



## Workforce Innovation and Opportunity Act (WIOA) Policies and Procedures

---

### Supportive Service Policy

Policy Number: P-1003, Rev. 5

Revision Date: December 10, 2021

Supersedes: Supportive Service Policy & Procedures #1003 Rev. 4, dated 7-13-21

---

#### PURPOSE

This policy addresses the use and documentation of Workforce Innovation and Opportunity Act (WIOA) Title I funds for supportive services to eligible individuals enrolled in WIOA Title I Adult, Dislocated Worker, and Youth (Young Adult) programs.

The purpose of this policy revision is to:

- Remove maximum funding limitations for the provision of supportive services.
- Update procedures for seeking requested supportive services from community resources prior to using WIOA Title I funds.

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

#### BACKGROUND

WIOA Title I provides supportive service program guidelines for WIOA Title I eligible Adult and Dislocated Workers in [WIOA](#) Section 3(59), 134(d)(2) and (3) and for WIOA Title I eligible Youth (Young Adults) in WIOA Section 129(c)(2)(G). Additional supportive service guidance is provided in [20 CFR 680.900](#) and [TEGL 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. 3](#) provides additional supportive service guidance and local policy requirements.

#### POLICY

In compliance with [TEGL 19-16](#) and [ESD Policy 5602, Rev. 3](#), this policy addresses:

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

#### ELIGIBILITY FOR SUPPORTIVE SERVICES

WIOA Title I funded supportive services are not an entitlement. The provision of supportive services is determined by the unique financial and employment and/or training needs of each WIOA Title I enrolled individual and the WIOA Title I service provider's supportive service budget. Supportive services are

provided only when necessary to enable the individual to participate in career or training services and/or retain unsubsidized employment that may be at risk due to interruptions to key supports and, in most situations, when no other assistance is available in the individual's community.

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

WIOA Title I service providers must be familiar with support systems in the community and first coordinate with these organizations when applicable supportive services are requested. Service providers must refer individuals to community resources and/or other income supports known to provide requested supportive services via the Common Referral System (CRS) powered by United Way 2-1-1.

Exemption to the required referral process: Service providers are exempt from this referral requirement if the supportive service is of an immediate nature and the pursuit of non-WIOA funding for the supportive service will impose undue hardship on the individual or impact their ability to participate in WIOA Title I program activities, or it is known that the requested supportive service is not available from other resources in the community.

Referrals and outcome of referrals to other community resources including 2-1-1, or reason for exemption to this requirement must be documented in case notes recorded in the Supportive Service touchpoint in ETO.

## **ALLOWABLE SUPPORTIVE SERVICES**

The following is a list of allowable WIOA Title I funded supportive services available to eligible WIOA Title I enrolled individuals during program participation and during follow-up. This list is not intended to be an exhaustive or exclusive list of allowable services:

- Incentives for Young Adults enrolled in the WIOA Title I Youth (Young Adult) Program only.
- Transportation expenses such as:
  - Bus tickets, bus passes,
  - Gas,
  - Auto repairs.
- Childcare.
- Housing assistance which may include:
  - 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,

- Professional memberships.
- Tuition for In-School Youth (ISY) who are not eligible for Individual Training Accounts (ITAs).
- Reasonable accommodations for individuals with disabilities.
- Out-of-state job search and relocation to a new job.
- Training related expenses when tuition is 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:
  - The participant is also eligible for and enrolled in a WIOA Title I program.
  - Costs for allowable training expenses are not covered by Pell, other financial aid programs or private scholarships.
- Training related expenses paid via supportive services may also include the following if not covered via an ITA, Pell grant, or other financial aid programs:
  - Tuition if not covered via an ITA or contract (e.g., tuition for ISY)
  - Tools required for a specific course
  - School admission fees
  - Computer and lab fees
  - Books and supplies
- Other resources that are necessary for the participant to achieve their training and employment goals.

Supportive services are allowed for WIOA Title I-enrolled individual 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 individual'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. The individual's portion of the bill must be documented in case notes.

### **DISALLOWED SUPPORTIVE SERVICES**

The following are prohibited from being purchased with WIOA Title I supportive service funds. All costs will be considered disallowed and WIOA Title I funds utilized to purchase these items must be returned to the applicable WIOA Title I grant. If the provision of a supportive service is later deemed a disallowed cost, the individual's supportive service log and ETO record must be updated to reflect this outcome.

- Supportive services purchased prior to the individual'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.
- Any other item that is not required for the individual to successfully complete their training and

employment goals.

**Note:** Individuals receiving training services through WorkForce Central's Employer Reskill/Upskill Fund (i.e., incumbent worker training) are not considered "participants" for Department of Labor reporting purposes and therefore are not eligible for WIOA Title I supportive services unless they are also enrolled in one of WIOA Title I Youth, Adult, Dislocated Worker, or other programs.

## **INCENTIVES FOR WIOA TITLE I YOUTH (YOUNG ADULTS) ONLY**

The provision of WIOA Title I funded incentives for WIOA Title I enrolled young adults is described in [20 CFR 681.640](#), [TEGL 21-16](#) and [ESD Policy 5621, Rev. 3](#). The provision of incentives must comply with the requirements in [2 CFR 200](#).

WIOA Title I funded incentives are permitted for recognition and achievement directly tied to training, education, work experiences, or other accomplishments for services that are documented on the young adult's Individual Service Strategy (ISS).

WIOA Title I funded 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 movie theaters or other venues whose sole purpose is entertainment.

WIOA Title I 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.

### **Incentive Documentation Requirements**

WIOA Title I service providers must document the following in case notes recorded in ETO:

- How the incentive was determined appropriate for the young adult,
- How the incentive will contribute to the young adult's success,
- How the amount of the incentive was determined appropriate,
- The specific training, education, work experience, or other accomplishment the incentive was provided for as documented on the young adult's ISS, and
- Attempts to access incentives via non-WIOA resources in the community, if known and available, prior to issuing WIOA Title I funded incentives.

Documentation supporting the provision of an incentive must be uploaded in the Uploaded Files touchpoint in ETO.

Service providers must also internally maintain appropriate and identifiable expenditure records of incentive payments for the purpose of local, state, and federal WIOA Title I monitoring and auditing activities.

## **FUNDING LIMITS AND DURATION OF SUPPORTIVE SERVICES**

WorkForce Central does not limit the funding amount or duration of supportive service to eligible WIOA Title I enrolled individuals. WIOA Title I service providers have discretion to award supportive services in accordance with their internal policies, budget limitations, and WorkForce Central's Supportive Service policy. Service providers must ensure equitable treatment in the provision of supportive services.

## DOCUMENTATION REQUIREMENTS

Service providers must adhere to the following procedures for documenting and recording the provision of WIOA Title I funded supportive services in ETO. These procedures are applicable to supportive services provided during program participation and during follow-up. Instructions for uploading documents into ETO are in WorkForce Central's ETO Data Validation & Documentation Policy located on WorkForce Central's website at <https://workforce-central.org/about/policies/>.

1. Assessment: Participants' need for supportive services and justification for incentives (Young Adults only) must be determined as part of the initial and on-going assessment.
  - Supportive Services: The assessment of need for supportive services must be documented in case notes in the applicable Supportive Service touchpoint recorded in ETO.
2. Eligible enrolled individuals must prepare a personal budget verifying they do not have the financial resources to obtain the WIOA Title I funded supportive service or incentive (Young Adults only).
  - The individual's current budget must be uploaded into their ETO participant record. If additional supportive services are requested and the individual's budget has not changed since the previous provision of a supportive service, uploading a new budget in the subsequent supportive service touchpoint is not necessary. However, the reason for not uploading a new budget must be documented in case notes in the applicable supportive service touchpoint in ETO.
3. Referrals and outcome of referrals to other community resources including 2-1-1, or reason for exemption to this requirement must be documented in case notes recorded in the Supportive Service touchpoint in ETO.
4. Service providers will submit a written supportive service/incentive request to the service provider's authorized representative for approval. The request must be legible and include, at a minimum, the participant's name, ETO ID, date of supportive service or incentive (Young Adults only), vendor's name, and signatures of the case manager and the service provider's authorized representative.
  - Supportive Services: A legible copy of the supportive service request must be uploaded into the applicable Supportive Service touchpoint recorded in ETO.
  - Incentives (Young Adults only): A legible copy of the incentive request must be uploaded into the Uploaded Files touch point in ETO.
5. A supportive service tracking log must be uploaded into the applicable Supportive Service touchpoint recorded in ETO. The log must be legible and include the date of the supportive service or incentive (Young Adults only), type of service purchased, amount of the supportive service or incentive disbursed to the participant, vendor name, and a current total of supportive services and incentives spent to-date. Disallowed supportive services or incentives must also be documented on the supportive service tracking log.
6. All supportive services, except for incentives, must be recorded in ETO. Per WA State Employment Security Department (ESD), there is no service to record in ETO for the provision of incentives.
7. For WIOA Title I Adult and Dislocated Worker programs only, a separate qualifying career and/or training service must be provided to individuals and recorded in ETO to accompany the supportive service, except for supportive services provided during follow-up. The qualifying service must be recorded in ETO on or close to the same date as the supportive service.
  - It is recommended a case note 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 be recorded in the applicable Supportive Service touch point in ETO and include:

- The justification for the supportive service, including an explanation for how the supportive service is necessary for the individual to complete their training and employment plan.
  - When applicable, attempts to acquire requested supportive service from organizations in the community that are known to provide the service, outcomes of referrals to 2-1-1, or exemption from the referral requirement.
  - 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 followed by 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 must be uploaded into the applicable supportive service touch point recorded in ETO.
10. For rental assistance or mortgage assistance: A legible copy of the current rental/lease agreement, or mortgage statement in the participant's name, with signatures, and if applicable, a copy of the landlord's W-9 if payment is made directly to an individual, must accompany the supportive service request uploaded into the applicable supportive service recorded in ETO.
- It is not necessary to upload the entire rental/lease agreement. The minimum requirement for rental/lease agreements are the legible pages with the participant's name, rental address, rental amount, rent due dates, and signatures.
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 legible 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 the 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. For supportive services related to an individual's training such as tuition (if not covered by an ITA or contract), books, fees, school supplies, tools, and other necessary items required for the student's education program, a legible syllabus, registration/enrollment form, or similar document must accompany the supportive service request uploaded into the applicable supportive service touchpoint in ETO. The document must include:
- The name of the school,
  - Participant's name,
  - Title of the training program/class,
  - Time period of instruction, and
  - The items necessary for the student's participation in the specific training program for which the request for WIOA Title I funded supportive service is intended to support.
13. For all supportive services, a legible 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 receipt from the vendor is lost, 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; .900; 910; .920
- 20 CFR 681.570 and .580
- TEGL 19-16
- TEGL 21-16
- ESD WIOA Policy 5602, Rev. 3
- ESD WIOA Policy 5621, Rev. 3

## APPROVED



Katie Condit (Dec 10, 2021 10:09 PST)

Dec 10, 2021

Katie Condit, WFC CEO

Date

EQUAL OPPORTUNITY – EQUAL ACCESS

WorkForce Central is an equal opportunity employer/program.

Auxiliary aids and services are available upon request for individuals with disabilities. Washington Relay Service – 711