



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

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### Supportive Service Policy

**Policy Number:** P-1003, Rev. 8

**Revision Date:** May 3, 2023

**Supersedes:** Supportive Service Policy, Rev. 7 dated January 18, 2023

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#### PURPOSE

This policy addresses the allowability 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.

This policy was revised to:

- For the Young Adult program only, food (meals, groceries) as an allowable supportive service: Removed ambiguous terms throughout this supportive service that without definition could lead to different interpretations of reasonableness resulting in inconsistent application of supportive services for these types of expenses.

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 authorizes the purchase of services that are necessary to enable individuals to participate in activities authorized under WIOA Title I. Supportive service guidelines for eligible Adult and Dislocated Workers are defined 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. 4](#) provides additional supportive service guidance and local supportive service policy requirements.

#### POLICY

In compliance with Department of Labor (DOL) and Washington State Employment Security Department (ESD) requirements, 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 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
  - Driver license expenses (e.g., driver's education courses, acquiring or renewing a driver license).
  - Vehicle insurance expenses:
    - Vehicle must be in the individual's name.
    - Valid driver license required.
  - Auto repairs:
    - Vehicle must be in the individual's name.
    - Valid driver's license and valid insurance with the individual covered is required.
- Childcare
- Housing assistance which may include:
  - Move-in costs, such as first and last month's rent and non-refundable deposits
  - Rental assistance
  - Utilities (e.g., electric, water, sewer, garbage, gas)
- Employment-related services such as but not limited to:
  - Hygiene
  - Haircuts
  - Tools required for employment not otherwise provided by the employer
  - Licenses or permits
  - Payments and fees for employment applications, tests, and certifications
  - Professional memberships
- Food (meals, groceries) for individuals enrolled in the WIOA Title I Young Adult program only:
  - The provision of food as a supportive service is not an entitlement and is only available to WIOA Title I enrolled young adults who have a demonstrated and documented need.
  - The provision of food must be necessary for the young adult to remain engaged in program

activities, be necessary to successfully complete their employment and training plans as identified on their ISS, and pose an immediate need.

- As stated in ESD WIN 0111, Rev. 6, the U.S. Department of Labor (DOL) has an expectation that youth files include documentation of efforts made to first secure food for the youth through federal, state, and community food assistance programs and services and that the immediate need for WIOA Title I funds to be used to purchase food be for the purpose of enabling effective participation in youth program activities.

To that end, ESD requires WIOA Title I service providers first pursue food assistance that might be available through the Supplemental Nutrition Assistance Program (SNAP), called Basic Food in Washington, and food assistance available through local food banks and at-risk organizations. However, if an urgent need for food exists, WorkForce Central authorizes service providers to purchase food to address the immediate need followed by pursuing food assistance through SNAP and local food banks or at-risk organizations.

- The purchase of food is limited to the eligible young adult.
- **The purchase of food is not allowed for:**
  - Family members/relatives/children,
  - Roommates, or
  - Anyone other than the participant.
  - Alcohol.
  - Pet food.
  - Non-food items.
- The young adult must create a list of food needs and the service provider will make the purchase on behalf of the young adult.
- Service provider and the young adult will collaborate in the development of an action plan that identifies strategies to address the young adult's food inadequacies. The plan may include identifying community resources, financial planning/budgeting, meal planning, etc.
- Purchased food should accommodate the young adult's immediate storage and cooking capabilities. Consideration must be made if the young adult has access to a freezer, refrigerator, dry storage, oven, microwave, or other adequate food storage and meal preparation facilities. Takeout orders may be an option if the young adult lacks adequate storage or cooking facilities.
- **Maximum Funding Amount:** The maximum amount allowable and frequency of the purchase of food is dependent on the needs of each young adult and will be at the discretion of the serviceprovider.
- Medical and prescription services including eyeglasses
- Reasonable accommodations for individuals with disabilities
- Expenses for out-of-state job search that are not covered by the prospective employer
- Expenses for relocation to a new job that are not covered by the new employer
- Training related expenses such as, but not limited to, the following if the item is not purchased via an ITA, Pell grant, or other financial aid programs. The purchase of the following training services paid via supportive services must be documented in case notes:
  - Tuition if not covered via an ITA or contract (e.g., tuition for ISY)
  - Tools required for a specific course
  - School admission and testing fees
  - Computer and lab fees
  - Books and supplies
  - Uniforms
- Training related expenses when **tuition is paid** by programs other than WIOA Title I (e.g., 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, and
- Costs for allowable training expenses are not covered by Pell, other financial aid programs or private scholarships.
- Gift cards for the purpose of purchasing allowable supportive services.
- 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 should not fund expenses for family members or others who may be sharing the same resource. However, circumstances may arise when paying only the WIOA Title I-enrolled individual's portion of an expense is challenging or burdensome, or if doing so will not prevent eviction, utilities or phones being shut off, or creates some other barrier for the individual to participate in the WIOA Title I program. Service providers should first attempt to pay only the individual's portion of the supportive service expense but does have WorkForce Central's authorization to pay the entire expense if doing so is necessary for the WIOA Title I-enrolled individual to successfully complete their training and employment goals, and justification for doing so is documented in case notes.

Exceptions to this list of allowed supportive services, where permissible, must first be approved by WorkForce Central in writing. WorkForce Central authorization 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 resulting from violations of, alleged violations of, or failure to comply with federal, state, tribal, local, or foreign laws and regulations (e.g., traffic violations)
- Interest payments.
- Entertainment, including tips.
- Contributions or donations.
- Refundable deposits.
- Alcohol, tobacco, or marijuana products.
- Food (meals, groceries) for individuals enrolled in the WIOA Title I Adult and Dislocated Worker programs.
- Pet food.
- Items for family members or friends.
- Out-of-state job search expenses that are paid for by the prospective employer.
- Relocation expenses that are paid for by the prospective or new employer.
- Admission fees, tuition, and other expenses associated with graduate degree programs.
- 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.

Exceptions to this list of disallowed supportive services, where permissible, must first be approved by WorkForce Central in writing. WorkForce Central authorization must be documented in case notes.

## **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. 5](#). The provision of incentives must comply with

the requirements in [2 CFR 200](#).

WIOA Title I funded incentives are permitted for recognition and achievement of milestones in, and attainment of, employment or employment retention resulting from participation in one or more of the following youth services:

- Tutoring, study skills training, instruction, and dropout prevention
- Alternative secondary school services or dropout recovery services
- Paid and unpaid work experience
- Occupational skills training
- Education offered concurrently with workforce preparation and training for a specific occupation
- Financial literacy education
- Entrepreneurial skills training
- Post-secondary preparation and transition activities

Individuals enrolled in the WIOA Title I Young Adult program only may also receive incentives during follow-up for the following services:

- Financial literacy in follow-up (Youth Only)
- Post-secondary preparation and transition activities in follow-up (Youth Only)

Incentives may also be provided to young adults engaged in youth program elements funded by Title I statewide activities (Governor's reserve) funds.

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.

### **Incentive Documentation Requirements (Young Adults only)**

WIOA Title I Young Adult service providers must **not** record a service in ETO when providing an incentive. Incentive payments are considered financial transactions and not a service and as such, there is no service to record in ETO when providing an incentive. Documentation requirements are limited to:

- Recording a case note that specifies the WIOA Title I Youth program element/service and milestone achieved, or
- Attainment and retention of unsubsidized employment resulting from participating in one of the youth program elements, and
- Incentive amount paid for the achievement.
- 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 services (or incentives for young adults) to eligible WIOA Title I enrolled individuals. WIOA Title I service providers have discretion to deliver supportive services (and incentives for young adults) 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 and incentives.

The allowance for and limits on incentives to young adults in projects funded by WIOA Title I statewide activities discretionary funds will be outlined in the State's contracts' special terms and conditions.


## DOCUMENTATION REQUIREMENTS

WIOA Title I service providers must adhere to supportive service and incentive (young adult only) documentation and ETO data entry requirements outlined in WorkForce Central's ETO Data Validation & Documentation Policy located on WorkForce Central's [Policy Library](#).

## 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 Policy 1020
- ESD WIOA Policy 5602, Rev. 4
- ESD WIOA Policy 5621, Rev. 5

## APPROVED

  
Katie Condit (May 3, 2023 17:14 PDT)

May 3, 2023

Katie Condit, WorkForce Central CEO      Date

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