Workforce Innovation and Opportunity Act (WIOA) Policies and Procedures

Supportive Service Policy & Procedures

POLICY NUMBER: 1003, Rev. 3

REVISION DATE: 10-8-20

Supersedes: Policy 1003 Rev. 2, dated 4-14-20

PURPOSE

This policy addresses the use and documentation of Workforce Innovation and Opportunity Act (WIOA) funds for supportive services to eligible participants enrolled in WIOA Adult, Dislocated Worker and Youth programs. The purpose of this policy revision is to:

- Include the allowability of incentives for young adults enrolled in the WIOA Youth Program only and to clarify the allowability of training expenses as supportive services described in ESD Policy 5602, Rev. 2.
- Increase the maximum allowable limit for supportive services to $2,000.

At this time, WorkForce Central is not authorizing the provision of incentives for individuals enrolled in the WIOA Adult or Dislocated Worker Programs, or the provision of Needs-Related Payments.

BACKGROUND

WIOA provides supportive service program guidelines for WIOA eligible Adult and Dislocated Workers in WIOA Section 3(59), 134(d)(2) and (3) and for WIOA eligible Young Adults (Youth) in WIOA Section 129(c)(2)(G). Additional supportive service guidance is provided in 20 CFR 680.900 and TEGLs 3-15 and 19-16 for WIOA Adults and Dislocated Workers, and 20 CFR 681.570 and. 580 and TEGL 21-16 for WIOA Youth. ESD Policy 5602, Rev. 2 provides additional supportive service guidance and local policy requirements.

POLICY

In compliance with TEGL 3-15, TEGL 19-16 and ESD Policy 5602, Rev. 2, this policy addresses:

- Eligibility requirements to receive supportive services,
- WorkForce Central’s supportive service referral process that ensures coordination with other community resources,
- Allowable and unallowable WIOA-funded supportive services,
- Maximum limit and duration for receiving supportive services, and
- Documentation requirements.

ELIGIBILITY

Supportive services are not an entitlement. Supportive services are based on the unique financial and employment/training needs of each participant.

Adult and Dislocated Worker participants may be eligible for supportive services if:

1. They are actively engaged in services designed to achieve their training and employment goals (i.e., not exited and not in follow-up),
2. Have a demonstrated financial need, and
3. Are unable to access the supportive service from other resources in the community.

**Note:** Adults and Dislocated Workers are not eligible for supportive services after program completion (i.e., during follow-up).

Young Adult participants may be eligible for supportive services if:
1. They are actively engaged in services designed to achieve their training and employment goals or are actively engaged in follow-up post program exit.
2. Have a demonstrated financial need, and
3. Are unable to access the supportive service from other resources in the community.

**REFERRAL PROCESS & COORDINATION WITH OTHER COMMUNITY RESOURCES**

Funding for WIOA supportive services is limited and must be coordinated with other community resources. In every instance of providing supportive services, Service Providers must ensure that no other resource exists in the community or that the need is so urgent that referrals to other resources would delay the provision of the support service and create a hardship to the participant. Service Providers are required to refer participants to community resources and/or other income supports via the Common Referral System (CRS) powered by United Way 2-1-1.

Referrals and outcomes to other community resources including 2-1-1 must be documented in case notes in the participant's ETO record.

**ALLOWABLE AND DISALLOWED WIOA-FUNDED SUPPORTIVE SERVICES**

**Allowable Supportive Services:**

The following is a list of allowable WIOA-funded supportive services. This list is not intended to be an exhaustive or exclusive list of allowable services:

- Incentives for Young Adults enrolled in the WIOA Youth Program only.
- Transportation expenses such as:
  - Bus tickets, bus passes,
  - Gas, and/or
  - Auto repairs.
- Childcare.
- Housing assistance may include assistance with:
  - Move-in costs, such as first and last month’s rent and non-refundable deposits.
  - Payments toward the mortgage principal, homeowner’s insurance.
  - Rental assistance.
  - Utilities (e.g., electric, water, sewer, garbage, gas).
- Medical and prescription services including eyeglasses.
- Items necessary for training and employment-related activities such as, but not limited to:
  - Uniforms or professional attire,
  - Hygiene,
  - Haircuts,
  - Books, fees, school supplies and other necessary items for students enrolled in training,
  - Tools required for training or employment,
  - Licenses or permits,
  - Payments and fees for employment and training-related applications, tests and certifications, and/or
  - Professional memberships.
- Reasonable accommodations for individuals with disabilities.
- Out-of-state job search and relocation to a new job.
• Training expenses affiliated with training paid by programs other than WIOA Title I (such as Vocational Rehabilitation (VR), Trade Adjustment Assistance (TAA) or community and technical colleges through Worker Retraining (WRT)) if:
  o The participant is also eligible for and enrolled in a WIOA Title I program.
  o A non-WIOA Title I program selected and is paying the tuition for the training.
  o Costs for allowable training expenses are not covered by Pell, other financial aid programs or private scholarships.
  o The WIOA Title I program and case manager had no direct involvement in the process of selecting the training, which precludes the establishment of a WIOA-funded ITA.

• Other resources that are necessary for the participant to achieve their training and employment goals.

Supportive services are allowed for participant expenses only. Supportive services cannot fund expenses for family members or others who may be sharing the same resource. For example, rental assistance, utility assistance and cell phone support will be provided for the participant’s share of the rent, utility, or cell phone only and not that of the family or other household members on the rental agreement, utility or phone bill. Case notes must include a description of participant’s portion of the bill.

**Disallowed Supportive Services:**

The following are prohibited to be purchased with WIOA supportive service funds. All costs will be considered disallowed and WIOA funds utilized to purchase these items must be returned to the funding grant:

- Supportive services purchased prior to the participant’s program enrollment.
- Fines and penalties such as traffic violations, late fees, and interest payments.
- Entertainment, including tips.
- Contributions or donations.
- Vehicle payments.
- Refundable deposits.
- Alcohol, tobacco, or marijuana products.
- Food (meals, groceries).
- Pet food.
- Items for family members or friends.
- Out-of-state job search and relocation expenses that are paid for by the prospective employer.
- Needs Related Payments (NRPs) which are a form of supportive services available to eligible WIOA participants in training are not authorized by the Pierce County WDC.
- Any other item that is not required for the participant to successfully complete their training and employment goals

**INCENTIVES FOR YOUNG ADULT (WIOA YOUTH) ONLY**

The provision of incentives for Young Adults is described in 20 CFR 681.640, TEGL 21-16 and ESD Policy 5621, Rev. 2. The provision of incentives must be in accord with the requirements in 2 CFR 200.

Incentives are permitted for recognition and achievement directly tied to training, education, work experiences, or other accomplishments for services documented on the Young Adult’s Individual Service Strategy (ISS).

Incentives are not entitlements and must be customized to the unique needs of each Young Adult.
Federal funds may not be spent on entertainment costs. Therefore, incentives may not include entertainment such as movie or sporting event tickets or gift cards to move theaters or other venues whose sole purpose is entertainment.

Service providers choosing to provide incentives for Young Adults must develop policy and procedures for how they will provide incentives. The policy and procedures must be approved by WorkForce Central.

**FUNDING LIMITS AND DURATION OF SUPPORTIVE SERVICES**

The supportive services limit for each registered WIOA eligible participant is $2,000 for the duration of the participant's enrollment in the WIOA program, including follow-up for Young Adults only. The Service Provider may, on a case-by-case basis, increase this limit to $2,500 if the additional supportive services allocation would significantly benefit the participant's ability to continue and complete the program, or benefit the participant in job retention or wage progression. Authorization to increase the supportive service limit above $2,000 must be documented in case notes in the participant's ETO record.

NOTE: Training related expenses that may be covered by an Individual Training Account (ITA) do not count against the supportive services limit for each participant. ITA related training expenses may include but are not limited to assistance with the purchase of tools required for a specific course, current school admission fees, computer and lab fees, and books and supplies.

**PROCEDURES & DOCUMENTATION REQUIREMENTS**

1. Participants' need for supportive services and justification for incentives (Young Adults only) will be determined as part of the initial and on-going assessment.
   - The need for supportive services and justification for incentives (Young Adults only) must be documented in case notes recorded in ETO.

2. Participants must prepare a personal budget verifying they do not have the financial resources to obtain the supportive service or incentive (Young Adults only).
   - The most current budget must be included in the participant record uploaded into ETO.

3. Other community resources must be researched and determined unavailable prior to authorizing WIOA funds to pay for the supportive service or incentive (Young Adults only).
   - Evidence of referrals to other resources, including 2-1-1, and the outcomes of the referrals must be documented in the participants’ case notes in ETO.

4. Service Providers will submit a written supportive service request to the Service Provider's authorized representative for approval. The request must be legible and include the participant’s name, ETO ID, date of supportive service or incentive (Young Adults only), vendor’s name, justification for the supportive service or incentive (Young Adults only), evidence that other non-WIOA sources were explored and signatures of the case manager and the authorized representative.
   - A copy of the supportive service request must be uploaded into the applicable supportive service recorded in ETO.

5. A supportive service tracking log must be uploaded into the applicable supportive service recorded in ETO. The log must be legible and include the date of the supportive service or incentive (Young Adults only), type of service, amount of the supportive service disbursed to the participant, vendor name, and a current total of supportive services spent to-date.

6. All supportive services, with the exception of incentives, must be recorded in ETO on the date of the service or within 7-days of the service. Per ESD, there is no service to record in ETO for the provision of incentives.
7. For Adult and Dislocated Worker participants only, a separate qualifying career and/or training service must be recorded in ETO to accompany the supportive service. The qualifying service must be recorded in ETO on or close to the same date as the supportive service.
   - A case note must be recorded explaining how the career and/or training service connects to the supportive service recorded in ETO.

8. For all programs, a case note must be recorded for each supportive service provided to participants. The case note must include:
   - The justification for the supportive service. This includes an explanation for how the supportive service is required for the participant to complete their training and employment plan.
   - The community referral and outcome of the referral, when applicable.
   - Financial resources available to the participant, if any.
   - A detailed description of what is being purchased. For example, “a pair of pants, two professional shirts, and new pair of shoes”.
   - Vendor.
   - The initial amount requested and then the exact amount of the purchase.
   - Outcome of the supportive service request, when applicable. Examples include:
     - Documenting instances when a request for a supportive service was made but ultimately not purchases, or
     - If the supportive service paid for a test of some kind, explain the outcome of the test.

9. For bus tickets or bus passes: A copy of the front and back of the card and tickets with both the participant and Service Provider signatures must be uploaded into the applicable supportive service recorded in ETO.

10. For rental assistance or mortgage assistance: A copy of the current rental/lease agreement or mortgage statement in the participant's name, with signatures, must accompany the supportive service request with a copy uploaded into the applicable supportive service recorded in ETO.

11. For assistance with car repair, a gas card or mileage reimbursement: The need must be based on the lack of any other reliable transportation. The following must accompany the supportive service request with a copy uploaded into the applicable supportive service recorded in ETO:
   - A copy of the vehicle registration registered in the participant's or family member's name,
   - A copy of participant's current vehicle insurance card,
   - A copy of the participant's valid driver's license; and
   - And for repairs: a copy of the printed estimate for repairs from the vendor.

12. Incentives for Young Adults, (WIOA Youth) only: The justification for the incentive must be documented on the supportive service form uploaded into the applicable supportive service recorded ETO and in a case note. How the incentive will contribute to the young adult's success and how the amount of the incentive was determined must be clearly articulated and customized the unique needs of each Young Adult.

13. For all supportive services, an itemized copy of the receipt from the vendor must be uploaded into the applicable supportive service recorded ETO. The receipt must include the date of the purchase and amount paid. If the participant loses the receipt from the vendor, the participant and the Service Provider must sign a statement saying the participant received the supportive service, with the exact cost included in the statement. The statement must be uploaded into the applicable supportive service recorded in ETO.
REFERENCES

- WIOA Sections:
  - 3(59)
  - 134(d)(2) and (3)
  - 129(c)(2)(G)
- 20 CFR:
  - 680.330
  - 680.900
  - 680.910
  - 680.920
  - 681.570
  - 681.580
- TEGLs:
  - 3-15
  - 19-16
  - 21-16
- ESD WIOA Policy 5602, Rev. 2

REVISION APPROVED

Katie Condit
10/8/20

WFC CEO Approval

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