

**Supersedes AB 82 Youth Supportive Services Policy and
AB 18-09 R1 Adult & Dislocated Worker Supportive Services Policy/Procedure**

ACTION BULLETIN

TO: All Alameda County Workforce Development Board (ACWDB) Career Service Providers (CSP) supported through Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and Youth Program Funds

DATE: March 31, 2022

**SUBJECT: SUPPORTIVE SERVICES POLICY AND PROCEDURES FOR ADULTS,
DISLOCATED WORKERS, AND YOUTH**

PURPOSE OF THE BULLETIN:

The purpose of this bulletin is **to provide an update** to the ACWDB guidance regarding the provision of Supportive Services to WIOA-enrolled Adults, Dislocated Workers, and Youth. Modified language will appear in **bold**.

The provision of Supportive Services through special projects or discretionary grants will also be governed by this bulletin except in circumstances where ACWDB modifies guidance for provision of Supportive Services, or the project grant has built-in language regarding the provision of Supportive Services. Advanced notice will be provided should ACWDB make a determination to alter this policy under those grants.

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:

WIOA allows for the provision of Supportive Services which are services that are deemed necessary to enable an individual to successfully participate in career and/or training services authorized under WIOA sec. 134(c)(2) and (3), and in WIOA sec. 3(59).

At their March 10, 2022, meeting, the ACWDB took action to approve this update to the Supportive Services Policy.

During the follow-up period, (the four quarters immediately following exit from WIOA services), youth participants may be provided Supportive Services as specified in this

bulletin and the accompanying policy. Supportive Services are not allowable for Adults and Dislocated Workers during the follow-up period.

POLICIES:

1. Supportive Services for Adults, Dislocated Workers, and Youth will be limited to the following categories:
 - a. Transportation;
 - b. Work or **training** related clothing, tools, equipment, or safety items not covered through training funds, **training providers, other Supportive Services agencies, or employers;**
 - c. Verification/Documentation;
 - d. **Educational Testing (related to certifications and industry-recognized credentials)**
 - e. **Training Related Academic/Educational Materials (not covered through training funds, training providers, or other Supportive Services agencies)**
 - f. **Utilities; and**
 - g. **Needs-Related Payments (as defined in the attached Supportive Services Policy).**
2. Supportive Services should be provided to individual participants to:
 - a. Enable them to participate in career and/or training services; **or**
 - b. **Obtain or retain employment; or**
 - c. **Provide accommodations as needed to aid in training or employment success.**
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 Services in order to successfully engage in WIOA-funded Adult, Dislocated Worker or Youth Career and/or Training Services **or to obtain or retain employment.**
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, public assistance programs such as General Assistance, CalWORKs, CalFresh Employment and Training, Re-entry programs, Housing and Urban Development (HUD) programs, **United States–Mexico–Canada Agreement (USMCA)/Trade Adjustment Assistance Reauthorization Act (TAARA)**, and Community Services Block Grant (CSBG) programs. Career Coaches must refer participants to “211” services (through utilization of the <http://www.211.org> website) prior to offering WIOA supportive services to participants.
6. The provision of WIOA-funded Supportive Services will be funded through a specific Supportive Services line item in the service provider’s budget.
7. Budget modifications related to the Supportive Services line item may be requested from ACWDB half-way through the program year in the event that:

- a. It has become apparent that the service provider is not on track to spend their Supportive Services budget by the end of the program year; and
- b. The service provider 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 Services funds.

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

8. A service provider may opt to develop and implement their own Supportive Services Policy as long as no elements of the service provider's policy conflict with ACWDB's policy.
9. A maximum limit per enrolled participant must be established for WIOA-funded Supportive Services. That limit must be stated in the service provider's Supportive Services Policy. The maximum must be reasonable and defensible.
10. ACWDB recommends a maximum limit of \$500, per individual participant, **for a single participation cycle** for WIOA-funded Supportive Services. (The Participation Cycle begins on the date an applicant is determined eligible for WIOA services and concludes at the end of the fourth quarter post-exit – after all four quarters of follow-up have been completed. Participants may have consecutive participation cycles if after exit, they complete a new WIOA application and are enrolled in WIOA-funded services again).
11. Any Supportive Services Policy, independent of this policy must state that under special circumstances, on a case-by-case basis, and with proper justification, a career coach 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 Services; the circumstances or conditions that exist as described in the assessment; compliance with WIOA Supportive Services requirements, etc.
12. 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 other community service or community-based organizations, or community medical service providers.
13. If a service provider finds that an enrolled participant misuses the Supportive Services(s) provided:
 - a. Any future Supportive Services must be denied to that participant for the remainder of their participation cycle.
 - b. All areas of misuse must be documented in the case file.
 - c. The cost of Supportive Services provided must not be assigned to an alternate source of funding administered by the ACWDB. (The service provider must identify another fund source to cover the cost).

Examples of misuse include, but are not limited to, using support service for personal use or to purchase personal items, **(except where allowed)**, selling vouchers/cards for cash, gifting supportive service vouchers to friends or family, etc.

ACTION:

1. The ACWDB designates each WIOA Adult, Dislocated Worker, Youth, and Young Adult CSP and other program operators, as may be identified through discretionary grants or other special projects, as the providers of Supportive Services. Each CSP must adhere to these Supportive Services 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 **the ACWDB Program Liaison**, participants, or the public to review.
2. For Adults, Dislocated Workers, and Youth participants transportation, Supportive Services may be provided, purchased or reimbursed. The framework for each service is listed in the attached Supportive Services Policy.

If a CSP offers Supportive Services through funds other than WIOA, documentation of the alternative source(s) must be collected and maintained in the participant's case file – 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 Services Policy effective April 1, 2022.

Any discrepancies arising between this policy/procedure and federal or state provisions (due to future revisions) will default to the current minimum federal and state regulations and guidance available. This bulletin represents the most current information available at the time it was published. As policies or regulations are updated, the most current versions of bulletins will appear on our website at www.acwdb.org.

Information and Inquiries:

For further information and inquiries please contact:

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Attachments:

1. Supportive Services Policy
2. Participant Transportation Form
3. Transportation Reimbursement Form
4. Supportive Services Log Form
5. Supportive Services Matrix

ALAMEDA COUNTY WORKFORCE DEVELOPMENT BOARD (ACWDB)
ADULT, DISLOCATED WORKER, AND YOUTH CAREER SERVICES PROVIDERS

SUPPORTIVE SERVICES POLICY AND PROCEDURES

Effective April 1, 2022

I. GENERAL POLICY CONDITIONS:

At its March 10, 2022 meeting, the ACWDB took action to approve these modifications to the Supportive Services Policy and Procedures. The specific requirements for each allowable type of Supportive Services are outlined below. Updates or amendments are included in **bold** type:

II. TRANSPORTATION:

1. Mileage reimbursement, Gas Cards, Bus Passes, Rideshare Cards, (i.e. Uber and Lyft), BART tickets, Vehicle Repairs, and Parking Fees are the only transportation Supportive Services allowable under this policy.
2. Career Service Providers (CSP) must determine and document if the participant is eligible to receive transportation Supportive Services through other sources, such as General Assistance, CalWORKs, Pell Grants, Foster Care, etc.
3. Documentation of transportation Supportive Services usage is required:
 - a. Determination of amount of transportation Supportive Services 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 an attachment to this Action Bulletin/Policy).
 - 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 an attachment to this Action Bulletin/Policy).
 - c. A signature for the receipt of a transportation voucher and a copy of the reimbursement check must be maintained in the participant case file.
 - d. Verification of distance of travel should be documented through Google Maps, TripQuest, or other tools that can demonstrate the actual mileage between participant residence and destinations (when participants are attending in-person services).

III. WORK/TRAINING RELATED CLOTHING/SAFETY ITEMS:

1. Work, Training, and Interview Clothing – WIOA career coaches 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). Such items may include dress, skirt, slacks, blouse, shirts, shoes, and ties. The amount utilized for clothing must be reasonable and defensible.

2. Tools, Equipment, or 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 including Personal Protective Equipment (PPE). **Tools and equipment may include items or accommodations necessary to aid the participant to successfully engage in training or employment activities.** 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. Verification of participant need – and inability to pay for items/services.
 - b. A statement from the employer, indicating the safety items are required as a condition of employment – but are not offered by that employer.
 - c. Receipts verifying purchase of the necessary **tools**, equipment or clothing.
 - d. Copy of the participant’s reimbursement check.
 - e. A Supportive Services Log (Attachment 4 to this Action Bulletin/Policy) must be used to document the issuance of all Supportive Services.
 - f. WIOA career coaches must require participants to sign for receipt of all Supportive Services instruments (gift cards, transportation vouchers, reimbursement checks, etc.). The use of pre-paid gift cards require that the career coach obtain signed receipts that verify which items were purchased with the funds.
 - g. In the event Supportive Services are used for transportation; appropriate attendance records must be obtained to ensure their presence at the event or training.

IV. REQUIRED VERIFICATIONS & DOCUMENTS:

1. Required Verifications and Documents – Verification and documentation necessary to obtain or retain employment, **or to qualify for training** are the only items allowable under this Supportive Services category. 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 are 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 – but not offered or covered through that facility.
 - 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 this Action Bulletin/Policy) must be used to document the issuance of all Supportive Services.
 - e. Participants must be required to sign indicating receipt of all Supportive Services instruments (gift cards, transportation vouchers, reimbursement checks, etc.).

V. EDUCATIONAL TESTING:

1. **Educational Testing** is testing that is mandated for a participant to gain certifications or credentials related to vocational training programs and/or are necessary for the participant to accept employment in the industry or occupation of training. Career coaches must ensure that neither the training provider nor the employer will pay costs associated with this testing.
2. **Supportive Services for educational testing may only be provided once per participant, per participation cycle. The participant is required to present proof of successful completion of the testing – and/or verification of the certification received. This documentation must be maintained within the participant’s case file.**

VI. TRAINING-RELATED ACADEMIC/EDUCATIONAL MATERIALS:

1. Training-Related Academic/Educational Materials 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. Costs for training-related academic/educational materials may be issued on behalf of a participant who is enrolled in a training activity, if deemed allowable under WIOA guidelines. This includes costs associated with training like educational textbooks, **necessary equipment**, 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 mandatory – and that the participant does not have the means to purchase these materials themselves – and that there is no other program or organization that will supply these materials.**
3. When the training provider requires the participant to obtain materials – and these materials are required for the training, **and offered** by the training provider, 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, **equipment**, books, etc. are required, the WIOA career coach must verify that these items are necessary for the participant to attend **and succeed in** the class or training – and that they are not offered through the training provider.

VII. UTILITIES:

1. **Utilities Supportive Services may be paid through reimbursement to the participant for expenses incurred toward household utilities while a participant is engaged in career or training services.**
2. **Household Utilities will be defined as:**
 - a. **Pacific Gas and Electric Utility Expenses**
 - b. **Land Line or Mobile Phone Service Expenses**
 - c. **Internet or Data Services when necessary for training or job search activities**
 - d. **Water or Waste Collection Bill Expenses**

3. Utilities may be reimbursed to a participant once per month, until such time that the participant reaches the \$500 Supportive Services cap (that is applied per participant, per participation cycle).
4. Participants must provide evidence of the utility bill – and verification that the bill had been paid. Supportive Services funds may NOT be used to cover late fees or penalties associated with utility bills.

VIII. NEEDS-RELATED PAYMENTS:

1. **Needs-related payments** are non-taxable, direct stipends paid to participants to support their living costs during occupational training.
2. Participants must be enrolled in a vocational training program – and must NOT be eligible for Unemployment Insurance (UI) compensation.
3. If a participant does not possess valid documentation to establish that they have exhausted entitlement to UI benefits – or have been denied eligibility for UI benefits, they must apply for UI benefits through the California Employment Development Department (EDD) in order to determine whether they qualify.
4. The amount of weekly, needs-related payments paid to a participant should be reasonable and defensible; paid at a rate not to exceed \$250 per week – and must be capped at a maximum of \$1500 per participant, per participation cycle.

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,
- b) interest payments, child support, and **taxes**,
- c) **Contributions or donations**,
- d) Vehicle, mortgage, or rental payments,
- e) Entertainment, meals, **alcohol, tobacco products, and tips**,
- f) Refundable deposits,
- g) Out-of-State job search costs,
- h) Clocks, watches, etc.,
- i) Union Dues,
- j) Diapers, food or meals for dependents **or pets**, etc.,
- k) Childcare,
- l) Counseling Services,
- m) Immigration assistance,
- n) Health care,
- o) **Bail or Restitution**,
- p) Utilizing Bus, Bart or Gas Cards as “incentives” to continue or participate in WIOA related activities conducted by program operators, and
- q) Payments to parents and/or other family members or friends.

~End~

**WIOA SUPPORTIVE SERVICES
PARTICIPANT TRANSPORTATION FORM**

Name:	Date Enrolled:	CalJOBS State ID #
Home Address:		
Career Service Provider:		
Destination Address:		

BUS:

Bus #: _____ Cost of Daily Round Trip: _____ # of times/days I made this trip: _____

By my signature below, I agree to submit this form in addition to the Transportation Reimbursement Claim form, proof of expenses (if available), and proof of attendance in order to receive my reimbursement.

BART:_____ to _____ # of times/days I made this trip: _____
Beginning BART Station Destination BART Station

Cost of Daily Round Trip: _____

By my signature below, I agree to submit this form in addition to the Transportation Reimbursement Claim form, proof of expenses (if available), and proof of attendance in order to receive my reimbursement.

CAR:

Total Miles (Daily Round Trip): _____ # of times/days I made this trip: _____

Daily Travel From: _____ to _____
My house address / location Destination and Address

By my signature below, I agree to submit this form in addition to the Transportation Reimbursement Claim form, proof of expenses (if available), and proof of attendance in order to receive my reimbursement.

RIDESHARE:

Total Miles (Daily Round Trip): _____ # of times/days I made this trip: _____

Daily Travel From: _____ to _____
My house address / location Destination and Address

By my signature below, I agree to submit this form in addition to the Transportation Reimbursement Claim form, proof of expenses (if available), and proof of attendance in order to receive my reimbursement.

Updated Dec 2021

A screen print of a Google Maps or MapQuest (or some other online mapping tool) should be submitted with this form as verification of the mileage between the point of origination and the destination.

Participant Signature: _____ Date: _____

**ALAMEDA COUNTY WORKFORCE DEVELOPMENT BOARD
SUPPORTIVE SERVICES
TRANSPORTATION REIMBURSEMENT FORM**

Name:	Date Enrolled:	CalJOBS State ID#:
Home Address:		
Destination Address:		
Purpose of Trip(s):		

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

* Bus/BART/Uber/Lyft

PARTICIPANT 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
SUPPORTIVE SERVICES LOG**

Participant Name
CalJOBS State ID#

Supportive Services (type):	
Total Cost of Supportive Services:	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 Services (type):	
Total Cost of Supportive Services:	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:	

Updated 9/2021

Supportive Services Matrix

Supportive Services Categories:	Ad/DW Activity Codes	Youth Activity Codes	Allowable:	Requirements:
Transportation	181 Transportation Assistance	481 Transportation Assistance	Career Services: Job Interviews, Job Fairs, Job Clubs Training Services: Training Attendance OJT (Only until 1 st paycheck) Employment: Until 1 st paycheck	<ul style="list-style-type: none"> - Documentation of attendance - Pre-paid cards/vouchers may be issued to cover one month at a time
Tools, Clothing & Safety Items	188 Tools/Clothing	487 Tools/Clothing	Career Services: Interview Attire Training Services: Required Safety Equipment, Tools and Work Clothing not covered by Training Provider Employment: Required Safety Equipment, Tools, and Clothing not covered by Employer	<ul style="list-style-type: none"> - Documentation that item(s) is/are required - Costs must be reasonable and defensible and consistent with current norms
Verification & Documentation	185 Other	485 Other	Career Services: DMV or Birth Records Expunge Records Training Services: DMV Records, Medical Records/Tests, Physical, Vaccines Employment: Background Check, Drug Screening, Medical Records/Physical/Medical Tests/Vaccines	<ul style="list-style-type: none"> - Verification that the training provider/employer does not cover cost, but does require verification - Documentation of attendance
Educational Testing	191 Educational Testing	490 Educational Testing	Career Services: None Training Services: Testing fees not covered by ITA Employment: None	<ul style="list-style-type: none"> - Proof that participant is not eligible for other assistance - Proof of successful completion of test
Utilities	190 Utilities	489 Utilities	Career Services: Payments/Reimbursements to maintain utilities while job hunting Training Services: Payments/Reimbursements to maintain utilities while in training Employment: Until 1 st paycheck	<ul style="list-style-type: none"> - Document that participant is not eligible for other assistance - Documentation of attendance
Needs-Related Payments	326	491	Career Services: Not Allowed Training Services: Direct Stipend During Training Employment: Not Allowed	<ul style="list-style-type: none"> - Proof that participant is not eligible for other assistance - Proof of enrollment in training and attendance - Proof not eligible for UI