



**Seattle** Office of  
Labor Standards

# A publicly managed Paid Time Off fund for domestic workers: principles and considerations for program design.

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A publicly managed PTO fund for domestic workers: principles and considerations for program design.

## Acknowledgements

The research summarized in this report was only possible due to the willingness of many organizations to share their experiences successfully distributing funds to individuals historically excluded from social benefits programs. Key sources of information included interviews with individuals who have deep expertise in fund administration, as well as very helpful public reports. A list of these documents can be found in the “resources” section at the end of this report. We also spoke with experts who shared their wisdom regarding the specific needs of domestic workers when participating in a publicly managed fund.

The Seattle Office of Labor Standards would like to thank representatives from the following organizations for so generously providing their time and expertise: Arise Chicago, Fair Work Center, Scholar Fund, Seattle Office of Immigrant and Refugee Affairs, Washington Budget and Policy Center, Washington Immigrant Solidarity Network, and Washington State Department of Revenue. OLS deeply appreciates interviewees’ participation and cannot overstate the significance of their insights for this project.

This report was researched in collaboration with the Seattle Domestic Workers Coalition, currently: ALA Garifuna, Casa Latina, Fair Work Center, Hand in Hand: The Domestic Employers Network, the Harry Bridges Center for Labor Studies at the University of Washington, and Kim England, Professor of Geography and Labor Studies at the University of Washington. Moreover, it is the direct result of the findings of the Coalition’s earlier extensive research to understand the experiences of domestic workers in Seattle and their need for PTO. The results of this research are summarized in a companion report: “Paid Time Off for Domestic Workers: A City of Seattle Policy Assessment.”

Finally, OLS would like to thank Nicole Vallesterio Soper for her instrumental role in advancing this work.

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## Introduction

Despite the expansion of guaranteed Paid Sick & Safe Time (PSST) laws in recent years, many domestic workers in Seattle report having no meaningful access to paid time off (PTO). Domestic workers providing services for many different households, such as gardeners and housekeepers, are the least likely to enjoy PTO benefits.<sup>1</sup> On the recommendation of the Seattle Domestic Workers Standards Board and as directed by the Seattle City Council, the Seattle Office of Labor Standards (OLS) and the Seattle Domestic Workers Coalition have been researching PTO challenges and solutions since 2021.<sup>2</sup> Over the course of that research, the concept of a publicly managed fund emerged as one viable opportunity for action. OLS then received additional funding specifically for the purpose of researching how a publicly managed fund might be implemented. This report is the result of that work.

By “publicly managed fund,” we mean a program operated by a government and/or non-profit entity that distributes a financial benefit to domestic workers who do not receive pay for time off from the people who hire them. While applicants would need to demonstrate some proof of eligibility, this benefit would not necessarily require detailed tracking of hours worked for specific hiring entities, nor rely on collecting contributions from employers. For domestic workers working for many hiring entities, a publicly managed fund is currently the simplest and most cost-effective option for providing PTO.

Although the approach is somewhat novel, a publicly managed fund could immediately distribute PTO benefits upon setup. By contrast, the development of a portable PTO tool or application to track hours, collect contributions, and pay out PTO benefits based on individual jobs worked would cost millions of dollars and could take years to launch. Moreover, a fund may encourage higher rates of participation than a portable PTO application. The research of the Seattle Domestic Workers Coalition found that the segments of domestic workers facing the greatest barriers to PTO are hired by households least likely to see themselves as employers, and domestic workers are unlikely to approach hiring entities about this issue.<sup>3</sup> The power dynamics in these employment relationships make application to a public fund more appealing than adoption of a technological tool that requires hiring entities’ participation.

Eligibility for a publicly managed fund would be restricted to domestic workers who cannot access the paid leave guaranteed to other workers by City law because (1) they are independent contractors, (2) they do not work enough hours for any single employer to accrue and use time

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<sup>1</sup> Seattle Office of Labor Standards, “Paid Time Off for Domestic Workers: A City of Seattle Policy Assessment,” Oct. 2025.

<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

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off covered by Seattle’s Paid Sick and Safe Time (PSST) Ordinance for employees,<sup>4</sup> and/or (3) their work is not covered by the App-Based Worker Paid Sick and Safe Time Ordinance.<sup>5</sup> Most of these domestic workers are house cleaners and gardeners who do not find work through a larger business (e.g. not employed by an agency).<sup>6</sup>

This report describes a series of decisions implicated in designing a publicly managed fund. The topics emerged from research into other programs that have successfully distributed funds to identified populations, including interviews with individuals involved in fund administration. Particular attention was given to programs serving populations that are likely to include domestic workers and/or share lived experiences with domestic workers, as well as to programs that have operated in Seattle and in Washington. Those findings are then integrated with the research of the Seattle Domestic Workers Coalition to determine how a publicly managed fund might be established and operated in the City of Seattle.<sup>7</sup> While some conclusions reflect conditions specific to the City,<sup>8</sup> the decision points and associated recommendations could also inform other jurisdictions considering a similar program.

This document is composed of two sections:

1. On some topics, research led to clear recommendations or considerations that should influence decision-making. **Essential principles of program design include the following:**
  - 1) Create a low-barrier application process through which applicants can demonstrate that they meet clear standards for eligibility.
  - 2) Contract with an experienced third party to administer the fund.

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<sup>4</sup> Seattle’s Paid Sick & Safe Time Ordinance, SMC 14.16. When eligible for PSST, a domestic worker typically would accrue one hour of leave for every 40 hours worked. And an employee must wait 90 calendar days after commencing work for the employer before they are legally entitled to use accrued PSST. To provide an example, a housecleaner who cleans for a homeowner once a week for 3 hours would need to work 40 weeks for that same client before being able to use enough PSST to cover a single 3-hour shift.

Washington state has similar sick leave requirements for employees. RCW 49.46.

<sup>5</sup> Seattle’s App-Based Worker Paid Sick & Safe Time Ordinance, SMC 8.39. Companies that use digital platforms or “apps” to connect workers with clients must provide their workers with PSST based on the worker’s “average daily compensation” for each day worked for the company.

<sup>6</sup> House cleaners and gardeners working for companies who dispatch them to clients’ homes are typically employees of those companies, or if the company operates using an app, they are entitled to App-Based Worker Paid Sick & Safe Time. Nannies and home care providers in Seattle generally work for one or two employers and are more likely to be covered under PSST. Seattle Office of Labor Standards, “Paid Time Off for Domestic Workers: A City of Seattle Policy Assessment,” Oct. 2025.

<sup>7</sup> Seattle Office of Labor Standards, “Paid Time Off for Domestic Workers: A City of Seattle Policy Assessment,” Oct. 2025.

<sup>8</sup> This includes an assumption that employees are entitled to paid leave required by Seattle’s Paid Sick & Safe Time Ordinance, SMC 14.16.

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- 3) Contract with community organizations to act as “outreach partners.”
  - 4) Communicate in domestic workers’ own languages and in terms that all applicants can understand.
  - 5) Prioritize accessibility when designing the application for benefits and plan to provide support for applicants.
  - 6) Ensure confidentiality of applicants.
2. On other topics, decisions should depend on finalized program structures and external conditions that must be evaluated at the time of implementation. In some situations, there may ultimately be more than one viable approach. Actual implementation of a publicly managed fund, or perhaps a pilot, would allow for testing concepts and assessing the consequences of program design. **Questions to address during planning and implementation include the following:**
- 1) How is “domestic work” defined when determining eligibility for benefits?
  - 2) What should the amount of the benefit be?
  - 3) What is the ideal duration and frequency of application windows?
  - 4) How should funds be disbursed?
  - 5) Are there legal or financial implications for the domestic worker receiving the benefit? Can undesired consequences be mitigated?
  - 6) Should applications be used to collect data that aids future efforts to support domestic workers?
  - 7) Which agency should coordinate the program?
  - 8) How much would a publicly managed fund cost to operate?
  - 9) How is funding for the program generated?

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### Principles for successful program design.

Our research led to the following essential principles of program design for any government or organization (“program operator”) structuring a publicly managed fund. Some conclusions reflect circumstances specific to the City of Seattle, such as the existence of a Paid Sick & Safe Time Ordinance covering most employees. However, the recommendations below may prove useful to other jurisdictions considering a similar program.

1. *Create a low-barrier application process through which applicants can demonstrate that they meet clear standards for eligibility:*

A low barrier application process is necessary to ensure uptake by the target beneficiaries, but it must be reasonably balanced with safeguards that ensure funds are only delivered to qualifying domestic workers who are not already receiving PTO.

**Some of the applicant’s work must have a nexus to the jurisdiction:** Benefits should be available to domestic workers who perform some domestic work within the implementing jurisdiction’s boundaries, for example Seattle City limits. In Seattle, this approach is consistent with the City’s other labor standards, which attach when some or all covered work occurs within the City.<sup>9</sup> Proof of this nexus should not be so burdensome as to deter program participation. Evidence of any work, or perhaps a minimal number or frequency of jobs, completed in Seattle should suffice.

The program should not require that all work be performed within the jurisdiction. Most domestic workers work across a variety of work sites. In Seattle, many domestic workers live in less-expensive counties surrounding the City, and/or they may also work in any of several neighboring cities. Therefore, rather than require that all work be performed within the jurisdiction, eligibility could entail a minimum percentage of work or number of hours.<sup>10</sup> When determining a threshold, consider that a domestic worker likely could not prove, and the program operator would most likely not desire to vet, whether the worker meets a stringent minimum. Moreover, most domestic workers who cannot access PSST are likely not working a standard 40-hour workweek, so any threshold should be calculated accordingly. Alternatively, benefits could be made available to a domestic worker who either works or resides within the jurisdiction. This does not mirror Seattle’s other labor standards, but it could help facilitate a low-barrier application process.

**Require documentation of eligibility that is realistic for applicants to obtain:** Perhaps the most crucial principle for program design is flexibility in terms of documents accepted to substantiate an application. Were a fund to require strict proof of every job

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<sup>9</sup> For example, while the thresholds for coverage vary, the Commuter Benefit, Paid Sick & Safe Time, and Secure Scheduling Ordinances each attach when the employee works a certain minimum number of hours in the City. SMC 14.30.030, SMC 14.16.015, SMC 14.22.015.

<sup>10</sup> As an example, Seattle’s App-Based Worker Deactivation Rights Ordinance covers a worker when at least 25% of their work was performed in Seattle during the previous 180 days. SMC 8.40.030.

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worked, it would recreate many of the same obstacles associated with a portable PTO app (e.g. complex timekeeping/payroll and reluctance of hiring entities to participate).<sup>11</sup> Some examples of documents (or combinations of documents) that could demonstrate eligibility include a contract or receipt for a service performed; a signed form from a hiring entity (the program operator could develop a template); and an ID, bill, or other acceptable piece of mail that shows the domestic worker lives in the jurisdiction. A fund could also accept an attestation from the applicant, perhaps supported by an attestation from an employer, pastor, or community organization. Availability of documentation could also be considered when determining the amount of the benefit. (See *Question 2* for more information about approaches to determining a benefit amount.)

**The applicant must be unable to access PSST or other PTO:** Benefits should only be available to domestic workers who do not already receive PSST or PTO from the entities who hire them. Workers could sign an attestation that they are not receiving PSST or other PTO for the work that they are verifying. In other words, a domestic worker applying and attesting that they perform 20 hours/week of domestic work could also attest that they do not receive PTO from any hiring entity associated with those hours. If a fund is resource-constrained or there is a policy choice not to provide benefits to domestic workers who also work in industries where they do access PTO, the applicants could also be asked to attest that they do not have other employment where they receive it.

**The application should not require proof of need:** “Paid time off” refers to time that an employee may use for any purpose. A publicly managed PTO fund should not ask domestic workers to demonstrate any particular need (e.g. medical leave). Such a requirement would be impractical, increase administrative cost and burden, and interfere unnecessarily with participants’ privacy.

**Applicants should be eligible annually:** The purpose of a publicly managed fund would be to replace the PTO that domestic workers do not receive. PTO would be an ongoing benefit if workers were receiving it. A fund should allow domestic workers to apply on some regular basis, which could depend on the benefit amount and “look back” period for attestation and documentation. Annual eligibility would be simplest and also easiest to communicate to participants.

**Funds should be available to all who qualify:** Benefits should be available regardless of immigration status. In Seattle, Ordinance 121063 prohibits City employees from inquiring about immigration status,<sup>12</sup> and all of the City’s worker protection laws cover

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<sup>11</sup> Authors of a Washington State Department of Social & Health Services report on universal basic income programs suggest as a principle: “Avoid replicating systems of oppression when upholding program integrity.” Washington State Department of Social and Health Services, “Washington State Basic Income Feasibility Study,” June 2022, [https://capaa.wa.gov/sites/default/files/2024-01/2022\\_Jun\\_1\\_basic\\_income\\_feasibility\\_study\\_FINAL.pdf](https://capaa.wa.gov/sites/default/files/2024-01/2022_Jun_1_basic_income_feasibility_study_FINAL.pdf), p.10.

<sup>12</sup> SMC 4.18.015.

workers regardless of immigration status.<sup>13</sup> Without clear communication that the fund is available to all, some domestic workers may not be willing to participate.

2. *Contract with an experienced third party to administer the fund.*

Distribution of benefits requires an established payment system, as well as expertise on matters such as application review, fraud prevention, and customer service. An expert organization is best situated to perform that work. Moreover, the program operator should avoid collecting the personally identifiable information of applicants. Contracting with a third party, vetted for expertise in data privacy and security, would best enable the program operator to protect applicants' confidentiality. When selecting the fund administrator, the program operator should find a contractor with proven capacity to handle the following responsibilities:

- ❖ Designing an application system;
- ❖ Accepting and reviewing applications;
- ❖ Approving and disbursing funds to qualified applicants;
- ❖ Training outreach partners to facilitate the application process;
- ❖ Providing customer support and fielding participants' inquiries;
- ❖ Fraud prevention; and
- ❖ Ensuring data security and data privacy.

3. *Contract with community organizations to act as "outreach partners."*

Outreach partners would raise awareness about the fund and help eligible domestic workers apply. While doing so, they can also educate domestic workers about their rights to PSST, rights under Seattle's Domestic Workers Ordinance,<sup>14</sup> and how the Office of Labor Standards investigates alleged violations of worker rights.

**Choose groups who already work closely with domestic workers:** Many domestic workers may be reluctant to interact with a government agency. Community organizations can act as trusted messengers when they have established relationships with domestic workers. For example, operators of other funds reported that organizations' attendance at community events is a more effective outreach strategy than social media. Additionally, well-positioned outreach partners may already have staff that can speak the languages that domestic workers speak. They can also report back to the program operator on language access needs.

**Outreach partners can play a role in the application process:** The fund administrator could create organizational accounts for outreach partners so that the organizations

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<sup>13</sup> Seattle Office of Labor Standards, "Commitment to Immigrants and Refugees," accessed on Sept. 10, 2025, <https://www.seattle.gov/laborstandards/about/commitment-to-immigrants-and-refugees#olsprotectsrefugeeandimmigrantrights>.

<sup>14</sup> SMC 14.23.

could submit applications on behalf of the domestic workers that they assist. Outreach partners can therefore play a part in vetting and verifying applications, as well as facilitating more equitable access for applicants who might otherwise struggle to complete an online form for any number of reasons. The program could allow applicants who are experiencing housing instability or are reluctant to list a home address to use the address of an outreach partner for the purposes of ongoing communication and/or benefits distribution.

**Outreach partners will require ongoing support from the program operator, as well as the fund administrator:** To provide accurate services, outreach partners will need upfront and ongoing training on topics such as fund eligibility and how domestic workers can apply, as well as how to protect applicants' personally identifiable information when aiding with applications. Experts who have operated similar funds emphasized that it is critical that the work be funded, so as not to create additional unpaid community service obligations. Additionally, they advised that the program operator be clear and transparent regarding the expectations of community partners and how they will work with the program operator and fund administrator.

Community organizations also may need training and assistance to successfully apply for contracts to serve as outreach partners, as well as on how to complete contracting and reporting processes. The program operator should minimize reporting burdens so that the organizations can focus on providing services and so that smaller and/or newer organizations can participate. In Seattle, the Office of Labor Standards has many years of experience contracting with community groups that perform outreach to workers. The program operator should incorporate the best practices and lessons learned from OLS' experience administering the Community Outreach and Education Fund (COEF).<sup>15</sup>

4. *Communicate in domestic workers' own languages and in terms that all applicants can understand.*

Clear communication is critical to ensuring meaningful access to any benefit program.

**Write the application in plain language and provide high quality translation:** It is important to design a low-barrier application that is easy to understand and translate. Questions should be short and in plain language. Successfully drafting an equitable application form will entail soliciting feedback from the fund administrator, outreach partners, and translators, and making multiple rounds of revisions. Problems identified once applicants begin using the form must be addressed.

**Communicate with applicants in ways that are helpful to them:** Outreach and support must be offered in plain language and in the languages that domestic workers speak. A shared glossary of terms should be made available to outreach partners to ensure consistency in terminology in all languages spoken. Access to verbal resources in

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<sup>15</sup> Seattle Office of Labor Standards, "Community Outreach and Education Fund (COEF)," accessed on Sept. 10, 2025, <https://www.seattle.gov/laborstandards/funding/community-outreach-and-education-fund>.

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language is critical because literacy in any language may be limited. For example, interpretation should be made available when applicants contact the program's call center.

**Find out which languages local domestic workers speak:** Additional research is still needed in Seattle to understand which languages are spoken by local domestic workers. Outreach partners may aid this research by reporting language needs to the program operator. In Seattle, translations and interpretation should be made available in the City's top 15 languages<sup>16</sup> and any languages that outreach partners can initially identify as spoken in domestic workers' communities.

5. *Prioritize accessibility when designing the application for benefits and plan to provide support for applicants.*

In addition to maintaining flexibility regarding acceptable substantiation for claims, the program operator can take additional steps to make the fund accessible and equitable.

**Mitigate technological barriers:** Some benefits programs have found online applications to be a barrier to older participants and those who lack technological literacy or reliable access to the Internet. Online processing can also be a barrier if no translations are provided for a digital application. These barriers can be mitigated by empowering outreach partners to assist applicants in filing for benefits. Program designers should also weigh the expense and potential benefit of allowing paper applications. That said, the research of the Seattle Domestic Workers Coalition has found that many domestic workers are already using smartphones to find work and get paid.<sup>17</sup>

The online application should be easy to complete and consider applicants who have disabilities. This can be achieved through thoughtful design, including consultation with experts in designing for accessibility. If possible, the application should also be made mobile-friendly.

**Provide support via phone, as well as text message and email:** Experts conveyed that there is no substitute for having someone to talk to and answer questions, even with a low barrier application process. Their strong recommendation was that there be one central call center, likely operated by the fund administrator. Although applicants could contact outreach partners, who might be able to help with some issues, they should be directed to one central phone line for questions about filing and processing applications. The program operator should weigh the costs and benefits of providing support via text message and email, in addition to support over the phone.

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<sup>16</sup> Seattle Office of Immigrant and Refugee Affairs, "2023 Seattle Top Languages Other than English," accessed on Sept. 10, 2025, <https://www.seattle.gov/iandraftaffairs/LA#:~:text=Below%20are%20the%20top%2015%20languages%20in%20order,primary%20Chinese%20writing%20systems%3A%20Traditional%20and%20Simplified%20Chinese.>

<sup>17</sup> Seattle Office of Labor Standards, "Paid Time Off for Domestic Workers: A City of Seattle Policy Assessment," Oct. 2025.

6. *Ensure confidentiality of applicants.*

The program operator must design a process to maximize the security of applicants' personally identifiable information, including active consultation with legal and data security experts. This includes contracting with a fund administrator that has the expertise needed to protect personally identifiable information and prevent and respond to any data breaches. Prior to finalizing a contract, the program operator should understand how and when a potential fund administrator would ever disclose applicants' data to any third party. In collaboration with the fund administrator, the program operator must develop a data management and privacy policy governing who has access to data and how long it is retained. Domestic workers' personal information should be stored securely, should only be used for the purposes to which the applicants have consented, and should not be kept indefinitely. In Seattle, these policies should conform with the City's principles and protocols for data privacy.<sup>18</sup>

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<sup>18</sup> "City of Seattle Privacy Principles," accessed on Sept. 10, 2025, <https://seattle.legistar.com/View.ashx?M=F&ID=3603918&GUID=5EFFCFFA-632B-4D95-8324-DBA68C6CDC9F>.

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### Questions to address during planning and implementation:

In addition to the principles described above, our research surfaced the following questions to consider when establishing a publicly managed PTO fund. Some of this analysis assumes conditions specific to the City of Seattle, but any jurisdiction contemplating a similar program may need to address similar issues.

1. *How is “domestic work” defined when determining eligibility for benefits?*

In Seattle, should the fund be opened to domestic workers in industries not covered by the Domestic Workers Ordinance (DWO)? The DWO defines domestic work to include only “domestic services to an individual or household in or about a private home as a nanny, house cleaner, home care worker, gardener, cook, or household manager.”<sup>19</sup> A publicly managed fund could be made available solely to domestic workers covered by the ordinance. Alternatively, eligibility could be opened to specific additional types of work (e.g. in-home pet care) or to any work performed in private homes that might reasonably be considered “domestic work.”

When investigating options to improve domestic workers’ access to PTO, the Seattle Domestic Workers Coalition and the City focused on work covered by the DWO.

Therefore, additional research would be needed to understand workers’ experiences in other sectors, as well as to quantify the additional workforce.

2. *What should the amount of the benefit be?*

There are multiple possible approaches to determining the amount of the benefit paid to each applicant. In Seattle, the value of the benefit could be calculated to approximate parity with benefits obtained by employees covered by PSST. It could account for available funding and ability to serve an estimated eligible population. And the amount could be uniform or vary on some basis, such as part vs. full-time work or the availability of substantiating documentation. Examples of models to consider include the following:  
**Base the benefit amount on a comparable benefit for employees receiving PSST (or a similar paid leave benefit):** The benefit amount could be designed to replicate what an employee covered by a PSST protection would accrue, assuming they earned minimum wage. For example:

*Equivalent of one week of PTO, if working:*

- 20hrs/week earning 2025 Seattle minimum wage<sup>20</sup> = \$415.20
- 30hrs/week earning 2025 Seattle minimum wage = \$622.80
- 40hrs/week earning 2025 Seattle minimum wage = \$830.40

*Equivalent of PSST accrual:*

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<sup>19</sup> SMC 14.23.010, definition of “domestic worker.”

<sup>20</sup> Seattle Office of Labor Standards, “Minimum Wage,” accessed on Sept. 10, 2025, <https://www.seattle.gov/laborstandards/ordinances/minimum-wage>. In 2025, Seattle’s minimum wage is \$20.76.

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- An employee of a small employer, working 40hrs/week for 50 weeks of the year and earning 2025 Seattle minimum wage, would accrue 50 hours of PSST.  
= \$1,308
- An employee of a small employer, working 20hrs/week for 50 weeks of the year and earning 2025 Seattle minimum wage, would accrue 25 hours of PSST.  
= \$519

**Offer tiered benefits based on hours worked:** Tiers of benefits could be based on average weekly hours worked. For example, there could be a larger benefit for applicants who can demonstrate full-time employment and a smaller benefit for applicants who only work part-time. However, most housecleaners and gardeners that would be eligible for a public fund are unable to obtain a full 40-hour workweek. Domestic workers are often unable to find as many jobs as they would like, and/or they have significant caregiving responsibilities outside of work. Moreover, a 40-hour schedule is likely impracticable, given they need to travel between many worksites, and that travel time is generally uncompensated. Therefore, a program should not expect applicants to work 40 hours a week as a threshold for receiving a significant benefit.

Additionally, if there are any minimum thresholds of hours worked required to receive benefits, the program operator would need to determine the timeframe for determining the hours worked. Such a “lookback period” could depend on the frequency of benefit eligibility and distribution. For example, if applicants are eligible annually, the application could ask about the number of hours worked during the past year.<sup>21</sup> Program designers should consider that there may be significant seasonal variation in work availability, especially for gardening services.

**Offer tiered benefits based on applicant’s available documentation:** Different benefit amounts could be allocated based on the documentation provided by applicants. For example, the New York Excluded Workers Fund provided support to jobless workers who were excluded from unemployed benefits during the COVID-19 pandemic. The New York State Department of Labor verified the identity, residency, and work eligibility of applicants. A point system was assigned based on the perceived reliability of

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<sup>21</sup> One could look to benefits distributed by the Washington State Employment Security Department for examples of annual work hour requirements. Employees in Washington state must have worked certain total thresholds of hours during a “base year” or “qualifying period” to be eligible for unemployment insurance or paid family and medical leave, respectively.

Washington State Employment Security Department, “Basic eligibility requirements,” accessed on Sept. 10, 2025, <https://esd.wa.gov/get-financial-help/unemployment-benefits/basic-eligibility-requirements>.

Washington State Employment Security Department, “Benefit Guide: Washington’s Paid Family & Medical Leave Program,” Nov. 2024, <https://paidleave.wa.gov/app/uploads/2022/04/Benefit-Guide-V.14.pdf>.

documentation. Applicants provided combinations of documents that earned them different points and therefore different benefit amounts.<sup>22</sup>

3. *What is the ideal duration and frequency of application windows?*

Applications for benefits could be made available on a continual basis or during specified timeframes (e.g. applications are accepted every January). The approach would likely depend on available funding and the scale of the program. Regardless of the final decision, it is critical to inform domestic workers of a clear timeline for processing claims and then meet any stated deadlines. This can reduce duplicate applications, as well as the volume of calls to the fund administrator and outreach partners inquiring about application status.

4. *How should funds be disbursed?*

Each method of disbursing funds to recipients has benefits and drawbacks, and no single form of payment is universally accessible for all domestic workers. For example, some applicants may not have bank accounts and might be vulnerable to predatory check cashing schemes. And paper checks and gift cards need to be physically received, which may be difficult for some domestic workers. Therefore, program designers may choose to make multiple forms of payment available. Options to consider include checks, gift cards (digital and physical), direct deposit to banks and credit unions, cash transfer applications such as PayPal, Venmo, and Zelle, and trusted, non-predatory third-party services, such as Western Union.

5. *Are there legal or financial implications for the domestic worker receiving the benefit? Can undesired consequences be mitigated?*

Receipt of some types of benefits can affect an individual's eligibility for other benefits programs, tax filings, and application for citizenship. In addition to the inherent importance of understanding the program's potential impacts on participants, our research found that domestic workers may be reluctant to apply unless the program provides information about the legal and financial implications of receiving a benefit. While critical, the answers to such questions may depend on the final program design, as well as current federal and state policies governing public benefits, tax filing, and immigration law. For example, the characterization of purpose and eligibility for the publicly managed fund will be relevant, and whether the fund is operated as a purely public or a public-private partnership may matter. The program operator should understand the concerns below and communicate the impact of receiving funds to applicants, such as by drafting an FAQ and including information as part of outreach partner training.

**Loss of eligibility for other benefit programs:** A variety of benefits programs (e.g. SNAP) are offered by local, state, and federal governments. Many domestic workers may not be

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<sup>22</sup> New York City Comptroller Brad Lander, "Excluded Workers Fund," accessed on Sept. 10, 2025, <https://comptroller.nyc.gov/services/for-the-public/covid-19-recovery-center/english/excluded-workers-fund/>.

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eligible for some or all programs, but some may be. Determining whether a PTO benefit would impact participation in other benefits is a complex question, as different programs may or may not consider a PTO benefit to be “income” and therefore relevant to determining a recipient’s eligibility or benefit amount.

**Tax implications:** While Washington state does not have an income tax, benefit recipients may need to file federal income taxes.<sup>23</sup> The program operator will need to determine whether the benefit is likely considered taxable income and whether the fund administrator must issue 1099 forms, if the benefit is \$600 or more.<sup>24</sup>

**Public charge:** When finalizing the fund’s design, the program operator should consult with legal experts to assess whether receiving a benefit would impact an applicant’s ability to become a legal permanent resident or U.S. citizen under the federal public charge test. The “public charge test” applies to some immigrants when they apply for Green Card status or for a visa to enter the United States. Immigration officials can deny an application if they think it is likely that the applicant will become dependent on certain government benefits in the future.<sup>25</sup> Whether federal officials might consider receipt of a PTO benefit to be relevant to this test is a complex question and would depend on U.S. Citizenship and Immigration Services policies at the time.

**A note about alternative program design:** If the fund is resource constrained or an analysis finds that characterizing the benefit as “need-based” or “charitable” is relevant for tax or other policy purposes, the program could limit its eligibility or purpose. For example, the benefit could be a strict replacement for Paid Sick and Safe Time, as opposed to a broader Paid Time Off benefit. Or the program might require some attestation of need and/or income. The program operator should work closely with domestic workers and legal counsel to determine whether the benefits of any changes outweigh the drawbacks.

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For programs in Washington state, consider: Is the Washington Gift of Public Funds doctrine implicated by program design?

While on the topic of the legal consequences of program design, potential program operators within Washington state should note that the Washington State Constitution bars “gifts of public funds.” This Gift of Public Funds doctrine protects against the

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<sup>23</sup> An individual whose income falls below a certain threshold has no filing obligation. United States Internal Revenue Service, “Check if you need to file a tax return,” accessed on Sept. 10, 2025, <https://www.irs.gov/individuals/check-if-you-need-to-file-a-tax-return>.

<sup>24</sup> United States Internal Revenue Service, “About Form 1099-MISX, Miscellaneous Information,” accessed on Sept. 10, 2025, <https://www.irs.gov/forms-pubs/about-form-1099-misc>.

<sup>25</sup> Northwest Justice Project, “Public charge: what you need to know,” [washingtonlawhelp.org](https://www.washingtonlawhelp.org), accessed on Sept. 10, 2025, <https://www.washingtonlawhelp.org/vi/public-charge-what-you-need-know#c2066b02-7f46-4f6b-8f06-45f6179610c7>.

government inappropriately steering public resources to benefit private corporations or individuals.<sup>26</sup> With some exceptions, the state and its subdivisions may not confer a benefit to private parties unless it serves a “fundamental purpose of the government.” However, “the preservation of the public health” and “promotion of the public welfare” have been determined to be valid objectives.<sup>27</sup>

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6. *Should applications be used to collect data that aids future efforts to support domestic workers?*

The research of the Seattle Domestic Workers Coalition indicates that domestic workers are interested in accessing additional rights and benefits such as contracts, health care, and retirement.<sup>28</sup> A fund’s outreach efforts and application process could facilitate ongoing communications with workers on these topics, with the workers’ consent. For example, if the program operator establishes other portable benefits systems or publicly managed funds in the future, a mailing list and/or the existence of active user accounts could help expedite applications.

This goal would need to be balanced with data retention and privacy concerns. The program operator should determine whether the fund administrator, outreach partners, or both should maintain contact information. All parties retaining contact information for domestic workers should be trained regarding privacy protection and permissible uses.

7. *Which agency should coordinate the program?*

If the program is operated by a local or state government, a governmental agency (or agencies) will need to coordinate setup of the fund and manage its ongoing operations. While no single agency may have expertise in all topics relevant to administering a public fund, the program operator should consider the following criteria:

- ❖ Established relationships and experience contracting with community-based organizations;
- ❖ Understanding of domestic workers and immigrant communities;
- ❖ Experience connecting with communities in the languages they speak;
- ❖ Experience distributing benefits to individuals; and
- ❖ Knowledge of and commitment to practices promoting equity.

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<sup>26</sup> Municipal Research and Services Center of Washington, “Gift of Public Funds,” accessed on Sept. 10, 2025, <https://mrsc.org/explore-topics/officials/ethics/gift-of-public-funds>.

<sup>27</sup> *Hudson v. City of Wenatchee*, 94 Wn. App. 990, 995, 974 P.2d 342 (1999).

<sup>28</sup> Seattle Office of Labor Standards, “Paid Time Off for Domestic Workers: A City of Seattle Policy Assessment,” Oct. 2025.

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8. *How much would a publicly managed fund cost to operate?*

In addition to the actual benefits to be distributed, a publicly managed fund requires a separate budget to cover outreach and administration. When determining the total cost of operating a fund, consider the following expenses:

**Benefits to be distributed:** To estimate total dollars needed to cover disbursements to applicants, multiply the benefit amount(s) (see *Question 2* on determining a benefit amount) by an estimate of the total number of domestic workers who might participate. A program operator could use U.S. Census or other data to estimate the number of housecleaners and gardeners working in that jurisdiction.<sup>29</sup> One might wish to factor in some assumptions about the number of those workers not already earning PSST (e.g. not employed by an agency) and how many domestic workers would be reachable and interested in participating.

Another approach would be to determine the amount of funds available and adjust the benefit amount accordingly. A program could operate as a first-come, first-served system. In that case, program designers could consider restricting eligibility in future years to domestic workers who have not yet had the opportunity to receive funds.

In any case, the fund itself must be partitioned into its own account to clearly separate benefits disbursed from administrative expenses.

**Cost to process applications and disburse funds:** One rough estimate for the cost for a third-party fund administrator to perform the services described in *Principle 2* is about 10% of assets managed. A program operator should seek out qualified and interested organizations to solicit and compare descriptions of services and costs.

**Cost for community outreach:** The program operator should ensure adequate funding for grants to outreach partners to raise awareness about the program and aid eligible applicants in participating. This includes budget for the grants themselves, as well as for agency staff time and resources to create and maintain equitable and supportive systems for contracting and collaboration.

**Cost to translate materials and provide support in language:** When budgeting costs for contracts with a fund administrator and outreach partners, ensure adequate funding for the organizations to provide in-language outreach and support. The program operator may also wish to retain responsibility for creation of a “glossary” (see *Principle 4*) and translating certain materials (e.g. flyers and FAQs) and may need to engage with outreach partners and community in language.

**Agency staff time:** Some staff time will be required to establish the program and then to coordinate and monitor third-party administration and community engagement. More staff time will be required to get the program up and running than should be necessary once the program is established.

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<sup>29</sup> For an example of this approach, see Seattle Office of Labor Standards, “Paid Time Off for Domestic Workers: A City of Seattle Policy Assessment,” Oct. 2025.

9. *How is funding for the program generated?*

There are a variety of options for funding a program, and funding could be achieved through a combination of sources. Outside of including the program in the operating jurisdiction or organization's standard budgeting process, the following ideas were raised during our research:

**A tax or fee.** A tax or fee on transactions related to domestic work would seem to be a logical choice for supporting a PTO fund. Ideally, hiring entities who engage domestic workers but do not provide PTO should support the program. However, identifying and taxing these transactions may be impractical for the very same reasons that domestic workers struggle to access PTO (e.g. many hiring entities do not view themselves as responsible for providing benefits, and many transactions are informal and paid in cash). Attempts to identify informal transactions happening in private homes would likely only capture a small percentage of actual work performed. The jobs that would be easiest to capture and tax are those where the employers should be paying PSST directly to the domestic worker (e.g. a household hiring a nanny or a landscaping company employing a gardener).

**Allow hiring entities to contribute on a voluntary basis.** While unlikely to adequately fund a program in its entirety, a publicly managed fund could accept voluntary contributions from hiring entities. Soliciting donations to a fund, rather than encouraging compensation directly provided to individual workers, should be approached with caution. This funding stream has the potential to undermine compensation to domestic workers, such as provision of PTO or tips.

**Philanthropic support.** A publicly managed fund could be privately supported. Securing reliable private funding poses its own challenges. A program solely funded through private donations would be dependent on ongoing successful fundraising. When developing an operational strategy, capacity should be reserved for continuous efforts to develop and maintain relationships with funders. In one scenario, a PTO fund could be piloted with philanthropic support. If the pilot is successful, the program operator could develop a long-term strategy for maintaining fund operations.

## Conclusion

For domestic workers working for many hiring entities, a publicly managed fund is the simplest and most cost-effective option for providing PTO. It is currently less expensive to develop and administer and would be faster than developing the technology to facilitate portable benefits. It also bypasses the power dynamics that deter most domestic workers from bringing up the subject of time off with their employers.

Any jurisdiction seeking to improve domestic workers' access to PTO might consider whether a publicly managed fund is one piece of the solution. Policymakers can work with local domestic workers to understand how a publicly managed fund might serve their needs and may consider starting with a pilot program. Once we begin to learn from actual program operations,

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jurisdictions can refine program design and determine the most effective approaches to distributing benefits.

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## Resources:

Additional research into the experiences of domestic workers in Seattle is available here:

1. Seattle Office of Labor Standards, "Paid Time Off for Domestic Workers: A City of Seattle Policy Assessment," Oct. 2025.
2. Seattle Domestic Workers Coalition website: <https://sdwcoalition.wordpress.com/>

Those interested in further reading regarding publicly managed funds may wish to read the following helpful reports:

1. City of Chicago Office of Labor Standards, "Domestic Workers Portable Paid Time Off Policy Report," July 2025, <https://www.chicago.gov/content/dam/city/depts/bacp/OSL/domesticworkersportablepaidtimeoffpolicyreportfinal20250630v2.pdf>.
2. Seattle Office of Immigrant and Refugee Affairs, "Seattle Disaster Relief Fund for Immigrants and Seattle Relief Fund," Mar. 2022, <https://www.seattle.gov/documents/Departments/OIRA/2021-SDRF-SRF-Exec-Summary-Full-Report-FINAL.pdf>.
3. Washington Covid-19 Immigrant Relief Fund, "Washington Immigrant Relief Fund: Impact Evaluation Report," <https://wacommunityalliance.org/wp-content/uploads/2024/04/WIRF-Report-Public.pdf>.
4. Washington Dream Coalition, "Community Provides: Undocumented Communities in Washington State during the COVID-19 Pandemic," [https://assets.website-files.com/61959efc2f5d2186f9a2f09e/61a717bc848a3c6c7820423e\\_CommunityProvides.pdf](https://assets.website-files.com/61959efc2f5d2186f9a2f09e/61a717bc848a3c6c7820423e_CommunityProvides.pdf).
5. Washington State Department of Social and Health Services, "Washington State Basic Income Feasibility Study," June 2022, [https://capaa.wa.gov/sites/default/files/2024-01/2022\\_Jun\\_1\\_basic\\_income\\_feasibility\\_study\\_FINAL.pdf](https://capaa.wa.gov/sites/default/files/2024-01/2022_Jun_1_basic_income_feasibility_study_FINAL.pdf).
6. Washington State Employment Security Department, "Funding a wage replacement program for undocumented workers," Nov. 2024, <https://esd.wa.gov/media/pdf/2882/wage-replacement-undocumented-workers-reportpdf/download?inline>.