

**Regional Program Standards**

**Focus:** ☒ WorkSource Centers ☒ Youth Program Services  
☒ Other: Economic Opportunity Programs

**Topic: COVID-19 Emergency Policy**

**Date:** March 13, 2020

☒ New

☐ Revised

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## Overview

These Regional Program Standards follow State guidance and are provided to ease and enhance contractor ability to respond to participants during the COVID-19 emergency. Where the guidance is program-specific (e.g. WIOA) it will be noted.

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### Gap in Service

Where funders have authorized, a Gap in Service has been used to assure participants are not inadvertently auto exited during a time when they were unable to access services but continue to be interested in completing their program engagement.

Where staff are working with participants and deliver services, service data must continue to be entered into I-Trac. Further, if a participant has completed services and the enrollment should exit, the Gap in Service may be removed, and the record will exit back to the date of last qualifying service.

### WIOA and State Training and Work Experience Project

The State has authorized that all current WIOA IB enrollments (Adult/Dislocated Worker/Youth) and Training and Work Experience Project enrollments will receive an automated 90-day gap in service dated March 16, 2020. The State will re-evaluate the need to extend this gap and if it's determined necessary a second automated 90-day gap in service will be authorized.

### Economic Opportunity Program

The following Economic Opportunity Programs (EOP) have received an automated 90 Day Gap in Service dated March 16, 2020:

- A Home for Everyone (AHFE)
- Department of Community Justice (DCJ)
- Health Careers NW (HCNW)
- Portland and Portland ISVT

Note that the HCNW 90 Day Gap in Service applies only to the I-Trac record; data entry of all required information into PAGES is to continue as normal.

### Northwest Promise

No automated Gap in Service has been added for Northwest Promise participants. However, on a case-by-case basis where NW Promise participants indicate to staff that they are not able to engage in services due to the COVID-19 emergency but do intend on continuing once the emergency situation has passed, a 90 Day Gap in Service (COVID-19) is available in the Services control/Service dropdown. Adding this Gap in Service will extend the participation for 90 days from the date the Gap was added.

## All WIOA Participants

### Eligibility Determination, Enrollment, Documentation

During the COVID-19 emergency, remote eligibility determination, registration, enrollment and WIOA Documentation is allowable. When documentation is noted below as required, these Staff Attestation/Document guidelines are to be followed:



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### Staff Attestation

Where the staff and participant have video conference available, staff attestation of staff review of the required document can support Welcome requirements (Name/DOB), WIOA Registration (Youth) and WIOA Documentation (Adult/Dislocated Worker) requirements until these regional program standards have been rescinded.

### Document Required

Where either staff or participant do not have access to a video conference tool, any required document is to be uploaded to I-Trac. Follow Customer Secure Document Upload Tools instruction found on the I-Trac Resources/User Instructions tabs.

## Welcome Process

### WorkSource Portland Metro Centers

WIOA IB funded contractor staff may complete the Welcome process with their participants either via video conference or telephone if they have had training and permissions granted to the WOMIS registration system. Name and DOB documentation can be viewed and noted in WOMIS and Welcome Complete selected when all other required Welcome elements have been completed.

### Economic Opportunity Program

Each Center will designate WIOA IB staff who will complete welcome on behalf of EOP participants. The EOP contractor is responsible for any questions that arise from the transaction, including monitoring findings and related questioned or disallowed costs where it is determined the required process was not followed and the participant was not eligible for Welcome to be complete.

The requirements outlined above apply. When the document is presented via video conference to the EOP staff person (Staff Attestation) the EOP staff will provide the Center staff with the date of birth document type and number (where applicable) and the Center staff will complete Welcome. The EOP staff should enter a case note in the record confirming the document type used for Welcome and the name of the Center staff they talked to and completed Welcome with.

Where the document must be presented because video conference is not available (Document Required), the EOP staff will follow the process outlined in the Customer Secure Document Upload Tools document to upload the document required to complete Welcome through the I-Trac secure document upload feature. The Center staff person will view the document and complete Welcome. No additional case note is required when document upload is utilized.



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### Adult/Dislocated Worker WIOA Documentation

The following documentation requirements are in effect until these emergency regional program standards are rescinded; where Staff Attestation is noted the above Staff Attestation/Document rules apply:

- **Birth Date** – Staff Attestation.
- **Legal to Work** – Customer Attestation using WOMIS response.
- **Selective Service**
  - Selective Service online verification – Staff Attestation of website check.
  - Selective Service Registration Card – Document.
  - DD-214 Military Separation – Document.

During the emergency, only these three types of documentation of Selective Service Registration will be used. If the participant does not have one of the three options available (they aren't found in the Selective Service online verification site, they do not have a Registration Card or DD-214), Selective Service documentation is deferred while these emergency regional program standards are in place, **however: The Selective Service Registration documentation must be completed once these emergency regional program standards are rescinded.** Staff should discuss this with the participant to ensure the required documentation will be available later.

Further, the participant's response to the Selective Service registration question in WOMIS will be considered their attestation of "not knowing and willful" if documentation cannot be provided in one of the options available during the emergency.

**Note:** To validate Selective Service registration using the online tool, staff must be on the telephone or video conference with the participant because their SSN is required. SSNs **may not** be emailed, texted or entered in video conference chat boxes, but only verbally provided for the check. If the participant has a required document (SS Registration Card, DD-214) it must be uploaded via the secure portal in I-Trac.

- **Dislocated Worker** – Customer Attestation using WOMIS response. *(No change)*
- **US Military & Veteran Status** – Unless the participant can provide a DD-214 Military Separation document via the I-Trac secure document upload, select No Document – Eligible Not Prioritized. Once the emergency passes, this may be updated with an appropriate document for prioritization reporting.
- **Low Income** – Customer Attestation using WOMIS response. *(No change)*
- **Public Assistance** – Unless the participant can provide a Public Assistance Record document via the I-Trac secure document upload, select No Document – Eligible Not Prioritized. Once the emergency passes, this may be updated with an appropriate document for prioritization reporting.



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## Economic Opportunity Program

### WIOA Documentation

Designated EOP service provider staff are approved to complete WIOA Documentation for new enrollments. Following the requirements outlined in the WSPM Center Services regional program standards (documentation rules) and this Emergency regional program standards (documentation requirements during the emergency), the designated staff will either view or upload required documents and complete the WIOA Documentation Tab in the participant's Adult or Dislocated Worker enrollment.

The EOP contractor is responsible for any questions that arise from the transaction, including monitoring findings and related questioned or disallowed costs where it is determined the required process was not followed and the participant was not eligible for services that require WIOA Documentation to be complete.

## NextGen Youth Registration

The following documentation requirements are in effect until these emergency regional program standards are rescinded; where Staff Attestation is noted the above Staff Attestation/Document rules apply:

- **Social Security Number** – Customer Attestation using WOMIS response. *(No change)*
- **Birth Date** – Follow Adult/Dislocated Worker WIOA Documentation guidance above.
- **Legal to Work** – Follow WIOA Documentation guidance above.
- **Selective Service** – Follow Adult/Dislocated Worker WIOA Documentation guidance above.
- **US Military & Veteran Status** – When Veteran (Not Dishonorably Discharged) or Veteran's Eligible Spouse is selected, the DD-214 Military Separation Record must be uploaded via the secure portal in I-Trac.
- **Basic Skills Deficient** – The requirement for assessment of Basic Skills to determine deficiency is deferred during the COVID-19 emergency. The assessment and determination will be made within 90 days of the emergency guidance being rescinded. Not Deficient in Basic Skills must be selected to defer assessment and complete Registration.

**Note:** Deferral of basic skills assessment means that Out of School Youth applicants that have a high school diploma or GED must have at least one of the following employment characteristics to ensure WIOA eligibility:

- Aged out of Foster Care
- Disability
- English Language Learner
- Foster Care
- Homeless
- Juvenile Justice Involvement
- Parenting
- Pregnant
- Runaway



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- **Economic Characteristics** – Customer Attestation via signed application and staff entering information into I-Trac based on the participant supplying it verbally via telephone or video conference.
- **Residence** – Customer or Staff Attestation. *(No change)*
- **Six-month Income** – Customer Attestation via signed application and staff entering information into I-Trac based on the participant supplying it verbally via telephone or video conference. *(No change)*

## Participant Signatures

### Applications

When enrollment requires a participant sign an application, email electronic signature (see required content below) is approved for use during the emergency. An email should be sent to the participant once all registration information is collected and entered in I-Trac. The email should go to the Participant's email address and ask that the participant reply that they agree. Where the grant requires, the SSN and EEO Disclosures should be attached to the email. **Please Note:** The participant's completed application is not to be sent, as it contains PII.

The returned email agreement is to be retained and once the emergency regional program standards have been rescinded and services resume in the office, the email(s) must be printed and attached to the printed application and retained in the participant's file.

### Staff Email Content

The staff email to the participant must include the following verbiage:

[Name of Applicant] – Please reply to this email after reviewing the information below with “I Agree” if you do agree and wish to be enrolled in the program services we discussed. Thank you.

This email from my personal email account is my certification that the information I provided to staff and through the application process is true to the best of my knowledge as of the application date. I understand this information may be reviewed and verified and that I may be asked to return and sign the application once the Statewide COVID-19 emergency has been cancelled.

If requested later, I agree to provide documentation to confirm the information being used to determine my eligibility. I understand that providing false or inaccurate information could lead to removal from the program and deem me liable for all costs expended on my behalf. I further understand that if I am found ineligible after enrollment I will not be allowed to continue in the program and may be held responsible for the cost of the services I received.

By approving this application via email, I further acknowledge that I have received via email and reviewed information about the use of my social security number and understand the Equal Opportunity statement and complaint procedure.

I further understand that in order to provide me with the best service and support possible, partners within the WorkSource system may exchange information about my participation in program services. By approving this application via email, I give my consent to the sharing of this information between WorkSource partners.



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### Youth Under 18

When a WIOA Youth applicant is under age 18, staff are to forward the email sent to the applicant to their parent or guardian's email account to secure approval of enrollment. The parent or guardian email is to include this verbiage:

*[Name of Parent or Guardian] – [Name of Applicant] has applied for enrollment into services with [Name of Contractor Agency]. In order to enroll them in services, your approval is required. Please review the email below and the attachments included that [Name of Applicant] is being asked review and reply their approval to. If you agree that they may enroll in our services, please reply to this email with "I Agree." If you do not approve their engagement with our program services, please reply "I Do Not Agree" and the enrollment process will be terminated. Thank you ... if you have any questions please feel free to contact me.*

**Note:** Staff should include contact information for the parent to use if they have questions.

### Service Plans

Participant signatures on initial or updated service plans or strategies are waived during the emergency. When staff create or update a plan with a participant, they must date it, include the name of the staff that worked with the participant, and note in the participant signature area "Reviewed with Participant/Signature Waived/COVID-19." A copy of the new or updated plan is to be sent to the participant via email (as long as there is no PII included in the plan), and once the emergency regional program standards have been rescinded and services resume in the office, the plan is to be printed and retained in the participant's file.

## Support Services

### All Programs

Adjustments are made to make it easier to provide support to participants during the emergency. However, receipts are still required for support provided through gift cards or checks, e.g. gas, food, work clothing or tools, etc. Receipts may be secured after-the-fact, but there is no waiver to the requirement that contractors document that the support was used for its intended purpose and was not used on costs that are not allowable to a funding source.

### Participant Signature of Receipt

- **Check Endorsement** – Where contractors pay or reimburse a participant via check for a support service, the check endorsement will be considered the participant's acknowledgement of receipt of the support and no further signature is necessary.
- **Direct Deposit** – Where contractors pay or reimburse a participant via direct deposit to the participant's bank account for a support service, the fiscal documentation authorizing direct deposit and showing that the participant's name is on the bank account will be considered the participant's acknowledgement of receipt of the support and no further signature is necessary.





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- **Purchase Orders** – Where a purchase order (PO) is used with a merchant, the merchant may collect the participant's signature on the PO at the time of purchase and mail the PO back to the program (consider including a self-addressed, postage paid envelope).
- **Gift Cards, Bus Pass, Bus Tickets** – These supports may be mailed to the address of record in I-Trac on the date of the support award. Staff approving the support must add a case note in I-Trac attesting that the support was mailed to the address of record. This will be considered documentation of receipt.

### Economic Opportunity Programs

#### Food Purchases

Allowable funding for food purchases during the emergency has been communicated to contractors. Receipts are required and may be in electronic form submitted via text or email. Contractor must document need in an I-Trac case note.

Following are the guidelines for those food purchases.

- **Multnomah County & City of Portland – EOP Participants**  
Food purchases are for Multnomah County and City of Portland EOP eligible participants only. Food assistance may be provided in the form of a gift card, cash, check or on-line purchase on behalf of the participant. Food purchases must be paid from the contracted General Fund (City) allocation or the contracted A Home For Everyone Fund (Multnomah County) and may not exceed \$2,500 per contractor (that serves EOP-eligible participants).
- **Multnomah County & City of Portland – Non-Enrolled Participants**  
EOP providers serving participants who are residents of Multnomah County or the City of Portland may also provide food and allowable Support Services (as defined by EOP Regional Program Standards) to participants that are engaged in their program services but are not enrolled in EOP. Food and allowable support services must be paid from the contracted General Fund (City) allocation or the contracted A Home For Everyone Fund (Multnomah County) and may not exceed \$2,500 per contractor (that serve Multnomah County or City of Portland residents).

These payments will not be tracked in I-Trac. Invoice Reports to Worksystems for the support provided to non-EOP enrolled participants must note COVID Response – Food, or COVID Response – Support Services and include the non-enrolled participant's name.

### NextGen Youth Programs

#### Incentive Policy

Established Incentive payments may be pro-rated for achievement of milestones, such as completed enrollment into a Training program when the Training has been cancelled or postponed. Document the agreed-upon pro-rated Incentive payment in a case note that includes the revised milestone(s) to be achieved and the approved payment for each. Contractors are not required to update the participant's Incentive plan nor are they required to adjust their Incentive Policy for this temporary change.





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### Food Purchases

Allowable funding for food purchases during the emergency has been communicated to contractors. Receipts are required and may be in electronic form submitted via text or email. Contractor must document need in an I-Trac case note.

Following are the guidelines for those food purchases.

- **Multnomah County – NextGen Participants**

Food purchases are for Multnomah County EOI eligible participants only. Food assistance may be provided in the form of a gift card, cash, check or on-line purchase on behalf of the participant. Food purchases must be paid from the contracted General Fund allocation and may not exceed \$2,500 per contractor (that serves EOI-eligible participants).

- **City of Portland – Non-Enrolled Youth**

NextGen providers serving youth who are residents of the City of Portland may also provide food and allowable Support Services (as defined by NextGen Regional Program Standards) to youth that are engaged in their program services but are not enrolled in NextGen. Food and allowable support services must be paid from the contracted NextGen General Fund allocation and may not exceed \$2,500 per contractor (that serve City of Portland residents).

These payments will not be tracked in I-Trac. Invoice Reports to Worksystems for the support provided to non-NextGen enrolled youth must note COVID Response – Food, or COVID Response – Support Services and include the non-enrolled participant's name.

- **Washington County – Next Gen Participants**

Food and allowable Support Services for residents of Washington County who are WIOA participants. Food assistance may be provided in the form of a gift card, cash, check or on-line purchase on behalf of participant. Food and additional allowable support services must only use the specific grant fund budget provided of \$1,665 per contractor serving Washington County participants.

### Needs Related Payments

Needs Related Payments provide financial assistance to NextGen participants while they are engaged in on-line Workforce Preparation activities or on-line Workshops offered through WorkSource Portland Metro and the Oregon Employment Department.

Workforce Preparation activities are defined as on-line training in areas that will help a participant be better prepared for a work environment, such as computer applications including, but not limited to Microsoft Office, Excel, Word or video conferencing software. Exceptions to this Workforce Preparation definition must be justified in writing (email is considered written) to the contractor's Worksystems contract liaison for review and approval.

### WIOA Youth Eligibility

To be eligible to receive Needs Related Payments the participant must be enrolled in the WIOA Youth grant and:

- Be currently unemployed.
- Not qualify for, or have ceased qualifying for, unemployment compensation.
- Be engaged in an allowable activity.



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### Payments

Needs Related Payments are limited to \$6.00 per hour for the time engaged in the allowable activity, not to exceed 40 hours per week. Direct deposit to the participant's bank account is the preferred payment method; payment by check is allowable and the check endorsement is documentation of the participant's receipt.

Needs Related Payments have been determined to be non-taxable; therefore, issuance of a 1099 is not required.

**Required Documentation:** NextGen staff must provide evidence of engagement in the allowable activities through timesheets documenting verification of training attendance during the week (with time and dates noted). Verification may also be in the form of an email from the Instructors email account or verification through an online training system of participant login and engagement in the training course (with dates noted). Timesheet to be maintained with payment documentation.

## References

Office of Workforce Investments Guidance & Technical Assistance  
COVID-19 Emergency Guidance, April 6, 2020