

Department of Social and Health Services  
Olympia, Washington  
**EAZ Manual**

Revision # 1,329  
Category Equal Access (Necessary Supplemental Accommodations)  
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**Summary**

Updated around EAS process for waiving program requirements

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Equal Access (Necessary Supplemental Accommodations)

Revised on: ~~June 1, 2020~~[May 13, 2025](#)

Purpose

Title 2 of the Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability in all services, programs, and activities provided by the department.

Chapter 388-472 WAC broadly supports Title 2 of the ADA and outlines the following:

- [WAC 388-472-0005](#) What are my rights and responsibilities?

- [WAC 388-472-0010](#) What are necessary supplemental accommodation (NSA) services?
- [WAC 388-472-0020](#) How does the department decide if I am eligible for NSA services?
- [WAC 388-472-0030](#) How can I get NSA services?
- [WAC 388-472-0040](#) What are the department's responsibilities in giving NSA services to me?
- [WAC 388-472-0050](#) What if I don't accept or follow through with program requirements because I'm not able to or don't understand them?

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## Clarifying Information

### [WAC 388-472-0010](#) **What are NSA services?**

1. We use the term Equal Access (EA) services instead of Necessary Supplemental Accommodation (NSA) services.
2. We can provide EA services to you if you have an impairment(s) or other problems that make it difficult to access our programs. EA services include:
  - a. Arranging for assistive listening devices, sign language interpretation, or other communication aids;
  - b. Sending forms and letters in large print or other format;
  - c. Arranging for or providing help to complete and submit forms to us;
  - d. Reading or explaining letters or forms we send;
  - e. Helping you give or get the information we need to decide or continue eligibility;
  - f. If we know you have a person who helps you with your applications, notifying them when we need information or when we are about to reduce or end your benefits;
  - g. Calling you instead of having you come into the office;
  - h. Meeting with you in a room free of distractions (when possible);
  - i. Reminding you of appointments;
  - j. If you miss an appointment or deadline, contacting you about the reason before we reduce or end your benefits;
  - k. Reviewing our decision to stop, suspend, or reduce your benefits to make sure we followed your EA Plan;
  - l. Explaining to you a reduction or termination of your benefits (see [WAC 388-418-0020](#));
  - m. Helping you request continuing benefits or a fair hearing;

- n. Allowing someone you choose to be in charge of your benefits, and providing protective payments if needed.
- 3. For EA clients who have Limited English Proficiency (LEP), follow policy guidance under [Chapter 388-271 WAC](#), and in the [EA-Z Manual](#).
- 4. For EA clients who have an Authorized Representative or Protective Payee, follow policy guidance under [Chapter 388-460 WAC](#), and in the EA-Z Manual and Social Services Manual.
  - a. [Authorized Representative - Food Assistance](#)
  - b. [Authorized Representative - Food, Cash, and Medical Benefit Issuances](#)
  - c. [Payees on Benefit Issuances - Overview](#)
  - d. [Payees on Benefits Issuances - Protective Payees](#)
- 5. [Protective Payees - Guidelines](#)

**[WAC 388-472-0020](#) How does the department decide if I am eligible for NSA services?**

- 1. All CSD clients who are head of household are potentially eligible for EA services.
- 2. If two parents are part of a TANF [assistance unit](#), both clients are potentially eligible for EA services.
- 3. Public Benefit Specialists and WorkFirst ~~Program Specialists~~[staff](#) are responsible for completing an EA Screening at application and eligibility review for all CSD clients.
  - a. Guidance on completing an EA Screening can be found in the Equal Access (EA) Procedure [CSD Procedures Handbook](#).
- 4. Public Benefit Specialists, ~~WorkFirst Program Specialists~~[Case Planners](#), and Social Services staff are responsible for completing an additional EA Screening during a client contact when:
  - a. A client doesn't have an existing plan and may need one; **or**
  - b. An existing plan may require modification to better accommodate the client.

**[WAC 388-472-0030](#) How can I get NSA services?**

- 1. Public Benefit Specialists, ~~WorkFirst Program Specialists~~[Case Planners](#), and Social Services staff are responsible for developing an EA Plan when they identify a client as EA.
  - a. Steps on how to create an EA Plan can be found in the ACES Manual.
- 2. Public Benefit Specialists, ~~WorkFirst Program Specialists~~[Case Planners](#), and Social Services staff are responsible for modifying an existing EA Plan when they or the client determines a need to do so.
  - a. Staff may not remove existing accommodations from a plan without the client's consent.

- b. Steps on how to access and update an EA Plan can be found in the ACES Manual.

**WAC 388-472-0040 What are the department's responsibilities in giving NSA services to me?**

1. All CSD staff are continually responsible to review and follow a client's EA Plan, and document that they have done so.
2. We restore lost benefits for EA clients when:
  - a. We stop a benefit during a certification period because we are unable to tell if the client continues to qualify; **and**
  - b. The client provides proof they still qualify within twenty days after the benefit end date.

**Note: When a household reapplies for food assistance after the end of the certification period and is eligible, benefits begin effective with the reapplication date. This is true even if the applicant has an EA plan.**

**WAC 388-472-0050 What if I don't accept or follow through with program requirements because I'm not able to or don't understand them?**

1. When staff decide an EA client's limitation and/or impairment(s) is the cause for their refusal to accept or failure to follow through on the requirements listed below, the client has good cause and staff will not take any adverse action.
  - a. Public Benefit Specialists or WorkFirst staff Case Planners determine good cause for the following requirements. Refer to Basic Food Work Requirements- Good Cause for more information.
    - i. Maintain employment (e.g. work registrants); **or**
    - ii. Participate in food assistance employment or training (e.g. ABAWD clients).
  - b. WorkFirst or Social Services staff determine good cause for the following requirements:
    - i. Follow through with medical treatment;
    - ii. Follow through with referrals to other agencies; **or**
    - iii. Participate in the WorkFirst program.
2. When staff determines that a client has good cause, they review the client's EA Plan to ensure that all EA accommodations necessary to support the client's participation are included in their plan.

**Example: WorkFirst participant didn't follow through with job search. At the good cause appointment, the participant admits they can't read and didn't understand their Individual Responsibility Plan (IRP) instructing them to attend job search. The Case Manager would not recommend a WorkFirst sanction, they would create an EA service plan with the participant including accommodations like; having a representative who would also get a**

[copy of letters, reading or explaining letters or forms we send, and reminder calls about appointments. Then a new IRP would be created together with the participant to address the learning needs like a learning disability assessment or adult basic education classes.](#)

[2.3.](#) If the Department is unable to accommodate a client's limitation or impairment to support a specific program requirement, the Department ~~determines whether waives~~ that program requirement ~~or activity can be waived~~.

[a.](#) Department staff review the case with their direct supervisor to explore ~~if whether~~ an alternative accommodation can be provided [to address the EA need](#).

[i.](#) For cash programs:

[1.](#) If an alternative accommodation isn't possible, staff ~~submit an Exception to Rule request to see if the requirement can be waived~~ discuss the case with their supervisor and document the participant is EA, that they were unable to participate in their plan and any next steps (including asking for medical documentation)

[2.](#) For WorkFirst Program this might include considering: [deferrals or waivers also called exemptions from WorkFirst activities. See WFHB 3.5.1.9 and WFHB 3.5.1.10.](#)

[i.ii.](#) For Basic Food work requirements (including ABAWD) determine ~~is if~~ client meets criteria for exemptions. ~~Staff need to screen~~ Screen the customer for all exemptions/exceptions and ~~apply~~ the exemption that will be in effect the longest when an individual qualifies for more than one exemption. See Basic Food - Work Requirements for more information.