![Workforce Development Council of Seattle - King County logo]

TECHNICAL ASSISTANCE MEMORANDUM

Virtual Enrollment: Verbal Self-Attestation and Remote Eligibility Documentation and Registration Requirements during the COVID-19 Emergency

EFFECTIVE DATE: 08/28/2020   **TA#:** TA101

I.   PURPOSE:

This technical assistance (TA) memorandum communicates guidance from the Workforce Development Council of Seattle-King County (WDC) to WorkSource System staff and service providers for WIOA Adult, Dislocated Worker, and Youth programs, related to temporary, minimum requirements for eligibility documentation and registration into WIOA Title I-B programs due to COVID-19 impacts, as outlined in WIN 0109.

II.   BACKGROUND:

The COVID-19 emergency in Washington has temporarily closed WorkSource centers across the state for in-person services. The closures prevent Workforce Innovation and Opportunity Act (WIOA) Title I-B service providers from conducting in-person eligibility and other assessments, verifying and imaging acceptable documentation to establish eligibility or priority of service, and acquiring dated signatures from individuals for the purpose of registering them in the WIOA Title I-B youth, adult, and dislocated worker programs.

III.   GUIDANCE:

Virtual Enrollment

Service providers should adhere to the general process below when conducting virtual enrollments, while also following the specific instructions provided in WIN 0109:

   a) Complete eligibility application in ETO and conduct intake assessments with customer verbally by phone and/or other secure virtual platforms (email, text, chat, Skype, Zoom or WebEx)
   b) Transmit all documents that require customer completion and signature to customer via secure email (i.e. enrollment forms, disclosures, self-attestation form (verbal attestation is permitted if documented in case notes per instructions in WIN 0109(1)(a))
   c) Request copies of any required supporting documentation for upload and verification through some combination of electronic means (emailed or texted attachments, scans, digital photographs, electronic platforms such as DocuSign or Verisign) or postal pickup/mail drop-off to ensure protection of Personally Identifiable Information (PII)
   d) Receive verbal or written confirmation from customer certifying accuracy of enrollment information
   e) After completing all necessary intake and eligibility documents for enrollment, case manager uploads all relevant documents into ETO

Minimum Requirements for Documenting Eligibility for WIOA Title I-B Programs

a) Per WIN 0109, verbal self-attestation is allowed to document eligibility for criteria for which self-attestation is not otherwise allowed per DOL guidance but should not be used as a first resort. Service providers should attempt to collect eligibility source documentation when possible. However, during this time where COVID-19 is impacting programs' ability to physically collect documentation, documentation may be accepted verbally as long as it is clearly documented in case files according to the steps outlined in WIN 0109(1)(a) and (b).

b) In addition to the above, service providers should continue to comply with guidance provided in WDC TA

Remote or Virtual Eligibility Documentation

a) As stated in WIN 0109(2), to the extent possible, service providers should (but are not required to) make efforts to collect, maintain, and verify acceptable eligibility and priority of service documentation. In instances where COVID-19 impacts prevent the collection of required documentation early in the application process, the WDC may permit service providers to obtain those documents at a later time.

b) In addition to acceptable forms of verification listed in WIN 0109(2)(b), the WDC does permit self-attestation and applicant statements as allowable methods of verification for certain eligibility criteria.

Signature Collection and Alternatives

Service providers should obtain required signatures for eligibility documentation in accordance with methods outlined in WIN 0109(2)(c). The WDC will also permit the use of secure, HIPAA compliant, electronic document signing platforms not listed in WIN 0109(2)(c)(i), including but not limited to HelloSign, Doxy, Adobe Fill & Sign, and Adobe Signature.

Documentation in ETO

Service providers should securely maintain all documentation collected from customers to ensure availability for any future local, state, or federal monitoring or audit reviews, as stated in WIN 0109(2)(d). This includes but is not limited to the secure document uploads into ETO enrollment and/or compliance with existing protocols for maintaining organized, up to date customer files.

Security of Customer Data

Per the ETA Coronavirus (COVID-19) FAQs, the security of customer data and its transmission as well as ease of customer access must be considered. Local areas must maintain appropriate information security and privacy must be maintained to avoid disclosing Personally Identifiable Information (PII) through transmission of documents from personal computers, tablets, or cell phones if they are not encrypted. Such information 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. 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.

Service providers should also continue to follow WDC policies and protocols regarding MIS, reporting, and file documentation.

IV.   EXPIRATION:

This TA memo and corresponding WIN 0109 are effective until December 31, 2023 or until any potential termination, extension, or modification of this TA memo and/or WIN 0109 will be communicated by the WTECB and WDC, respectively.

V.   REFERENCES:

- ETA COVID-19 FAQ, 6/10/2020 - ETA Coronavirus (COVID-19) Frequently Asked Questions
- WIN 0109, WIOA Title I-B verbal self-attestation and remote eligibility documentation and registration requirements during the COVID-19 emergency
- TEGL 39-11, 06/28/2012 - Guidance on the Handling and Protection of Personally Identifiable Information (PII)
- Eligibility Policy Handbook, Revision 4 - Handbook Revision 4, 12/28/2018
- Technical Assistance Memo No. 13, 07/26/2019 - Customer File Case Notes