Employment Security Department
WASHINGTON STATE

WorkSource Information Notice (WIN)

Employment System Administration and Policy

☒ Policy-related | ☒ Fiscal | ☒ Performance | ☐ Q&A | ☐ Other

Number: WIN 0135
Date: June 1, 2023
Expiration Date: N/A

TO: Washington WorkSource System

FROM: Gary Kamimura, Policy Manager

SUBJECT: State Guidance and Instructions for the Federal Economic Security for All Program

Purpose:

To communicate guidance and instructions for the Federal Economic Security for All (EcSA) program that is funded by WIOA Title I Governor's statewide activities funds.

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.

Background:

Economic Security for All (EcSA) is a poverty reduction model that coordinates existing programs to increase their collective ability to support low-income Washingtonians in their pursuit of equity, dignity, and sustained self-sufficiency. Governor Inslee approved an additional $5.4 million in Program Year 2022 WIOA Title I-B Statewide Activities Funds for a new round of Federal EcSA.

Additionally, at the direction of the Governor's Office, ESD received an additional $1.4 million to allow for the expansion of Federal EcSA to individuals whose household income is above 200% of the Federal Poverty Line, but who are at risk of dropping below. Due to this expansion, areas may designate up to 15% of their Federal EcSA enrollments to serve individuals whose documentation places their household income in excess of 200% of the Federal Poverty Line, but who are at risk of falling below it as defined by LWDBs.

This document has been prepared to codify developments and expansions in the Federal EcSA program and address questions that have arisen through the course of Federal EcSA service provision.

Note: To avoid ambiguity, programs funded by the Governor's WIOA statewide activities funds will be called Federal EcSA, while those funded by state general funds will be called State EcSA.

Content:

Program Requirements:

The priority of these funds is to accomplish the following goals:

1. Leverage WIOA and non-WIOA services (public assistance programs, housing, many others) to stabilize customer's lives, conveniently and with dignity for the customer.
2. Establish and implement customized career plans to reach 100% of participant income adequacy, as established by the UW self-sufficiency calculator.
3. Provide extensive wrap-around services and continue bundling benefits to maintain stability as customers pursue their customized career plan, continuously until they reach income adequacy.
4. Include people experiencing poverty in program design and implementation.
5. Work collaboratively across local, state, and federal levels to remove barriers to coordinated delivery of multiple benefits.

To properly measure accomplishment of these goals, LWDBs and sub-grantees are expected to comply with the following requirements:

- After enrollment into the program in accordance with Federal EcSA policy, all clients must be tracked in ETO (or its successor) according to the case management policies and procedures required by the WIOA Title I-B program and as laid out in Attachment A below.
- Clients must be assessed using the UW Self-Sufficiency Calculator and their information stored at program entry and upon attainment of employment in a manner that allows ESD and the designated contractor overseeing the implementation of the self-sufficiency calculator to collect and record this data to assess performance, and to demonstrate whether the client has reached their income adequacy and/or self-sufficiency goal. Additionally, LWDBs must designate a local Point of Contact who will manage reporting on the use of the calculator and the data collected.

Eligibility:

In order to meet eligibility requirements for the Federal EcSA program, applicants must fall into one of the following eligibility pools:

All EcSA Participants Must:

- Be from a household (as defined by Health and Human Services (HHS) poverty guidelines) that is below 200% of the Federal Poverty Level and
- Meet basic eligibility requirements for any of the three WIOA Title I-B Formula Programs

EcSA Participants over 200% of the Federal Poverty Line Must:

- Meet basic eligibility requirements for any of the three WIOA Title I-B Formula Programs and
- Be from a household (as defined by HHS poverty guidelines) that is:
  - Still below self-sufficiency wage as defined by the UW Self-Sufficiency Calculator or
  - Are at risk of falling into poverty based on factors determined by the LWDB

In order to enroll applicants under this expansion, LWDBs must create a policy to establish the factors that make an applicant likely to fall into poverty. Circumstances include but are not limited to:

- Recent loss of employment

- End of unemployment insurance payments or other public assistance
- Loss of housing
- Status as a recent victim of domestic violence or stalking

LWDBs are **not** required to serve individuals with income above 200% of the Federal Poverty Line. Creation of a local policy to allow the use of funds for such individuals does **not** obligate an area to expend any funds to serve individuals who are over 200% of the Federal Poverty Line.
Once enrolled, individuals over 200% of the Federal Poverty Line must be served in accordance with all the same rules and policies that govern individuals enrolled while below 200% of the Federal Poverty Line.

<u>Co-Enrollment:</u>

One of the goals of the Federal EcSA program is the promotion of a holistic approach to fighting poverty. For this reason, co-enrollment in any program that will assist clients to that end is encouraged.

- Eligibility for the Federal EcSA program does not supplant the eligibility criteria for any other program. LWDBs must ensure each participant meets the specific eligibility requirements prior to enrollment in each program.
- Likewise, prior or simultaneous co-enrollment in another program does not relax eligibility and documentation requirements for the Federal EcSA program. While actions undertaken to meet the requirements of other programs may be used to satisfy Federal EcSA requirements, those elements **must** also meet Federal EcSA requirements in order to satisfy eligibility policies.
    - This is particularly vital in the creation of the career plan. Individuals who are enrolled in Federal EcSA must be administered the UW Self-Sufficiency Calculator, and the results of this must be included in a comprehensive plan to help the participant to attain employment that exceeds their income adequacy goal.

<u>Minimum Requirements for Documenting Eligibility:</u>

In order to demonstrate eligibility, LWDBs are required to maintain documentation that verifies the following:

- ID
- U.S. Citizenship or otherwise legally entitled to work in the U.S.
- Age
- Household income status
- Selective Service registration, if applicable
    - Note: In accordance with Federal policy, individuals who were required to register but who did not do so who can demonstrate that their failure was not knowing or willful may be served under the Federal EcSA program. These individuals must have their Selective Service status adjudicated in accordance with the policy of the LWDB under which they will be served.

To better facilitate co-enrollment and local monitoring, the documents permitted to satisfy all of the above are the same as those designated by LWDB policy for the WIOA Title I-B programs, including self-attestation where allowable.

Additionally, areas that choose to serve individuals over 200% of the Federal Poverty Line must also fulfill the following requirements:

- To establish eligibility, the service provider must collect documentation that demonstrates that the applicant is at risk of falling below 200% of the Federal Poverty Line. This documentation is to be determined at the discretion of the LWDB. Examples may include:
    - Layoff letter
    - Documentation showing the end of benefits
    - Eviction notice
    - Self-Attestation
        - Note: self-attestation, while allowable at the discretion of LWDBs, is recommended only as a last resort should other options prove unavailable. LWDBs must establish a formal process including documentation that the applicant attests to their status and that documentation must be accompanied by case notes explaining the circumstances that place the applicant at risk

Allowable Uses of Federal EcSA Funding:

Funds allocated and expended under the Federal EcSA program must comply with the regulations governing the use of WIOA Title I-B statewide activities funds, including federal, state, and local policy rules controlling the use of WIOA formula funds. Any departure from such policies must be approved by the LWDB in accordance with their local procedures concerning new policy adoption.

One of the goals of the Federal EcSA program is the development and expansion of new techniques to better meet the specific needs of local populations facing poverty. LWDBs are encouraged to pursue innovation within the bounds of federal, state, and local policy. At LWDB request, the ESD Grants Management Office will assist in developing such programs and navigating potential issues, including those that arise as a result of the implementation of incentive programs or the expansion of services to those over 200% of the Federal Poverty Line.

Enrollment and ETO Guidance/Services:

Enrollment, eligibility, services, and all other aspects of client progress must be recorded in State MIS (ETO or its successor). LWDBs and sub-grantees may use other means to record participation locally, but all information within them must also be located in ETO, or in designated paper files if LWDB policies allow their use.

- If paper files are used, the service provider must maintain a file for Federal EcSA with all relevant information included.
- LWDBs and their sub-grantees must enter client data into the designated University of Washington Self-Sufficiency Calculator. Tracking of income information in other systems is acceptable for local purposes, but does not replace this requirement.
- It is imperative that to the fullest extent possible that data entered into ETO accurately reflect the service provided at the time the service is provided. Therefore, the minimal ETO data entry requirements are as follows:
    - Services must be entered at the point in time at which they are delivered.
    - If services cannot be entered at the time they are delivered, Federal EcSA services must be entered within 14 calendar days of service delivery, and the date entered must reflect the date the service was delivered. Subsequent edits to the services after the 14 calendar-day period to correct errors or further describe circumstances are acceptable.
    - Services entered after the 14 calendar-day restriction must be entered in accordance with the following process:
        - For any Federal EcSA service errors identified after the 14 calendar-day

restriction, staff must correct the errors and request that the individual who has supervisory oversight over the program review and approve the correction. This approval must be documented with a case note. The case note must identify the service name, the reason for the correction, and the designated supervisor’s review and approval of the correction.
        - Example: “The [enter service name, i.e.: Occupational Skills service that was provided on {date service occurred}] was not entered within the 14 calendar-day allowable timeframe per WIN 0135. As a designated supervisor, I reviewed and approved the late entry”.
- See Attachment A for enrollment procedures.

Performance and Evaluation:

The success of LWDBs and their sub-grantees in accomplishing these goals will be measured based on the following criteria:

- Reach target number of enrollments for individuals who meet eligibility requirements of the program.
- Reach target number of participants enrolled in training for a career with starting wages above their unique income adequacy goal, in accordance with targets negotiated between LWDB and GMO.
- Reach target number of participants with employment income above their income adequacy goal.
- Meet targets for expenditure of funding on the schedules set in the contract.
- Use the designated Self-Sufficiency Calculator, and record the results at intake and exit in accordance with the guidance provided.

To facilitate the tracking of these criteria, LWDBs will provide reports on a quarterly basis, with specific format as defined in local contracts executed between ESD and LWDBs.
For the purposes of tracking target enrollments in the Federal EcSA, there are two numbers that will be considered. First, the total number of enrollments. This is a straightforward counting of all individuals who are enrolled into the Federal EcSA program. The second is the total number of unique individuals enrolled across the State and Federal EcSA programs.

> ***Example:*** *If an LWDB has a requirement for 30 Federal EcSA participants and 30 State EcSA participants, their requirement for general enrollment in State EcSA is 30, and their requirement for total unique individuals enrolled between the two programs is 60, regardless of whether individuals are co-enrolled in both State and Federal EcSA.*

Monitoring:

The Federal EcSA program will be monitored by the ESD Monitoring Unit, at a time and in a manner to be determined in consultation between the Grants Management Office, the ESD Monitoring Unit, and the LWDB to be monitored.

MOU and IFA Requirements:

Per WorkSource System Policy 1013, Infrastructure Funding Agreements (IFA), entities that provide direct services under the Federal EcSA programs, if providing direct services through the one-stop center(s) (AJCs), must sign the MOU, and pay their proportionate share of IFA costs.

References:

- WorkSource System Policy 1013 Revision 4 - One-Stop Memorandum of Understanding
- WorkSource System Policy 1024 Revision 2 – Infrastructure Funding Agreements and State Funding Mechanism

Website:

Workforce Professionals Center

Direct Inquiries To:

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Olympia, WA 98507-9046
SystemPolicy@esd.wa.gov

Attachments:

- Attachment A – ETO Guidance and Procedures
- Attachment B – UW Self-Sufficiency Calculator Guidance
- Attachment C – DSHS WIOA Client Spending Guidance

Attachment A - ETO Guidance

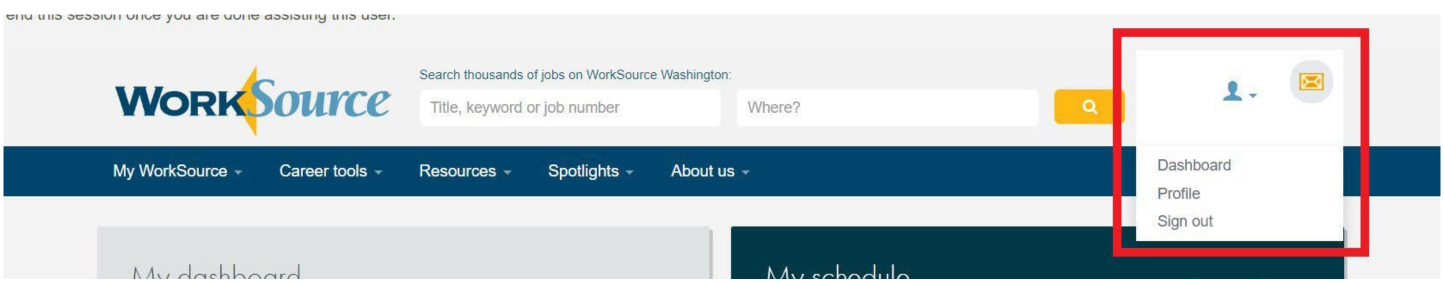
<u>Enrolling a Client in the Federal EcSA Program</u>

First, ensure that client has an account on WorkSourceWA.com.

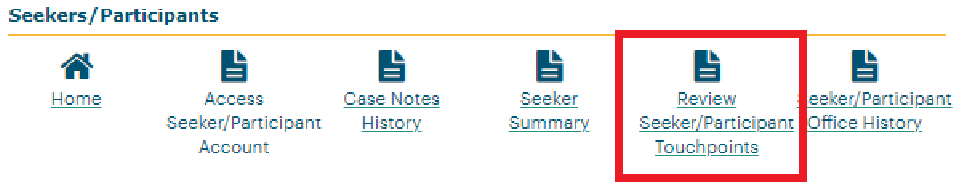
- Several demographic fields can only be filled in by an account on WorkSourceWA.com, making a fully completed account vital.
- If a client is not in ETO, they do not have a fully completed account on WorkSourceWA.com.
- You can check a client's status by going to their dashboard, and selecting "Access Seeker/Participant Account".

- If they do not have an account on WorkSourceWA.com, you will get the following message:

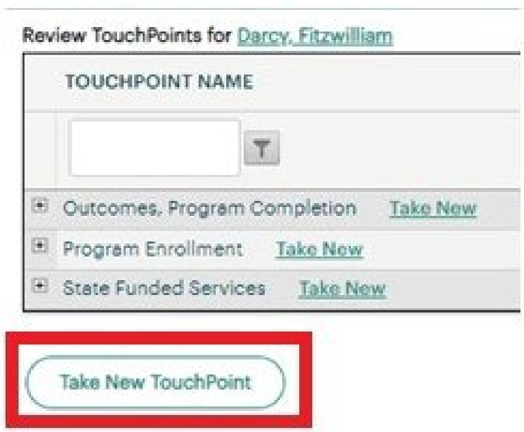
- If they do have an account, you will need to ensure that their profile is filled out fully. You can reach the profile by clicking on the person in the upper right corner of the page, and clicking "profile." You then ensure that every field is filled. Some clients selected "no" on the question "would you like to be assessed for additional services;" if this is the case, you will need to change their answer to "yes" and fill in the answers, or else ETO will not have complete demographic information.



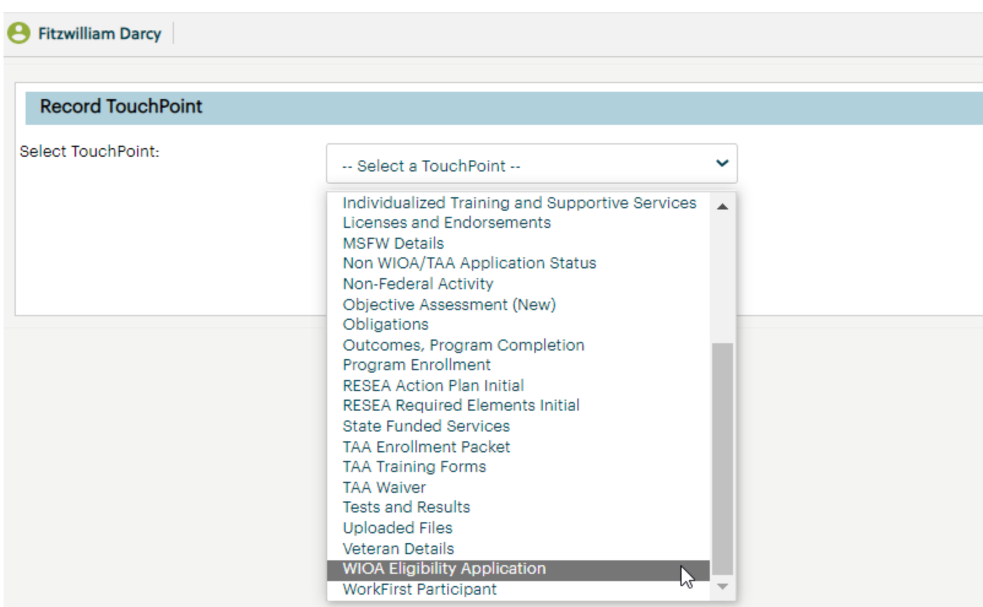
- Once you have verified that their profile is filled out in full, you will then move on to fill out the WIOA Eligibility Application
  - Case managers must follow local policy concerning the entry of a new WIOA Eligibliity Application if a WIOA Elligibility Application for a currently active program is already present.
- If they do not yet have a WIOA Eligibility Application taken, you will start by selecting "Review Seeker/Participant Touchpoints" from the client's dashboard:



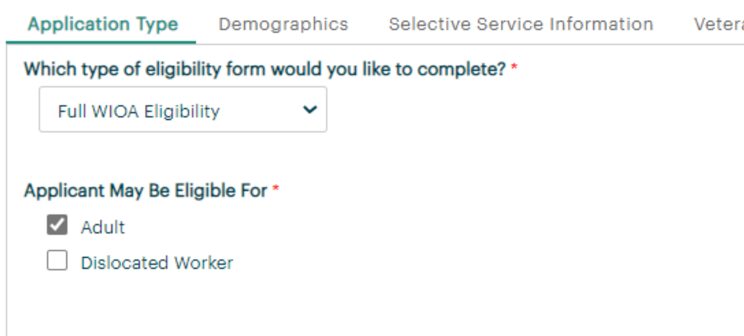
- From this menu, select "Take New Touchpoint" from the bottom of the list.



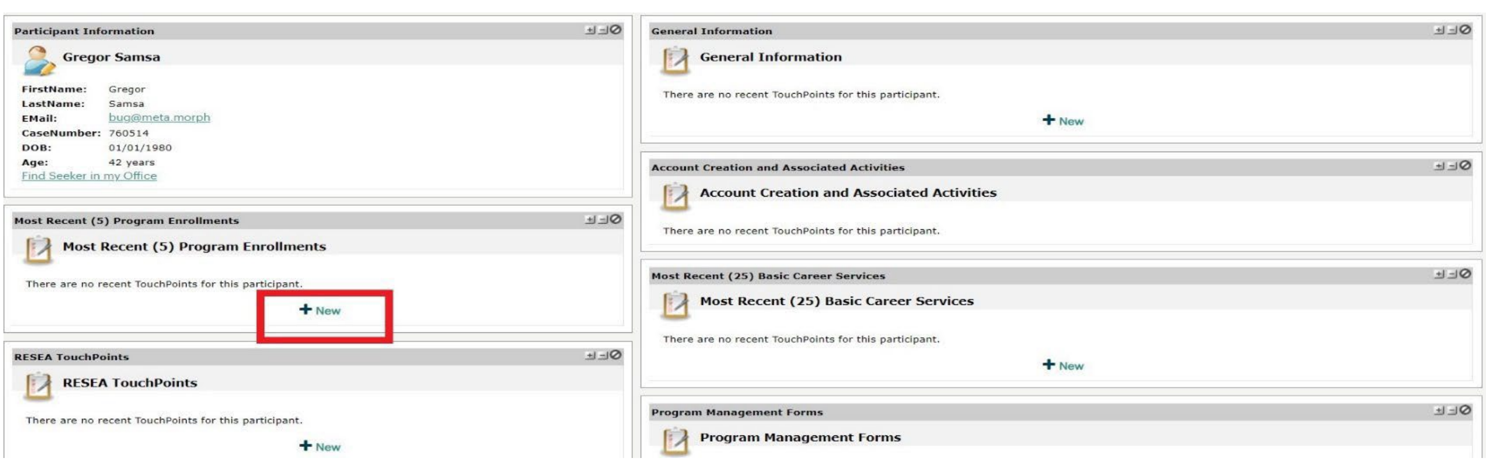
- Select "WIOA Eligibility Application" from the dropdown list



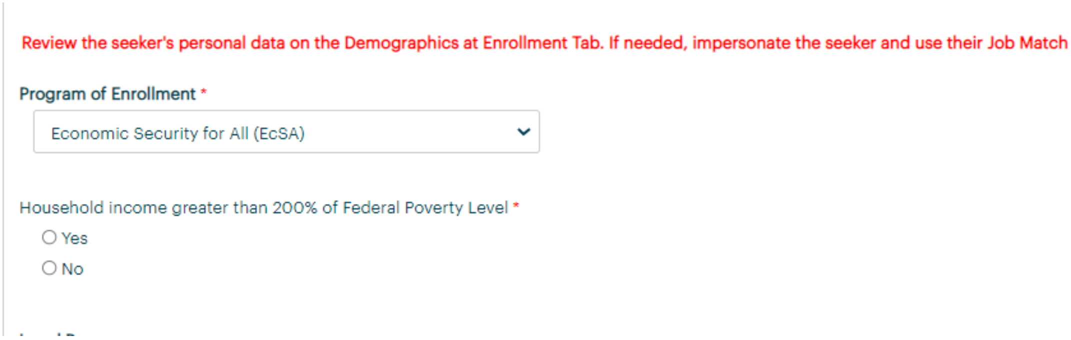
- Select “Full WIOA Eligibility” from the dropdown menu, and select “Adult.” If the participant also may fit into Dislocated Worker or Youth, you may select those options as well.



- Fill out each of the tabs in the WIOA Eligibility Application fully, ensuring that all necessary information is included.
  - Remember that the income standard for the WIOA Adult program is typically lower than the requirement for the EcSA program, so it is possible to have a participant who is eligible for the EcSA program, but who would warrant a response of “No” for the question regarding whether a participant is low-income. Take care to fill out the form and case note accordingly.
- Once you’ve ensured that their account is fully completed and a WIOA Eligibility Application has been taken, you can begin the enrollment process. From the client dashboard, select “new” in the area titled “Most Recent Program Enrollments”.



- Select the program “Economic Security for All,” and then answer the question that populates “Household income greater than 200% of the Federal Poverty Level” with either a yes or no, depending on their income status.



- Fill out the other items on the Program Enrollment form, and save.

How to Track an EcSA Career Plan

- In order to complete a Federal EcSA enrollment in the system, a service marking the completion of the career plan and UW Self-Sufficiency Calculator must be entered. In order to streamline processes and avoid errors, the service to be taken for Federal EcSA is "Development of Individual Employment Plan."
    - The career plan must be complete and service entered within 30 calendar days of the enrollment.
- This service will also serve as the location where the Federal EcSA Career Plan is to be located.
    - If the client already has a career plan as a result of a prior, ongoing program enrollment, the bulk of the plan may be located in other parts of ETO, but the Development of Individual Employment Plan must include any EcSA-specific elements of the enrollment, such as information concerning the UW Self-Sufficiency Calculator results, and how the results relate to the larger career plan.

Program Completing a Participant

- Create new *Outcome, Program Completion* TouchPoint.
- Select Economic Security for All (EcSA) from active program enrollment dropdown menu.
- Complete *Outcome, Program Completion* TouchPoint data elements as appropriate for the participant:
- Identify whether they are "employed at outcome".
- Enter annualized wages.

ETO Reports

General Tips:

- The system pulls automated reports for programs on Monday. Because of this, waiting until later in the week can save time and effort
- The first time you pull a report, you may need to turn off pop-up blockers for the site.
- ETO reports will eventually time out if the data selected takes too long to collect; if it extends past that time period, it will provide whatever information it has.
    - The system will provide you whatever information it has pulled as of the timeout. Please note that this may not be all data that is available from the period requested. For this reason, multiple report pulls for especially long date ranges are therefore recommended.

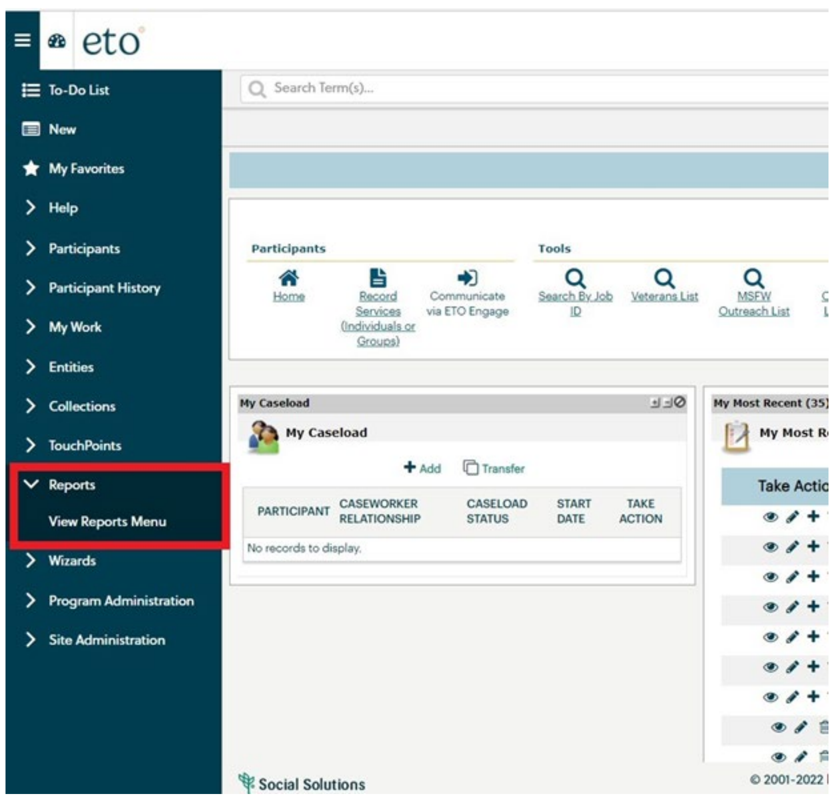
Suggested Reports:

To assist with tracking case management and service provision, the following ETO reports are recommended:

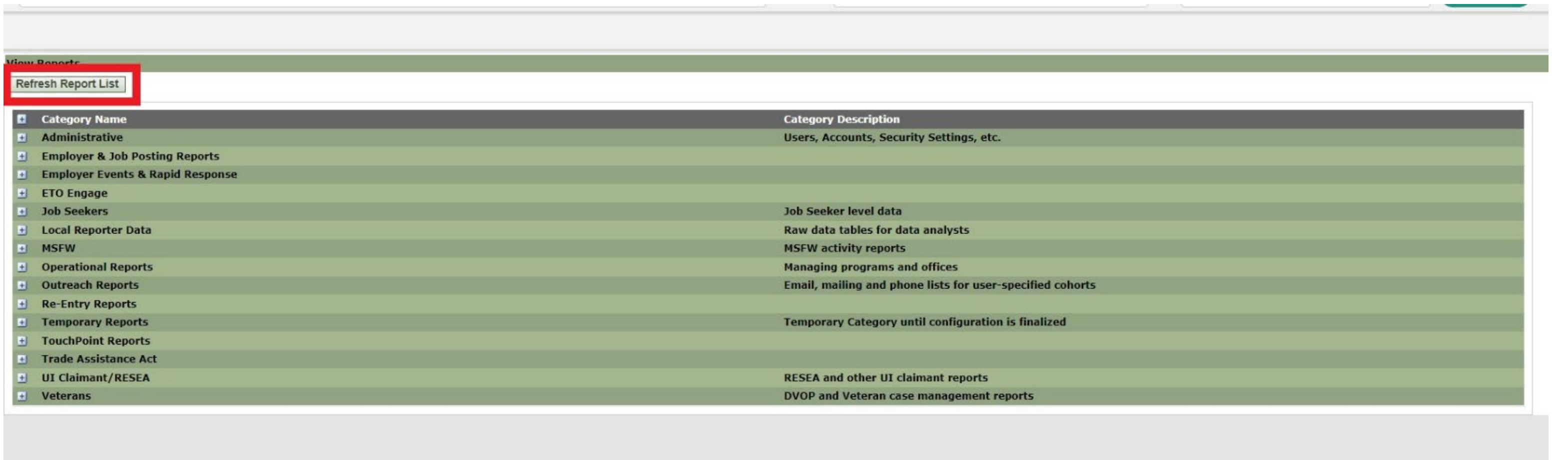
- Program Enrollments Report Without Demo Details
- Outcomes Touchpoints With Employment Start Date Information
- Case Management Report without Demographic Details
- Local Reporter Data Optimized
- Create a Record in ETO

Getting Started

- The reports menu is in the user control panel on the left side of the page
- Select the three bars, then choose “Reports” from the dropdown menu



- Always start by refreshing the Reports List

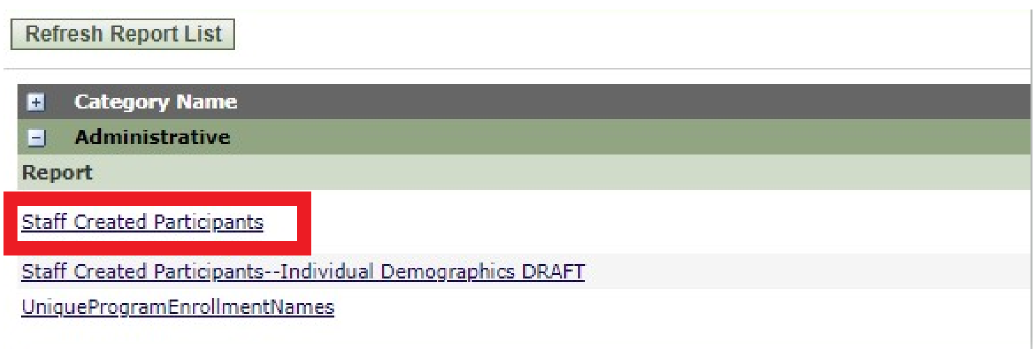


Select Report:

- The reports previously mentioned are in different sub-categories:
  - Local Reporter Data
    - Local Reporter Services Report OPTIMIZED
    - Program Enrollment Outcomes

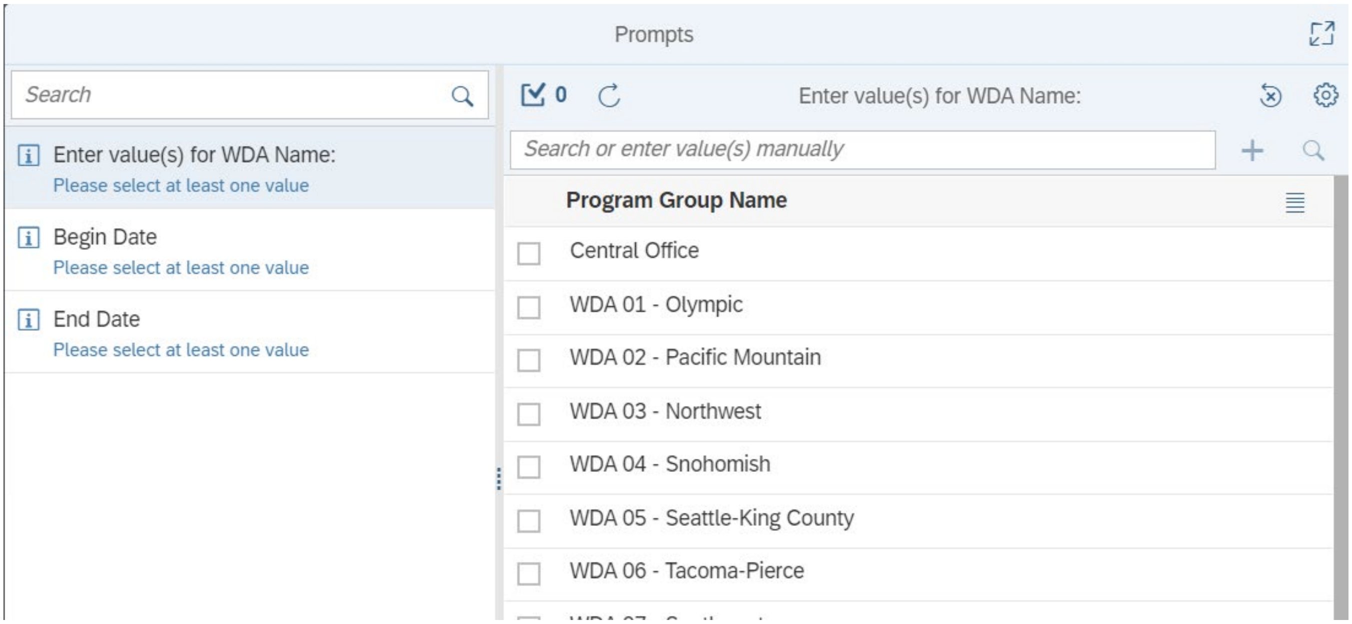
  - Operational Reports
    - Outcomes Touchpoints With Employment Start Date Information
    - Program Enrollment Report With Demographic Details

- Administrative Report
  - Staff Created Participants



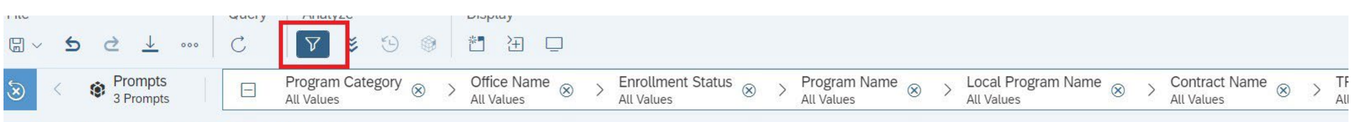
Selecting Data:

- Select dates and areas from which to collect information
- Remember, the more you select for time and area, the longer the report takes to populate.



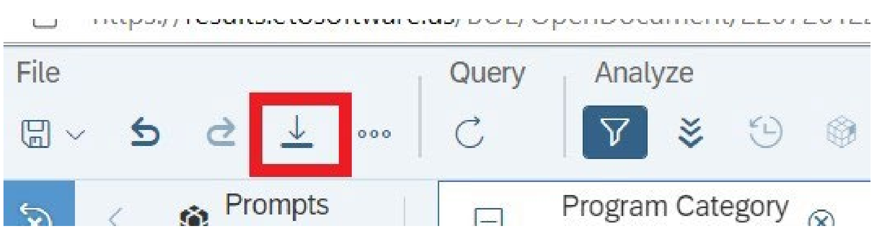
Navigating the Report

- The Filter Bar can be used to sort data before export
    - You may not have this by default; to bring it up, click “Filter Bar” on the toolbar at the top.
    - Select the information you wish to see by clicking on the options on the bar below.



Exporting to Excel

- Select the export button from the taskbar, shown below



- Choose the format you prefer.
- The file will be automatically saved in your downloads folder if you’re using Edge
- If you’re using Chrome, it will not automatically save, and you will need to save it before closing
- Note: Chrome can sometimes cause issues with ETO. If you have difficulty, try using Edge.

Self-Sufficiency Calculator Step-By-Step Guide to Saving Customer Information

The following is a step-by-step guide to saving customer information in the Self-Sufficiency Calculator.

STEP #1: FIND THE SELF-SUFFICIENCY CALCULATOR ON THE INTERNET
Go to www.thecalculator.org.

STEP #2: LOG IN TO THE CALCULATOR AS A CASEWORKER
On the main page for the Self-Sufficiency Calculator, click on the button at the bottom left of the screen: "Case Manager Log In click here." On the case manager page, enter your ID & password and click on the "Login" button. Once you have logged in you can register a new customer, search for or list customers, edit registration data, or enter exit data.

*(Your manager will give you a Case Manager ID and Password. If you do not have those, please see your manager.)

Registering a new ECSA customer

STEP #3: REGISTER A NEW CUSTOMER
Click on "Register New Client." This refers to the date that you create a self-sufficiency calculator record for your customer, to allow you to capture "pre" and "post" wage data. Selecting this option will take you to the Personal Info page.

STEP #4: COMPLETE INFORMATION ON THE CUSTOMER INFORMATION PAGE
Answer each of the questions on the Personal Info page for your new ECSA customer. Required fields have a red asterisk and you must complete those in order to proceed to the calculator.

STEP #5: PROCEED TO THE CALCULATOR
After you've completed the Personal Info Page, click the "Continue to Calculator" button at the bottom of the screen.

STEP #6: ENTER CUSTOMER DATA
Enter your customer's data on the Wages/ Income and Expenses pages. You can navigate easily through the pages using either the tabs at the top of the page or the "Next" button at the bottom of each page.

STEP #7: REVIEW CUSTOMER DATA
Go to the Review page to double-check the
information you have entered. Click on any of the blue "edit" buttons to make necessary changes. Once you have reviewed the information, click on the "Move to Final Report" button.

STEP #8: SAVE INFORMATION
From the drop-down menu at the bottom of the Final Report page, select “Print this page,” click on the “GO” button and print the report for your file. Then select “Save registration data & exit calculator” and click on the “GO” button.

Editing customer registration data

STEP #1: LOCATE CUSTOMER RECORD
After logging-in as a case manager, use the client search field to locate the customer’s record (you can search by first name, client ID, or ETO ID).

STEP #2: EDIT RECORD
Once you have located the record, click on “edit record” and use the tabs to get to the appropriate page(s) to edit registration data.

STEP #3: SAVE INFORMATION
Once you have made the necessary changes to customer registration data, go to the Final Report page. From the drop down menu at the bottom of the page, select “Print this page,” click on the “GO” button, and print the report for your file. Then select “Save registration data & exit calculator” and click on the “GO” button. *Please note: registration data should reflect customer information at the time of registration; only make edits if you find that the information initially entered was incorrect at the time.*

Exiting an ECSA registered customer

STEP #1: EXIT A CUSTOMER
The "exit" function is intended to capture the wage data when your customer secures employment as a result of participating in the ECSA program. After logging in as a case manager, use the client search field to locate the customer’s record (you can search by first name, client ID, or ETO ID).

STEP #2: ENTER CUSTOMER DATA
Once you have arrived at the Personal Info page, work through each of the pages entering income and expense information as you did at registration. (Note: the data you entered at registration will appear on these pages at exit. Edit as needed and leave data that is still current at exit.)

STEP #3: REVIEW CUSTOMER DATA
Go to the Review page to double-check the information you have entered. Click on any of the blue “edit” buttons to make necessary changes. Once you have reviewed the information, click on the “Move to Final Report” button.

STEP #4: SAVE INFORMATION
From the drop-down menu at the bottom of the Final Report page, select “Print this page” and click on the “GO” button and print the report for your file. Then select “Save exit data & exit calculator” and click on the “GO” button.

Attachment C - DSHS document concerning financial impacts from WIOA programs

WIOA Funded Service	Definition	Status	Citation
On the Job Training (OJT)	*Training provided by an employer to a paid participant while engaged in productive work in a job that improves knowledge or skills essential to the full and adequate performance of the job; provides reimbursement to the employer of up to 50% (for WIA) or up to 75% (WIOA) of the wage rate of the participant, for the extraordinary costs of providing the training and additional supervision related to the training; limited in duration as is appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participants, as appropriate.*	Countable for SNAP benefits	*Food and Nutrition Act* Sec. 6 (l) earnings to individuals participating in on-the-job training under title I of WIOA shall be considered earned incomefor purposes of SNAP except dependents under 19 years of age. *7CFR §273.9(b)(1)(v)* earnings for OTJ are countable excluding earnings paid to those under 19. This includes monies paid under WIA/WIOA and money paid by theemployer. *WAC 388-450-0045(1)* for WIOA OJT, excluded for TANF, included for Basic Food.
Work/ Internship Experience (WEX)	*For adults and dislocated workers, work experience is a planned, structured learning experience (and training) that takes place in a workplace for a limited period of time and is linked to a career. Work experience may be paid or unpaid, as appropriate. A work experience workplace may be in the private for profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists.*	Not countable for SNAP benefits	*7CFR §273.9(b)(1)(iii)* training allowances under WIOA other than OJT earnings are excludable. *WAC 388-450-0045(1)* payments issued under WIA/WIOA other than OJT earnings, are excluded.
Incentive Payments			
Needs Related Payments	*Financial assistance (income support) to eligible adults and dislocated workers in training to enable them to participate in that training.*		
Transitional Job	*A transitional job is a training service that is a subsidized, time-limited work experience with a public, private, or nonprofit employer for individuals with barriers to employment who are chronically unemployed or have an inconsistent work history to establish a work history that will lead to retention in unsubsidized employment. This service must be provided in combination with career services and/or support services. If it is not, it must be recorded as a work experience and/or internship.*		

Additional Q&A

1. **How would incentive payments for completion of an activity that are not repeatable and not guaranteed payments be treated?**

   Payments received too infrequently or too irregularly to be anticipated are excluded if under $30 per quarter 7 CFR §273.9(c)(2). These payments would be countable income if they could be anticipated, exceeded 130% Federal Poverty Level, or were received during a periodic report or recertification period.

2. **Would gift cards impact SNAP benefits for in the following circumstances:**

   Cards that are general use, like Visa gift cards
   Gift cards that can be used as cash and can be reasonably anticipated are counted as income 7 CFR §273.9(b)(2)(v). These gift cards are counted as cash on hand at time of eligibility determination are counted as a resource 7 CFR §273.8(c)(1).

   Cards that are for specific vendors, like Safeway gift cards
   Vendor-specific gift cards are excluded both as a resource 7 CFR §273.8 (e)(2) and as income 7 CFR §273.9(c)(8).

3. **Would money earned as part of Disaster Relief Employment count as income for the purposes of SNAP?**

   According to FNS guidance and 7 CFR §273.9(c)(10)(v), if the funds were allowances under WIOA, were specifically verified as funded by a National Emergency Grant under WIA through the state labor department, and not considered on-the-job training, they could be excluded.