Recommendations from Washington State's Washington Workforce Association for a National Response to Unemployment Related to COVID-19

We sincerely appreciate your commitment to supporting Washington state’s dedicated workers and employers, and the workforce system as we organize to support and stabilize our local communities. Your efforts thus far have been commendable, we are grateful for your continued leadership for our state and nation.

The executive leadership of the Washington Workforce Development Boards collectively as the Washington Workforce Association (WWA) represent the front-line responders to the looming national unemployment crisis in the state of Washington. WWA’s membership service all Washington businesses and citizens in providing education, job training, employment and upskilling programs, including Washington’s collaboration of 12 local workforce boards, local and state government entities, and ranging from small non-profit programs and WorkSource Centers (American Job Centers), literacy and vocational training to community colleges and other skills training organizations. Our diverse members have significant experience in mobilizing a response to national disasters like the 2001 Nisqually Earthquake and the 2014 Oso landslide responding to economic downturns that required new and innovative responses to support employers and workers. Our ability to rapidly respond is predicated on the speed of the federal and state government’s release of critical funding and removal of regulatory barriers

Below are our recommendations for a comprehensive federal response.

1. **Under the U.S. Department of Labor and U.S. Department of Education Workforce Innovation and Opportunity Act (WIOA)**
   - Implement Presumptive Eligibility
     i. First, presume everyone that contacts our system to be eligible for WIOA Title I services (Basic, Individualized, and Training) and Title III (Wagner Peyser), helping increase throughput of our system and breakdown administrative barriers to access and service
     ii. Second, waive document collection requirements allowing phone/self-attestation for program.
   - Remove the State approval for 100% transfer of funding between Adult and Dislocated Worker and Youth funding, to allow local workforce areas the flexibility to immediately address the needs in a local area with existing resources
   - Virtual Service Delivery
     i. Provide supportive services without seeing customers face to face and not requiring signatures – email attestation, phone attestation, also food as an allowable supportive service
   - Interagency & Eligible Partner Org Data Sharing for UI Customers
     i. Breakdown barriers between agencies and subcontracted partners to share customer data to deliver shared outreach to people who need services, particularly across Titles with shared customers
   - Waive 20% WIOA youth program work experience expenditure requirements as we shift & blend resources to effectively meet immediate need of customers
   - Suspend Local/State Planning Requirements, Performance Negotiations, and spending obligation requirements through end of PY 2020
• Adjust Eligible Trainer Provider List Policies to account for school closures and allow previously eligible program online schools to be immediately eligible dependent on local determination.

• Increased funding through expanded WIOA or National Emergency Grant funding:
  i. Akin to the unique circumstances following prior National Emergencies, rapidly expand occupations necessary for adequate COVID-19 response, including but not limited to:
     2. Temporary Employment applicable to COVID-19 response, including drivers/delivery services; IT support occupations, HAZMAT, maintenance and cleaning, etc.

• Increase in Dislocated Worker job training funds to respond to, and fund, eligible trainings on the statewide Eligible Training Provider List.

2. A coordinated federal response from the U.S. Small Business Administration, U.S. Department of Commerce and U.S. Department of Labor to support employers:

• Require State’s eliminate all cumbersome paperwork for businesses to access grants to cover 3-6 months operating expenses for business with less than 25 employees; low or no interest payroll loans and grants; extended unemployment insurance, and other programs or resources to reduce the impacts of widespread unemployment.

• Expand and promote Shared Work.

• Set up a federal call center and webpage that clearly details resources available, application requirements, and average length of application to funding.

3. Provide National Emergency Dislocated Worker Funding or Workforce Innovation and Opportunity Act Rapid Response funding to rapidly expand online services for the federally funded American Job Center System, including but not limited to:

• American Job Center equipment purchases for employees who are required to work from home and need to continue to provide services including:
  i. Software to support remote work, such as video conferencing, virtual meetings and case management, secure web-based servers and remote access file storage to keep customer information confidential and free conference calling.
  ii. Lap top computers, phones and printers for remote work
  iii. Increased bandwidth capabilities for State & Local Boards

4. Dramatically expand Unemployment Insurance funding and extended Unemployment Insurance (UI) to support those laid off or unemployed due to business closure or economic decline due to COVID-19:

• Waive the 5-day waiting period for receiving UI benefits.

• Provide funding, or require use of the UI Modernization Fund, to State’s to move all service delivery online and provide adequate equipment for remote workforce service delivery.

• Expand part-time Shared Work program to allow unemployment insurance to pay a portion of an employee’s salary if their hours are reduced but they are not fully laid off/to avoid full dislocation.

• Provide resources specific to supporting dislocated low-wage workers or vulnerable workers receive re-employment assistance and job training to adapt their skills for new careers.
• Address work search requirements by allowing online job search activities & workshops to meet requirements, increasing our system’s capacity to serve those with limited access to opportunity.

• Ensure a federal disaster is declared, making Disaster Unemployment Assistance available to workers who would not otherwise be eligible for Unemployment Insurance, but who lose their jobs as a result of COVID-19, in particular independent workers including nannies, personal care aides, cleaners, for-hire drivers, and other freelance and “gig” workers.

• Ensure that any workers who are furloughed by their employer are eligible for Unemployment Insurance for the duration of their furlough, waiving the 90-Day exit period.

5. **Additional regulatory relief and funding to provide maximum support to displaced and dislocated workers and reduce negative impacts of COVID-19**

   • Allow for States to request waivers to reduce the work participation under the Temporary Assistance for Needy Families and SNAP
   
   • Address federal student loan interest, as well as payments for room and board for students required to leave campuses due to school closure or move to online coursework
   
   • Expansion of social safety net programs to stabilized low wage workers, displaced and unemployed workers including:
     i. Medicaid
     ii. Supplemental Nutrition Assistance Program (SNAP)
     iii. Temporary Assistance to Needy Families, cash assistance
     iv. Social Security Disability Insurance
     v. Paid family leave

Respectively submitting on behalf of the Washington Workforce Association.

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