3.7.2 Documenting and Reporting Participation

Revised on: September 20July 1, 2021

The *Documenting and Reporting Participation* section includes:

NOTE: Due to the COVID-19 pandemic affecting Washington State, staff aren't required to mail the monthly WorkFirst Participation Verification Forms and can use other methods to verify participation hours

- Documentation verified over the phone with non-contracted providers is acceptable and should include:
    - Name and phone number of person verifying
    - Date verified
    - Actual hours verified
    - Frequency (daily, weekly, monthly, etc.)
- Staff are encouraged to be creative in working with participants who are still in activities to verify their participation hours, if possible.
- Staff should gather information regarding current non-contracted activities and document in eJAS if a participant is continuing to participate or if their situation has changed and they the reason they are no longer able to participate.

3.7.2.1 What is monitoring participation?

When we refer to "monitoring participation", we are talking about a monitoring and reporting system that makes sure WorkFirst participants are actively doing required activities. Monitoring individualparticipants in their WorkFirst activities is a key element in ensuring strengthened accountability.

WorkFirst participants benefit from this strengthened accountability because it will help them model the type of behavior that is required by employers. Close monitoring, and learning to come in or call in to scheduled activities, will helps participants build transferable skills for the workplace.

As we monitor participation, partner agencies, contractors and non-contracted service providers ~~will be~~ follow~~ing~~ the same basic guidelines to report attendance, participation and progress for WorkFirst participants:

- Most participants in non-contracted activities ~~will~~ must have the monthly WorkFirst participation verification form turned in to the WFPS or WFSSS by the 5th of each month.

- The WFPS or WFSSS enters the WorkFirst participation information into eJAS by the 15th of each month for the previous month's activity.

- eJAS~~/CATS~~ participation and progress reports must be input by the 10th of each month.

- Unexcused absences ~~will~~ must be reported immediately to the WFPS or WFSSS.

- Partners, contractors and providers must also document participation for participants in unpaid core or non-core activities. There are additional reporting requirements for these activities, as described in Section 3.7.1.2.

3.7.2.2 What is participation and progress?

All partners and contractors must report whether a participant is participating and progressing satisfactorily each month, as follows:

- Partners and contractors use eJAS to report progress in basic education, high school and GED completion. They also use eJAS to report actual hours of participation for unpaid core and non-core activities.

- Non-contracted providers report actual hours of participation and progress on the eJAS WorkFirst participation verification form (but not hours missed due to holidays or absences).

- Any provider may also communicate issues in other ways (such as meetings, e-messaging or phone calls).

Satisfactory participation means the ~~individual~~participant is actively involved in doing the required activities. Satisfactory progress means that the ~~individual~~participant is making gains, learning new skills, and becoming more employable.

- For reports of unsatisfactory participation, the participant may be unable or unwilling to participate. The WFPS or WFSSS must determine if there ~~i~~'s good cause for nonparticipation or start the sanction process if appropriate.

- For reports of unsatisfactory progress, the WFPS or WFSSS determines what the ~~individual~~participant needs to do to meet the activity requirements or whether another activity would be more appropriate.

The WFPS and WFSSS also access eJAS ad-hoc, the Client Accountability Report (CAR) and the Caseload Management Report (CLMR) each day to track whether a participant has had an unexcused absence or has been referred back via eJAS.

3.7.2.3 Who monitors participation?

WFPSs or WFSSSs ~~will~~ monitor participation on a regular and consistent basis. If the participant is working with a contractor or partner agency, participation and progress reporting ~~will~~ occurs

electronically through eJAS. If the participant is working with a non-contracted service provider, the participation and progress information from the eJAS WorkFirst participation verification form ~~will is~~ ~~be~~ input into eJAS by the WFPS or WFSSS by the 15-th of each month for the previous month's activity.

You can find information about how partners document and report participation in the Employment Services, WorkFirst Training, LEP Pathways, Supported Work and Community Jobs sections. The remainder of this section describes how to document and report participation in contracted and non-contracted services.

3.7.2.4 What is Documenting Participation?

We must document excused absences and actual hours of participation for unpaid core and non-core activities. Under federal rules, we must obtain written documentation in a State-approved format, such as time sheets or attendance records, to verify the specific hours of attendance by each participant in scheduled activities. Non-contracted providers <u>must</u> ~~will~~ document participation by filling out an eJAS WorkFirst participation verification each form each month.

Partners and contractors must also document their approval of excused absences in eJAS notes. The eJAS note should describe why the participant was unable to attend his or her scheduled activity, the date of absence and the hours absent.

The eJAS notes, time sheets, attendance records and eJAS forms become the source documents for participation reporting in eJAS. In addition, documentation must be held by the provider, contractor or partner agency for at least 30 months so it is available for state or federal audits.

eJAS Note Redaction Procedure

If a note has been entered in eJAS in error, or in an inappropriate note type, the note must be redacted.

Examples:

- Notes entered into the wrong participant's record
- Confidential notes entered into a general note type when it would be more appropriate for a special records note
- Incorrect information entered
- Notes entered by WF partners incorrectly or in the wrong note type
- Other unique situations including Address Confidentiality Program (ACP)

eJAS note Redaction Step by Step

- The WFPS or WFSSS must:
  - o Once the note has been identified, you copy and paste directly from eJAS the client identification number, note type, and actual note including date and time stamp.
  - o Forward the information to your supervisor for review and redaction approval
  - o Replace the note into the correct note type upon supervisor approval

- - *For all ACP cases, please do not email or Skype the above information. A request for note redaction should be completed with supervisor either by phone or face to face
- The Supervisor must:
  - Review note redaction request
  - Upon approval by supervisor, alert staff to replace the note in the correct note type or correct participant's record as appropriate
  - Forward the request, including the copy and paste provided by staff, to both Maria Santiago and Donelle Colón in HQ Operations
  - *For all ACP cases, please do not email or Skype the above information. A request for note redaction will be coordinated with HQ by contacting Maria Santiago or Donelle Colón over the phone
- *HQ Operations:*
  - Reviews the request within 24 hours
  - Upon approval, sends the note for redaction
  - Sends a confirmation email to the supervisor when the request has been completed
  - *For ACP cases, HQ contacts the supervisor directly confirming completion

3.7.2.5 What are Contracted service requirements?

The service provider ~~will~~ documents the ~~individual~~participants' attendance in the program and report any unexcused absences within one business day to the WFPS or WFSSS via eJAS. The WFPS or WFSSS ~~will~~ starts the good cause determination and start the sanction process, if appropriate, when a participant exceeds the allowable limit for unexcused absences.

By the 10th of each month, contractors must~~will~~ report to the WFPS or WFSSS, via eJAS, to confirm the participant's progress (when required) and participation for the previous month's unpaid core or non-core activity. Participation for community jobs, career jump, on-the-job training and work study participation ~~will be~~ is collected from ACES earnings data.

Specifically, the contractor ~~will~~ reports:

- Actual hours of participation.
- The number of hours and instances for excused absences.
- The number of hours missed due to holidays (See List of State Holidays).
- The number of hours of unexcused absences.
- Progress reports are only required for basic education, high school or GED completion.

For excused absences, contractors and partners report regularly scheduled hours missed due to excused absences, listing the date of the absence and the number of hours missed on that date. If the participant only misses part of a day, enter actual hours and excused absence hours separately in eJAS. For example, a participant is scheduled to participate for 7 hours on the 12th, but gets an

excused absence for 3 hours in the afternoon for a doctor's appointment. Enter 4 actual hours of participation and 3 excused absence hours for the 12th into eJAS.

For holidays, contractors report regularly scheduled hours missed due to state holidays. Holiday hours should reflect but not exceed an average of the daily hours the participant is scheduled for in an activity.

For example, a participant is scheduled to participate 5 hours per day on Mondays, Wednesdays and Fridays. Everyone is given 2 days off for the Thanksgiving holiday. When reporting participation for this participant:

- Do-no't report any holiday hours for the Thursday.
- Report only up to 5 holiday hours for the Friday (since the participant normally participates for 5 hours every Friday).

Contractors will ask participants to make up absences if possible. Any makeup time should be reflected in the contractor's documentation and entered into eJAS under actual hours of participation.

The WFPS or WFSSS will receives an e-message from the contractor when an individualparticipant has an unexcused absence or is referred back electronically. When this happens:

- A magenta colored flag will appears on the contractor caseload screen for the individualparticipant in the corresponding column to indicate the WFPS or WFSSS needs to take action on the case.
- The e-message text line will auto--fills when a contractor reports an unexcused absence to the WFPS or WFSSS.
- The contractor will completes the text box of the e-message.
- eJAS takes the contractor to the Client Notes issue type that corresponds to the action being taken.
- The contractor must will make case notes to add any relevant comments for your future reference.
- The magenta flag will turns to a green flag once the WFPS or WFSSS has entered notes in the Sanction/SafetyNet category, to indicate action has been taken on the case.

Contracted providers are required to report unexcused absences immediately and participation/progress monthly. WorkFirst partner agencies will make sure that their contractors are reporting each month, and can withhold payment if this requirement is-n'ot met.

3.7.2.6 What are Non-contracted service requirements?

We may refer individualparticipants to non-contracted services, such as free basic education, doctors, or various types of services from non-profit agencies. Since these providers do-no't have eJAS access, the WFPS or WFSSS must manually monitor participation for these cases. For unpaid core or non-core activities, the WFPS or WFSSS must also enter documented actual hours of participation into eJAS.

A standard WorkFirst Participation Verification Form is available in eJAS for these cases. This form is the tool to be used by the WFPS or WFSSS to document the participant's progress and

participation in their WorkFirst activities. The form ~~will~~ collect~~s~~ information about actual hours of participation but not ask for information about absences. For unpaid core or non-core activities, use DMS to store the form so this documentation can be made available to state and federal auditors.

The WFPSs or WFSSSs print the form from eJAS and give or mail the form to the participant. Add to the participant-'s IRP that it is the participant ' s responsibility to have the service provider complete the form and return the form to the WFPS or WFSSS by the 5th of the month. The WFPS/WFSSS enters the WorkFirst participation information into eJAS by the 15th of each month for the previous month's activity.

The WFPS or WFSSS must ensure these forms are turned in each month. When these cases are set up, open the component code for 30 days if it is not a core or non-core activity. The IRP end date should be the anticipated end date of the entire activity. The IRP is not required to have the end date of the activity coincide with the date of the 30-day review. For not countable activities, eJAS reports will alert you that a monthly participation report is due based upon the end date of the component code. Core and non-core activities will appear on the WFPS or WFSSS Multiple Client Monthly Participation eJAS screen.

For no~~n-t~~countable activities, if the report confirms the ~~individual~~participant is making progress, update the component code for another 30 days. The IRP must have the actual start and end date for the non-contracted activity so we can track how long the activity is supposed to last.

If the ~~individual~~participant has a medical deferment, with written documentation from a medical provider that indicates the ~~individual~~participant is unable to perform any activities or attend any appointments for a length of time greater than 30 days, the ~~individual~~participant is-n~~o~~'t required to provide the monthly reviews to the WFPS or WFSSS.

Examples:

- A~~n~~ ~~individual~~participant may be on bed rest for 90 days. The medical provider confirms the ~~individual~~participant is unable to do any activity and w~~ill~~on't ~~not~~ have recurring medical appointments during that time frame. The WFPS or WFSSS extends the appropriate X component code for 90 days and does not need the WorkFirst Participation Verification Form every 30 days.

- A~~n~~ ~~individual~~participant has documentation from a licensed medical provider that ~~he/she~~they're ~~is~~unable to work for a period of 90 days but will be receiving physical therapy twice per week. The component code would be established for 30 days and the WorkFirst Participation Verification Form would be required every month to verify the participation in the physical therapy appointments.

If the WorkFirst Participation Verification Form is unclear or is missing necessary information to confirm the participation is occurring, the WFPS or WFSSS contacts the non-contracted service provider to verify the information (documenting the contact's name, title, phone number and date of contact). For countable core or non-core activities, enter zero hours into eJAS if you cannot obtain actual participation hour documentation from the provider.

3.7.2.7 Are there requirements for ~~individual~~participants in "X" components?

WorkFirst participants who are engaged in issue resolution as their WorkFirst participation must have the participant's participation reviewed every 30 days.

When an participant is receiving services from a contracted provider, the WFPS or WFSSS will receives the monthly report electronically via eJAS. If the participant is in a countable X code, they will appear on the WFPS or WFSSS multiple client monthly participation eJAS screen. These individualparticipants may have the "X" component code with an end date of greater than 30 days, because the reporting will occur through eJAS.

IndividualParticipants who are in "X" component codes and receiving non-t countable services from a non-contracted service provider must have the component code for a maximum of 30 days, the end date of the activity will beis used as the tickler to ensure the WorkFirst Participation Verification form has been received.

3.7.2.8 Monitoring Participation - Step-by-step guide

1. The WFPS or WFSSS refers the participant to the contractor by:
   a. Entering both the component code and contractor code on the component code screen;
   b. Building an IRP that states the agreed activity, contractor or contact information, and the scheduled number of hours;
   c. Completing the eJAS referral form and transmitting the form to the contractor; and,
   d. Entering the presumed start and end date on both the component code screen and the contractor screen.

2. The WorkFirst contractor will:
   . Accepts or rejects the referral in eJAS;
   a. Makes an entry in Client Notes in eJAS to document first contact with the individualparticipant, this will auto fill the date of the entry in the first contact column on the contractor caseload screen,
   b. Enters the actual start date of the activity in eJAS;
   c. Reports unexcused absences in eJAS within one business day and document this in the participant's Client Notes in eJAS;
   d. Reports excused absences in eJAS and document the reason the participant was unable to attend in the participant's Client Notes in eJAS.
   e. Reports regularly scheduled hours missed due to an official state holiday.
   f. Reports the participant's actual hours of participation, absences, and progress in BE, HS or GE by the 10th of each month for the previous month's activities.
   g. Rounds participation hours up to the next ¼ (.25) hour increment. Example: participant reports for class one day for 6 hours and 10 minutes. The participation hours for that day would be 6.25 hours.

3. The WFPS or WFSSS will:
   . Starts the good cause determination or the sanction process, whichever is appropriate, for unexcused absences or unsatisfactory participation;

     a. Determines next steps, using the case staffing process if desired, for unsatisfactory progress;

     b. Checks the contractor screen in eJAS on a regular basis to make sure that all reports of unexcused absences or unsatisfactory participation/progress are responded to in a timely manner.

How to Treat Excused and Unexcused Absences - Step-by-Step

The WorkFirst partner or contractor will:

Upon 2 excused or unexcused absences, sends an immediate notify via eJAS to the WFPS.

ESD will:

Upon 2 excused or unexcused absences, contacts the participant, if possible, and the case manager as part of the Continuous Activity Planning (CAP) process to determine whether the activity is appropriate for the participant and discuss next steps.

Excused Absence

Upon receipt of the immediate notification or contact from ESD, the WFPS will:

1. Keeps the current activity open.

2. Hasve a conversation with the participant, if possible, and the service provider to determine if the participant is in a correct activity and review next steps.

3. Updates IRP if needed.

Unexcused Absence

Upon receipt of the immediate notification or contact from ESD, the WFPS will:

1. Keeps the current activity open.

2. Hasve a conversation with the participant, if possible, and the service provider or partner as part of the Continuous Activity Planning (CAP) process to discuss next steps, including if it is appropriate to refer the client back to DSHS, to determine if the participant is a correct activity and review next steps.

If it is identified that the appropriate next step would be to refer the client back, then the component can be closed (ESD will close the component and refer the participant back). The WFPS will then:

1. Opens a PR component and ensure the activity code is closed.

2. Initiates the good cause/sanction process, following the steps laid out in WFHB Section 3.5.1. , "Entering Non-Compliance Sanction (NCS)."

eJAS Entering Excused Absences - Step-by-Step

1. On the Client Monthly Participation Screen or Multiple Client Monthly Participation Screen, enter the date range of monthly participation.

2. Click the link in the Excused Hours/Dates column.

- o This brings up a new pop-up screen "DSHS Excused Absences Reporting".

3. Click in the required date box.

4. Click on the specific calendar date to enter the date of the absence.

5. Enter the number of excused hours missed on that date in the "Excused Hours" box.

   - o Users can enter excused absence hours in ¼ hour increments.

6. Click the "Close" button after entering the excused absence hours - this ~~will~~ take_s you back to the participation page.

   - o Users ~~will~~ get an alert when they click the "Close" button on the excused absences page reminding them to click the update button on the participation page to save the information.

7. Click "Update" button on the participation page to save excused dates and absences.

   - o The history of excused absences is on the same "Actual Hours Transaction History" screen. To view details of the excused absences, click on the Excused Hour link from the Transaction History screen. This ~~will~~ open_s the DSHS Excused Absences Reporting page which lists date range start and end dates, the date of the excused absence(s) and the excused hours.

Non-contracted services- Step-by-step guide

1. The WFPS or WFSSS refers the participant to the non-contracted provider by:

   a. Entering the component code on the component code screen. Open the component for 30 days for not countable activities. The end date of the component will indicate that when a WorkFirst Participation Verification form is due (the CLMR is used to monitor these cases); or

   b. Entering an "RO" component code to refer the participant if the start date is unknown or if it is unknown whether the participant will be accepted for services;

   c. Creating an IRP with the actual start and end date of the service and requiring the participant to turn in the WorkFirst Participation Verification form each month (unless the participant has a medical deferment, with written documentation from a medical provider indicating the participant is unable to perform any activities or attend any appointments for a length of time greater than 30 days); and

   d. Completing the WorkFirst Participation Verification form in eJAS, printing the form and either handing it or mailing it to the participant.

2. The Service Provider ~~will be asked to~~:

   . Accept_s or reject the referral manually; and

   a. Report the participant's participation and progress by the 5th of each month for the previous month's activities on the WorkFirst Participation Verification form.

3. By the 15th of each month, the WFPS or WFSSS enters the WorkFirst Participation Verification information into eJAS for the previous month's activity and ~~will~~:

   . For core or non-core activities:

    i.   Enters the actual hours of participation into eJAS. If this data is no't made available, enter zero hours of participation into eJAS.

    ii.   Sends the DMS the WorkFirst Participation Verification form to DMS.

    iii.   Updates the component code to match the IRP end date.

    a.   Starts the good cause determination or the sanction process, whichever is appropriate, for unsatisfactory participation;

b.   Determines next steps, using the case staffing process if desired, for unsatisfactory progress;

c.   Updates the component code for another 30 days if the participant is in a not countable activity, is making satisfactory progress and it is appropriate for the participant to continue in the activity; or

d.   If the participant is in an X component code for a total of 90 days, the case needs supervisory review/approval prior to granting additional time to remain in the same component.

Resources

Related WorkFirst Handbook Sections

- 3.1 Tools - Overview
- 1.2 Required Participation
- 6.1 Resolving Issues
- 4.1 Career Scope Phases and Processes

Forms & Other Resources

- Consent to Exchange Information for Services Coordination
- List of State Holidays
- Social Services Manual
- Social Services Manual
- Consent to Exchange Information for Services Coordination
- List of State Holidays