to Work in the U.S.” message. Ask the participant if they are legally entitled to work in U.S. Take the appropriate actions from the participant’s response:

- a. If the answer is yes, continue.
- b. If the answer is no, do not continue; close out of this page. Advise participant you are not able to create their record in the system. Refer participant to the [Resources](#) tab on WorkSourceWA.com and offer any available resources within your local office and area.

Note: We are unable to provide a hard-stop on this page. We do have a stop-gap later in the procedure.

4. Read the Data Sharing message to the participant.
5. Complete the required* fields (first name, last name, DOB). Enter an email and cell phone if the participant is able to provide this information. Stop at the cell phone field as information after the field does not apply.

Note: Entering the first name, last name, and DOB ensures this staff-created ETO participant account merges with a WSWA account created by the job seeker at a later time.

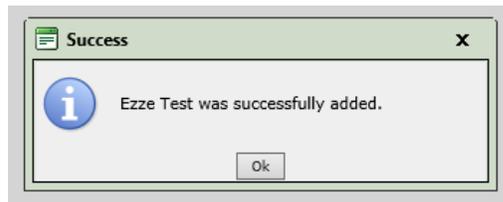
6. When finished entering information, scroll to the bottom of the page, and read the acknowledgement statement before clicking [Save](#).

By clicking 'Save', the customer and I acknowledge all information I enter on behalf of the customer to create their record is true and accurate to the best of our knowledge.

Save

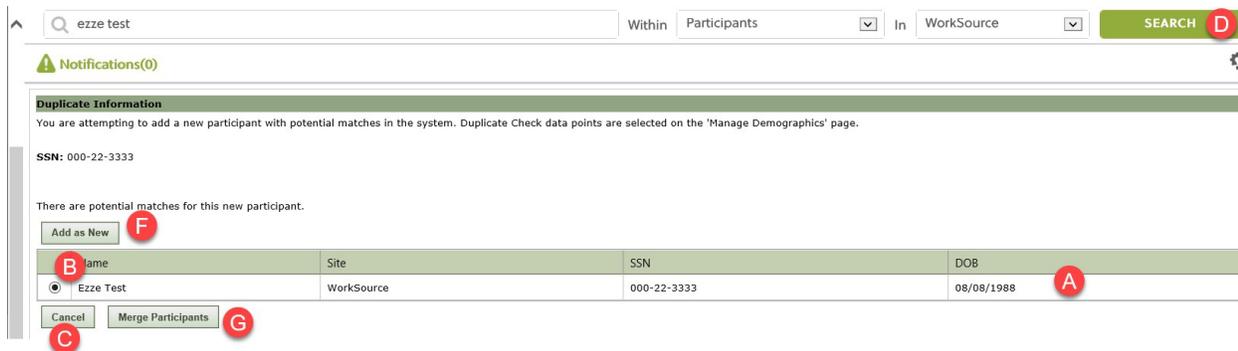
6

Click OK from this box.



7. You may get a Duplicate Information message if ETO detects you are trying to create a duplicate account. If this occurs review the name and DOB you used to create the account.

Do not continue with the add new participant process until you review the information and decide whether this is a duplicate participant or if corrections need to be made before moving forward.



- a. Review the Name and DOB for accuracy.

If the data isn't correct:

- b. Select the radio button.
- c. Click Cancel, to return to the previous screen to make the changes and click Save to create participant record

If the Name and DOB are correct,

- d. Enter the participant's name in the Quick Search bar, change In field to WorkSource to search the entire ETO system for duplicate participants.
- e. Review the records produced in the Quick Search Results to determine if the participant record you are trying to create is already in ETO or if you will need to create a new record. If you find the record already exists, select the correct record, and enter the services provided to the participant there.



- f. If this is a new participant, go to step 1 above and start the process again; when you get to the Duplicate Information screen click Add as New to create the new record.
- g. **DO NOT USE** the Merge Participants functionality button if you find a duplicate record. Submit a remedy ticket so the records can be merged by ITSD, and other appropriate actions taken.

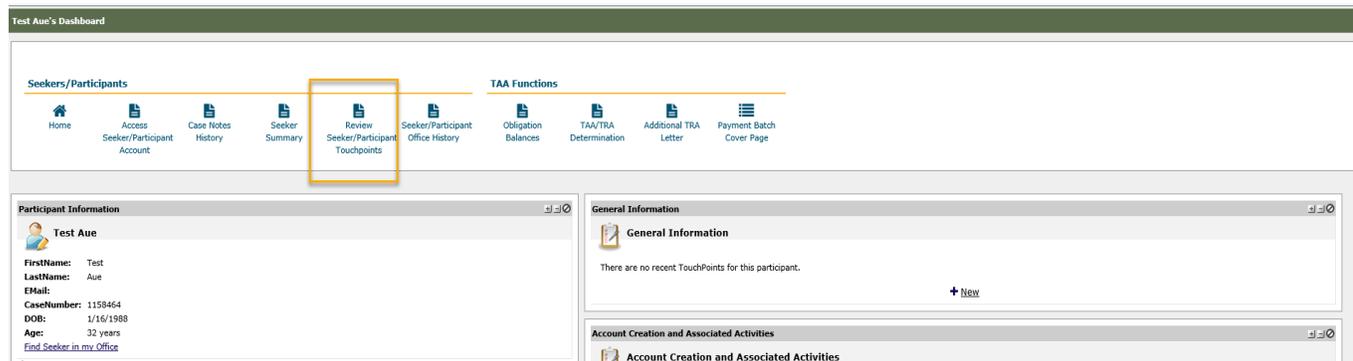
After clicking OK, you land on the participant's dashboard.

STEPS TO ADD DETAILS TPs:

To complete the record creation process, the following Details TPs are required:

- Demographic Details
- Disability Details
- MSFW Details
- Veterans Details

Adding the Details TP process starts from the participant's dashboard. Click the Review Seeker/Participants Touchpoints widget at the top of the dashboard.



The screenshot shows the 'Test Aue's Dashboard' with a navigation bar at the top. The 'Seekers/Participants' section contains several icons, with 'Review Seeker/Participant Touchpoints' highlighted by a yellow box. Below the navigation bar, there are three main sections: 'Participant Information' (showing details for Test Aue), 'General Information' (stating 'There are no recent TouchPoints for this participant.' with a '+ New' button), and 'Account Creation and Associated Activities'.



The screenshot shows the 'Review TouchPoints' widget for participant 'Aue, Test'. It features a search field for 'TouchPoint Name' and a message 'No records to display.'. A yellow arrow points to the 'Take New TouchPoint' button at the bottom of the widget.

Click Take New TouchPoint to add the required "Details" TPs.

Always begin by selecting the Demographic Details TP from the dropdown menu.

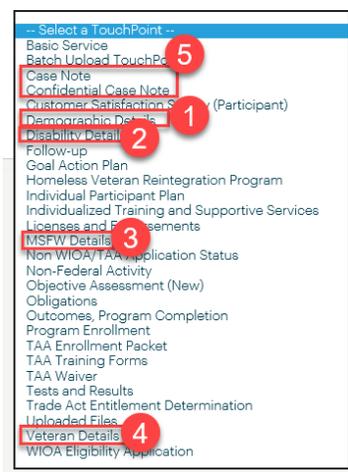
There is a hard stop to completing the process of adding a new participant record when creating the demographic details TP.

1. When the answer is no to the entitled to work in U.S., all fields disappear, you get a warning.
2. If you attempt to upload a document you get a message (see below).
3. If you attempt to save you get a message (see below).

Staff instruction: STOP and submit a remedy ticket to have participant information removed from ETO if a record was created on the view/edit page for a participant who is not entitled to work in the U.S.

If the participant is legally entitled to work in the U.S., continue by completing **all** information on all tabs of the Demographic Details TP. There are a few 'flag' fields that are read-only (grayed out); no data can be entered in read-only fields. They are located on the Profile, Occupation and Student tabs. Also, the Legacy tab is read only.

Once the Demographic Details TP is completed, continue on by selecting and completing the remaining TP's in the following order until you have created one of each of the TP's shown here. There is one read-only field at the bottom of the Disability Details TP. If the first question on the MSFW Details TP is answered 'Yes', then all other questions must be answered. And the Veteran Details TP has interactive questions based on how certain questions are answered. If a question displays on this TP, it is required to be answered.



Add a case note detailing the reason the participant was added to ETO without a WSWA account. If necessary, refer to [WIN 0088](#) for guidance on entering case notes.

The participant now has a record created in ETO. You can now begin adding programs and services to the participant's record.

REMINDER: Prior to program enrollment, check to see if you can find the participant in WSWA via impersonation. If the participant has a WSWA account demographics should always be updated in WSWA. If the participant does not have a WSWA account, check for a case note to verify if the participant was added manually using this create a record process. If the participant was added manually, and program enrollment was not completed at the time of the initial record creation, staff should review the details TPs to ensure accurate information prior to program enrollment.

PROVIDING JOB SEARCH ASSISTANCE

To provide job search assistance to individuals without an SSN, seekers need to be referred to other job search website applications, such as career one-stop, career builders, LinkedIn, etc.

RECORDING SERVICES

Staff will record any of allowable services that reflect the assistance provided to individuals. The list of services is available in the [WorkSource Services Catalog](#).

Participant data without an SSN will remain as a separate record in ETO even if the individual subsequently opens an account on WorkSourceWA.com. This means an increased probability of duplicate records.

DUPLICATE SEEKER ACCOUNTS

The WSS Team will merge duplicate seeker accounts. Submit a remedy ticket for action.

CONTACT

WorkSource Systems Support (WSS) Team at esdgpssteam@esd.wa.gov