

# TANF & BFET ELEMENTS ONLY

## ***Talent and Prosperity for All***

*Washington's Operational and Program-Specific  
Workforce Plan Components*

January 29, 2020 Update  
DRAFT FOR RELEASE



Washington State  
Workforce Training

# OPERATIONAL ELEMENTS

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## (a) State Strategy Implementation

### **(1) State Board Functions.**

*Describe how the State board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision making processes to ensure such functions are carried out).*

*(2) Implementation of State Strategy. Describe how the lead State agency with responsibility for the administration of each core program or a Combined State Plan partner program included in this plan will implement the State's Strategies identified in II(c) above. This must include a description of—*

### **(A) Core Program Activities to Implement the State's Strategy.**

*Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies.*

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### **TEMPORARY ASSISTANCE for NEEDY FAMILIES (TANF) - WorkFirst**

DSHS administers Temporary Assistance for Needy Families (TANF), which will be included in the Washington State WIOA Combined Plan as an optional, Combined Plan partner and as a "mandatory partner" within the one-stop delivery system. The State of Washington provides cash assistance to financially needy families through the federal TANF program. WorkFirst is the Washington State's welfare-to-work component of TANF. In addition to the TANF cash grant, WorkFirst provides a range of services that address barriers to work and move families towards financial stability and economic success.

The Department of Social and Health Services(DSHS) partners with several state agencies to provide WorkFirst services: the State Board for Community and Technical Colleges (SBCTC) provides basic and vocational education, and work-based learning; the Employment Security Department (ESD) provides job search services through its WorkSource offices; the Department of Commerce, through its contractors, provides subsidized employment and work experience for individuals with barriers to employment; DSHS's Office of Refugee and Immigrant Assistance provides services to limited English

proficient individuals; and the Department of Children, Youth and Families provides subsidized child care.

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**SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM EMPLOYMENT AND TRAINING (SNAP E&T) - BASIC FOOD AND EMPLOYMENT TRAINING PROGRAM (BFET)**

DSHS administers the Basic Food Employment and Training program (BFET), which will be included in the Washington State WIOA Combined Plan as an option, Combined Plan partner program. BFET joins the plan to articulate the programs’ role in aligning with, leveraging, and supporting workforce development efforts in Washington State, but not as a partner within the one-stop delivery system due to the 50/50 match and reimbursement structure of the program. Through a 50% reimbursement program with 43 community-based organizations (CBOs), 34 community and technical colleges, the Employment Security Department and the DSHS’s Office of Refugee and Immigrant Assistance (ORIA), the Department of Social and Health Services (DSHS) administers the BFET program. The program provides supervised job search, job search training, , educational services, skills training, help with development of self-employment microenterprises, a year of post-employment support services, and support services to Basic Food recipients not participating in the state’s TANF program.

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**(B) Alignment with Activities outside the Plan.**

***Describe how the activities identified in (A) will be aligned with programs and activities provided by mandatory one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding***

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**TANF (WorkFirst) /SNAP E&T (BFET) Programs**

WorkFirst and BFET activities are structured to be provided in partnership with core and mandatory one-stop partners. Alignment within the comprehensive one-stops varies in local regions and per contractors situated in the respective regions. There may be some duplication in services between the partner programs; however, that is primarily due to each program having its own eligibility criteria which must be met by the participants. In addition, WorkFirst includes 26 Local Planning Areas (LPAs) that help coordinate and plan for WorkFirst implementation and poverty reduction efforts locally. Representatives of the workforce development system are called out as partners in the law requiring these local collaboration entities.

For BFET specifically, there may be local contractors that provide BFET services as well as WIOA funded services. These contractors may or may not be located within the one-stop. In this case, contractors determine which program(s) the client may be served by and how a comprehensive suite of services can be provided to support the individual along the pathway to goal completion.

Services are provided through the WorkFirst and BFET partnerships, and program data is tracked using the Electronic Jobs Automated System (eJAS). The eJAS tracks participation by service component code with starting and ending dates. The partners who provide the services are also identified in eJAS using distinct contractor codes, allowing the program to track multiple services by different partners. The system is able to track participation by participant, by contractor and by service component. Historical data for the programs from eJAS is stored in the DSHS data warehouse. This allows partners to be aware of services the participant is actively enrolled in as well as where there may be opportunities for additional support and potential co-enrollment in WIOA funded services.

With TANF as a mandatory partner program within the comprehensive one-stop in each workforce development region, DSHS will continue to partner to analyze methodologies to streamline intake, share information, and jointly serve WorkFirst and BFET eligible participants.

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**(C) Coordination, Alignment and Provision of Services to Individuals.**

*Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and mandatory and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services to individuals including those populations identified in section II(a)(1)(B). The activities described shall conform to the statutory requirements of each program.*

All partners in Washington’s combined plan have agreed to explore opportunities to align service delivery to improve outcomes for all workforce development participants, in particular populations with barriers to employment. All participating program partners are committed to the goals outlined in the Integrated Service Delivery and Access and Technology chapters of the state combined plan and will monitor their implementation through the planning cycle, and meeting periodically to assess where additionally coordination among partners is needed to accomplish a particular goal. In particular, system partners were committed to meeting regularly in the early part of the plan cycle to discuss appropriate professional development for frontline and managerial one-stop staff that aligns to the Navigational model discussed in the Integrated Service Delivery chapter of the plan. This resulted in some jointly developed professional development modules that are accessible by partner staff and provide a baseline understanding of WIOA and the Core and Mandatory partner programs and their services.

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Overall, the system’s goal is to ensure that every customer has the education, employability skills, work experience, and credentials needed to move into sustained employment and economic self-sufficiency, and receives the wraparound services needed to pursue his or her career pathway. The three goals the system has committed itself to are:

- Increase the number of front-line staff with system-navigator competencies within the workforce system.
- Developing an intake process that eliminates redundant assessments and streamlines customer experience.
- Increasing the number of participants, including those with barriers, who have defined career pathways and have gained portable skills, received industry recognized credentials, and/or earned college credits.

Ensuring universal access to workforce development services has been a bedrock principle in Washington’s planning process. Every Washington resident needs universal, barrier-free access to our state’s workforce system. Technology is a powerful tool that can reduce obstacles to access. However, it’s clear that technology will not solve all accessibility issues. Tailored approaches to different populations are required. To that end, Washington has developed the following goals geared towards improving access to services for populations with barriers to employment:

Implement secure, wireless Internet access in public areas of all comprehensive One-Stop centers in Washington by 2020.

Establish a state-level advisory committee on accessibility and barrier solutions and ensure the designation of local advisory committees during the first two years of the plan. By the fourth year of the plan, ensure the state-level advisory committee has received annual progress reports on one-stop centers' accessibility at the local level.

Identify and encourage local pilot programs that use technology to facilitate and improve an integrated service delivery for customers, including programs designed to improve access to the system.

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**TANF (WorkFirst)/SNAP E&T (BFET) Programs**

DSHS will continue to partner with core, mandatory, and other one-stop partner programs to coordinate activities and use of resources to provide comprehensive, high-quality, customer-centered services, including supportive services to TANF and BFET eligible individuals, including those populations identified in section II (a) (1) (B).

DSHS is worked with local Workforce Development Councils (WDCs) to develop a "Principles of Collaboration" agreement to help formalize how we will engage and interact with each other. In addition, the department is worked to enhance the previous Memorandum of Understanding (MOU) with the Division of Vocational Rehabilitation (DVR) regarding the co-enrollment and joint service provision to individuals eligible for both DVR and TANF services.

DSHS has also co-convened an ad-hoc committee made up of workforce development partners, including all core program administering agencies at the state level to examine the possibility of developing a joint eligibility process for clients entering the workforce development system. This will potentially inform process as we continue to partner across programs and agencies to decrease duplicative efforts regarding screening for eligibility for multiple programs as well as co-enrollment and supportive services strategies.

As one of the TANF/WorkFirst and BFET partners, the State Board for Community and Technical Colleges (SBCTC) has also provided a response DSHS would like to include with our response regarding SBCTC collaborative efforts with DSHS around these programs specifically:

WorkFirst - SBCTC WorkFirst providers include community and technical colleges, private career schools and community-based organizations that provide access to education and training. SBCTC providers contribute basic skills and college placement assessments and one-on-one academic planning to establish appropriate education and training pathways for individuals. They provide ongoing academic advising in collaboration with other WIOA partners to develop a career pathway for each individual and provide ongoing barrier resolution. SBCTC providers work closely with partners to appropriately co-enroll participants in education, training, work-based and barrier removal activities to best meet the employability skill needs of the individual and move them toward self-sufficiency. SBCTC providers also offer Work Study and internship opportunities.

Basic Food Employment and Training (BFET) - SBCTC BFET providers include all 34 community and technical colleges within the state. College BFET providers are available to assist individuals with accessing SNAP assistance through the Washington Connection portal and/or by evaluating their eligibility and submitting requests to DSHS for final verification. Colleges provide basic skills and college placement assessments and one-on-one academic planning to establish appropriate education and training pathways for individuals. Colleges offer barrier removal services to individuals and collaborate with WIOA partners to access additional needed services. A one-on-one, client-centered approach to career pathway development is utilized by college staff. Colleges provide funding for tuition, education and training fees, testing fees, books, transportation, tools, and emergency services. They also provide assistance in acquiring other resources and support services from other partners when needed. This includes co-enrollment with community-based organizations for work-based learning and employment services, ESD for employment services, and other college programs for access to additional support services and funding.

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**(D) Coordination, Alignment and Provision of Services to Employers.**

***Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, mandatory and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs. The activities described shall conform to the statutory requirements of each program.***

WIOA is an opportunity to reinvent and re-energize business engagement. By serving jobseekers and businesses, the workforce development system will be a catalyst for creating a strong and vibrant future workforce.

Local workforce development councils will play a lead role in business engagement. The state's workforce development partners have collaborated on a set of resources local councils can leverage to improve business engagement. Additionally, state partners have set the following goals to improve business services. These goals will be monitored by state partners regularly during the planning cycle.

- Establish a baseline and increase the number of businesses utilizing the workforce system.
- Establish a baseline and increase the number and percentage of businesses reporting satisfaction with the services they receive via the workforce system by 5 percent each year.
- Have at least one sector partnership in development in each workforce region. Use the Sector Partnership Framework to show progress over time.
- Train at least 30 percent of the workforce system on the implementation of sector partnerships.
- Increase resources for work-and-learn opportunities, including on-the-job training and apprenticeship, internships, job shadows, but especially, incumbent worker training.
- Increase the amount of work-based training, including incumbent worker training, on-the-job training and apprenticeship, job shadows, internships.

- Increase the partnership and level of participation between business services delivery agencies/organizations to avoid confusion for employers and duplication of work

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**TANF (WorkFirst)/SNAP E&T (BFET) Programs**

DSHS will collaborate with workforce development partners to help ensure a coordinated, intentional effort to engage businesses and provide services is developed and executed. To best serve employers and current and future jobseekers, partner agencies must work to streamline communication and relationship building efforts with business and provide support, technical assistance, and a supply of job-ready and qualified workers without alienating employers through a haphazard or redundant approach which is often the result of each workforce development partner in a given region conducting individual as opposed to collaborative job development and relationship building. Employment placement services will require working with employers to determine which jobs are currently available, which jobs are projected to become available, and what the skill requirements are for available jobs. Engaging employers and sharing labor market trend data will better inform curriculum development, support work-integrated activities, enhance program offerings, and assist in evaluating the effectiveness of the program in meeting industry need. In addition, the workforce system must work to inform both industry and postsecondary education about labor market trends, wage expectations, incumbent worker training opportunities, and retention strategies. Staff must be able to engage business as equal partners in the service delivery process.

**(E) Partner Engagement with Educational Institutions.**

*Describe how the State's Strategies will engage the State's education and training providers, including community colleges and area career and technical education schools, as partners in the workforce development system to create a job-driven education and training system.*

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**(F) Partner Engagement with Other Education and Training Providers.**

*Describe how the State's Strategies will engage the State's other education and training providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.*

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**(G) Leveraging Resources to Increase Educational Access.**

***Describe how the State’s strategies will enable the State to leverage other Federal, State, and local investments that have enhanced access to workforce development programs at the above institutions, described in section (E).***

Washington’s guided pathway for BEdA clients allows students in levels 1-3 Adult Basic Education (ABE) and English Language Acquisition (ELA) to participate in On-ramps to I-BEST at a \$25 dollar per quarter fee, which is waived for students unable to pay. BEdA’s five on-ramp program options include:

- A competency-based high school completion on-ramp. HS 21+ awards credit for prior learning and military and work experience;
- An I-BEST at work on-ramp which works with incumbent workers in the workplace. The teaching team is comprised of a basic skills instructor and a trainer from the company;
- An ELA on-ramp, Integrated Digital English Acceleration (I-DEA) targets the lowest 3 levels of ELA and provides students with 50% of the instruction online, a computer, and 24/7 Internet access to learning;
- On-ramps contextualized in employability skills and college readiness; and
- Career specific on-ramps that are contextualized to a specific career pathway like healthcare or welding.

When students are ready, most often at Level 4 ABE and Level 5 ESL, they can move into quarter one of I-BEST with tuition funded by the Washington State Opportunity Grant, Washington’s State Need Grant, or partnering agency funds if eligible. This allows students without a high school diploma or an equivalency to earn the six college-level credits required to transition onto Ability to Benefit and federal financial aid in their second quarter of I-BEST.

Beginning in their second quarter in I-BEST, students move on to federal financial aid under the Ability to Benefit option if eligible. Upon receiving a 2-year degree in Washington, students without a high school diploma or GED® can check a box and receive their high school diploma.

They then can then use those same funding sources (with the exception of Opportunity Grant) to transition into a CTC applied baccalaureate program or transfer to a 4 year university.

TANF/WorkFirst: DSHS promotes educational access and uses TANF funds to fund tuition, fees and supportive services for TANF (WorkFirst) participants to engage in Basic Education for Adults (BEdA), enabling them to obtain credentials such as a Washington state high school diploma, GED or high school equivalency, as well as Limited English Proficiency Pathway education to increase the literacy and numeracy skills required to earn college level vocational education credits and credentials. The SBCTC’s Integrated Basic Education and Skills Training (I-BEST) program, which has approved vocational education career pathway programs at all 34 community and technical colleges, is also an allowable, funded, activity under TANF/WorkFirst. I-BEST allows participants either without a high school diploma or equivalency and/or testing below college level in English and/or math to be immediately enrolled within a college-level vocational education career pathway program while concurrently boosting basic

skills in literacy and numeracy, expediting the acquisition of college level credits and credential leading to living wage jobs.

BFET: The BFET program is comprised of a 50/50 reimbursement program with contracted providers. These BFET partner agencies, which include all 34 community and technical colleges, put forward the cost of program operations, BFET activity, and participant reimbursement. The funds used by the BFET partner agency cannot be from a federal source. DSHS subsequently reimburses the partner 50% of allowable BFET expenses. This partnership and funding model increases access to education and educational attainment, and enables Washington State to leverage state, county, city, local, and private funds by matching these funds with Federal funds.

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#### **(H) Improving Access to Postsecondary Credentials.**

***Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.***

Washington's Integrated Basic Education and Skills Training Program (I-BEST) quickly teaches students literacy, work, and college-readiness skills so they can earn postsecondary credentials and degrees and move through school and into living wage jobs faster.

Pioneered by Washington's community and technical colleges, I-BEST uses a team-teaching approach to combine college-readiness classes with regular, credit-bearing academic or job training classes. I-BEST challenges the traditional notion that students must move through a set sequence of basic education or pre-college (remedial) courses before they can start working on certificates or degrees. The combined teaching method allows students to work on college-level studies right away, clearing multiple levels with one leap.

I-BEST was named a Bright Idea by Harvard's John F. Kennedy School of Government in 2011 and has been designated by the U.S. Department of Education as one of the most significant, national innovations. I-BEST is being replicated and implemented across the country.

Research conducted separately by the Community College Research Center and the Workforce Training and Education Coordinating Board found that I-BEST students outperform similar students enrolled in traditional basic skills programs. I-BEST students are:

- Three times more likely to earn college credits.
- Nine times more likely to earn a workforce credential.
- Employed at double the hours per week (35 hours versus 15 hours).
- Earning an average of \$2,310 more per year than similar adults who did not receive basic skills training. According to a December 2012 report by the Community College Research Center, I-BEST benefits are well worth the costs.

DSHS TANF (WorkFirst) and SNAP Employment and Training (Basic Food Employment and Training-BFET) strategies support access to post-secondary credentials through contracting and partnering with the State Board for Community and Technical Colleges. This partnership includes all 34 community and technical colleges.

TANF: Through TANF (WorkFirst), participants have access to a continuum of educational opportunities to include Basic Education for Adults and Vocational education. Washington's innovative post-secondary educational opportunities are structured around career pathways with stackable certificates allowing students to earn college credits leading to industry recognized certifications and degrees. DSHS supports participant access to these programs through referral, tuition payment, coordinated case management, supportive services, and child care. In addition, the TANF/WorkFirst program actively supports and

promotes the use of the Integrated Basic Education and Skills Training (I-BEST) program, allowing low skilled (literacy and numeracy) adults or those without a high school diploma or equivalent to enter a college-level, credit bearing, career pathways program and bolster basic skills through team-taught, integrated instruction contextualized to the vocational education career pathway. In addition, DSHS has developed linkages with Labor and Industries Apprenticeship programs and is participating in collaborative cross-agency workgroups designed to maximize opportunities and referrals for work-based learning to help ensure TANF participants are considered for Registered Apprenticeship opportunities.

BFET: Vocational education is available to BFET participants when they have education or training needs that are necessary to enhance employability or as part of a job placement program that requires industry specific training. SBCTC's "Tipping Point Research" shows that it takes at least one year of college level credits and a credential for individuals to receive the "economic bump" in wage earning potential that will increase the likelihood of earning a living wage. All 34 of Washington's community and technical colleges provide vocational training education as part of the BFET strategy for meeting the demand for a skilled workforce. This effort is supported and coordinated by SBCTC in partnership with DSHS.

Some of the supports that remove barriers to educational access under the BFET program include: transportation, books, tuition, clothing, dependent care, tutoring services, and equipment necessary for degree completion. Along with funding, BFET partner agencies provide career navigation and academic advising to assist BFET participants to succeed in their academic endeavors.

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**(I) Coordinating with Economic Development Strategies.**

*Describe how the activities identified in (A) will be coordinated with economic development entities, strategies, and activities in the State.*

**TEMPORARY ASSISTANCE FOR NEEDY FAMILIES/BASIC FOOD EMPLOYMENT AND TRAINING PROGRAM**

DSHS will join in the collaborative process of identifying priorities and strategies regarding economic development at the state, regional, and local levels in order to better ensure a coordinated and supported process and reduce the likelihood of fragmented or duplicative efforts for both TANF and BFET.

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**(b) State Operating Systems and Policies**

The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in section II Strategic Elements. This includes—

**(1) The State operating systems that will support the implementation of the State’s strategies. This must include a description of—**

**(A) State operating systems that support coordinated implementation of State strategies (e.g., labor market information systems, data systems, communication systems, case-management systems, job banks, etc.).**

**(B) Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.**

**(2) The State policies that will support the implementation of the State’s strategies (e.g., co-enrollment policies and universal intake processes). In addition, describe the State’s process for developing guidelines for state-administered one-stop partner programs’ contributions to a one-stop delivery system, including benchmarks, and its guidance to assist local boards chief elected officials, and local one-stop partners in determining equitable and stable methods of funding infrastructure in accordance with sec. 121(h)(1)(B). Beginning with the state plan modification in 2018 and for subsequent state plans and state plan guidelines, the State must also include such guidelines.**

**(3) State Program and State Board Overview.**

**(A) State Agency Organization**

*Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.*

**(B) State Board**

Provide a description of the State Board, including---

**(i) Membership Roster.** Provide a membership roster for the State Board, including members' organizational affiliations.

**(ii) Board Activities.** Provide a description of the activities that will assist State Board members and staff in carrying out State Board functions effectively.

**(4) Assessment of Programs and One-Stop Program Partners.**

*(A) Assessment of Core Programs. Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider.*

*(B) Assessment of One-Stop Program Partner Programs. Describe how other one-stop delivery system partner program services and Combined State Plan partner program included in the plan will be assessed each year.*

*(C) Previous Assessment Results. Provide the results of an assessment of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner program included in the plan during the preceding 2-year period. Describe how the State is adapting its strategies based on these assessments.*

*(D) Describe how the state will conduct evaluations and research projects on activities under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for By the Secretary of Labor and the Secretary of Education under WIOA.*

**(5) Distribution of Funds for Core Programs.**

*Describe the methods and factors the State will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.*

(D) For Title I programs:

*provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—*

*(i) Youth activities in accordance with WIOA section 128(b)(2) or (b)(3),*

*(ii) Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3),*

*(iii) Dislocated worker employment and training activities in accordance with WIOA section 133(b)(2) and based on data and weights assigned.*

(B) For Title II:

*(i) Describe how the eligible agency will award multi-year grants or contracts on a competitive basis to eligible providers in the State, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness.*

*(ii) Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers.*

**Eligible Providers**

(F) Title IV Vocational Rehabilitation

**(6) Program Data**

***(G) Data Alignment and Integration. Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State’s plan for integrating data systems should include the State’s goals for achieving integration and any progress to date.***

***(i) Describe the State’s plans to make the management information systems for the core programs interoperable to maximize the efficient exchange of common data elements to support assessment and evaluation.***

***(ii) Describe the State’s plans to integrate data systems to facilitate streamlined intake and service delivery to track participation across all programs included in this plan.***

***(iii) Explain how the State board will assist the governor in aligning technology and data systems across mandatory one-stop partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals.***

***(iv) Describe the State’s plans to develop and produce the reports required under section 116, performance accountability system. (WIOA section116(d)(2)).***

***(A) Assessment of Participants’ Post-Program Success. Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.***

***(B) Use of Unemployment Insurance (UI) Wage Record Data. Explain how the State will meet the requirements to utilize quarterly UI wage records for performance***

*accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)*

*(C) Privacy Safeguards. Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.*

**(7) Priority of Service for Veterans**

*Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist.*

**(8) Addressing the Accessibility of the One-Stop Delivery System.**

*Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) with regard to the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria. (This Operational Planning element applies to core programs.)*

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**(9) Addressing the Accessibility of the One-Stop Delivery System for Individuals with Limited English Proficiency.**

*Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will ensure that each one-stop center is able to meet the needs of limited English proficient individuals, such as through established procedures, staff training, resources, and other materials.*

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## PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

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## TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

**States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:**

***(a) Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act).***

On November 1, 1997, Washington's WorkFirst Program became operational statewide. The program design was to move families on welfare into employment as quickly as possible through upfront job search, work experience activities, and short-term education and training.

The State has instituted, by rule, uniform program policies in all political subdivisions, including uniform TANF cash benefit standards.

Washington State provides cash benefits to all needy families who meet the eligibility criteria established by rules of the Department of Social and Health Services and in accordance with this State Plan. WorkFirst is the major cash assistance program providing cash benefits and services for low-income families with (or expecting) children in Washington State.

The WorkFirst program offers services and activities to help people in low-income families find jobs, keep their jobs, find better jobs, achieve financial stability and move toward financial success. Low-income families are those with income below 200 percent of the Federal Poverty Level (FPL). The program links families to a variety of state, federal, and community resources to meet this goal. Examples include:

- (1) Child support collection
- (2) Food assistance
- (3) Subsidized child care
- (4) Medical assistance
- (5) Tuition assistance at community and technical colleges
- (6) WorkFirst support services

WorkFirst support services include assistance with supports such as work clothing, work tools, car repair, driver's and vehicle licensing, and transportation. Job preparation services also include education and training tuition assistance, books, test fees and subsidized work experience. These services are designed to help individuals keep their jobs or get better jobs.

The WorkFirst Program is focused on obtaining paid, unsubsidized employment for all recipients who are able to work. In addition, WorkFirst is dedicated to assisting families up and out of poverty once they become employed by providing employment retention and wage progression services. In operating the WorkFirst Program, the State will:

- Provide an up-front employability screening and assessment for participants prior to any job search activity assignment in order to assess the individual's work readiness and barriers to employment
- As appropriate, require participation in initial job search as one method to determine employability and refer for further assessment if participation fails to find a job
- Reassign participants who do not find work, to additional job search activities for a short length of time, to paid work experience, subsidized employment, other work-like activities, or barrier removal activities as determined appropriate by assessment
- Provide post-employment services to assist clients in remaining employed and to progress in skills and wages
- Provide educational opportunities in the context of learning while working, both in classroom settings and on the work-site
- Encourage a new alliance of state, local, and tribal government, business, faith-based organizations, nonprofit organizations, and individuals, who dedicate themselves to helping families in poverty overcome barriers. (See RCW 74.08A.280(2))

As the WorkFirst program has evolved, more emphasis has been placed on overcoming barriers to employment, job retention, and reducing the re-cycling that characterizes a significant part of the TANF population.

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***(b) Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)***

The State includes the following activities in its definition of work:

- Unsubsidized paid employment
- Subsidized paid employment
- Work experience
- On-the-job training
- Job search and job readiness assistance
- Life skills training
- Community service
- Vocational education
- Job skills training related to employment

- Education related to employment for a parent who has not completed high school or equivalent
- Volunteering in a child’s licensed child care, pre-school or elementary school
- Internships
- Practicums
- Participation in other programs to become employable to the extent federally countable such as
  - Mental health services
  - Family violence services
  - Substance abuse services
  - Searching for housing
- Participation in post-employment activities to the extent federally countable

**What criteria will Washington State use to determine whether a parent or caretaker relative is ready to engage in work before 24 months?**

The State requires all WorkFirst clients to be screened upon application and then enter into an initial work search or take whatever actions necessary in order to productively engage in the initial work search.

**What criteria has the State established relative to a single custodial parent’s “demonstrated inability” to obtain needed child care?**

The State recognizes that informed choice is consistent with individual responsibility and that parents should be given a range of options for available child care while participating in the WorkFirst Program. Criteria established for “demonstrated inability” to obtain needed child care include:

- Is not affordable (costs more than the co-payment would be under the Working Connections Childcare Program)
- Is not appropriate (not licensed, certified or approved under federal, state, or tribal law and regulations for the type of care used or there is no appropriate and approved relative or in-home provider available)
- Does not meet the level of care required for a child with special medical or behavioral health needs, or
- Is not within a reasonable distance (within reach without traveling farther than is normally expected in the community)

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***(c) Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State’s workforce development activities are addressing employment and training services for parents or caretakers receiving assistance.***

**Work Participation Focus** In operating the WorkFirst program, the State uses the work participation rates specified in federal welfare reform legislation (P. L. 104-193) as its work participation goal.

However, the state, to the extent possible, will use the work participation rates as a minimum standard and will work toward exceeding these goals. Washington has established program goals around reduced caseloads and wage progression efforts with the expectation that low-income families will be lifted up and out of poverty through employment, and WorkFirst is designed to meet that expectation. To the degree possible, all low-income families will have access to services that will help them gain in work skills and earn enough to become financially stable.

The State has used various welfare-to-work models, including models focused on moving job ready individuals into work as rapidly as possible, and providing employment-related training that is expected to lead directly to work for those lacking work skills.

**Cross-Agency Collaboration** While the Department of Social and Health Services is the single State agency responsible for administering the TANF program, six core state agencies are designated to work together to manage the WorkFirst program. These agencies include the Office of Financial Management, Department of Commerce, the Employment Security Department, the Department of Social and Health Services, the State Board for Community and Technical Colleges, and the Department of Children, Youth & Families (DCYF).

More specifically, the Employment Security Department provides labor exchange (Wagner-Peyser) services for WorkFirst clients, the community and technical colleges provide various kinds of vocational education and subsidized work experience, and the Department of Commerce provides subsidized jobs and unpaid work experience opportunities for clients with barriers to employment. In addition, DCYF has a subsidized child care program for low-income working families and those participating in TANF/WorkFirst and Basic Food Employment and Training (BFET). DCYF also manages the state-funded pre-kindergarten program, a home visiting system and other family strengthening services for low-income, at-risk, pregnant, or parenting families, including those receiving TANF. The WorkFirst Partnership Team works for collaboration and innovation across agencies and direction comes from the WorkFirst Leadership Team and the Legislative-Executive WorkFirst Poverty Reduction Oversight Task Force.

Within the Department of Social and Health Services, the Division of Vocational Rehabilitation serves TANF/WorkFirst clients who qualify under its rules.

Post-TANF parents may be eligible for services through the BFET program up to its eligibility threshold of 200% of the FPL.

**TANF Employment and Training Needs Addressed in Workforce Development System** In the TANF program, the education and training options for parents are circumscribed by the work participation rate target and various process rules that don't apply to the WIOA core programs. Examples include: the 12-month limit on stand-alone vocational education and the 30% cap for vocational education participation. On the other hand, strengths of the TANF funding stream include ability to provide tuition assistance and childcare for parents engaged in approved education and training activities.

Historically, previous to WIOA, the one-stop workforce development system in Washington State did not prioritize providing services to clients with the range of barriers to employment identified in WIOA, who can be found in disproportionate numbers on the TANF caseload. With the expanded number of partners represented in this Combined State Plan, and the efficiencies that go with improved coordination, Washington State seeks to improve its capacity to serve these disadvantaged populations. This will be accomplished through intentional work at both the local and state levels and through the articulation of partnerships, services and strategies within Memoranda of Understanding, and local plans.

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***(d) Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)***

The State has established confidentiality rules and procedures within the guidelines provided under state (RCW 74.04.060 and RCW 74.04.062) and federal law. The following changes have been made in response to state and federal welfare reform legislation:

The State has revised confidentiality provisions that expand access to client records by law enforcement officials. Specifically, in accordance with state welfare reform legislation, the Department of Social and Health Services will disclose the current address and location of a WorkFirst recipient to an officer of the law or a person identified as a United States immigration official if the department is given the recipient's name and social security account number and the officer/official satisfactorily demonstrates that the recipient is a fugitive, that the location or apprehension of the recipient is within the officer's/official's duties, and that the request is made in the proper exercise of those duties. In addition, if the department becomes aware that a WorkFirst recipient is the subject of an outstanding warrant, the department may contact the appropriate law enforcement agency and, if the warrant is valid, provide the law enforcement agency with the location of the recipient.

The Department of Social and Health Services will provide the Employment Security Department with the names and social security numbers of all recipients in the WorkFirst program (or any successor state welfare program). This information will be used for the purposes of statistical analysis and evaluation of the WorkFirst (or any successor state welfare) program only.

Attachment A [of the TANF State Plan] is written certification by Governor Jay Inslee that during the fiscal year the State will: Establish and enforce standards and procedures to ensure that the State will screen for and identify WorkFirst clients with a history of family violence as defined under P. L. 104-193 (while maintaining confidentiality), refer such individuals to counseling and supportive services and waive some requirements, such as time limit, work participation, and child support cooperation, in cases where compliance with such requirements would make it more difficult for clients to escape family violence or unfairly penalize clients.

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***(e) Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)***

Under state welfare reform legislation, the director of the Office of Financial Management established an interagency task force on unintended pregnancy in order to: review existing research on the short and long-range costs; analyze the impact on the WorkFirst program; and develop and implement a state strategy to reduce unintended pregnancy.

The Department of Social and Health Services, Health Care Authority, Department of Health, Office of the Superintendent of Public Instruction and other state programs established goals and have continued to take action to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on teenage pregnancies. The numerical goal for reducing the illegitimacy ratio of the state was established at 1% per year for federal Fiscal Years 2009, 2010, and 2011. The current focus is to decrease unintended pregnancy, empower families to choose if and when they have children, and increase access and decrease barriers to quality family planning services.

Through a federal waiver, called TAKE CHARGE, the State provides pre-pregnancy family planning services to citizen men and women with family incomes up to and including 260% of the FPL. The State also extends eligibility for family planning services to citizen women up to 260% of the federal poverty level for a year after their pregnancy ends. Non-citizen women with Medicaid coverage for the birth of a child receive state-funded family planning services for one year after the end of their pregnancy. These women are NOT eligible for family planning services under the federally-approved family planning waiver. Non-Medicaid, low-income men and women can also receive family planning services through Department of Health Title X-funded family planning clinics.

Additional programs that contribute to achieving out-of-wedlock pregnancy goals include:

- The Washington College Grant and College Bound Scholarship programs for low-income students wishing to pursue higher education;
- The Early Childhood Education Assistance Program serving low-income three and four year old children;
- The Promoting Academic Success and Learning Assistance Programs for low-income and high-risk public school students; and
- The full-day kindergarten and reduced class size programs in high-poverty elementary schools.

All of these programs affect long-term outcomes including reduced likelihood of contact with the criminal justice system, higher earnings as adults, less reliance on social services as adults and fewer out-of-wedlock births.

***(f) Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)***

In conjunction with the Washington State Association of Prosecuting Attorneys, through the WAPA/State Judicial Case Processing Task Force, the state has developed mandatory reporting protocol for child support cases meeting the criteria for statutory rape.

The state has linkages with an Interagency Workgroup on Unintended Pregnancy Prevention to review current outreach programs for men and women which deal with teen pregnancy, and make recommendations concerning the incorporation of appropriate education about the crime of Rape of a Child.

Under state welfare reform legislation, for the purposes of minor parents' or pregnant minors' living arrangement requirements, the most appropriate living situation cannot include a living situation including an adult parent of the qualifying child and is found to meet the elements of Rape of a Child as set forth in state law (See RCW 9A.44.079).

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***(g) Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)***

In 2011 the legislature enacted RCW 74.08.580 to address concerns regarding use of benefits at prohibited establishments, specifically, the following activities and products: gambling, pari-mutuel betting, lottery tickets, tattoos, body piercings, tobacco products, and alcoholic beverages. It further prohibits taverns, beer/wine specialty stores, nightclubs, contract liquor stores, bail bond agencies, gambling establishments, tattoo/body piercing shops, adult entertainment venues, or any establishment where persons under the age of eighteen are not permitted, from having Automated Teller Machines (ATMs) and Point of Sale (POS) terminals on their premises that accept EBT cards.

The Department compares a list of EBT transactions at ATMs and POS machines monthly to a list of prohibited locations throughout the State provided by appropriate licensing authority for the state. The state Office of Fraud and Accountability or the state licensing authority for that business type (e.g. Liquor Control Board, Gaming Commission) physically inspects the location to verify that the match is accurate and appropriate and first sends letters to non-compliant businesses and clients. Continued non-compliance by businesses results in referral to the individual licensing authority for regulatory action. Continued non-compliance by clients results in the opening of an intentional program violation investigation.

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***(h) Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)***

Adequate authorized access to cash by recipients is ensured via an analysis required of the EBT vendor. The vendor is required by contract to perform a cash access assessment on an annual basis. The results are reviewed with the Department to address any drought identified, especially related to remote locations. If such a locale is identified during the annual review, the EBT vendor is prepared to deploy EBT-only POS machines that would allow case transactions and cash-back access for those clients.

As of August 1, 2012, the EBT ATM fee was eliminated. Clients are notified that if they choose to withdraw cash benefits using an ATM, they may incur a surcharge for the transaction accessed by the bank or ATM owner. This information is provided on the form "Your DSHS Cash or Food Benefits" (DSHS 14-520), or the informational pamphlet "Your Washington EBT Quest Card" (DSHS 22-310).

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***(i) Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)***

Families from other states receive the same benefits as other longer term Washington state residents.

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***(j) Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)***

The State exercises its option to provide federally funded TANF, Medicaid, and social services block grant (SSBG) benefits to qualified alien families who are eligible to receive these benefits. The State provides State Family Assistance which is a state-funded cash and medical benefits to those individuals who do not qualify for federally-funded assistance because of their immigration status, but otherwise meet all other eligibility requirements, including children and pregnant women. These are segregated funds and expenditures are claimed toward the state's MOE requirement.

The State follows federal sponsor deeming rules for qualified alien families receiving federally funded benefits. The income and resources of the sponsors for families receiving state-funded assistance are deemed until the sponsored immigrant becomes a naturalized U.S. citizen or has 40 work quarters

under the Social Security Act. Sponsor liability does not apply to the victims of domestic violence who self-petitioned under the Violence Against Women Act and their dependents.

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***(k) Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)***

The State will provide client protections by requiring that clients are treated with dignity and respect, are given sufficient opportunity to make their needs known to the Department, are free from discrimination on any basis prohibited by state or federal law, have their eligibility determined according to rules and procedures of the Department promulgated pursuant to the Administrative Procedures Act (RCW 34.05), are permitted to make applications for benefits and have the application processed and decision made in a timely manner, have their rights and responsibilities explained to them, are informed of which programs and services are available to them through the Department, have the conditions, requirements and benefits for which they are eligible explained to them, and are allowed to exercise, after full explanation, options and choices available to them.

Fair and equitable treatment does not mean that all WorkFirst benefits and services are available to all clients in all areas of the state at any one time. The State's need in some cases to gradually phase in a new service or to undertake pilot initiatives for purposes of determining program effectiveness may limit access to some services for some clients for limited periods of time.

Washington will ensure applicants and recipients of assistance are notified in writing: of the decisions of the Department regarding the type and amount of benefits available to them, including an adequate and advance notice of adverse actions; the legal basis for the determination; that they may request, within 90 days of such notice an administrative hearing, with due process protections, and conducted by the independent Office of Administrative Hearings pursuant to Chapters 74.08 and 34.05 RCW; and that they may obtain judicial review of an adverse decision without payment of a fee or posting a bond for filing such appeal or preparation of any necessary record. The State will provide an opportunity for any applicant or recipient aggrieved by an agency action to have an impartial administrative hearing before an Administrative Law Judge pursuant to RCW 74.08.080 and Chapter 34.05 RCW. The State will continue benefits pending the hearing decision, pursuant to Washington Administrative Code 388-458-0040.

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***(l) Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—***

***(1) providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or***

***(2) in other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.***

The state will assist TANF adults in receiving training for or obtaining employment in eldercare related employment in the home, health, community care, and long-term care facilities when there are identified employment opportunities in local communities.

In general, the TANF/WorkFirst program seeks to balance meeting the needs of adults, based on their particular work histories, employment barriers, and personal goals, with the actual opportunities available to them on the job market. As indicated under (c) above, the Department relies upon its WorkFirst partner, the Employment Security Department, to provide job market information and other employment services to its clients. The State Board for Community and Technical Colleges, another WorkFirst partner, provides oversight of high-wage, high-demand education and training program approval and career pathway planning services to clients. The ultimate goal is economic self-sufficiency and an end to reliance on public assistance.

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***(m) Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)***

#### MAINTENANCE OF EFFORT (MOE)

Through a variety of state and community-based service providers, the State offers the following types of services which help families remain intact, reduce their dependence on public assistance by encouraging employment, reduce risky behaviors which can result in unplanned out of wedlock pregnancies, or support the formation of two-parent families. Services are provided to families (and qualifying non-custodial parents) whose income is at or below 400% of the (FPL):

- a) Financial literacy;
- b) Classes in child development, community resources, and parenting skills;
- c) One-to-one mentoring of children and youth in professionally supported relationships;
- d) Individual, marital, and family counseling services, to include domestic violence counseling for victims and offenders;
- e) Alternative secondary education for at-risk youth that provides education, clinical counseling, and social services to students and families who have social adjustment, emotional, or school related difficulties;
- f) Community centers that provide family support and family preservation services;

- g) Domestic abuse shelters that provide victims of domestic violence and their families with a safe haven of temporary shelter with provisions for basic needs (food, clothing, etc.), counseling, and services for children;
  - h) Housing for eligible victims who need safety and support and are ready to go to school/work;
  - i) Preschool programs for 3 and 4 year old children provided at no cost to income eligible children;
  - j) Medical services and financial benefits to needy family members to address work-related injuries;
  - k) Domestic violence services such as assessment service, planning, counseling services, case management, and linkage and referral to recipients of TANF who have or are currently experiencing issues of safety and functioning related to domestic violence, which would adversely affect their ability to become self-sufficient;
  - l) State funded medical care to help needy families;
  - m) After school programs for children;
  - n) Food, meals, groceries, and volunteer services at food and commodity outlets and soup kitchens;
  - o) Services and education activities to prepare for employment;
  - p) Residential shelter and outreach to eligible teens;
  - q) One-time financial and material assistance to eligible families;
  - r) Education and enrichment programs to children from infancy and up;
  - s) Youth development programs
  - t) Programs that address social-economic barriers, family violence, inadequate parenting skills, lack of workplace skills, poverty, teenage pregnancy, poor school performance, and behavioral difficulties;
  - u) Programs that provide public awareness, education, and advocacy to prevent child abuse and neglect in families;
  - v) Drug and alcohol treatment; and
  - w) Subsidized and unsubsidized work experience.
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## SUPPLEMENTAL NUTRITION ASSISTANT PROGRAM, EMPLOYMENT AND TRAINING (SNAP E&T or BFET)

*(a) General Requirements: The State agency must prepare and submit an Employment and Training (E&T) Plan to its appropriate Food and Nutrition Service (FNS) Regional Office. The E&T Plan must be available for public inspection at the State agency headquarters. A State agency may include its plan for the SNAP E&T program in a Combined Plan under WIOA but will require FNS approval prior to implementation and must continue to make a copy of the plan available for public inspection. If a State includes SNAP E&T in a Combined Plan under WIOA, the State agency will detail the following for each year covered by the Combined Plan:*

*(1) The nature of the E&T components the State agency plans to offer and the reasons for such components, including cost information. The methodology for State agency reimbursement for education components must be specifically addressed;*

Washington's E&T Program, called Basic Food Employment and Training (BFET) began as a pilot in 2005 in the White Center community. BFET provides assistance to Basic Food recipients on a voluntary basis to assist in employability. Eligible individuals have the ability to receive the following services through contracted services offered at local community based organizations (CBO) and community and technical colleges (CTC):

- **Adult Basic Education/English Language Acquisition** includes education activities provided to participants with low reading, writing or math skills in order to raise their overall employability. High School Equivalency (formerly GED), High School Completion, Adult Basic Education (ABE), and English Language Acquisition (ELA).
- **Case management** includes coaching, navigation, and referring clients to available community resources.
- **Supervised Job Search** activities assist participants while looking for employment. This may include access to job listings, email, fax, telephone or assistance in preparing applications and resumes.
- **Job Search Training** activity is education and assistance provided to participants to secure employment. This may include education in a career setting, like Washington's I-BEST, assistance in preparing applications, resume writing, interview skills, and general computer instruction related to seeking employment.
- **Support Services** are ongoing supplemental assistance to assist clients during the transition to education and/or employment approved activities. This can include: transportation, child care, housing, clothing, books, educational supplies, tools, emergency assistance, etc.
- **Vocational Education** is education or instruction in specific skills and abilities required in an occupational field. This may include occupational assessment, remedial and entry level job skills training, customized and institutional skill training, and upgrade training.
- **Life Skills** training includes gaining abilities for adaptive and positive behavior that enable individuals to deal effectively with the demands and challenges of everyday life and employment.

BFET is a 50% match reimbursement program. CBOs and CTCs are reimbursed for 50% of the approved activities as outlined in their contract. In FFY 2019, DSHS contracted and operated a 50% match reimbursement program with 43 CBO's, 34 community and technical colleges, the Employment Security Department and the Office of Refugee and Immigrant Assistance (ORIA).

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***(2) An operating budget for the Federal fiscal year (FFY) with an estimate of the cost of operation for each FFY that is covered by the Combined Plan. Any State agency that requests 50 percent Federal reimbursement for State agency Basic Food E&T administrative costs, including salaries, benefits, goods and services and travel, must include in its plan, or amendments to its plan, an itemized list of all activities and costs for which those Federal funds will be claimed, including the costs for case management and casework to facilitate the transition from economic dependency to self-sufficiency through work. This request does not include costs for participant reimbursements. Costs in excess of the Federal grant will be allowed only with the prior approval of FNS and must be adequately documented to assure that they are necessary, reasonable and properly allocated. A State must submit a plan amendment to request budget adjustments at least 30 days prior to planned implementation;***



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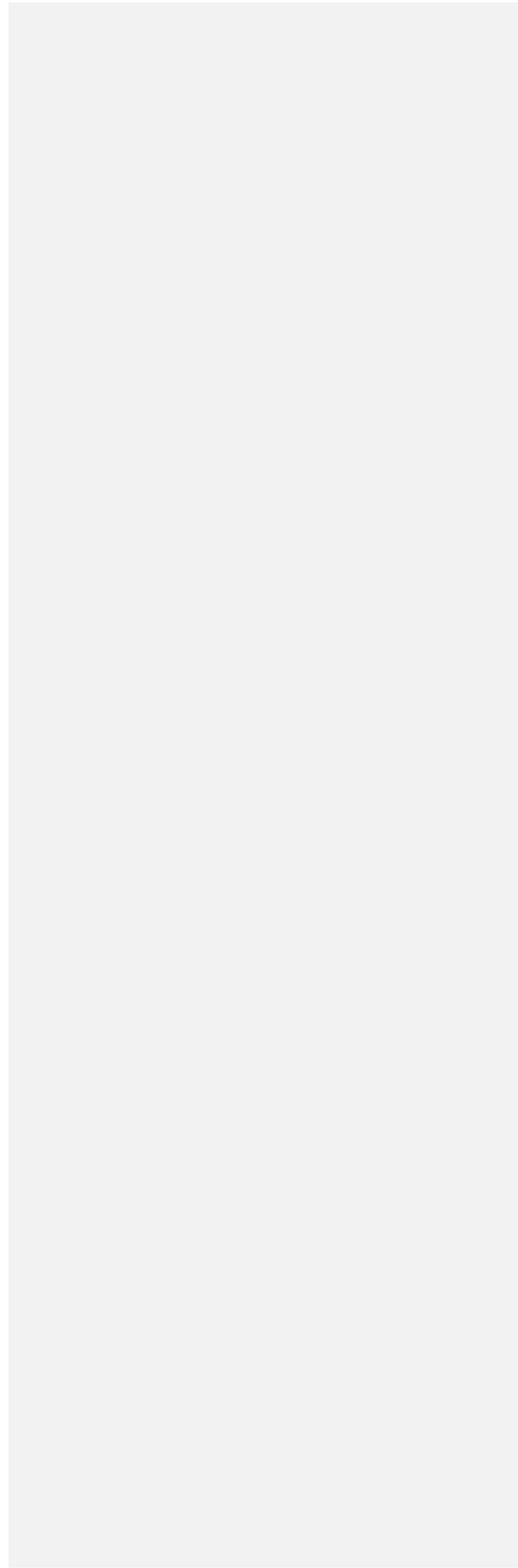


TABLE 5

Planned Fiscal Year Costs of the State E & T Program by Category of Funding

FISCAL YEAR 2020

	State cost	Federal cost	Total
<b>I. Direct Costs:</b>	<b>\$17,602,210</b>	<b>\$20,329,570</b>	<b>\$37,931,780</b>
a) Salary/Wages	\$6,753,131	\$8,648,164	\$15,401,294
b) Fringe Benefits* Approved Fringe Benefit Rate Used _____%	\$2,118,603	\$2,818,087	\$4,936,690
c) Contractual Costs (Admin Only)	\$8,057,143	\$8,116,363	\$16,173,506
d) Non-capital Equipment and Supplies	\$46,867	\$47,867	\$94,734
e) Materials	\$81,791	\$86,041	\$167,832
f) Travel	\$157,125	\$222,678	\$379,804
g) Building/Space	\$387,550	\$390,369	\$777,920
h) Equipment & Other Capital Expenditures	\$0	\$0	\$0
<b>Total Direct Costs</b>	<b>\$17,602,210</b>	<b>\$20,329,570</b>	<b>\$37,931,780</b>
<b>II. Indirect Costs:</b>	<b>\$1,307,953</b>	<b>\$1,614,509</b>	<b>\$2,922,462</b>
Indirect Costs*Approved Indirect Cost Rate Used: _____%	\$1,307,953	\$1,614,509	\$2,922,462
<b>III. In-kind Contribution</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
State in-kind contribution			
<b>Total Administrative Cost (Total of items I, II, and III)</b>	<b>\$18,910,163</b>	<b>\$21,944,079</b>	<b>\$40,854,242</b>
<i>100 Percent Federal E&amp;T Grant</i>		\$0	\$0
<i>50 percent Additional Administrative Expenditure</i>			
<b>IV. Participant Reimbursement (State plus Federal):</b>			
a) Dependent Care (including contractual costs)	\$23,100	\$26,800	\$49,900
b) Transportation & Other Costs (including contractual costs)	\$4,040,633	\$4,131,913	\$8,172,545

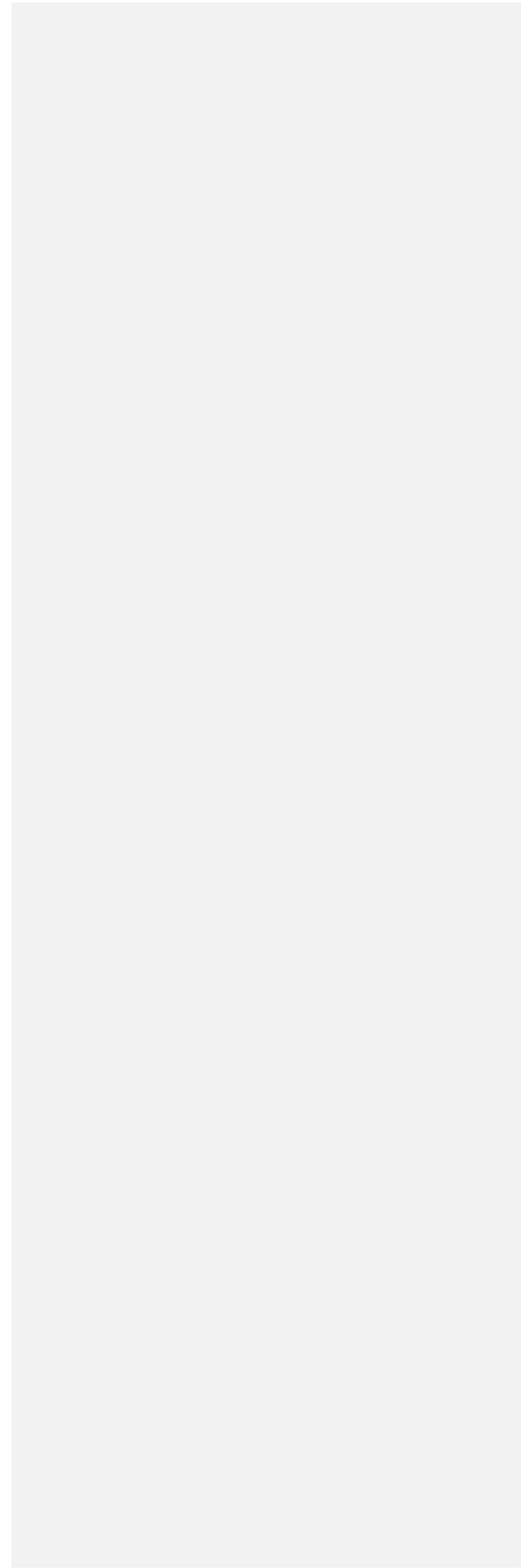
c) State Agency Cost for Dependent Care Services			
<i>Total 50 percent Participant Reimbursement Expenses</i>	\$4,063,733	\$4,158,713	\$8,222,445
<b><u>V. Total Costs</u></b>	<b>\$22,973,896</b>	<b>\$26,102,792</b>	<b>\$49,076,688</b>

**Budget Narrative and Justification**

<b>Item</b>	<b>Narrative</b>
<b>I. Direct Costs:</b>	
a) Salary/Wages	<p>Contracted staff will work with clients and administrators of the Basic Food Employment and Training (BFET) Program within WA state. DSHS staff will administer both the BFET program and the ABAWD (Able Bodies Adult Without Dependents) program within the state.</p> <p><b>Contracted staff</b> Total FTEs 273 for a total cost \$13,878,490</p> <p>Staff vary from case managers to fiscal managers.</p> <p><b>DSHS staff</b> Total FTE 20.9 Total cost \$1,522,804 Social &amp; Health Program Consultant 2 – BFET Field Unit 10 positions = \$711,630 Social &amp; Health Program Consultant 4 – BFET Field Unit 1 position = \$ 86,709 Social &amp; Health Program Consultant 3 – BFET Field Unit 1 position = \$ 69,408 WMS (Program Managers and Contracts Manager) 3 positions = \$231,597 Social &amp; Health Program Consultants 2 (BFET HQ) 3 Positions = \$211,734 Fiscal Analyst 4 – 1.0 Position = \$67,752 Fiscal Analyst 5 – 1.9 Positions = \$143,974</p> <p>NOTE: ABAWD Unit and Program Managers, salaries detailed in ABAWD Pledge.</p>
b) Fringe Benefits* Approved Fringe Benefit Rate Used <b>Varies%</b>	<p>Contractor fringe benefit rate varied from 25 to 50 %. WA state does not have a federally approved rate.</p>

	<p><b>Contracted staff</b> Total FTEs 273 for a total cost \$ 4,360,097</p> <p>Staff vary from case managers to fiscal managers.</p> <p><b>DSHS staff</b> Total FTE 20.9 Total cost \$576,593 Social &amp; Health Program Consultant 2 – BFET Field Unit 10 positions = \$271,544 Social &amp; Health Program Consultant 4 – BFET Field Unit 1 position = \$ 30,505 Social &amp; Health Program Consultant 3 – BFET Field Unit 1 position = \$ 26,776 WMS (Program Managers and Contracts Manager) 3 positions = \$85,576 Social &amp; Health Program Consultants 2 (BFET HQ) 3 Positions = \$81,085 Fiscal Analyst 4 – 1.0 Position = \$26,490 Fiscal Analyst 5 – 1.9 Positions = \$54,617</p> <p>NOTE: ABAWD Unit and Program Managers, salaries detailed in ABAWD Pledge.</p>
c) Contractual Costs	The contractor costs listed on Section I are for the contracted DHS sub-contractors. This does not include the cost to WA state.
d) Non-capital Equipment and Supplies	Non-capital equipment and supplies could include: Computers, staplers, pens, pencils, staples, tablets, calendars, miscellaneous office supplies, printers
e) Materials	Includes items for the client, such as: files folders, printing costs, labels, marketing materials, etc.
f) Travel	Travel must be related to the BFET program and be at the current federal mileage and per diem rate.
g) Building/Space	All lease cost for each contractor included calculation which must have square footage, FTE and percentage of time worked on the BFET program. Other costs included here could include building maintenance and insurance.
h) Equipment & Other Capital Expenditures	Not allowed for this program.
<b>II. Indirect Costs:</b>	
Rates vary per contractor	Contractors with a federally approved indirect rate use that rate, but must provide the approval letter to DSHS. DSHS also grants de Minimis rates (up to 10%) to some contractors with prior approval. Contractors requesting a de Minimis must state specific items covered by the rate in their request for approval.

<b>III. State In-kind Contribution</b>	
	Not allowed for this program.
<b>IV. Participant Reimbursements</b>	
a) Dependent Care	This is used for co-pays regarding child care services.
b) Transportation & Other Costs	Support services for clients including transportation, educational/credential testing, clothing, books & training supplies, housing & utilities, and personal hygiene.
c) State Agency Cost for Dependent Care Services	N/A


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***(3) The categories and types of individuals the State agency intends to exempt from E&T participation, the estimated percentage of work registrants the State agency plans to exempt, and the frequency with which the State agency plans to reevaluate the validity of its exemptions;***

The BFET state plan submitted and approved by FNS acknowledges the voluntary participation program and exempts all households receiving Basic Food Assistance from mandatory participation in E&T activities. This includes mandatory work registrants and Able Bodied Adults Without Dependent's (ABAWDs).

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***(4) The characteristics of the population the State agency intends to place in E&T;***

BFET serves individuals who are eligible for Basic Food Assistance and have a desire to pursue an education or need assistance in obtaining employment. Recipients enrolled in the BFET program must be ready to work and commit to the ability to engage in employment and training activities of at least 20 hours per week.

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**(5) The estimated number of volunteers the State agency expects to place in E&T;**

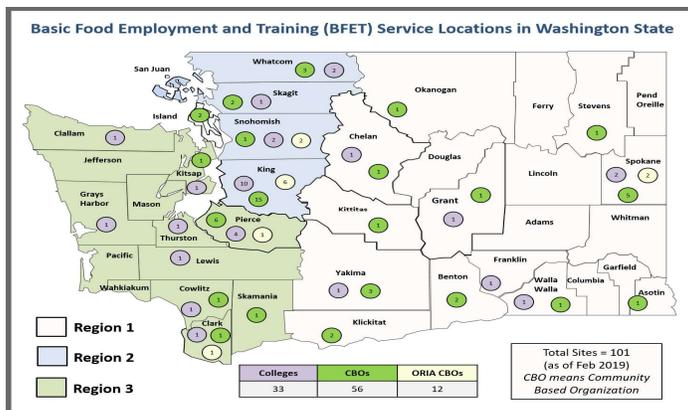
BFET served the following individuals in FY 2015 – 2019: It is estimated 23,000 individuals will participate in BFET in FFY 2020.

FFY	# of Unique Clients Served
2015	20,558
2016	20,383
2017	20,119
2018	18,390
2019	17,613

**(6) The geographic areas covered and not covered by the E&T Plan and why, and the type and location of services to be offered;**

BFET services are administered by local CBOs and community and technical colleges. BFET currently operates and provides services in 28 of the 39 Washington counties. These counties include: Asotin, Benton, Chelan, Clallam, Clark, Cowlitz, Ferry, Franklin, Grant, Grays Harbor, King, Kitsap, Kittitas, Klickitat, Lewis, Mason, Okanogan, Pacific, Pend Oreille, Pierce, Skagit, Skamania, Snohomish, Spokane, Stevens, Thurston, Wahkiakum, Walla Walla, Whatcom, and Yakima Counties.

BFET continues to seek opportunities to increase providers in counties with expand into the 11 counties not currently served (Adams, Columbia, Douglas, Garfield, Island, Jefferson, Lincoln, San Juan, and Whitman). The program has not had the opportunity to provide services in these counties due to the lack of CBOs operating E&T activities in these counties.



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***(7) The method the State agency uses to count all work registrants as of the first day of the new fiscal year;***

Washington's BFET program provides a wide range of services designed to help participants enhance their employability skills and obtain employment. Services are provided through BFET partnerships and program data is tracked using eJAS.

EJAS tracks participation by service component code with start and end dates. Partners providing services are identified in eJAS using a distinct contractor code, allowing the program to track multiple services by various partners including satellite sites to gather regional data accurately. The system tracks participation by participant, by contractor and by service component/activity. Historical data is stored in the DSHS data warehouse and is easily accessible by the program.

Washington began evaluating the BFET program outcomes in October 2008 using a two-step data match process ensuring an "apples to apples" comparison between service providers. In addition, DSHS began a process to utilize evaluation data outcomes to establish performance benchmarks for individual partners.

Performance measures are identified by each provider and included in their annual contract. Performance measures are monitored by DSHS using eJAS data, which are provided to providers quarterly. The BFET Program Managers conduct quarterly meetings with agency leadership discussing performance measures amongst a variety of other topics.

**Outcome Reporting**

Evaluation plan reports are provided to FNS annually. Reports provided to FNS contain the following information:

1. The number and percentage of E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T;
2. The number and percentage of E&T participants and former participants who are in unsubsidized employment during the fourth quarter after completion of participation in E&T;
3. The median quarterly earnings of all the E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T;
4. The number and percentage of participants that completed a training, educational, work experience or an on-the-job training component; and

5. The number of all E&T participants who:
  - a. Are voluntary vs. mandatory participants
  - b. Have received a high school degree (or GED) prior to being provided with E&T services
  - c. Are Able Bodied Adults Without Dependents (ABAWDs)
  - d. Speak English as a second language
  - e. Are male or female
  - f. Are within each of the following age ranges: 16-17, 18-35, 36-49, 50-59, 60 or older and
  - g. Activity Participation: Supervised job Search; Job Search Training; Basic Education; Vocational Education; and Strategies for Success/Life Skills.
  
6. The number and percentage of participants that received high school diploma or equivalency prior to participation in E&T.

Of the number and percentage of E&T participants to be reported in the first four measures above, a disaggregation of the number and percentage of those participants by the characteristics listed in a, b, and c. A participant may have more than one characteristic.

#### Data Match Processes and Cohort Definition

Washington's employment data match is designed to capture employment outcomes from all service providers. A participant cohort is identified in each quarter, comprised of BFET clients who exited due to employment during the quarter. Each quarter's cohort is tracked as a whole for four quarters after the initial quarter to measure employment and performance over time.

The participant cohort for the entered employment data match is identified through the eJAS system by the start date of the service component code. The cohort is defined as those participants exiting the program due to employment, within a given quarter, following the federal fiscal year. For example, if someone starts participating on November 1, 2017, he or she will become part of the first federal fiscal quarter cohort.

Each quarterly cohort is followed for four quarters and matched with Washington's Employment Security Department's Unemployment Insurance (UI) wage file and New Hire Directory (from ACES). If a participant in the cohort is employed on either file, he or she will be tallied and sorted by service component. The results of the data match report is reviewed quarterly along with the cohort's employment median earnings. The department uses this information to measure contractors' performance and program employment outcomes.

Washington provides annual reports to FNS WRO using the evaluation data match and implemented data share agreements with Employment Security Department and the State Board

for Community and Technical Colleges. The available evaluation data continues to reflect strong program outcomes.

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***(8) The method the State agency uses to report work registrant information on the quarterly Form FNS-583;***

Same as above.

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***(9) The method the State agency uses to prevent work registrants from being counted twice within a Federal fiscal year. If the State agency universally work registers all SNAP applicants, this method must specify how the State agency excludes those exempt from work registration under 7 C.F.R. §273.7(b)(1). If the State agency work registers nonexempt participants whenever a new application is submitted, this method must also specify how the State agency excludes those participants who may have already been registered within the past 12 months as specified under 7 C.F.R. §273.7(a)(1)(i);***

Same as above.

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***(10) The organizational relationship between the units responsible for certification and the units operating the E&T components, including units of the Statewide workforce development system, if available. FNS is specifically concerned that the lines of communication be efficient and that noncompliance by the participant be reported to the certification unit within 10 working days after the noncompliance occurs;***

SNAP eligibility is determined by DSHS staff located within the local Community Service Office (CSO). Staff who determine SNAP eligibility and certification are Public Benefit Specialist (PBS) or Work First Program Specialist. During the eligibility process staff recognize that a client may be eligible for BFET services. If this occurs, a referral through the states internal system BARCODE is made to the BFET Support Team or a brochure given to local CBOs offering services. The BFET Support Team consists of ten S&H Program Consultants (BFET specialists), one supervisor, one lead worker and an Administrator who oversees the program. The primary focus of this team is to support the CBO's and ensure integrity of program operations; this includes auditing CBO's who determine BFET eligibility through the eJAS system. Referrals received from the CSO's are reviewed by the BFET Specialist, who makes contact with the SNAP recipients to discuss the BFET program and refers these individuals to local CBO's offering services.

BFET services are administered by CBO's. SNAP recipients must make contact with a CBO in their area who determine eligibility for the BFET program and engage participants in approved BFET activities.

BFET activity is tracked in the eJAS system. The eJAS system relays participant information to/from the ACES system, which informs DSHS staff of a participant's participation in the BFET program. BFET is a voluntary participation program and noncompliance by the participant does not impact SNAP certification.

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***(11) The relationship between the State agency and other organizations it plans to coordinate with for the provision of services, including organizations in the statewide workforce development system, if available. Copies of contracts must be available for inspection;***

Washington's BFET Program contracts services with CBO's, the Employment Security Department and the State Board for Community and Technical Colleges to administer services. Each contract specifies performance measurements and identifies deliverable services.

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***(12) The availability, if appropriate, of E&T programs for Indians living on reservations after the State agency has consulted in good faith with appropriate tribal organizations;***

The Centennial Accord signed by the Governor of WA state on August 4, 1989 was established to better achieve mutual goals through an improved relationship between WA state government and tribal sovereign governments and includes 26 federally recognized tribes. The accord strives to attain, "a government –to – government relationship into more-efficient, improved and beneficial services to Indian people and non-Indian people".

Washington State has a history of working with local tribal councils and programs, such as the Tribal TANF program. The CSD staff to include the BFET Administrator participates on the WA state DSHS Indian Policy Advisory Committee (IPAC), which was established in 1977 to guide the implementation of the Original Concurrent Jurisdiction Tribal State Agreement of 1987; the Centennial Accord; the Millennium Accord and the Governor's Office of Indian Affairs.

Washington partners with the following tribes to deliver BFET services:

- *Northwest Indian College*: Located in the northwest corner of Washington has provided vocational education through BFET for basic food recipients enrolled in their college for over six years.
- *Spokane Tribe of Indians*: Located in Stevens County in eastern Washington provide E&T services in an underserved area of our state. Spokane Tribe of Indians intends to

provide services to create a strong and robust E&T program to serve eligible basic food recipients in Stevens, Spokane, Lincoln, Ferry, Grant, and Pend Oreille Counties.

- *Confederated Tribe of the Colville Reservation*: Located in Nespelem in eastern Washington. The program provides employment readiness opportunities to basic food recipients. Services will be provided in Omak, Nespelem, Keller and Inchelium.

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***(13) If a conciliation process is planned, the procedures that will be used when an individual fails to comply with an E&T program requirement. Include the length of the conciliation period.***

BFET does not have a process. The program is voluntary.

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***(14) The payment rates for child care established in accordance with the Child Care and Development Block Grant provisions of 45 CFR 98.43, and based on local market rate surveys.***

BFET participants who are participating in activities and in need of child care services are required to apply for child care assistance through Washington's Child Care Subsidy Program (CCSP). Funding for the CCSP is paid out of the Child Care Development Fund and the TANF block grant. If participants are not eligible to receive CCSP funds, CBO's may assist the participant and request reimbursement from the program.

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***(15) The combined (Federal/State) State agency reimbursement rate for transportation costs and other expenses reasonably necessary and directly related to participation incurred by E&T participants. If the State agency proposes to provide different reimbursement amounts to account for varying levels of expenses, for instance for greater or lesser costs of transportation in different areas of the State, it must include them here.***

The BFET program will reimburse partners for providing support services (participant reimbursement) for transportation expenses for participants in an approved BFET activity. This includes bus passes, gas voucher, auto repair, etc. These costs cannot exceed \$1200 annually.

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***(16) Information about expenses the State agency proposes to reimburse. FNS must be afforded the opportunity to review and comment on the proposed reimbursements before they are implemented.***

The BFET program will reimburse CBO's for providing support services (participant reimbursement) if the client is participating in an approved activity. BFET will reimburse the CBO for the following support services:

- Transportation<sup>1</sup>;
- Clothing, this includes uniforms or protective clothing needed for training<sup>2</sup>;
- Personal hygiene;
- Testing fees
- Housing and utilities<sup>3</sup>.
- Books and supplies
- Childcare
- Medical

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***(b) Able-bodied Adults without dependents (ABAWD): A State agency interested in receiving additional funding for serving able-bodied adults without dependents (ABAWDs) subject to the 3-month time limit, in accordance with 7 C.F.R. §273.7(d)(3), must include the following for each Federal fiscal year covered by the Combined Plan under WIOA:***

***(1) Its pledge to offer a qualifying activity to all at-risk ABAWD applicants and recipients;***

The ABAWDs throughout the state are typically among the lowest income individuals, who also face some of the highest barriers such as homelessness and undiagnosed mental/physical health conditions. DSHS will attempt to assist at-risk ABAWDs by providing programs and resources directly to clients, as well as providing education to other community agencies accessible to ABAWDs. DSHS will be focusing on building infrastructure to serve ABAWDs statewide despite waivers.

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***(2) Estimated costs of fulfilling its pledge;***

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<sup>1</sup> The transportation limit is \$150 per participant per month for a maximum of \$600 per year.

<sup>2</sup> The clothing limit is \$300 per participant per year

<sup>3</sup> Housing expenses are Only allowed after all other available outside resources for housing stabilization have been exhausted. Housing stabilization assistance may be given to include rental assistance when housing stability is reasonable and directly related to helping BFET participants prepare for self-sufficiency through training or other approved BFET activity. Housing support services are limited to two (2) months. (All information highlighted in pink needs to be deleted).

Washington State is requesting pledge funds to serve ABAWDs. These funds will ensure Washington provides the best customer service to our ABAWD clients and build capacity to ensure accurate case processing. WA understands and acknowledges that we are prepared to serve any at-risk ABAWD who wants to participate in E&T, even if the state does not receive funding for the full estimated cost to fulfill the pledge. Pledge funds would be used to supply:

ABAWD Pledge Cost Description	Cost Estimate
<b>Leadership for this team consists of 1 ABAWD Program Manager, 1 Social &amp; Health Program Consultant, .10 Fiscal Manager, and .33 Employment and Training Coordinator.</b>	
ABAWD Program Manager (1 FTE) to manage the program.	\$104,950
ABAWD Program Consultant (1 FTE) to assist in managing the program, cultivating E&T program and opportunities.  3 E&T Program Coordinator at .33 for a total of .99 of an FTE to assist with local administrative needs and related projects and programs. The three E&T Program Coordinators are located in Washington State's three service regions and will be the local contact connecting our Community Service Offices to local E&T providers.	\$102,094  \$107,449
BFET/ABAWD Fiscal manager (.10) to manage ABAWD Pledge funding.	\$10,405
Travel needed to support engagement to strengthen provider, stakeholder and community understanding and collaboration to meet ABAWDs needs. This also includes increase costs associated with monitoring Workfare sites in non-exempt areas.	\$40,000
Funding to cover mandatory worker's compensation fees to the Washington State Labor & Industries for each Workfare participant.	\$4,700
Publications, electronic and paper, to ensure ABAWDs and potential ABAWDs have information and resources to engage in activities to meet work requirements. This may include mailers, posters, flyers and brochures to help direct ABAWD clients to available activities and the engagement services offered by DSHS. This includes translation fees.	\$75,000



<p>support in accessing activities at community colleges or with other community partners. If an individual wants to engage in education activities at the college, the participant will be enrolled in the colleges BFET program for participation in BFET activities to meet work requirements. The ABAWD Navigator will also work to enhance collaborations with community partners and increase resources for colleges to support low-income students.</p> <p>In addition to potential referral to the BFET program, college ABAWD Navigator will focus on engaging clients in Adult Basic Education and other soft skill building the ABAWD population often needs before stepping them onto vocational education.</p>		
<p>ABAWD Employment Specialist - Employment Security Department</p> <p>Contract to hire, train and oversee ABAWD Employment Specialist housed at ESD locations across the state.</p> <p>The ABAWD Employment Specialist position will create a point of contact for immediate engagement of ABAWDs in activities that matter and fulfill the work requirement for Basic Food eligibility. This includes providing orientation to the ABAWD program, assistance registering in WorkSourceWA.com, work skill assessment, case management, engaging in supervised job search activities, providing job search training, retention services, referrals and support in accessing Strategies for Success classes and other workshops. The ABAWD Employment Specialist will also provide all required participation data.</p> <p>ESD ABAWD Employment Specialist will support ABAWD clients along their job readiness pathway.</p>	<p>3,000,000</p>	
<p>Total</p>	<p>\$6,142,213</p>	

***(3) A description of management controls in place to meet pledge requirements;***

The ABAWD policy staff will manage ABAWD compliance in partnership with the specialized ABAWD staff. This includes:

- Outreach and management of Workfare sites

- Policy clarifications
- Development of statewide DSHS staff training on referrals to approved activities
- Approval of external employment and training programs
- Contract development, negotiation and monitoring for ABAWD Navigators
- Monitoring of ABAWD participation through monthly reports
- Community and stakeholder outreach for education on aiding the ABAWD population
- Monitoring of internal processes and procedures to meet ABAWD policies

DSHS uses a comprehensive data mining systems to ensure program compliance and accurate ABAWD coding based on demographic and other data entered during SNAP eligibility determinations.

In the event that specialized ABAWD staff need assistance in meeting ABAWD applicant/recipient needs, DSHS has a Workload Prioritization Team (WPT) that can distribute work to the hundreds of other financial services eligibility staff to assist. DSHS also fosters quality integrity, and seeks assistance from ESA’s Department of Program Integrity to ensure compliance with ABAWD and work registration regulations.

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***(4) A discussion of its capacity and ability to serve at-risk ABAWDs;***

Services will be available through the following organizations:

- 34 BFET Community and Technical Colleges
- 12 ORIA BFET CBOs
- 44 BFET CBOs
- 13 Workfare Sites
- 16 Employment Security Sites

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***(5) Information about the size and special needs of its ABAWD population;***

Washington State currently estimates 90,000 ABAWDs statewide, with 13,000 in non-exempt areas. After applying the maximum number of 15 percent exemptions (1,750 clients receiving the exemption for 12 months), 11,250 are considered at-risk for losing SNAP benefits due to having no personal or geographical exemptions. The ABAWDs in King County without the waiver are typically among the lowest income individuals, who also face some of the highest barriers such as homelessness and undiagnosed mental/physical health conditions. DSHS will attempt to assist at-risk ABAWDs by providing programs and resources directly to clients, as well as providing education to other community agencies accessible to ABAWDs. DSHS will be focusing on building infrastructure to serve ABAWDs statewide despite waivers.

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***(6) Information about the education, training, and workfare components it will offer to meet the ABAWD work requirement.***

Washington will not require mandatory BFET participation for ABAWDs during FY 2020. The BFET program remains a voluntary program available to ABAWDs to meet participation.

Washington State offers four main pathways to serve ABAWDs to maintain SNAP eligibility:

1. *BFET*: Services include supervised job search, job search training, basic education, vocational education, case management to remove barriers and job retention services. BFET also offers support services such as transportation and educational supplies. Clients must participate in at least 20 hours per week, with no more than nine supervised job search or job search training hours each week.
2. *Career Ladder for Educated and vocationally Experienced Refugees (CLEVER)*: Program offered through the Office of Refugee and Immigrant Assistance (ORIA) designed to assist highly educated and/or vocationally skilled refugees to re-enter their profession in the United States.
3. *Limited English Proficiency (LEP) Pathway*: Program offered through the Office of Refugee and Immigrant Assistance (ORIA) to aid refugee clients in learning English and skill gain.
4. *(NEW) State Approved E&T Programs*: DSHS has created a process to verify and approve outside agency employment and training programs that align with ABAWD requirements and meet requirements within the CFR.
5. *(NEW) Unpaid Work*: DSHS will allow clients to self-report other unpaid work to meet work requirements. Unpaid work must meet the 80 hours a month minimum.
6. *Unsubsidized work*: In partnership with the Employment Pipeline program within CSD and in partnerships with local Workforce Development Councils, DSHS may refer clients to these and other employment programs to search for employment to meet minimum requirements.
7. *Workfare*: DSHS contracts with at least 12 non-profit agencies to provide voluntary positions that comply with workfare provisions. The State will consider the minimum workfare requirement for ABAWDs choosing the workfare option to be the SNAP monthly benefit amount divided by the Washington state, city, or local minimum wage and rounding down to the next whole number. Workfare will comply with the federal

Fair Labor Standards Act (FLSA) minimum wage laws. Workfare hours are the responsibility of the household. If there are more than one ABAWD in an assistance unit, the ABAWD Specialized Team will document how the household chooses to share responsibility. Workfare anticipates \$4,700 in workers' compensation insurance pay to the Washington State Department of Labor and Industries to cover program participants for the year.

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***(c) Optional Workfare:*** State agencies or other political subdivisions must describe in detail in the plan how the political subdivision, working with the State agency and any other cooperating agencies that may be involved in the program, will fulfill the provisions of 7 C.F.R. §273.7(m). If a State opts to operate an optional workfare program or modify an existing optional workfare program, through a Combined Plan under WIOA, it must provide the following:

***(1) State agencies or political subdivisions submitting a workfare plan must submit with the plan an operating budget covering the period from the initiation of the workfare program's implementation schedule to the close of the Federal fiscal year for each year covered by the Combined Plan. In addition, an estimate of the cost for one full year of operation must be submitted together with the workfare plan for each Federal fiscal year covered by the Combined Plan.***

WA State will not be using this option.

***(2) If workfare plans are submitted by more than one political subdivision, each representing the same population (such as a city within a county), FNS will determine which political subdivision will have its plan approved. Under no circumstances will a SNAP recipient be subject to more than one SNAP workfare program. If a political subdivision chooses to operate a workfare program and represents a population which is already, at least in part, subject to a SNAP workfare program administered by another political subdivision, it must establish in its workfare plan how SNAP recipients will not be subject to more than one SNAP workfare program.***

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***(d) Voluntary Workfare:*** State agencies and political subdivisions may operate workfare programs whereby participation by SNAP recipients is voluntary. In such a program, the penalties for failure to comply, as provided in 7 C.F.R. §273.7(f), will not

***apply for noncompliance. The amount of hours to be worked will be negotiated between the household and the operating agency, though not to exceed the limits provided under 7 C.F.R. §273.7(m) (5) (ii). In addition, all protections provided under 7 C.F.R. §273.7(m)(6)(i) shall continue to apply. Those State agencies and political subdivisions choosing to operate such a program shall indicate in their workfare plan how their staffing will adapt to anticipated and unanticipated levels of participation for each Federal fiscal year covered by the Combined Plan under WIOA. FNS will not approve plans which do not show that the benefits of the workfare program, in terms of hours worked by participants and reduced SNAP allotments due to successful job attainment, are expected to exceed the costs of such a program. In addition, if FNS finds that an approved voluntary program does not meet this criterion; FNS reserves the right to withdraw approval.***

WA State will not be using this option.

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***(e) Comparable Workfare: The State agency or political subdivision must provide a description of its program, including a methodology for ensuring compliance with 7 C.F.R §273.7(m)(9)(ii) for each Federal fiscal year covered by the Combined Plan under WIOA.***

Washington State's Workfare program will follow the Comparable Workfare format in that ABAWDs who are at risk of losing their SNAP benefits will be allowed to count volunteer workfare hours to regain or retain eligibility.

The State will consider the minimum Workfare requirement for ABAWDs choosing the Workfare option to be the lesser of: 16 hours per month volunteer work, or the SNAP monthly benefit amount divided by highest applicable minimum wage where the client lives or works. Workfare will comply with the federal Fair Labor Standards Act (FLSA) minimum wage laws. Workfare participants will be eligible for participant reimbursements issued directly from DSHS, dependent upon match funding availability.

- Organizations which wish to register as a Workfare site will need to complete an agreement. The organization must:
- Be a nonprofit, public or government agency
- Provide supervised duties in which participants will learn vocational skills and gain work experience.
- Provide necessary documentation and reporting of attendance to DSHS.
- Report documentation monthly.
- Report any issues or problems timely.
- Furnish training, equipment and materials required for duties of the workfare position.

ABAWD pledge funds will cover Labor and Industries (L & I) insurance costs for volunteers at the Workfare site.

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***(f) Process: The State agency must submit amendments to the SNAP E&T segment of the Combined Plan for FNS approval at least 30 days prior to the planned implementation in order to receive federal SNAP E&T funding for the activities not covered by the approved Combined Plan.***

***(g) Plan Modifications: If FNS determines that the performance of a State agency with respect to employment and training outcomes is inadequate, FNS may require the State agency to make modifications to the State E&T plan to improve the outcomes.***