



*WIOA Title I Program Policies*

## Supportive Services Policy

<b>POLICY #:</b>	<i>P-WIOA-1003, Rev. 10</i>
<b>EFFECTIVE:</b>	<i>July 10, 2025</i>
<b>SUPERSEDES:</b>	<i>Supportive Services Policy, Rev. 9, effective January 24, 2025</i>

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### **PURPOSE:**

This policy communicates the allowability and documentation requirements for WIOA Title I funded supportive services and incentives.

This policy was revised to:

- Include the provision of incentives for the WIOA Title I Adult and Dislocated Worker programs.
- Remove guidance and reference to the Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) 10-23 due to DOL's rescission of this TEGL on March 27, 2025.
- Other non-substantial edits for clarity purposes.

At this time, WorkForce Central is not authorizing the provision of WIOA Title I funded Needs-Related Payments (NRPs).

### **BACKGROUND:**

WIOA Title I authorizes the purchase of certain services that are necessary to enable WIOA Title I enrolled individuals to participate in WIOA Title I activities. Supportive service guidelines for eligible WIOA Title I Adults 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 Title I Adults and Dislocated Workers, and 20 CFR 681.570, 681.580, and TEGL 21-16 for WIOA Title I Youth (Young Adults). The Washington State Employment Security Department (ESD) Policy 5602 (current revision) provides additional supportive service guidance and local supportive service policy requirements.

**POLICY:**

In compliance with DOL and ESD, this policy addresses:

- WIOA Title I supportive service eligibility requirements.
- 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 for the provision of WIOA Title I funded supportive services.
- Documentation requirements for the provision of WIOA Title I incentives.

**WIOA Title I Supportive Services Eligibility Requirements**

WIOA Title I supportive services are not an entitlement. The provision of supportive services is determined by the unique circumstances of each WIOA Title I enrolled individual and the WIOA Title I service provider's supportive services 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.

**Referrals to 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 WIOA Title I enrolled individuals to community resources via the Common Referral System (CRS) powered by United Way 2-1-1.

Exemption to the required referral process: Service providers are exempt from first coordinating access to supportive services through community resources 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 negatively 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 the referrals to other community resources including 2-1-1, or the reason for the exemption to this requirement must be documented in case notes recorded in the Supportive Service touchpoint in ETO.

## Allowable Supportive Services

WIOA Title I 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. WIOA Title I service providers should first attempt to pay only the WIOA Title I enrolled 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.

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

- Incentives for achieving milestones while engaged in specific services, see ["Incentives"](#), below.
- 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 WIOA Title I enrolled individual's name.
    - Valid driver's license is required.
  - Auto repairs:
    - Vehicle must be in the WIOA Title I enrolled individual's name.
    - Valid driver's license and valid insurance with the WIOA Title I enrolled 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., electricity, water, sewer, garbage, gas, internet)
    - Itemized utility bill is required.
- Cell phones
  - Itemized cell phone bill is required.

- Employment related services such as but not limited to:
  - Hygiene products
  - Haircuts
  - Tools required for employment not otherwise provided by the employer
  - Licenses or permits necessary for employment
  - Payments and fees for employment applications, tests, and certifications
  - Professional memberships
- Food (meals, groceries) for WIOA Title I Youth (Young Adults) only:
  - The provision of food as a WIOA Title I funded supportive service is not an entitlement and is only available to WIOA Title I enrolled young adults on a limited and reasonable basis if necessary to enable them to participate in allowable WIOA Title I youth program activities and reach their employment and training goals.
  - 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 WIOA Title I service provider.
  - In compliance with ESD Policy 5602 (current revision), and when applicable, WIOA Title I service providers must first coordinate the purchase of food with other community, state or federal services that provide food assistance and document these efforts. This includes pursuing food assistance available through the Supplemental Nutrition Program (SNAP) and through local food banks and at-risk youth organizations.
  - If WIOA Title I funds are used to purchase food, DOL requires the following be recorded in case notes:
    - Unsuccessful efforts to first secure food through federal, state, and community food assistance programs, and
    - The immediate need for WIOA Title I funds to be used to purchase food for the youth to enable effective participation in youth program activities.
  - The purchase of food is not allowed for:
    - Family members, relatives, children, roommates, anyone other than the participant.
    - Alcohol
    - Pet food
    - Non-food items
  - WIOA Title I service providers are encouraged to collaborate with the young adult in the development of a plan that identifies strategies for addressing 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 food storage and cooking capabilities such as 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.
- Medical and prescription services including eyewear.
- 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 that are not available for purchase via a WIOA Title I individual training account (ITA), Pell grant, or other financial aid programs. Purchases of the following via WIOA Title I supportive services must be documented in case notes:
  - Tuition- (authorized for WIOA Title I in-school youth (ISY) only).
  - Tools required for a specific course
  - School admission and testing fees
  - Computer and lab fees
  - Books and supplies
  - Uniforms
- 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.

Exceptions to the list above, where permissible, must first be approved by WorkForce Central in writing. WorkForce Central authorization must be documented in case notes recorded in ETO.

### **Disallowed Supportive Services**

WIOA Title I supportive service funds are prohibited for the following items. All costs will be considered disallowed and WIOA Title I funds utilized to purchase the items must be returned to the applicable WIOA Title I grant. If the provision of the supportive service is 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 enrollment into a WIOA Title I program.
- 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, parking tickets, etc.)
- 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 and/or services for anyone other than the WIOA Title I enrolled individual
- 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 Employee Training Grant (i.e., incumbent worker training) are not considered “participants” for DOL reporting purposes and therefore are not eligible for WIOA Title I supportive services unless they are also enrolled in one of the WIOA Title I programs.

Exceptions to the list above, where permissible, must first be approved by WorkForce Central in writing. WorkForce Central authorization must be documented in case notes.

## **Incentives**

The provision of WIOA Title I funded incentives for WIOA Title I Youth (Young Adults) is described in 20 CFR 681.640, TEGL 21-16, and ESD Policy 5621 (current revision) and the provision of incentives for WIOA Title I Adult and Dislocated Workers are described in 2 CFR 200.75, 2 CFR 200.456, and ESD Policy 5621 (current revision). The provision of incentives must comply with the requirements of 2 CFR 200.

WIOA Title I service providers must maintain appropriate and identifiable expenditure records of incentive payments for the purpose of local, state, and federal monitoring and audits.

### **Incentives for WIOA Title I Young Adults**

WIOA Title I funded incentives are permitted for eligible young adults enrolled in the WIOA Title I program 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
- 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 move theaters or other venues whose sole purpose is entertainment.

DOL considers incentive payments financial transactions rather than services. Therefore, the minimum documentation required in the State's MIS for the WIOA Title I Young Adult program is a case note that includes the youth program element and milestone, such as the attainment and retention of unsubsidized employment when applicable, along with the incentive amount paid for the achievement.

### **Incentives for WIOA Title I Adult and Dislocated Workers**

WIOA Title I funded incentives are authorized for individuals enrolled in the WIOA Title I Adult and Dislocated Worker programs for recognition and achievement of milestones from participation in one or more of the following services:

- Work experience
- Occupational skills training
- Registered apprenticeship
- On-the-job training
- Increased capacity training
- Customized training
- Entrepreneurial training

Incentives may also be provided to adults and dislocated workers engaged in WIOA Title I statewide activities (Governor's reserve) funds.



Unlike incentives for WIOA Title I young adults, incentive payments for WIOA Title I Adult and Dislocated Workers does not include incentive payments for attainment and retention of unsubsidized employment.

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.

DOL considers incentive payments financial transactions rather than services. Therefore, the minimum documentation required in the State's MIS for the WIOA Title I Adult and Dislocated Worker programs is a case note that includes the justification for the incentive and the WEX or training milestone achieved along with the incentive amount paid for the achievement.

### **Funding Limits and Duration of Supportive Services**

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

### **Supportive Service Documentation and ETO Requirements**

WIOA Title I service providers must adhere to supportive service and incentive documentation and ETO data entry requirements outlined in WorkForce Central's ETO Data Validation and Documentation Policy Handbook 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
- TEGL 10-23
- ESD Policy 1020 (current and future revisions)
- ESD Policy 5602 (current and future revisions)
- ESD Policy 5621 (current and future revisions)

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