



STATE OF WASHINGTON  
**WASHINGTON WORKFIRST**

- *Office of Financial Management*
- *Department of Social and Health Services*
- *Employment Security Department*
- *Department of Community, Trade & Economic Development*
- *State Board for Community and Technical Colleges*
- *Department of Early Learning*

June 19, 2007

TO: All WorkFirst Staff

FROM: Carole Holland, Senior WorkFirst Coordinator  
Office of Financial Management

Deborah Marley, Assistant Secretary  
Economic Services Administration

Paul Trause, Deputy Commissioner  
Work Source Operations Division, ESD

Marijo Olson, Assistant Director  
Community Trade and Economic Development

Jim Crabbe, Director  
State Board of Community and Technical Colleges

Amie Lapp Payne, Senior Policy Advisor  
Department of Early Learning

SUBJECT: **DOCUMENTING AND REPORTING WORKFIRST PARTICIPATION (JULY 2007)**

The federal Deficit Reduction Act (DRA) established new participation verification requirements. Beginning July 1, 2007, once WorkFirst partners and contractors complete the all-day WorkFirst Forward training, partners/contractors will document and report actual hours of WorkFirst participation in unpaid core and non-core activities. That is, participation in job search, community service, work experience, countable 'X' codes and countable education and training activities.

These new 'actual hours' rules do not apply to employment. The federal rules acknowledge that verifying actual hours of employment every month would create a hardship for employers and might discourage them from hiring WorkFirst participants. WorkFirst will use financial eligibility rules and systems to verify, calculate and report the average weekly hours of participation in Community Jobs, Career Jump, work study, on-the-job training, self-employment and regular employment.

Key concepts for documenting and reporting actual hours of participation in unpaid core and non-core activities include:

- **Documentation:** We must maintain documentation, or proof, of all participation we report to the federal government. Documentation can include items such as time sheets, eJAS notes, attendance records, WorkFirst Participation Verification forms or daily job search logs. As you work with parents, be sure to document what they are doing and store the documentation so it is available for audits.
- **Reporting Actual Hours:** All trained WorkFirst partners and contractors, including DSHS staff, will have access to new eJAS/CATS screens that will collect information about actual hours of participation. Enter actual hours of participation and any absences just as they occur each month by the 10<sup>th</sup> of the following month. It is mandatory to complete the all-day WorkFirst Forward training before staff access these new eJAS screens.
- **Absences:** Ask parents to make up absences if they can by the end of the month. Excused absences may count towards participation. Use eJAS notes to document when a parent calls in as soon as they can with a good reason for an absence. Headquarters will decide when to apply these hours towards participation.
- **Non-contracted activities:** DSHS staff will use the eJAS WorkFirst Participation Verification form to document participation in non-contracted/non-partner activities. The form will not collect any information about absences. Providers will be asked to turn in the form by the 5<sup>th</sup> of the following month so DSHS staff can input the data by the 15<sup>th</sup>.
- **Automation:** WorkFirst will use automation to ease communication, reduce workload and avoid errors. In the future, eJAS will display each parent's average weekly hours of employment/self-employment, their monthly FLSA maximum hours for the past, current and upcoming month and indicate when a second parent in the home is doing unpaid work.
- **Quality Assurance:** The federal government may do audits and apply penalties if we are found to be out of compliance with their new participation verification requirements. WorkFirst Quality Assurance will do case reviews each month, and then go over the results at the WorkFirst Participation Review Committee meeting. The entire WorkFirst partnership will be involved in identifying problem areas and coming up with common solutions and action plans so we can find and fix discrepancies before they show up in federal audits.

Thank you for your assistance as we implement the new federal participation requirements for unpaid core and non-core activities. If you have any questions or need further information, please contact Brent Low at (360) 725-4633 or [LowBD@dshs.wa.gov](mailto:LowBD@dshs.wa.gov).

cc:     Bob Bowman                     Sandy Miller                     Tom Everett  
          Amber Gillum                 Ken Kelhofer                    Tom Medina  
          Kelly Lindseth               Denny Naughton                 Ko Vang  
          Dori Shoji                    Diane Klontz                    Steve Ebben  
          Sam Senn                      David Johnson                  Brent Low  
          Bill Bergh                    Amy Hatfield  
          Connie Ambrose               Robin Thompson  
          Barbara Bucsko               Carla Gira  
          Cindy Mund