



AB - #82 (REVISED)
Effective Date: July 1, 2009
Revision Date: 9/30/11
Effective Retroactive to: 07/01/11

ACTION BULLETIN

TO: Employment Plus II Program (EPP II) Providers

DATE: September 30, 2011

SUBJECT: REVISION TO THE SUPPORT SERVICES POLICY AND PROCEDURES FOR THE EMPLOYMENT PLUS II PROGRAM (EPP II)

Purpose of the Bulletin:

The purpose of this bulletin is to discuss the changes and inform the Employment Plus II (EPP II) Program operators of Revisions to the Support Service Policy and Procedures, developed especially for the EPP II program.

Citations:

The Support Service Policy includes all the elements required by the Department of Labor.

Workforce Investment Act Sections 101(46) and 129(2)(g)

Federal Register Vol. 65, No. 156 / August 11, 2000 / Rules and Regulations

Subpart D – Youth Program Design, Elements, Parameters – 664.440 Supportive Services

Internal Revenue – Publication 587 Business Use of Home Daycare Facility, Standard Meal and Snack Rates

Internal Revenue Service (IRS) – Publication 463, Travel, Entertainment, Gift, and Car Expenses

Background:

The State of California, during their annual program monitoring of the Alameda County Workforce Investment Board (ACWIB) processes, has indicated that the ACWIB must revise their Supportive Services policies for enrolled WIA participants. ACWIB must ensure that it makes additional definition of supportive services and how to enroll and document participant needs for service. Therefore, **ACWIB is prescribing revised Supportive Services Policy for all providers to use.**

The Workforce Investment Act Final Rules and Regulations define Supportive Services as “services necessary to enable an individual to participate in activities authorized under the Act.” The WIA law requires that provision of Support Services to youth enrolled in WIA programs

must be necessary, reasonable, equitable, justifiable, during one registration cycle of enrollment to exit (may be within 12 or 18 months of activities) and must be documented in the individual case file.

EPP II Program Operators will continue to adhere to:

1. The existing General Policy Guidelines and Documentation Requirements issued July 9, 2009 AB#81 with modifications (see attachments).
2. Supportive Services will be limited by the Youth Program Operator WIA funded budget. A maximum limit of \$500, per individual youth, for WIA funded supportive services. The maximum must be reasonable and defensible. Under special circumstances, on a case by case basis and with proper justification, a counselor could request a waiver to exceed \$500 from ACWIB Liaison up to the amount required based on the assessment of need.
3. Limit Support Services to four types:
 - Transportation
 - Work-Related Clothing and Safety Items
 - Required Verification/Documentation for DMV printouts, health/drug screening tests and fingerprinting; and
 - Education/Training Fees (includes cost for books) for Post-Secondary, Vocational and/or Training tuition fees, only if participant cannot access the service without additional financial services, like Financial Aid, Pell grants, Board of Governors Grants (BOGG), EOP Waivers, Cal Grants if available, and must be used before WIA funds as last resort.
4. Basic Living Needs like meals, housing, watches, alarm clocks or deposits for housing/apartments, childcare, etc. **WILL NO LONGER BE ALLOWABLE.** Such services may include linkages to and/or referrals to community services assistance for child care, assistance with housing and/or referrals to medical services

The specific requirement for each Support Service is outlined below:

Transportation:

1. Operators must determine, and document, if the youth participant is eligible to receive transportation support services through other sources, such as those listed in General Policy Guidelines, Item #3 (see attachment General Policy Guidelines).
2. Bus passes and BART tickets are transportation support services allowable under the EPP II program, typically until the client receives their first paycheck.
3. A signature for the receipt of a transportation voucher or copy of the reimbursement checks must be in the case file.
4. Assistance with transportation to pre-approved vocational training programs, Individual Training Accounts (ITA), On-the-Job Training, Internships, Summer Job activities and/or similar programs (tutorial sessions, job fairs, job interviews, etc). WIA participant must agree and provide proof of activity such as attendance sheets, job fair flyer and/or proof that they attended the job interviews.
5. Youth attendance in pre-arranged activities, that requires transportation supportive services must be tracked and documented in the case file, i.e., attending tutoring session

at another location other than youth operator office site (see attachment Documentation Requirements).

6. Gas Cards up to the maximum of \$100 , may be issued on a once a month basis, for travel to and from home to participate in pre-arranged, allowable WIA activities. But, determination of amount of transportation and a receipt which would substantiate that these transportation costs were used for the purpose intended. If a participant were issued a gas card to participate for the first two weeks of a paid internship, training or reporting to a job (referred by the program operator), the participant must provide a signature indicating receipt of the gas card, in addition, required that the participant obtain a receipt after purchasing gas with the gas card and provide this receipt to the program operator in order to substantiate that gas was actually purchased by the participant.

In addition, verification will be required of attendance and/or reported to work during the transportation time request. A signature for the receipt of a transportation voucher, gas card and/or copy of the reimbursement check must be in the case file.

7. Program Operator will continue to adhere to existing General Policy Guidelines and Documentation Requirements related in AB#82 (see attachment).

Work-Related Clothing and Safety Items:

1. Program Operators will continue to adhere to existing General Policy Guidelines and Documentation Requirements related in AB #82 (see attachment).
2. Participant support to purchase tools that are demonstrated as required for a specific job, with a concurrent offer (i.e., an offer letter from an organization that states that specific tools are required to start work).
3. Work and Interviewing Clothing – WIA Case Manager utilizing clothing for clients to wear to interviews, must check first with community based resources, such as, Wardrobe for Opportunity, and if none available, must document no resources available in the case notes and/or ISS. Thereafter, operator may make arrangements to purchase one set (one time only) of appropriate interviewing clothing utilizing a gift cards up to the maximum of \$75. Such items may include skirt, blouse, and shoes for women and/or slacks, shirts, shoes and ties for men.
4. Participant and WIA Case Manager must ensure signed receipts are obtained for accepting gift cards, return with signed receipts of purchase of items and must verify how many job referrals or results of interviews is included in the ISS/case documentation.

Required Verification(s) and Documents:

1. Program Operators will continue to adhere to existing General Policy Guidelines and Documentation Requirements related in AB#82 (see attachment).
2. Assistance with obtaining pre-approved work and training related licenses and permits, specifically demonstrated as a need for employment, job retention and/or wage increase (as budgetary limitation allow);
3. Assistance with rectifying criminal backgrounds, fees associated with “Sealing Records” or Live Scan;

4. Copy of Birth Certificate;
5. T.B. Tests/Results (if required before employment by employer);
6. Tattoo Removal (if barrier to employment and is documented).

Education/Training Fees Reimbursements

1. Educational support services are only provided to certified and enrolled WIA youth when, and only when, it is deemed necessary to obtain their educational goals and WIA youth are not eligible for other subsidized support such as PELL , Financial Aid or Scholarship grants.
2. Education/Training Fees on a semester or quarterly will be limited by the Youth Program Operator WIA funded budget. The maximum must be reasonable and defensible.
3. Documentation that participant is in need of supportive services, is eligible for WIA and enrolling them into Education or Training Activity Codes.
4. Education and/or training fees may be provided, if deemed eligible under WIA guidelines to Disconnected and Connected youth. This includes reimbursement for registration/tuition fees and/or educational textbooks and supplies (includes backpack, pens, pencils, paper notebooks and calculator).
5. The participant may pre-pay the tuition and fees, then submit the receipts for reimbursements and/or Operator can make arrangements with college Financial Aid Office to accept vouchers and/or check on behalf of participant. Check must clearly identify participant name and reason for funds allocated (i.e., to pay tuition or books). A receipt from school and/or training site regarding payments made must be documented and placed into participant WIA case file.
6. If additional uniforms, tools, books, etc. are required, WIA Case Manager must verify that these items are necessary for the participant to attend the class or training. Again, receipts for reimbursements will be required and must be in the case file.
7. Eligible WIA youth may receive transportation vouchers (Bus or Bart tickets) to attend school or training site, but, will be limited by the Youth Program Operator WIA funded budget. The maximum must be reasonable and defensible.
8. Program Operators will continue to adhere to existing General Policy Guidelines and Documentation Requirements related in AB#82 (see attachment).

Non-Allowable Supportive Services:

ACWIB does not allow the following to be provided through Support Services/participant support:

- a) Fines and penalties such as traffic violations, tickets, late finance charges, and/or interest payments,
- b) Contributions or donations
- c) Vehicle, mortgage, rental payments or other bills;
- d) Meals;
- e) Refundable deposits;
- f) Out-of-State job search costs;
- g) Clocks, watches, etc;
- h) Union Dues;
- i) Diapers, food or meals for dependents, etc.;
- j) Child care;

- k) Counseling Services;
- l) Immigration assistance;
- m) Health care;
- n) Utilizing Bus, Bart or Gas Cards as “incentives” to continue or participate in WIA related activities conducted by program operator; and
- o) No payments can be made to parents and/or family member.

Action:

The Alameda County Workforce Investment Board designates each EPP II operator as the provider of support services. Therefore, each operator must implement the Revised Support Service Policy and Procedures to ensure compliance with the State’s finding. Program operators must make the policy available for participant review and make policies available for family review upon request. convene. The framework for each service is listed in the attached General Policy Guidelines and Documentation Requirements.

If an operator does not use any EPP II funds to provide support services, documentation of the alternative source(s) of funds in the context of a referral system, would still include documentation in the assessment, on the ISS and in the case file.

All EPP II operators will implement the Revised Support Service Policy retroactive to July 1, 2011.

Information and Inquiries:

For further information and inquiries please contact:

Rosario Flores
Program Financial Specialist
(510) 259-3827
rflores2@acgov.org.

ATTACHMENT

Attachment A - Supportive Service Policy and Procedures

ALAMEDA COUNTY WORKFORCE INVESTMENT BOARD
EMPLOYMENT PLUS II PROGRAM (EPP II)
SUPPORT SERVICE POLICY AND PROCEDURES

Effective July 1, 2009

Revised September 30, 2011

Applicable to Provision of all Types of Support Services

GENERAL POLICY GUIDELINES

1. Supportive Services can be provided, when necessary, to enable an individual youth, eligible for and enrolled in the WIA funded Employment Plus II Program (EPP II), to participate in WIA activities, including mandated follow-up services. Supportive services are not pre-enrollment or incentive activities. Pre-enrollment and incentive activities require a separate policy.
2. Supportive Services can be provided to an individual youth who is unable to obtain such supportive services through other programs providing such services. **WIA funds are the “funds of last resort”**. A determination of the availability of supportive services through other programs must be made prior to providing WIA funded supportive services. WIA supportive services must be paid directly to the eligible enrolled youth to participate in activities that are leading to education and employment.
3. Other programs providing supportive services may include, but are not limited to: PELL grants, scholarships, Cal Grants, Board of Governance Grants (BOGG), EOPS and/or Fee Waivers, Alameda County public assistance programs like General Assistance, CalWORKs, Foster Care, and CalLearn, Prisoner Re-entry programs, Housing and Urban Development (HUD) programs, and Community Services Block Grant (CSBG) programs.
4. Supportive Services can only be provided following a complete assessment of supportive service needs to participate in WIA funded EPP II activities; a determination of the availability of other funds to cover the supportive service needs; and supporting documentation in the Individual Service Strategy (ISS) form.
5. Supportive services will be limited by the Youth Program Operator WIA funded budget. A maximum limit of \$500, per individual youth. The maximum must be reasonable and defensible.
6. Supportive Services can include referrals to: Linkages to Community Services, referrals for Assistance with Child and Dependent care; referrals for Assistance with housing; referrals to medical services.
7. Assistance with uniforms or other appropriate work attire and work related tools, including such items as eye glasses and protective eye gear is appropriate. But, payments and/or referrals shall be documented into case file.
8. If a Youth Program operator finds that a youth participant misuses the supportive service(s) provided:
 - a. All future supportive services will be unavailable to that participant for the remainder of their participation in EPP II.
 - b. All areas of misuse must be documented in the case file.
 - c. The cost of misused supportive services cannot be assigned to an alternate source of funding administered by the ACWIB. (The operator must identify another fund source to cover the cost).
 - d. Examples of misuse include, but are not limited to: using supportive service for personal use, using gas/store cards to purchase personal items, selling vouchers/cards for cash, etc.

DOCUMENTATION REQUIREMENTS

I. TRANSPORTATION

- a) Mileage reimbursement includes issued Gas Cards, Bus Passes and BART tickets as the only transportation support services allowable under the EPP II.
- b) Operators must determine, and document, if the youth participant is eligible to receive transportation support services through other sources, such as those listed in General Policy Guidelines, Item #3.
- c) Documentation of transportation support services usage is required.
- d) Youth attendance in pre-arranged activities, that requires transportation supportive services must be tracked and documented in the case file. Determination of amount of transportation support service necessary for participation is required. The Participant Transportation Reimbursement Form is required as part of the determination of need to participate. This form will be provided by ACWIB. A print out (MapQuest or Google Maps) verifying the mileage from home to WIA Activity site must be attached to all supportive documents in the case file.
- e) Cost of mileage to/from home and pre-arranged activities is calculated using the Internal Revenue Service (IRS) the current IRS value of \$.55 per mile. The Transportation Reimbursement Form is used to track transportation costs per participant. The form will be provided by ACWIB.
- f) A signature for the receipt of a transportation voucher or copy of the reimbursement check must be in the case file.
- g) Gas cards can only be issued once a month up to a maximum of \$100 per month.

II. WORK-RELATED CLOTHING & SAFETY ITEMS

- a) Work-related clothing and safety items necessary to participate in pre-arranged activities, like job interviews or work experience, are allowable supportive service under EPP II. Safety items will include: protective glasses, hard hats, gloves, steel toe boots, and protective clothing. Additional safety items may be allowed when required by the worksite, and with written permission from the ACWIB Program Liaison.
- b) Youth Program operators must determine and document if the youth participant is able to receive safety items through the other sources before provision.
- c) Documentation of supportive service usage is required.
- d) If the supportive service is required for a work experience, a copy of the worksite agreement, indicating the safety items are required as a condition of work must be included in the participant case file.
- e) Receipt from the participant/parent/guardian showing purchase of the necessary equipment must be in the case file.
- f) Copy of the reimbursement check must be in the case file.
- g) Monitor review of pre-arranged activity to ensure youth participant is properly using the work-related clothing and safety items is required.

III. REQUIRED WORK VERIFICATION(S) & DOCUMENTS:

- a) Attainment of documents necessary to participate in WIA funded activities is an allowable supportive service under EPP II. Documents may include, but are not limited to: DMV printouts, health/drug screening tests (includes T.B. testing), fingerprinting, etc.
- b) Operators must determine and document if the youth participant is able to receive document support service through other sources before provision.
- c) Documentation of document support service is required:
 - Information from an employer or training facility indicating that a document(s) is necessary as a condition of participation must be included in the participant case file.
 - Receipt from the participant showing purchase of the necessary document(s) must be in the case file.
 - Copy of the reimbursement check must be in the case file.

***If an operator does not use any EPP II funds to provide support services, documentation of the alternative source(s) of funds in the context of a referral system, would still include documentation in the assessment, on the ISS and in the case file.**

IV. EDUCATION/TRAINING FEES

- a) Educational support services are only provided to certified and enrolled WIA youth, when and only when, it is deemed necessary to obtain their educational goals and WIA youth are not eligible for other subsidized support such as PELL Grants, Financial Aid, BOGG Grants, CalGrants, scholarships, Cal Grants, Board of Governance Grants (BOGG), EOPS and/or Fee Waivers, Alameda County public assistance programs like General Assistance, CalWORKs, Foster Care, and CalLearn, Prisoner Re-entry programs, Housing and Urban Development (HUD) programs, and Community Services Block Grant (CSBG) programs or Scholarship grants.
- b) Operators must document in case note and ISS, if the WIA eligible participant is not able to receive support services through other sources before provision is made.
- c) Education/Training Fees can be issued on a semester or quarterly bases, but, will be limited by the Youth Program Operator WIA funded budget. The maximum must be reasonable and defensible.
- d) A check request and copy of the reimbursement check must be in the case file that reflects participant name and stating reimbursements are made for what purpose.

All EPP II operators will implement the Revised Support Service Policy retroactively to July 1, 2011.

If you have any questions about the Support Services Policy or Procedures, please contact your ACWIB Program Liaison.

**Cost Per Registration Cycle
\$500 Maximum Expenditure for All Supportive Services
Outlined and Budgeted for in the Individual Services Strategy**

Activities Allowable for Supportive Services	Transportation Costs	Clothing & Safety Items	Verifications & Documents	Education & Training
	Job Search Activities	Job Search Activities	Job Search Activities	Job Search Activities
	Job Interviews	Required Interview Attire	Obtain DMV Records	None
	Job Fairs		Obtain RAP Sheet	
	Job Clubs		Records Expunge	
	One Stop Career Centers		Obtain Birth Records	
	Volunteer Assignments		Obtain Court Records	
	Participate in Training	Participate in Training	Participate in Training	Participate in Training
	Apprenticeship	Required Safety Equipment	Obtain DMV Records	Pre-Vocational Training
	Internships	Required Tools	Obtain Drug Screen Tests	Textbooks not Covered w/Tuition
	Occupational Skills	Required Work Clothes	Obtain Live Scan	Supplies Required for Training
	On-the-Job		Obtain Physical Exam	Other Required Fees
	Pre-Vocational		Obtain Vaccinations	
	Tutoring			
	Work Experience			
	Obtain/Retain Employment	Obtain/Retain Employment	Obtain/Retain Employment	Obtain/Retain Employment
	First 2 weeks of Paid	Required Safety Equipment	Obtain Drug Screen Tests	None
	Employment or Training	Required Tools	Obtain Live Scan	
		Required Work Clothes	Obtain DMV Records	
			Obtain TB Test or Vaccinations	
Criteria Applicable for Providing Supportive Services	Provided to individual to enable them to participate in employment or training activities	Provided to individual to enable them to participate in employment or training activities	Provided to individual to enable them to participate in employment or training activities	Provided to individual to enable them to participate in employment or training activities
	If wages or stipend received during activity, supportive service allowable up to receipt of 1 st pay check Documentation of attendance at the activity for which transportation service is provided is required in case file. Gas Cards are limited to the amount necessary to participate in an activity for one (1) month at a time.	Maximum amount for Interviewing/Work Clothing is \$75 Documentation of requirement for each equipment or safety items is required in case file. Cost for each piece of equipment or safety item must be reasonable and comparative to going rate.	Documentation that Employer or Training Provider does not cover costs of tests/docs for hire or training is required in case file. Documentation of attendance at the activity for which verification/document service is provided is required in case file.	Documentation that participant has applied for, and has been rejected for Financial Aid is required in the case file. Documentation of requirement for education or training fees for participation in the activity is required in case file.