

3.2.1 Comprehensive Evaluation

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Legal References:

- [RCW 74.08A.260](#)
- [RCW 74.08A.275](#)
- [RCW 74.08A.285](#)
- [RCW 74.12.410](#)
- [WAC 388-61-001](#)
- [WAC 388-310-0400](#)
- [WAC 388-310-0700](#)
- [WAC 388-310-0200](#)

This WorkFirst Handbook (WFHB) section describes the purpose and content of the comprehensive evaluation, continuous activity planning, and engagement pathways - including:

- [3.2.1.1](#) What is the comprehensive evaluation?
- [3.2.1.2](#) How do I complete the comprehensive evaluation?
- [3.2.1.3](#) What topics does the comprehensive evaluation cover?
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3.2.1.1 What is the comprehensive evaluation?

The purpose of the comprehensive evaluation is to learn more about the participant's strengths, readiness, and ability to succeed in the workplace. It helps to identify both strengths the family

has and challenges they may be facing. It helps both the participant and WorkFirst staff identify what services and activities will help the family move toward stability.

Its primary objectives are:

- Gather information about a participant's skills and abilities to place them in appropriate activities, using a strength-based, family-driven approach
- Identify barriers to WorkFirst participation that need further immediate assessment versus obstacles or challenges that can be addressed alongside work-related activities
- Involve the participant in WorkFirst plan development, in order to better meet their goals
- Achieve participant engagement in activities that support the family's success
- Capture the family's story in a way which builds rapport and supports ongoing case management

3.2.1.2 How do I complete the comprehensive evaluation?

WorkFirst staff use the Pathway Development Tool (PDT) to complete a participant's comprehensive evaluation. The Personal Pathway is also available to support this process. Both tools are available in eJAS. How to use these tools is discussed in [WFHB 3.2.2](#) and [3.2.3](#).

Before beginning this process, WorkFirst staff set a positive tone by explaining its purpose. By completing the comprehensive evaluation, WorkFirst staff:

- Help the participant succeed in assigned activities and in employment
- Better understand the family's circumstances and whether there may be barriers to workplace success
- Understand what services to offer, so the participant can make progress towards their personal goals
- Provide support services and resources that help the participant resolve issues without delay

Questions within the PDT touch on sensitive topics (like family planning, substance abuse, or family violence). Acknowledging this can help prepare the participant for the discussion. This includes:

- When screening for family violence, asking if it's safe to do so and only screening with one parent at a time (for two-parent households)
- Identifying areas in which the participant may need accommodations or services to help them be successful in WorkFirst
- Noting that specific and sensitive details aren't required. Our goal isn't to re-traumatize participants. We want to be able to understand how trauma may impact the participant's experience

- Responses to these topics may result in an immediate action, including consulting with experts at the request of the participant
- Responses may also result in immediate referral for situations that require reporting of information, under mandatory reporting rules (see [EA-Z Manual](#) for more information)
- Responses may result in other referrals, including a referral for further assessment

3.2.1.3 What topics does the comprehensive evaluation cover?

The comprehensive evaluation covers a number of topics – all help determine what activities best meet the participant’s specific needs and goals. Some of these topics are legally required. However, covering all topics with the participant ensures that the family’s circumstances are completely evaluated and the participant is engaged using a whole family approach.

Topics covered in the comprehensive evaluation include:

- Family*
- Employment & Work Experience*
- Education & Training*
- Financial Literacy*
- Family Violence
- Substance Use
- Emotional Health
- Medical/Health
- Housing*
- Transportation*
- Legal Issues*
- Other Agencies

For more information on these topics, please refer to [WFHB 3.2.3.2](#).

NOTE: WorkFirst partners are able to review some of the information within certain PDT topics (*) that are not deemed as special records categories, please see [WFHB 1.6.4](#).

NOTE: Equal Access (EA) and limited English proficiency (LEP) screening occurs in ACES.

3.2.1.4 Who must receive a comprehensive evaluation and when?

A comprehensive evaluation is completed when a participant is approved or [likely to be approved](#) for WorkFirst cash assistance. For two-parent households, separate comprehensive evaluations must be completed for each participant, using the PDT. In most circumstances, the comprehensive evaluation should be completed immediately following financial intake.

If the participant is not able to complete the comprehensive evaluation during financial intake, WorkFirst staff may save/pend the tool, if started, for the Case Manager to finish. At this juncture, the participant is informed that their local CSO will outreach to them with next steps. WorkFirst staff in the local office have the option of connecting the participant with their Case Manager prior to leaving to set up an appointment, if time allows and is otherwise feasible.

- **NOTE:** WorkFirst staff should make an effort to complete the comprehensive evaluation with a participant at the financial intake, including covering all required topics within the PDT.
- **Example:** Terrance shares in the middle of his comprehensive evaluation at his local CSO that he needs to pick his children up in 30 minutes. The worker pends the PDT under the reason *Customer is unable to complete*. The worker is aware of who Terrance's Case Manager will be ongoing and is able to connect them before Terrance leaves the office, which allows him to set up an appointment before departure.
- **Example:** During Lydia's comprehensive evaluation with WorkFirst staff in the Customer Service Contact Center (over the phone), her new baby begins to cry in the background. Lydia mentions she has been on the phone for a while. At that point worker checks in with Lydia to inquire around whether she can continue at this time. Lydia indicates she can, so the worker continues. Since they are able to complete all topics within the PDT, the worker marks the *Tool Verified as Complete* and *saves*. The worker transfers the call to the social service phone queue for a Pregnancy to Employment assessment, as Lydia's baby is under two years old.
- **Example:** Talena shares during her comprehensive evaluation that she is struggling with depression. The worker refers to the **Customer Driven Severity Scale** and Talena indicates it is greatly impacting her ability to do normal day to day things and could impact her ability to participate in activities. It is very obvious that Talena is struggling with the conversation and discussing her barrier. The worker checks in and in partnership with Talena they determine to stop where they are in the process for now. The worker documents the conversation around Talena's depression in the Mental Health topic section of PDT and pends the PDT under the reason *Referral to Social Services*. The worker lets Talena know her Case Manager will be reaching out to continue the process.

Participants in sanction status who desire to reengage in WorkFirst participation must also have their comprehensive evaluation reviewed and updated so it reflects their current circumstances and supports activity engagement. See WFHB 3.2.3.7 for additional details on using the PDT for sanction reengagement.

NOTE: Child-only TANF cases aren't required to have a comprehensive evaluation.

NOTE: Dependent teens aren't required to have a comprehensive evaluation. It is recommended that WorkFirst staff document the dependent teen's education activities and other pertinent information in the dependent teen's eJAS Client Notes.

A comprehensive evaluation is considered active for up to 12 months. Sometimes an update to the evaluations needs to occur for a participant. This includes:

Scenario	WorkFirst staff
The participant leaves TANF cash assistance and then returns.	Create a new PDT to reflect any changes in the family's circumstances.
If the participant's circumstances have changed.	Determine if a new PDT is needed to support engagement in new or existing activities.

NOTE: The PDT "copy over" function can be used for up to 12 months. For more information see [WFHB 3.2.3](#).

3.2.1.5 What is Continuous Activity Planning (CAP)?

Continuous Activity Planning (CAP) is an informal meeting or joint evaluation with the participant, WorkFirst staff, WorkFirst partner(s), and others to discuss the participant's progress in an activity and recommendations for the next activity. It can also be a tool for problem-solving when the participant isn't successfully engaging. This meeting can be conducted via phone or in person. It's documented using the eJAS case staffing/extension review tool and in client notes under the **Continuous Activity Planning** note type.

WorkFirst staff must document:

- The names of all the participants in the meeting
- How the meeting was conducted (phone or in person)
- When the meeting took place
- Results or outcome of the meeting

3.2.1.6 When is a CAP required?

After the initial comprehensive evaluation, there may be times where a new comprehensive evaluation or a CAP is required in order to understand how the participant is progressing in WorkFirst. The decision to complete a comprehensive evaluation or a CAP is based on results from the last **completed** comprehensive evaluation, and when that evaluation occurred.

Comprehensive evaluation completed ...	Participant is ...	WorkFirst Staff Next Steps
Within last 6 months.	<ul style="list-style-type: none"> • Transitioning to a new activity. • Not progressing in an assigned activity. • Failing to complete the current activity. 	Conduct Continuous Activity Planning meeting.
Over 6 months ago.	<ul style="list-style-type: none"> • Progressing in their IRP and moving onto the next step/activity. • Not progressing in their IRP or participating. 	Conduct Continuous Activity Planning meeting. Review comprehensive evaluation and if needed, create a new PDT to reflect changes in circumstances.
12 months ago (or longer).	<ul style="list-style-type: none"> • Due for the family violence and family planning annual screenings. 	Complete annual comprehensive evaluation using PDT.

NOTE: The PDT “copy over” function can be used for up to 12 months. For more information see [WFHB 3.2.3](#).

3.2.1.7 What is "likely to be approved"?

"Likely to be approved" means those who appear to meet financial eligibility based on available information and their application is pending for verification of items such as:

- Personal identification
- Pregnancy verification
- Household composition

Applicants whose eligibility is pending for **financial-related verification** (e.g. income verification, appear eligible and applying for Unemployment Compensation, possible job start) are less likely to be approved. In these circumstances, the comprehensive evaluation can be completed after financial eligibility is verified.

3.2.1.8 What are the engagement pathways following the comprehensive evaluation?

Engagement pathways are WorkFirst activities included in the Individual Responsibility Plan (IRP). The criteria below are provided to assist the WorkFirst staff and participant in making an informed decision about which pathway(s) is most appropriate based on information gathered during the comprehensive evaluation. Refer to the [Stacking Activities Chart](#) when determining the appropriate mix of activities for the participant.

The *Navigation* section of the PDT can assist in determining next appropriate steps for the participant – see [WFHB 3.2.3](#) for more information.

Prior to referring participants to a pathway, WorkFirst staff must advise them of WorkFirst program requirements and their responsibility to participate in the activities identified in their IRP. WorkFirst staff are to ensure all participants have a plan to address child care and transportation needs prior to referral. Participants reporting to an activity without arranged child care and transportation may be referred back, as they aren't able to begin participating without these supports in place.

If the comprehensive evaluation doesn't identify an appropriate pathway based on the following criteria, a CAP may be conducted immediately to develop a plan for engagement.

Career Scope (Job Search)

Referrals to Career Scope may be appropriate for participants who are "work ready." This means they meet one or more of the following criteria :

- Have current employment or employment within the last 90 days
- Are receiving Unemployment Compensation benefits or have a 'pending' Unemployment Compensation claim (*Note: JS should be the requirement for parents in this category*)
- Indicate an interest in pursuing employment

- Have recently completed an education or supported work program
- Are participating in another core activity for no more than 20 hours per week and need another activity to meet federal requirements, and can accept employment within four (4) weeks

Additional information to assess work readiness is available in [WFHB 4.1.3](#).

Exception: Participants who are working full-time and want assistance finding a better job are appropriate for Career Scope services as long as they can contact Career Scope staff at least once a week to receive assistance. Otherwise, you may refer them to the WorkSource Center as a self-directed job seeker.

Education & Training Activity

Referrals to Education & Training may be appropriate for participants who meet one or more of the following criteria:

- Have little or no work history
- Currently attend an educational activity
- Have had difficulty in school with reading, writing, math, following verbal directions, etc. and want to improve their basic skills in order to get a job or a better job
- Show an interest in getting a high school diploma or high school equivalency certificate
- Completed high school equivalency, but need or want to brush up on their skills
- Indicate interest in pursuing post-secondary education or want to enter an occupation that requires training

Community Jobs

Referrals to full-time Community Jobs may be appropriate for participants who meet one or more of the following criteria:

- Are currently working on barrier/issue resolution and are ready to combine issue resolution with work in a supportive setting
- Are ready to learn to self-manage issues that affect the ability to obtain or keep employment
- Aren't work ready (see [WFHB 4.1](#))
- Are ready and able to be employed full-time (32-40 hours per week) within six months of the Community Jobs enrollment
- Are able to participate full-time (40 hours per week) right now
- Have child care and transportation plans
- Have participated in other activities without success

- Don't currently hold an unsubsidized job, unless these hours are minimal and career progression is unlikely. These situations are approved on a case-by-case basis by Commerce staff

Referrals to part-time Community Jobs may be appropriate for participants who are single parents with a child under the age of six and also meet one or more of the following criteria:

- Aren't work ready (see [WFHB 4.1](#))
- Are open in WorkFirst sanction and are interested in curing the sanction
- Are ready and able to be employed at least part-time (20 hours per week) within six months of the Community Jobs enrollment
- Are able to participate 23 hours per week
- Have child care and transportation plans
- Are managing known barrier removal issues (such as mental or physical health, chemical dependency and family violence)
- Don't currently hold an unsubsidized job

NOTE: Community Jobs referrals should only be made for participants not likely to succeed in attaining unsubsidized employment. Based on comprehensive evaluation results, Community Jobs is an option for those who have participated in other activities and haven't been successful or where other activities aren't appropriate.

Community Works Program

Referrals to Community Works may be appropriate for participants who:

- Are currently enrolled/interested in an education component
- Are employed fewer than 32 hours per week
- Need additional hours to meet WorkFirst participation requirements or are transitioning between activities
- Need additional support for re-training or additional experience to be competitive in the labor market
- Able to be in the work activity for one to 12 months for at least five hours per week

Unsubsidized Employment

Participants in this pathway are (full- or part-time):

- In paid, unsubsidized employment
- Self-employed
- Participating in college work study
- Participating in a paid work experience, practicum or internship

Limited English Proficient (LEP) Pathway

Referrals to the LEP Pathway may be appropriate for participants who:

- Have difficulty understanding or communicating in English
- Have an English as a Second Language (ESL) proficiency level and are identified by college staff or an employment counselor as needing specialized assistance to participate
- Individuals receiving Refugee Cash Assistance (RCA) or Refugee Medical Assistance (RMA)

Issue Resolution

Participants may be in this pathway full- or part-time, depending on their ability to participate in work or work-like activities. Whenever appropriate, issue resolution activities should be stacked with one of the employment and training activities associated with pathways listed above.

These activities help participants resolve issues including:

- Emotional, mental and physical health, and/or learning disabilities
- Caring for a child with special needs
- Alcohol or substance abuse/chemical dependency
- Family violence
- Homelessness
- Family planning
- Parenting struggles or issues
- Pregnancy-related
- Child Protective Services engagement

Exempt

An Exemption from work participation requirements may be appropriate for participants who:

- Are a needy caregiver relative and aged 55 or older
- Have a severe and chronic disability (including those likely to be approved for SSI or other federal benefits)
- Are required to be in the home to care for a child with special needs
- Are required to be in the home to care for an adult relative with a disability
- Are the parent of a child two years or younger (Infant/Toddler Exemption which has a 730 day lifetime limit)
- Have recently had a child and already exhausted the Infant/Toddler Exemption (the postpartum exemption)

3rd trimester of pregnancy Deferral

Participants in the third trimester of pregnancy can choose not to participate in WorkFirst activities.

NOTE: Participants eligible for young child or pregnancy related exemptions may still be required to participate if they have mandatory requirements (e.g. identified needs for the parent such as substance use or mental health).

3.2.1.9 How are results of the comprehensive evaluation used to develop an Individual Responsibility Plan?

Comprehensive evaluation results and subsequent discussion with the participant regarding pathway options and criteria steer development of the Individual Responsibility Plan (IRP). They also aid in identifying what support services the participant needs to effectively engage in activities and services.

The IRP is developed by the WorkFirst staff and participant to describe:

- The participant's activity requirements and responsibilities
- Action steps the participant agreed to do
- CSD responsibilities and which support services are available to support participation
- What happens if the participant fails to engage in agreed to activities outlined within their plan without a good reason

IRPs may be developed to support short and long-term goals. For long term plans, consecutive activities may be included to support participants in long-term goals. They should also include the best mix of activities to support the participant and their family.

Participants are expected to participate full-time, or as close to full-time as they are able based on their situation. All activities within a plan should be geared towards preparing the participant for future employment and economic stability.

3.2.1.10 Can a participant be placed in sanction for not participating in the comprehensive evaluation?

If a participant fails to attend their comprehensive evaluation appointment, staff must go through the good cause process and determine if the participant had a good reason for not coming to the appointment. WorkFirst staff should determine and document whether a participant is refusing to participate, or simply unable to due to circumstances outside of their control.

For information on the good cause and non-compliance sanction process, see [WFHB 3.5.1](#).

3.2.1.11 Comprehensive Evaluation - Step-by-Step Guide

At financial intake, and other appropriate times outlined above, WorkFirst staff conduct a comprehensive evaluation by:

1. Offering and completing the Personal Pathway with the participant (see [WFHB 3.2.2](#)).
2. Using the Pathway Development Tool to complete the participant's comprehensive evaluation (see [WFHB 3.2.3](#)).

Note: If the participant is not able to complete the comprehensive evaluation during financial intake, WorkFirst staff may save/pend the tool, if started, for the Case Manager to finish. The participant is informed that their local CSO will outreach to them with next steps. WorkFirst staff in the local office have the option of connecting the participant with their Case Manager prior to leaving to set up an appointment, if time allows and is otherwise feasible.

3. Determining with the participant appropriate activities using information documented in the Pathway Development Tool (see [WFHB 3.2.3](#)).

Note: If unable to identify an appropriate pathway based on criteria noted in [WFHB 3.2.1.9](#) or [3.2.3](#), schedule a CAP meeting immediately.

4. Developing the IRP based on the pathway agreed to by the participant. This includes opening appropriate component codes (referral, activity, or indicator) and updating the IRP in eJAS, outlining the required activities and level of participation for the participant.

Note: The development of an IRP is not appropriate until the requirements for a comprehensive evaluation have been satisfied within the PDT, including marking it *Tool Verified as Complete* and selecting *save*.

5. Issuing support services necessary for participant to engage in IRP activities.
6. Documenting the comprehensive evaluation results and IRP development discussion in eJAS.

NOTE: If the comprehensive evaluation is scheduled to be completed in the future, WorkFirst staff are to discuss and provide a child care referral, transportation resources and/or other needed support services in order to support the participant's future appointment.

Resources

Related WorkFirst Handbook Chapters

- [1.2 Required Participation](#)
- [1.6 Required Documentation](#)

- [3.2.2 Personal Pathway](#)
- [3.2.3 Pathway Development Tool](#)
- [3.3.1 Individual Responsibility Plan](#)
- [3.4 Case Staffing](#)
- [3.5.1 Entering Sanction & Non-Compliance Sanction](#)
- [6.1 Resolving Issues - Overview](#)

Forms & Other Resources

- [Customer-Driven Severity Scale](#) – *only accessible to CSD staff*
- [Personal Pathway \(DSHS 11-154\)](#)
- [WorkFirst Partner Directory](#) – *only accessible to CSD staff*
- [WorkFirst Website](#)