

LEGISLATIVE REPORT

Economic Security for All

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Executive summary

In 2022, the Legislature appropriated state funds for Economic Security for All (EcSA) in proviso, expanding its capacity to deliver comprehensive and coordinated services to the 26 percent of Washingtonians who live in poverty. This is the second of two reports from the Employment Security Department (ESD) required by the proviso. This report reflects the first nine months of the 12-month period of performance for this appropriation.

EcSA is a poverty reduction model that coordinates existing programs to increase their collective ability to support low-income Washingtonians in their pursuit of equity, dignity and sustained self-sufficiency. A combination of intensive program navigation, local innovation, and flexible support fills gaps and meets needs within existing programs and regulations. At the local level, EcSA is run by partnerships of community service providers, includes the voices of those who have experienced poverty, and is convened and coordinated by Local Workforce Development Boards (LWDBs). EcSA takes an innovative approach to equitably reduce poverty, focusing on historically marginalized populations and people with multiple obstacles to self-sufficiency.

In July 2022, EcSA began receiving state funding to continue the program. In response, ESD and LWDB partners committed to serving an additional 925 customers by June 2023, to provide coordinated access to training and support, helping them and their families move out of poverty and become self-sufficient. Through the end of the third quarter of performance (March 31, 2023), EcSA has already exceeded this commitment and is on track to enroll far more customers than anticipated by the end of the fiscal year. The program has also exceeded training targets.

Highlights for July 2022 through March 2023

- Enrolled and established personalized self-sufficiency wage goals for 949 customers.
- Increased recruitment and participation of historically marginalized populations and unhoused individuals. Through March, close to half of EcSA participants were people of color and 9% unhoused.
- Placed 379 customers in training that leads to employment at self-sufficiency earnings.
- 166 customers have obtained employment at self-sufficiency earnings.
- Median annualized earnings for those exiting the program with employment is \$46,800 – This is for a population starting in poverty, 71% of whom had income below \$9,860 at the time of enrollment.

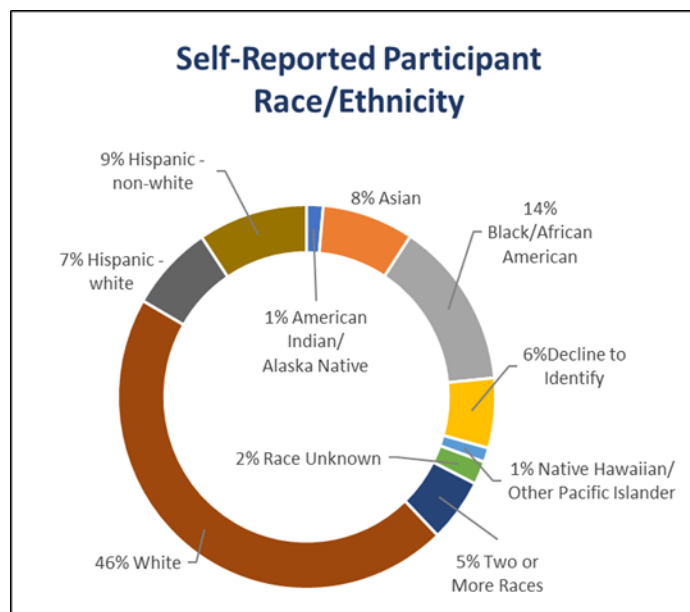
Background

Economic Security for All (EcSA) is a poverty reduction model that coordinates existing programs to increase their collective ability to support low-income Washingtonians in their pursuit of equity, dignity and sustained self-sufficiency.

Providers are required to:

- Build career plans around individualized self-sufficiency goals.
- Bundle services for each participant based on their individual needs.
- Focus efforts based on equity outcomes, in particular services to individuals who are BIPOC or unhoused.
- Coordinate services via local teams across all partner programs.
- Include voices of those with lived experience.

Within that framework, communities are empowered to innovate based on local opportunities and needs. At the local level, EcSA is run by partnerships of community service providers, including the voices of those who have experienced poverty, and is convened and coordinated by Local Workforce Development Boards (LWDBs).



EcSA serves low-income Washingtonians with an equity focus

Over 1.8 million Washingtonians, 26% of the state's population, are currently living in households that earn less than 200% of the federal poverty level (FPL). Of those, more than 500,000 are children, a number greater than the populations of the cities of Spokane and Tacoma combined.

Local EcSA partnerships are implementing new models to increase their collective impact for Washingtonians experiencing poverty, with a strong focus on equity. The model's commitment to equity and inclusion is reflected in customer demographics.

- Close to half of the customers served are people of color — compared to 22% of the statewide population.
- About 10% of EcSA customers are unhoused, and all are in poverty, with income below the eligibility threshold for Supplemental Nutrition Assistance Program (SNAP).
- EcSA serves customers in rural and urban areas of the state.

EcSA's pilot phase

In 2019, Gov. Inslee piloted EcSA using federal Workforce Innovation and Opportunity Act (WIOA) funds. Initial funds were awarded to four local partnerships in July 2019. A second round of funding was awarded in June 2021 to seven additional local partnerships, totaling approximately \$12 million in both rounds.

Statewide expansion

In 2022, the Legislature appropriated state funds for EcSA in proviso, expanding its capacity to deliver comprehensive and coordinated services to the 26% of Washingtonians who live in poverty.ⁱ This proviso requires two reports from Employment Security Department (ESD).

\$6,208,000 of the general fund — state appropriation for fiscal year 2023 is provided solely for the continuation of the Economic Security for All program. The department must collect quarterly data on the number of participants that participate in the program, the costs associated with career, training, and other support services provided, and progress made towards self-sufficiency. The department must provide a report to the governor and the legislature on December 1, 2022, and June 1, 2023, that includes an analysis of the program, a summary of the quarterly data collected, and associated recommendations for program delivery.

With proviso funding, ESD began working with the LWDBs. Together, this group co-designed implementation, agreed to targets, and executed contracts. Each LWDB collaborated with local leaders from social service, education and workforce programs — as well as people with lived experience of poverty — to better coordinate their programs, focus on human-centered service delivery, and execute local contracts. The LWDBs lead these local partnerships, streamlining services to help more low-income families move out of poverty. Each local service model was developed in partnership with people who have lived experience of poverty. This is critical, as people experiencing poverty have repeatedly shared feedback that programs are siloed and disjointed. EcSA has acted on their input to improve coordination and make programs easier to use together, relying on local coordination teams to bundle services.



Providing services

ESD and local teams have engaged over 120 local partner organizations to ensure that customers get all the services for which they are eligible, with as few barriers as possible. This requires intentionality at the local, regional and state levels.

Local. LWDBs and their subcontractors consider how best to leverage local programs and resources to coordinate delivery of the following services:

- Bundling multiple benefits to stabilize customers' households.
- Creating career plans for customers to reach a self-sufficiency earnings goal.
- Coordinating wrap-around support across programs to fill gaps in benefits.
- Connecting to training or education, with supports to cover living expenses.
- Supporting customers until they achieve self-sufficiency.

Regional. LWDBs lead local partnerships with community organizations as well as people experiencing poverty. Depending on local need, partnerships include housing insecurity programs, workforce development programs, local Department of Social & Health Services (DSHS) service providers and other community-based organizations. The LWDBs also manage subcontractors, ensuring that all applicable rules are followed and sharing best practices across programs.

State. EcSA has a technical advisory committee, comprising representatives from state agency partners, labor unions, nonprofit organizations and local implementation leaders. It advises ESD, providing guidance on programmatic decisions related to required elements, service delivery, program alignment, and policy.

Including people who have experienced poverty

People experiencing poverty have often been treated as the greatest barrier to their own advancement. The EcSA program recognizes that the best source of expertise is the people who live there. Human-centered design is foundational to EcSA. Many of EcSA's staff and partners have lived experience of poverty. Local programs partner with others who have escaped poverty. EcSA programs place their experience at the center of the work.

Goals, outcomes and expenditures

The EcSA program is dedicated to accomplishing the following goals:

- Help people move all the way out of poverty to a self-sufficiency wage, with a strong focus on equity.
- Bundle workforce, education and social services to stabilize customer's lives.
- Establish and implement customized career plans to reach self-sufficiency.
- Remove barriers at the local, state and federal levels that prevent coordinated delivery of multiple benefits.

Bundling services

Cycles of poverty are reinforced and maintained by the complexity of program requirements and by a lack of awareness of available resources. Even when people in need are aware of programs, accessing them often becomes a full-time job. EcSA combats this challenge by

having experienced staff navigate and leverage all available services. This support allows customers to maintain focus on the details of their plan.

Using career plans to achieve self-sufficiency

People live in poverty for different reasons. A one-size-fits-all program is not sufficient to address their needs. Differences in personal circumstances, individual needs and regional requirements all demand that each customer be assessed based on their own individual need. To accomplish this, EcSA has partnered with the University of Washington Self-Sufficiency Standard and Seattle-King County Workforce Development Council to assess customers using a *self-sufficiency calculator*. Each customer's self-sufficiency goal varies depending on family composition, geographic location and individual economic factors. The self-sufficiency assessment establishes the goal that case managers and customers use to co-create career plans, which are designed to stabilize and move customers and their households out of poverty permanently.

Coordinated wrap-around services provide stability

During the process of exiting poverty, instability often occurs when people take the first steps to improve their situation. These steps often make them ineligible for the services they previously relied on for survival. For this reason, stability is one of the most vital parts of the process. The program uses a comprehensive approach to ensure that unexpected issues are avoided when possible — and addressed quickly when not. State EcSA funding is less restrictive than many federal support service resources and allows local programs the flexibility to cover an unexpected change in child care costs, a heating bill, help with a rent payment, and other obstacles that often knock people off their path to self-sufficiency.

Removing barriers at local, state and federal levels

Many programs designed to serve people experiencing poverty have been developed and implemented independently of one another. As a result, eligibility, enrollment and outcome requirements often don't align across programs. Customers must go through multiple cumbersome application processes to secure the supports and services they need to be successful. This burden often discourages them from accessing services. It can also lead them to lose one benefit to receive another. The EcSA program is designed to address these risks wherever possible. At the service delivery level, case managers and staff must understand the rules of various programs and carefully plan to prevent unexpected loss of benefits and hardship. At the program level, EcSA is partnering with local front-line service providers, state agencies — including DSHS — and those at the federal level to identify and remove structural policy and process barriers, where possible, to improve cross-program partnerships.

Partnership with DSHS to remove barriers with SNAP

Washington DSHS has been partnering with ESD and LWDBs since EcSA pilots began in 2019. Through ongoing engagement at state and local levels, DSHS has tried to remove partnership barriers between EcSA and SNAP.

Data sharing

Data-sharing limitations are often a key barrier to greater program alignment. In late 2021, DSHS requested and received approval from the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) to share SNAP recipient contact information with ESD. ESD gave the data to the EcSA pilot program being implemented in Cowlitz County to allow for targeted outreach to SNAP recipients. This is the first time this type of data sharing has been allowed in Washington state between DSHS and ESD.

The agreement to share data with the Cowlitz County program was recently expanded to include all 12 LWDBs that have the appropriate data security infrastructure in place. Local data-sharing agreements are currently being finalized and many local EcSA implementers should have access to this outreach data before the end of June.

Waiver request to minimize EcSA support impacts on SNAP benefits

Earnings and support payments provided through state funded EcSA services currently count as income when DSHS staff determine eligibility for SNAP assistance. These supports can inadvertently decrease the amount of food assistance a customer receives as they access EcSA services. Customers engaged in paid work-based training or receiving incentive payments could see a substantial decrease in their food assistance amounts as they progress along their career plan toward self-sufficiency.

To address this, DSHS recently submitted a waiver request to USDA FNS to allow EcSA earnings and payments, including incentives, internship, work-based training and other supports, to be excluded as income for the purposes of determining eligibility for SNAP. If approved, this would eliminate the risk of unintended loss of SNAP benefits, allowing customers to take full advantage of EcSA supports and allowing local implementers flexibility to provide increased supports to their customers.

Washington College Grant: removing a barrier to access

Because all EcSA customers are below 200% of the federal poverty level (FPL), they may qualify for the Washington College Grant to cover the cost of education and training needed to reach their self-sufficiency goal. ESD is working with the Washington Student Achievement Council

(WSAC) to explore automatic eligibility for the Washington College Grant. This would eliminate the requirement to complete state or federal financial aid applications for the first year of training enrollment. ESD and WSAC will likely need a data-sharing agreement for this to work. It will also require collaboration and support from financial aid offices at postsecondary schools across the state.

Measuring outcomes

Methodology

The targets for each measure and LWDB were established during contract development. ESD is monitoring the variation between targets and actuals during this first year of EcSA receiving state funds. Currently, we are three quarters into the fiscal year. The December 2023 report will include data for the full year, along with observations and any recommendations for documenting or refining methodology in the future.

Highlights

ESD and LWDB partners committed to serving an additional 925 customers with the FY23 EcSA funding. Through the end of the third quarter of performance (March 31, 2023), EcSA has already exceeded this commitment and is on track to enroll far more customers than anticipated by the end the fiscal year. The program has also exceeded training targets. Below is a summary of key program indicators through March 31, 2023:

- Enrolled and established personalized self-sufficiency wage goals for 949 customers.
- Focused on historically marginalized populations for customer recruitment.
- Served close to 50% people of color and 9% unhoused.
- Placed 379 customers in training that leads to employment at self-sufficiency earnings.
- Helped 166 customers obtain employment at self-sufficiency earnings.
- The median annualized earnings for those exiting the program with employment is \$46,800. This is for a population starting in poverty, 71% of whom had income below \$9,860 at the time of enrollment.

Enrollments, July 2022 through March 2023

LWDB	Q3 Target	Actual
Olympic	28	71
Pacific Mountain	64	116
Northwest	7	78
Snohomish	55	41
Seattle-King	106	182
Tacoma-Pierce	115	110
Southwest	90	123
North Central	33	31
South Central	53	56
Benton-Franklin	43	65
Spokane	78	76
Statewide Total	672	949

Training services

Training services are connections to training offered at community colleges or other local training providers to provide specific vocational skills that lead to employment with self-sufficiency earnings. Training services include training funded through partner resources, including Pell Grant, WA College Grant, DSHS (BFET, WorkFirst), or WIOA programs. EcSA training funding is used to fill the gap when there is unmet need or when a training does not qualify for other resources.

Through March 2023, a total of 379 customers have entered training that leads to employment with self-sufficiency earnings. Of the 379 customers entering training, 208, or 58%, are currently still enrolled and on track to complete their programs. We are finding that customers need longer to complete training programs., which results in delays for people obtaining jobs that pay self-sufficient wages.

Customers Receiving Training, July 2022 through March 2023

LWDB	Q3 Target	Actual
Olympic	9	39
Pacific Mountain	35	37
Northwest	3	31
Snohomish	17	21
Seattle-King	46	72
Tacoma-Pierce	88	60
Southwest	48	1
North Central	33	31
South Central	30	35
Benton-Franklin	20	29
Spokane	18	23
Statewide Total	349	379

Placements in employment with self-sufficiency earnings

Through March 2023, local EcSA models have helped 166 customers, or 67% of exited customers, obtain jobs that pay self-sufficient wages. This is 73% of the statewide target of 228. Many of the local areas below target on this indicator have a high number of customers currently engaged in training with anticipated end dates in summer 2023.

Self-sufficiency employment placements July 2022 to March 2023

LWDB	Q3 Target	Actual
Olympic	12	14
Pacific Mountain	27	20
Northwest	2	4
Snohomish	40	0
Seattle-King	10	37
Tacoma-Pierce	39	23
Southwest	42	27
North Central	13	4
South Central	12	5
Benton-Franklin	27	27
Spokane	4	6
Statewide Total	228	167

Career and support services

Career services. Case managers help customers navigate career services, which include customer assessments, referrals to partner resources, career counseling and plan development, mentorship, financial literacy, workforce preparation activities, job search and placement assistance. The table below includes only those career services provided directly with EcSA funding. The table does not include career services provided through partner resources.

Support services. Services include only those supports directly provided with EcSA funds: rental assistance, child care, health care, transportation, incentive payments and other work and training related expenses. The table does not include supports provided to customers through partner resources.

Career and support services July 2022 to March 2023

LWDB	Career services	Support services
Olympic	156	188
Pacific Mountain	136	135
Northwest	77	143
Snohomish	107	3
Seattle-King	704	99
Tacoma-Pierce	430	57
Southwest	261	19
North Central	34	147
South Central	316	137
Benton-Franklin	336	70
Spokane	414	83
Statewide Total	2971	1081

Expenditures

Total contract (July 2022 – June 2023) and expenditures (July 2022 to March 2023)

LWDB	Total Contract	Total Expenditures
Olympic	\$368,207.00	\$178,206.27
Pacific Mountain	\$522,444.00	\$379,893.54
Northwest	\$69,694.00	\$47,967.16
Snohomish	\$591,165.00	\$466,451.19
Seattle-King	\$1,039,448.00	\$630,193.68
Tacoma-Pierce	\$745,364.00	\$637,432.00
Southwest	\$557,764.00	\$362,425.28
North Central	\$493,711.00	\$406,438.27
South Central	\$552,518.00	\$393,346.48
Benton-Franklin	\$459,166.00	\$384,196.69
Spokane	\$613,519.00	\$418,002.31
Statewide Total	\$6,013,000.00	\$4,304,552.87

Expenditures: by category

LWDB	Career	Training	Support	Other*
Olympic	\$ 15,395.65	\$ 28,179.14	\$ 28,957.85	\$ 105,673.63
Pacific Mountain	\$ 212,218.54	\$ 56,000.00	\$ 111,675.00	\$ -
Northwest	\$ 10,602.18	\$ 12,746.66	\$ 22,933.87	\$ 1,684.45
Snohomish	\$ 322,617.52	\$ -	\$ -	\$ 143,833.67
Seattle-King	\$ 5,255.00	\$ -	\$ 75,205.71	\$ 549,732.97
Tacoma-Pierce	\$ 251,128.00	\$ 236,633.00	\$ 56,615.00	\$ 93,056.00
Southwest	\$ 214,559.39	\$ -	\$ 8,421.28	\$ 139,444.61
North Central	\$ 158,889.96	\$ 49,941.95	\$ 171,246.47	\$ 26,359.89
South Central	\$ 752.00	\$ 104,938.31	\$ 21,434.31	\$ 266,221.86
Benton-Franklin	\$ 216,944.39	\$ 95,043.36	\$ 26,492.40	\$ 45,716.54
Spokane	\$ 326,986.62	\$ 72,632.00	\$ 18,383.69	\$ -
Statewide Total	\$ 1,735,349.25	\$ 656,114.42	\$ 541,365.58	\$ 1,371,723.62

*Includes navigators, customer outreach, case management staff and coordination with partner organizations.

Implementation highlights

Each LWDB is implementing innovative and unique practices to deliver EcSA services. This report highlights two areas of practice: local partnerships tailored to support key demographics and incentive payments. The December 2023 report will expand on those practices associated with the most promising outcomes for enrollment, training completion and job placement.

Tailoring local partnerships to key demographics

Three LWDBs are partnering with different local organizations to support the needs of key customer demographics in their areas, specifically those who are:

- Unhoused
- Refugees
- Monolingual Spanish speakers

Connecting unhoused customers to transitional housing

South Central LWDB partners with shelter providers to serve unhoused customers. South Central covers Kittitas, Klickitat, Skamania, and Yakima counties and has a disproportionately large population of customers who are unhoused. Over 20% of their EcSA customers identify as homeless upon entering the program, compared to approximately 9% of customers statewide. This LWDB partners with the following organizations to connect customers with stable transitional housing.

- Union Gospel Mission
- Camp Hope
- Entrust
- YWCA
- Triumph Treatment Services
- Comprehensive Healthcare
- Department of Corrections

South Central has also established two-way customer referrals with Union Gospel Mission and Camp Hope. It refers customers to these organizations for temporary housing support, while the shelters refer people to the LWDB for workforce development services.

Assisting recent refugees and meeting workforce demand

Snohomish LWDB is prioritizing refugees for enrollment in EcSA services. The LWDB serves Snohomish County which has experienced an influx of refugees from Ukraine and Afghanistan. In response, Snohomish LWDB partnered with Pacific Associates and Refugee & Immigrant Services Northwest to recruit and enroll refugees in EcSA services.

At the same time, Snohomish observed high interest among this population for cyber-security training, which is also a high-demand field in the region. The LWDB is now supporting a cohort of EcSA customers who are about to begin cyber-security training and is combining funding from EcSA as well as WIOA to cover costs.

Providing equitable access to monolingual Spanish speakers

Benton-Franklin LWDB prioritizes equitable access for monolingual Spanish speakers, who make up 60% of its EcSA customers. The LWDB, serving Benton and Franklin counties, partners with the Pasco library, where they have collocated services, and Pasco Public Schools for outreach events. The LWDB has also prioritized community representation when recruiting EcSA staff, the majority of whom identify as Hispanic, family of seasonal farm workers or first-generation college graduates of immigrant parents. The emphasis on recruiting from within the community supports equitable access to information through Spanish marketing materials and customer service for monolingual Spanish speakers.

Incentive payments

One of the most exciting aspects of EcSA is the unique opportunity to experiment with new methods of supporting customers, including incentive payments. These payments, linked with participation in local program activities, incentivize retention in training and education and cover expenses that might interfere with training success. Five of the eleven LWDBs have implemented incentive payments in different ways.

- Northwest
- Olympic
- Pacific Mountain
- Seattle-King
- North Central

Here are three models currently being implemented by local EcSA programs:

- Mobility mentoring – Pacific-Mountain LWDB
- Monthly and milestone incentive – Seattle-King
- Monthly incentive – North Central

Mobility mentoring - Pacific-Mountain LWDB

Pacific Mountain and its partners are testing the use of incentive payments integrated with “mobility mentoring”. Mobility mentoring is a national model based in Boston that has been extensively tested over time and is now used in many states. It focuses on four essential elements:

- Coaching for economic mobility
- Bridge to Self-Sufficiency®
- Goal setting
- Recognition

Case managers partner with customers so that over time they acquire the resources, skills, and sustained behavior changes necessary to attain and preserve their economic independence. Along the way, incentives are paid for achievement of self-sufficiency and performance goals, as defined by the customer’s Individual Employment Plan and Financial Action Plan.

Maximum incentive allowed per person: Up to \$4,000 per year.

Outcomes from July 2022 to March 2023

- 67 customers have received over 200 incentive payments. The average amount of incentives earned per customer is just over \$1,600.
- 41 customers have completed an industry recognized credential.
- 23 participants completed a home-buyer course.

Monthly and milestone incentive - Seattle-King LWDB

This LWDB focuses on domestic violence survivors through a partnership with the YWCA. Monthly incentive payments provide survivors with a more reliable and steady source of income, empowering them to make their own financial decisions, which helps them recover from abuse and repair their finances. Incentive payments are based on achieving monthly goals and progress. The incentive payments help alleviate the stress and anxiety that comes

with financial insecurity, providing survivors with the stability and peace of mind they need to focus on their healing, recovery and career development goals.

All customers receiving incentives through the partnership with YWCA have children. Incentive payments help cover the cost of supplies their children need, such as diapers, clothing, school supplies and child care expenses.

Customers participating in this incentive model are required to attend financial literacy training and complete monthly progress reports with their case managers.

Maximum incentives allowed per person: 10 monthly payments of \$500.

Outcomes from July 2022 to March 2023

- 78 EcSA customers received monthly incentive payments.

Monthly incentive - North Central LWDB

North Central LWDB's SkillSource is using an incentive program designed to keep customers engaged with their case manager and making satisfactory progress on their training plan. To qualify, a customer must:

- Meet at least monthly with their case manager to review progress.
- Make satisfactory progress on their customized career plan for each month of enrollment.
- Complete additional monthly activities outlined in their individualized career plan.

Maximum incentives allowed per person: By meeting all requirements, customers can get \$1,000 per month and up to \$12,000 a year.

Outcomes from July 2022 to March 2023

- 31 customers were enrolled with a plan to receive training and incentive payments.
- Four have completed training and successfully entered self-sufficiency employment. These four had an average annual income at enrollment of \$10,920 and an average income at exit of \$47,216 — a 332% increase.

Recommendations

Based on results from the first three quarters and feedback from local implementation leaders, ESD has three recommendations.

Maintain high outcome standards as contractual requirements of EcSA and work with a third-party evaluator to evaluate their impact. EcSA adheres to the highest outcome standards for poverty reduction programs. These include:

- Achieving a full self-sufficiency wage
- Bundling workforce, education, and human services
- Recruiting customers from demographics who have historically been marginalized.

Two key innovations in the EcSA model are that it contractually requires self-sufficiency wages as a customer outcome, and it requires a coordinated approach to bundling services and recruiting for equity. EcSA makes self-sufficiency, bundled services and equity contractual requirements that are measured, tracked, and regularly reviewed with local partners.

ESD should work with a third-party to evaluate EcSA. Developing more rigorous evaluation methodology will help us understand the impact of these three outcome standards individually and collectively.

Continue to support innovative local incentive payment models and evaluate their effectiveness. Incentive payment models are still early in implementation and being tested, but initial data indicates that these have potential. ESD should include a formal evaluation of EcSA incentive models to assess their effectiveness and compare outcomes for customers receiving incentives against similar populations. Evaluations should be made available to all EcSA implementers for learning and development. The results should also inform which models get funded in future.

Continue pursuing data sharing and waiver requests. ESD should continue to work with federal, state and local partners to identify and remove barriers that hinder the ability of local programs to streamline access to services and benefits. Specifically:

- ESD and DSHS should continue working together to identify and address partnership barriers and unintended negative impacts to customers' SNAP, TANF and other benefits. They should pursue data-sharing agreements, federal waiver requests, and other remedies as appropriate.
- ESD and WSAC should continue work on data-sharing agreements and processes to allow EcSA customers automatic eligibility to the Washington College Grant. This would

reduce a significant barrier to accessing postsecondary education by eliminating the requirement to complete state or federal financial aid applications for the first year of training enrollment.

Endnotes

¹ DSHS analysis of 2020 American Community Survey data, using the SNAP threshold of 200% FPL as the poverty line.
