

ACTION BULLETIN

TO: All Workforce Innovation and Opportunity Act (WIOA) Funded Adult and Dislocated Worker Career Service Providers

DATE: February 22, 2019

SUBJECT: SUPPORTIVE SERVICES POLICY AND PROCEDURES FOR ALL ADULT AND DISLOCATED WORKER CAREER SERVICE PROVIDERS

PURPOSE OF THE BULLETIN:

The purpose of this bulletin is **to provide a correction** to Alameda County Workforce Development Board's (ACWDB) Career Service Providers (CSP) guidance regarding the Policy and Procedures for providing Supportive services to WIOA-enrolled Adults and Dislocated Workers. Modified sections will appear in **bold**.

CITATIONS:

- WIOA Section 134(d)(2); and Section 3(59)
- Federal Register, WIOA; Published 8/19/2016, Section 680.840, Subpart G
<https://www.federalregister.gov/d/2016-15975/p-1373>
- Department of Labor (DOL), Employment and Training Administration (ETA), Training and Employment Guidance Letter (TEGL) 19-16; Published March 1, 2017

BACKGROUND:

The Workforce Innovation and Opportunity Act allows for the provision of supportive services which are services that are necessary to enable an individual to successfully participate in activities authorized under WIOA sec. 134(c)(2) and (3) (adults and dislocated workers) and are defined in WIOA sec. 3(59).

POLICIES:

1. Supportive services for Adults and Dislocated Workers will be limited to three types:
 - a. Transportation;
 - b. Work Related Clothing/Safety Items; and
 - c. Verification/Documentation.

2. Supportive services should be provided to individual participants to enable them to participate in career and training services.
3. Participants must be actively enrolled in WIOA to be eligible to receive supportive services.
4. Supportive services are allowable only after a participant has been assessed for need of supportive service in order to successfully engage in WIOA-funded Adult and Dislocated Worker Career and Training Services.
5. WIOA-funded supportive services may be provided only when a participant is unable to obtain such assistance through other programs or organizations. WIOA funds must be the “funds of last resort”. A determination of the availability of supportive services through other programs must be made prior to providing WIOA-funded supportive services. Other programs providing supportive services may include, but are not limited to: Pell grants, scholarships, Alameda County public assistance programs such as General Assistance, CalWORKs, Re-entry programs, Housing and Urban Development (HUD) programs, and Community Services Block Grant (CSBG) programs.
6. The provision of WIOA-funded supportive services will be funded through a specific Supportive Service line item in the CSP budget.
7. Budget modifications related to the supportive service line item may be requested from ACWDB half way through the program year in the event that:
 - a. It has become apparent that the CSP is not on track to spend their supportive service budget by the end of the program year; and
 - b. The CSP can demonstrate through documentation that participants are receiving supportive services from sources other than WIOA; or that participants have not been able to demonstrate adequate need to justify the expenditure of WIOA supportive service funds.

These conditions must be verifiable through case-notes in CalJOBS.

8. A maximum limit per enrolled participant must be established for WIOA-funded supportive services. That limit must be stated in the CSP’s Supportive Service Policy. The maximum must be reasonable and defensible.
9. ACWDB recommends a maximum limit of \$500, per individual, for WIOA-funded Supportive Services.
10. Any Supportive Service Policy must state that under special circumstances, on a case-by-case basis, and with proper justification, a counselor may request a waiver to exceed the \$500 cap. An ACWDB Program Liaison will consider the request and respond based upon a number of factors which may include, but are not limited to: the amount being requested; the type of supportive service; the circumstances or conditions that exist as described in the assessment; etc.
11. Basic Living Needs like meals, housing, watches, alarm clocks or deposits for housing/apartments, childcare, etc. **ARE NOT ALLOWABLE.** Such services may be provided through linkages and/or referrals to community service organizations, community-based organizations or community medical service providers.
12. A CSP may opt to either adopt ACWDB’s Supportive Service Policy or create a policy of their own so long as no elements of the CSP’s policy conflicts with ACWDB’s policy.
13. If a CSP finds that an enrolled participant misuses the supportive service(s) provided:
 - a. Any future supportive services must be denied to that participant for the remainder of their participation.
 - b. All areas of misuse must be documented in the case file.

- c. The cost of supportive service provided must not be assigned to an alternate source of funding administered by the ACWDB. (The CSP must identify another fund source to cover the cost).
- d. Examples of misuse include, but are not limited to: using support service for personal use, using gas/store cards to purchase personal items, selling vouchers/cards for cash, etc.

ACTION:

1. The ACWDB designates each WIOA Adult and Dislocated Worker CSP and other program operators as may be identified through discretionary grants or other special projects as the provider of supportive services. Each CSP must adhere to these Supportive Service Policies and Procedures. However, individual CSPs may develop internal policies to provide further clarification and more in-depth definition so long as such policies do not conflict with this ACWDB policy. CSPs should make this, and any internally developed policies available for participants to review.
2. For Adults and Dislocated Workers participants transportation, work related clothing/safety items, and required verifications/documents can be provided, purchased or reimbursed. The framework for each service is listed in the attached Supportive Service Policy.

If an operator provides supportive services through funds other than WIOA, documentation of the alternative source(s) must be collected and maintained in the participant's case file/record – and must be reported to a Workforce Technician for tracking. Additionally, these non-WIOA funded activities should be tracked in CalJOBS through an enrollment activity.

All CSPs and any other organizations responsible for the provision of WIOA-funded supportive services will implement this Supportive Service Policy effective retroactive to July 1, 2018.

Information and Inquiries:

For further information and inquiries please contact:
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Workforce Board System Administrator
(510) 259-3802
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Attachments:

1. Adults and Dislocated Workers Services Supportive Service Policy
2. Adults and Dislocated Workers Services Participant Transportation Form
3. Adults and Dislocated Workers Transportation Reimbursement Form
4. Adults and Dislocated Workers Supportive Services Log Form
5. Supportive Service Matrix

ALAMEDA COUNTY WORKFORCE DEVELOPMENT BOARD
ADULT AND DISLOCATED WORKER CAREER SERVICE PROVIDERS

SUPPORTIVE SERVICE POLICY AND PROCEDURES
Effective Retroactive to July 1, 2018

Applicable to Provision of all Types of Supportive Services

I. GENERAL POLICY CONDITIONS:

The specific requirement for each allowable types of Supportive Services is outlined below:

II. TRANSPORTATION:

1. Mileage reimbursement, Gas Cards, Bus Passes, Rideshare Cards (e.g. UBER and LYFT) and BART tickets are the only transportation supportive services allowable under this policy.
2. CSPs must determine and document if the participant is eligible to receive transportation supportive services through other sources, such as General Assistance, CalWORKs, Pell Grants, and Foster Care.
3. Documentation of transportation supportive services usage is required:
 - a. Determination of amount of transportation supportive service necessary for participation is required. The Participant Transportation Form is required as part of the determination of need. This form will be provided by ACWDB (as Attachment 2 to AB 18-09).
 - b. Cost of mileage to/from home and Pre-Vocational and Vocation Training site is calculated using the Internal Revenue Service (IRS) value per mile at the time of travel. The Transportation Reimbursement Form is used to track transportation costs per participant. The form will be provided by ACWDB (as Attachment 3 to AB 18-09).
 - c. A signature for the receipt of a transportation voucher or copy of the reimbursement check must be maintained in the participant case file.

III. WORK RELATED CLOTHING/SAFETY ITEMS:

1. Work and Interview Clothing – WIOA case managers assisting a participant to obtain clothing to wear to an interview or begin employment, must check first with community-based resources such as, Wardrobe for Opportunity, and if no assistance is available, must document such lack of resources in the participant record. Thereafter, the CSP may make arrangements to purchase one set (one time only) of appropriate interviewing/work clothing utilizing a gift card(s) up to the maximum of \$75. Such items may include skirt, slacks, blouse, shirts, shoes, and ties.
2. Safety items – Items necessary to obtain or retain a job are an allowable expense under ACWDB’s Supportive Services policy. Safety items will be limited to: protective glasses,

hard hats, gloves, steel toe boots, and protective clothing. Additional safety items may be allowed with written permission from the ACWDB Program Liaison. CSPs must determine and document whether the participant is able to receive safety items through the employer or other entity before approving the provision of WIOA-funded supportive services.

3. Documentation of all WIOA-funded supportive services is required and must be maintained in the participant case record:
 - a. A statement from the employer, indicating the safety items are required as a condition of employment.
 - b. Receipts verifying purchase of the necessary equipment or clothing.
 - c. Copy of the participant's reimbursement check.
 - d. A Supportive Services Log (Attachment 4 to AB 18-09) must be used to document the issuance of all supportive services.
 - e. WIOA case managers must require participants to sign for receipt of all supportive service instruments (gift cards, transportation vouchers, reimbursement checks, etc.). The use of pre-paid gift cards require that the case manager obtain signed receipts that verify which items were purchased with the funds.
 - f. In the event supportive services are used for transportation to and from a training opportunity, appropriate attendance records must be obtained to ensure attendance.

IV. REQUIRED WORK VERIFICATION(S) & DOCUMENTS:

1. Required Verification and Documents – Verification and documentation necessary to obtain or retain employment are the only items allowable under this supportive service category for Adults and Dislocated Workers. Documents may include, but are not limited to: DMV printouts, health/drug screening tests, fingerprinting, background checks, etc.
2. CSPs must determine and document if the participant is able to receive this assistance through the employer or other organizations before provision of WIOA-funded supportive services is approved.
3. Documentation of supportive services is required and should be maintained in the participant record:
 - a. A statement from the employer or training provider indicating that verification/documentation is necessary as a condition of training/employment.
 - b. Receipt from the participant verifying purchase of the necessary documentation.
 - c. A copy of any reimbursement check issued to the participant.
 - d. A Supportive Services Log (Attachment 4 to AB 18-09) must be used to document the issuance of all supportive services.

Education/Training Costs

1. Educational supportive services are only provided to WIOA participants **enrolled in training activities** when it is deemed necessary to obtain their educational goals and only when the participant is not eligible for support or assistance from other entities, such as Pell, Financial Aid or Scholarship grants.
2. Education and/or training **costs** may be **issued on behalf of** a participant **who is enrolled in a training activity**, if deemed allowable under WIOA guidelines to Adults and Dislocated

Workers. This includes **costs associated with** registration/tuition fees and/or educational textbooks and supplies (includes backpack, pens, pencils, paper notebooks and calculator) that are not otherwise included in the cost of training, but that are required in order to successfully participate in and complete the training. **Documentation is required to demonstrate that these items are required.**

3. When the training provider requests materials from the participant – and these materials are required for the training, resulting costs should be included in the Individual Training Account (ITA) paperwork – and must be paid directly to the training provider and not to the participant.
4. If additional uniforms, tools, books, etc. are required, the WIOA case manager must verify that these items are necessary for the participant to attend the class or training.

Non-Allowable Supportive Services

ACWDB does not allow the following to be provided through supportive services:

- a) Fines and penalties such as traffic violations, tickets, late finance charges, and/or
- b) interest payments,
- c) Contributions or donations
- d) Vehicle, mortgage, rental payments or other bills;
- e) Meals;
- f) Refundable deposits;
- g) Out-of-State job search costs;
- h) Clocks, watches, etc;
- i) Union Dues;
- j) Diapers, food or meals for dependents, etc.;
- k) Child care;
- l) Counseling Services;
- m) Immigration assistance;
- n) Health care;
- o) Utilizing Bus, Bart or Gas Cards as “incentives” to continue or participate in WIOA related activities conducted by program operator; and
- p) No payments will be made to parents and/or other family members or friends.

ADULTS & DISLOCATED WORKERS SERVICES PARTICIPANT TRANSPORTATION

Name:	Date Enrolled:
Home Address:	
Career Service Provider:	
Training/Employer Address:	

BUS: I verify that I take bus # ____ to my training site and that it costs me \$ _____ each day.

I understand that I must submit a Transportation Reimbursement Claim form with my class attendance record in order to be reimbursed.

Signature: _____

BART: I verify that I take the BART to my training site. I ride from
_____ to _____
BART Station BART Station

It costs me \$ _____ each day.

I understand that I must submit a Transportation Reimbursement Claim form with my class attendance record to be reimbursed.

Signature: _____

CAR: I verify that I drive a car to my training site. It is _____ miles from
_____ to _____ located at
My house training site
_____ Address of training site

I understand that I must submit a Transportation Reimbursement Claim form with my class attendance record in order to be reimbursed.

Signature: _____

**ALAMEDA COUNTY WORKFORCE DEVELOPMENT BOARD
ADULTS & DISLOCATED WORKERS SERVICES
TRANSPORTATION PAYMENT CLAIM**

Name:	Date Enrolled:
Home Address:	
Training/Employer Address:	

DATE	START	FINISH	MILES	FARE*	DESTINATION OF TRIP
TOTALS:				\$	

* Bus or BART

SIGNATURE: _____

Mileage will be paid at _____ (cents) per mile for use of a private automobile. Actual transportation cost will be reimbursed for use of public transportation.

**ALAMEDA COUNTY WORKFORCE DEVELOPMENT BOARD
ADULTS & DISLOCATED WORKERS SERVICES
SUPPORTIVE SERVICES LOG**

Participant Name
SSN

Supportive Service (type):	
Total Cost of Supportive Service:	Date Initiated
If Eligible for Other Funds (list type)	
What percentage is covered with Other Funds	
Is Documentation of Need Attached? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Percentage covered with WIOA Funds	Amount of WIOA Funds
Comments:	

Supportive Service (type):	
Total Cost of Supportive Service:	Date Initiated
If Eligible for Other Funds (list type)	
What percentage is covered with Other Funds	
Is Documentation of Need Attached? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Percentage covered with WIOA Funds	Amount of WIOA Funds
Comments:	

12/2018

Supportive Service Matrix

Supportive Service Categories:	Allowable:	Requirements:
Transportation	<p>Job Search: Job Interviews Job Fairs/Job Clubs</p> <p>Training: Attendance at Training OJT (Only until 1st paycheck)</p> <p>Employment: Until 1st paycheck</p>	<ul style="list-style-type: none"> - Documentation of attendance; - Pre-paid cards/vouchers may be issued to cover one month at a time
Clothing & Safety Items	<p>Job Search: Interview Attire</p> <p>Training: Required Safety Equipment Required Tools Required Work Clothing</p> <p>Employment: Required Safety Equipment Required Tools Required Work Clothing</p>	<ul style="list-style-type: none"> - Maximum for Work Clothing = \$75.00; - Documentation that item(s) is/are required; - Costs must be reasonable and justifiable and consistent with current norms
Verification & Documentation	<p>Job Search: DMV or Birth Records Expunge Records</p> <p>Training: DMV Records Medical Records/Physical Medical Tests/Vaccines</p> <p>Employment: Background Check Drug Screening Medical Records/Physical Medical Tests/Vaccines</p>	<ul style="list-style-type: none"> - Verification that the training provider/employer does not cover cost, but does require verification - Documentation of attendance
Education/Training	<p>Job Search: None</p> <p>Training: Materials/fees not covered by ITA</p> <p>Employment: None</p>	<ul style="list-style-type: none"> - Document that participant not eligible for other assistance