

Memo: WIOA Title I-B enrollment and eligibility documentation requirements during the COVID-19 emergency

This guidance supersedes any Workforce Snohomish policy or procedure where a conflict is present; all other Workforce Snohomish policies and procedures still apply.

This Workforce Snohomish guidance expands on requirements considering [local Policy 2020](#) and tools.

Workforce Snohomish acquired two tools for its subrecipients to use with virtual enrollments: Cognito Forms & DocuSign. Cognito Forms has all the WIOA eligibility and enrollment forms in a fillable format that customers and employment specialists should use to collect information needed for enrollment; DocuSign allows staff to add a signature line on a PDF, email it to a customer for signature, and collect the signed document.

This guidance provides 3 virtual enrollment options, as described below. Whenever possible, source documentation demonstrating eligibility through **Option 1** should always be collected via Cognito Forms, DocuSign, other applicable virtual programs, or a combination of said methods. If there are significant barriers to the methods stated, self-attestation is a last resort method that may be used as the minimum documentation.

Workforce Snohomish Adult, Dislocated Worker (DW), Youth, and National Health Emergency (NHE) Subrecipients will follow one of the three options below to enroll eligible customers:

Option 1: Cognito Forms Virtual Enrollment

Subrecipients must use **Option 1** to collect source documentation demonstrating eligibility and only rely on alternate options when absolutely necessary.

1. WIOA team pre-screens customers via virtual one-on-one meetings or group WIOA orientations.
2. A complete virtual WIOA application in Cognito Forms is shared with customers who may be eligible for WIOA Title 1 services and the customer fills out the entire application, signs it, uploads required identity documentation and submits.
3. If the customer is unable to fill out the form an employment specialist may call the customer via phone, or use other virtual tools, and fill out the form on their behalf. In such a scenario, the job seeker must be emailed the full application to sign via DocuSign; the customer must also use the *Document Upload Form* to upload and share their identity verification documents; and fill and sign the *Self-attestation Form*.
4. To enroll a customer in ETO, the employment specialist must fill out the *WIOA Eligibility Application* touchpoint using information in the Cognito Forms signed by the customer. The employment specialist may choose to call the customer during the touchpoint data entry for clarifications; that step would be in addition to the ones outlined above, not as a substitution. All documents received must be uploaded in ETO under the *WIOA Eligibility Application* touchpoint.
5. To finish enrollment, employment specialists will take a program enrollment touchpoint after completion and verification of WIOA Eligibility Application touchpoint.

Option 2: Enrolling customers directly into ETO

Subrecipients may choose to utilize **Option 2** when significant barriers present themselves to using Option 1.

1. When necessary, an employment specialist may enroll a customer directly into ETO with a customer on a phone line, or other virtual voice communication means.
2. To initiate this process, the employment specialist will email the customer all WIOA enrollment documents and disclosures; have customer fill out the following:
 1. Self-attestation form
 2. Document upload form and upload identification documents
3. After receiving the required documentation listed above, the employment specialist will open up ETO and take a WIOA Eligibility Application touchpoint and fill out the entire application with the customer on the phone.
4. While filling out the application, employment specialists will upload all relevant and appropriate documentation that was received from the customer.
5. To finish enrollment, employment specialists will take a program enrollment touchpoint after completion and verification of WIOA Eligibility Application touchpoint.

Option 3: Verbal Self-Attestation Enrollment

Subrecipients may only use **Option 3** as a last resort with no other options available.

Per [Workforce Information Notice \(WIN\) 0109](#), verbal self-attestation is allowed to document eligibility for criteria for which self-attestation is not otherwise allowed per DOL guidance, but **should only be used as a last resort**. Employment Specialists must attempt to collect eligibility source documentation when possible. In circumstances where customers face significant barriers to utilizing any virtual form of enrollment with no access to a WorkSource Center because of closures due to COVID-19, full verbal self-attestation, but **must** follow the stated guidelines below:

The employment specialist and applicant conduct the eligibility determination and registration verbally by phone with the employment specialist **case-noting** the following in ETO:

1. That verbal self-attestation was necessary due to a one-stop office closure caused by COVID-19.
2. 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."
3. That the employment specialist has provided to the applicant the *Equal Employment Opportunity and Complaint and Grievance Procedures* and *WIOA Title I-B Program Data Collection Certification* information ([see Attachment A of this WIN](#)) 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."
4. If determined eligible per verbal attestation method, the employment specialist will continue to verbally obtain from the applicant all information required for federal

reporting and record the information via the WIOA Eligibility Application touchpoint in ETO.

5. To finish enrollment, the employment specialists will take a program enrollment touchpoint after completion and verification of WIOA Eligibility Application touchpoint.

Limitations:

It is Workforce Snohomish's guidance to prioritize customers who are on permanent layoff for enrollment as DW. For persons on temporary layoffs and furloughs, additional information such as a case note entered into ETO justifying the need for services is required; The need for justification results from the expectation that such employees are expected to resume their duties with their current employers once the COVID shelter in place order is lifted.

Security:

Customer information collected via Cognito Forms must not be saved in staff personal computers. Information downloaded from Cognito forms must be saved in secure shared drives, ETO, or within Cognito itself.