

Subject:	Supportive Services for WIOA Title I and other Grant Funded Initiatives
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Distribution:	Arapahoe/Douglas Works! Workforce Center Leadership and Employees

The Arapahoe/Douglas Workforce Board (ADWB) has designated Arapahoe/Douglas Works! (ADW!) as the provider of Career Services for WIOA Title I: Adult, Dislocated Worker and Young Adult programs, Title III: Wagner Peyser, and Temporary Assistance for Needy Families (TANF).

ALL MARCH 2017 TEGL REVISIONS ARE HIGHLIGHTED IN YELLOW

CITATIONS/REFERENCES

- Workforce Innovation and Opportunity Act (WIOA) of 2014 (Public Law (113-128) enacted July 22, 2014;
- Training and Employment Guidance Letter (TEGL) 19-16 Guidance: Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules
- Office of Management and Budget (OMB) Uniform Guidance 2 CFR, Part 200
- Colorado Department of Labor and Employment Program Guidance Letter (PGL) WIOA/WIA-2000-01 Supportive Services
- PGL MIS-2012-01: Guidance on Data Integrity and the Customer Participation Cycle for WIA and TAA Programs

PURPOSE

To establish guidance, process and procedure in regards to providing supportive services to eligible WIOA Title I funded programs, as well as any other ADW! grant funded initiatives, and in alignment with those program requirements.

BACKGROUND

WIOA was signed into law on July 22, 2014 and is designed to help job seekers access employment, education, training, and supportive services to succeed in the labor market; and to match employers with the skilled workers they need to compete in the global economy. WIOA supersedes Titles I and II of the Workforce Investment Act (WIA) of 1998, and amends the Wagner-Peyser Act and the Rehabilitation Act of 1973.

Per TEGL **19-16**, “a key principle in WIOA is to provide local areas with the authority to make policy and administrative decisions and the flexibility to tailor the workforce system to the needs of the local community. To ensure maximum flexibility, this guidance provides local areas the discretion to provide the supportive services they deem appropriate, subject to **WIOA’s limitations.**”

ADWB-01-2017, **Change 1**: Supportive Services for WIOA Title I and other Grant Funded Initiatives

Page 1 of 8

In accordance with WIOA, the ADWB has developed the following written policy and procedure to ensure, in coordination with other entities, the highest quality, most comprehensive service provision possible; preventing the duplication of resources and services; and establishing limits on the amount and duration of these services.

The United States Department of Labor issued a new Training and Employment Guidance Letter (TEGL) pertaining to providing Supportive Services during Follow-Up for Title I WIOA Adults and Dislocated Workers. As of the issuance of this guidance, TEGL 19-16 **effective March 1, 2017**, Supportive Services **cannot** be provided to Adults and Dislocated Workers as a Follow-Up Service, nor can a Supportive Service be used to initiate participation or extend the exit date of a participant. **This rule does not apply to the Title I WIOA Youth program.**

The language from page 19 of the referenced TEGL 19-16 reads as follows:

"Supportive services may be made available to any adult or dislocated worker participating in Title I career services or training activities that is unable to obtain supportive services through other programs providing such services. Additionally, the supportive services must be necessary to enable the individual to participate in career services or training activities. **Note that follow-up career services are not a qualifying service for the receipt of supportive services; therefore, an individual who is only receiving "follow-up" services may not receive supportive services.** Individuals identified as needing ongoing supportive services must still be participating in career services (other than follow-up), training activities, or both to continue to receive supportive services. **Supportive services also may not be used to extend the date of exit for performance accountability purposes. Supportive services, like follow-up services, do not make an individual a participant or extend participation."**

POLICY/ACTION

ADW! maintains a list of, and referral links to, entities throughout the community that provide supportive services in the local area (see Attachment A). In addition, ADW! continually assesses these supportive services needs on an ongoing basis. Supportive services may be provided to eligible Title I WIOA customers, as well as customers of other ADW! grant funded initiatives, who are participating in career or training services, and who are unable to obtain supportive services through other community programs providing such services.

When a participant is referred to a community entity for supportive services, documentation of the referral will be narrated in the customer's Connecting Colorado c-notes. Whenever possible, the c-note may include information such as: date of referral, referral agency name, reason for referral, results of the referral, whether funds are, or are not, available, and/or the amount of funding available through the referral agency. When appropriate, the following example may be utilized as a c-note template:

- **Date of Referral:**
- **Referral agency name:**
- **Reason for Referral:**
- **Results of Referral:**
- **Are funds available from the community resource? (Y/N)**
- **If so, amount of funding available through community resource:**

As with training services, supportive services must be provided in a manner that maximizes informed customer choice in selecting supportive services providers, and be in accordance with the goals/activities outlined in the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS). The Workforce Specialist (WFS) will assist the customer with such choices; however, the ultimate decision rests with the participant.

ADWB-01-2017, **Change 1**: Supportive Services for WIOA Title I and other Grant Funded Initiatives

Page 2 of 8

In addition, it is the responsibility of all employees to ensure that support services are appropriate and that the customer's choice is the most logical, reasonable and feasible decision. When making decisions regarding these costs, it is important to consider if the purchase is good use of taxpayer dollars. The WFS must apply the "reasonable" and "prudent" definitions to all requests.

With any supportive service, ADW! cannot and should not be all things to all people. The resources and services of ADW! should be limited to items/needs that are directly related to assisting participants in obtaining gainful employment. WIOA Title I is not an entitlement program.

ELIGIBILITY & REQUIREMENTS

Eligibility

In order for a participant to receive any allowable supportive services, the following must occur:

- The participant has been determined eligible per WIOA eligibility requirements, and/or any other ADW! grant funded initiative eligibility requirements;
- The supportive services are necessary for the individual to participate in Title I activities, and/or any other ADW! grant funded initiative;
- Supportive services may be made available to anyone participating in Title I career or training services, and/or any other ADW! grant funded initiative;
- The participant is unable to obtain supportive services through other agencies;
- The participant is in compliance with program regulations and policies during the period of program participation/training.

Requirements

With any supportive services provided at ADW!, participants will work collaboratively with their WFS to provide updates which demonstrate follow through, as identified and outlined in their IEP/ISS. Examples of these updates may include, but are not limited to, grades, attendance, letter(s) from instructor(s), certificate of completion, paystubs, etc. In addition, these progress updates should be reflected in the participants' c-notes.

SUPPORTIVE SERVICES LIMITS/CAPS

Note: Both the "Participation Cycle Cap" and "Lifetime Cap" mentioned below are applicable and inclusive of all agency programs provided at ADW!, which may include, but are not limited to, WIOA Title I Adult, Foundation Grants, Enhanced Grants, etc. In addition, these caps are inclusive of WIOA Title I Adult funding, and/or any other funding received through grant initiatives, provided by other workforce regions.

➤ **Participation Cycle* Supportive Services Cap (maximum of \$6,000)**

Supportive services funded by WIOA, and/or any other ADW! grant funded initiatives, may not exceed \$6,000 during the participant's participation cycle.

*Per PGL MIS-2012-01 (Guidance on Data Integrity and the Customer Participation Cycle for WIA and TAA Programs), and for the purpose of this guidance, participation cycle is defined "as the period that begins on the participation date and ends on the exit date."

➤ **Lifetime Supportive Services Cap (maximum of \$10,000)***

Following the allowable duration in between program enrollments (as mentioned in ADW!'s WIOA Classroom Training Policy), should a customer re-enroll into a WIOA Title I program, and/or any other grant initiative at ADW!, the previous amount provided in supportive services during any previous enrollments will be applied towards the above mentioned lifetime cap of \$10,000. As an example, consider the following scenario:

ADWB-01-2017, **Change 1**: Supportive Services for WIOA Title I and other Grant Funded Initiatives

Page 3 of 8

John Smith, an ADW! participant, has reached the "Lifetime Cap" of \$10,000 in supportive services:

- In 2005, John Smith received \$3,000 in supportive services while enrolled in a WIA program;
- In 2015, John Smith received \$6,000 in supportive services while enrolled in a WIOA program;
- Following the allowable period of time in between enrollments per local policy, John Smith may not receive more than \$1,000 (for a total of \$10,000) in supportive services, if he should become enrolled in a WIOA program, and/or any other ADW! grant funded initiatives, in the future.

➤ **Gas Vouchers and/or Public Transportation (maximum of \$2,000)**

Should a participant determine the need to utilize supportive services to receive gas vouchers and/or public transportation, the cap for gas vouchers and/or public transportation is \$2,000. All other allowable supportive services will have the maximum caps as noted above.

Note: If a participant reaches the maximum of \$2,000 in gas vouchers and/or public transportation, he/she may receive an additional \$4,000 in supportive services, if needed (for a maximum of "Participation Cycle" cap of \$6,000).

DOCUMENTATION/REQUESTING SUPPORTIVE SERVICES

When a request for a supportive service is outside of gas vouchers and/or public transportation, the participant will be required to provide three (3) unique vendor quotes for review. These vendor quotes will then be provided to the WFS. In any case, the cost of supportive services must be both reasonable and competitive in cost. Following due diligence (which may include, but not limited to: allowing an allotted timeframe to obtain three (3) unique vendor quotes), if a WFS is unable to obtain the three (3) unique vendor quotes, please notify a program manager.

Note: In some cases, it will not be necessary to request multiple vendor quotes; for example costs in the customer's name, which may include, but is not limited to, utility bills, phone bills, rent, etc.

Documentation should show a reasonable effort was made to determine and select the lowest, competitively priced service available. The Arapahoe County Purchasing Division has provided a sample quote template which has been provided to ADW! employees.

ALLOWABLE SUPPORTIVE SERVICES

Maximum supportive services listed by category below are per participant, not per program year and/or household, and will follow the previously mentioned supportive services limits/caps. In addition, in an effort to maximize informed customer choice, it is the determination of the participant how to best utilize any available supportive services funds to ensure successful completion of any goals/activities as outlined in his/her IEP/ISS.

Supportive Services may include, but are not limited to:

- Transportation;
- Child Care;
- Dependent Care; and
- Housing

While needs-related payments are an allowable supportive service through WIOA Title I, ADW! does not provide needs-related payments at this time.

ADWB-01-2017, **Change 1:** Supportive Services for WIOA Title I and other Grant Funded Initiatives

Page 4 of 8

As mentioned, with any supportive services provided at ADW!, participants will work collaboratively with their WFS to provide updates which demonstrate follow through, as identified and outlined in their IEP/ISS. Examples of these updates may include documentation of their progress; this documentation may include, but is not limited to, grades, attendance, letter(s) from instructor(s), certificate of completion, paystubs, etc. In addition, these progress updates should be reflected in the participants' c-notes.

➤ Transportation

Each WFS is required to enter all transportation assistance in Connecting Colorado through the services screen prior to issuance. WFS will record issuance of transportation assistance in the participant's c- notes. In addition, participants must have a valid Colorado Driver's License, current registration and current proof of automotive insurance documentation. Insurance documentation will be uploaded into the Connecting Colorado scanning menu and reviewed with each new request to ensure the insurance is current.

A participant cannot receive a bus pass, bus tickets and gas vouchers in the same month without approval from an agency manager. Connecting Colorado c-notes, and the participant's file, must document the reason for the exception.

➤ **Gas (Vouchers (monthly maximum of \$60; maximum Participation Cycle Cap of \$2,000))**

Transportation assistance is allowable in the form of gas vouchers; and will discontinue once a participant has reached the maximum Participation Cycle cap of \$2,000.

➤ **Public Transportation (maximum Participation Cycle Cap of \$2,000)**

Bus tickets or monthly passes (Local, Regional, Express) are allowable; and will discontinue once a participant has reached the maximum Participation Cycle cap of \$2,000.

Note: The Participation Cycle Cap of \$2,000 is inclusive of gas vouchers and/or public transportation.

➤ Automotive Repairs

Major car repair expenses may be provided to eligible participants. Participants must have a valid Colorado Driver's License, current registration and current proof of automotive insurance. All documentation must be in the participant's name. Insurance documentation will be uploaded into the Connecting Colorado scanning menu. Per the Colorado Department of Revenue, after becoming a Colorado resident, you have thirty (30) days to transfer your driver's license and ninety (90) days to register your vehicle.

Note: For participants who have not yet obtained a Colorado driver's license, a memorandum must be drafted to justify transportation assistance and directed towards a program manager and/or the deputy division manager.

➤ Automotive Insurance

If eligible, participants must have a valid Colorado Driver's License and current registration. All documentation must be in the participant's name. Documentation will be uploaded into the Connecting Colorado scanning menu. Per the Colorado Department of Revenue, after becoming a Colorado resident, you have thirty (30) days to transfer your driver's license and ninety (90) days to register your vehicle.

Note: For participants who have not yet obtained a Colorado driver's license, a memorandum must be drafted to justify transportation assistance and directed towards a program manager and/or the deputy division manager.

ADWB-01-2017, **Change 1:** Supportive Services for WIOA Title I and other Grant Funded Initiatives

Page 5 of 8

➤ Other Allowable Supportive Services

In order for a participant to receive any allowable supportive service, he/she must be in compliance and accordance with the following sections of this policy:

- "Eligibility/Requirements" (pages 2-3)
- "Documentation/Requesting Supportive Services" (page 4)

Other allowable supportive services may include, but are not limited to:

- Telephone;
- Utilities;
- Child Care/Dependent Care;
- Housing;
- Linkages to community services;
- Referrals to health care;
- Assistance with educational testing;
- Reasonable accommodations for individuals with disabilities;
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes;
- Payments and fees for employment and training-related applications, tests, and certifications;
- Legal aid services;
- Health Aids (for example, corrective lenses, eye examinations, hearing aids, etc.);
- Medical and Dental Needs;
- Clothing (note: designer items will not be funded by ADW!);
- Hygiene (note: salon products, and/or nail polish and perfume, will not be funded by ADW!);
- Tools (note: firearms and/or knives will not be funded by ADW!).

Note: Other types of support services allowable for participants may be considered on a case-by-case basis and must be approved by the Program Manager and/or Deputy Division Manager prior to issuance.

➤ Incentive Payments (only allowable for eligible WIOA Young Adults)

Incentive payments may be paid to eligible and active/follow-up WIOA Young Adults only. All incentive payments will require a W-9 to be filed with the Administrative Services Division and approval by the ADW! Quality Assurance Team. Documentation of activity completion or credential attainment must be documented in the file prior to the disbursement of the incentive payment and included as backup with the incentive Request for Purchase (RFP) form.

See chart on following page.

Activity	Incentive Amount
Basic Skills Education / Secondary Education / Postsecondary Education	\$50 for 'A' semester average \$40 for 'B' semester average \$30 for 'C' semester average
Completion of high school diploma or high school equivalency Completion of occupational credential, which may include, but is not limited to, a degree, licensure, and/or certificate	Completion of high school diploma or high school equivalency=\$100 Completion of occupational credential, which may include, but is not limited to, a degree, licensure, and/or certificate =\$150
Employment Retention	\$25 for 3 month retention \$50 for 6 month retention \$75 for 9 month retention \$100 for 12 month retention
1st Scenario: Post TABE Test Increase 1 functioning level not reaching the 9th grade level or; 2nd Scenario: Increased functioning level at or above 9th grade level	1st Scenario: \$25 incentive payment or; 2nd Scenario: \$50 incentive payment
Incentive Card: Used when completing program goals/activities (which may include, but is not limited to: workshops, leadership activities, and/or passage of employer exams.	\$25 value (refer to Guidance)

DISALLOWED SUPPORTIVE SERVICES

Per the Office of Management and Budget (OMB) Uniform Guidance 2 CFR, Part 200, ADW! will not pay for any type of late fees, fines, damages, penalties or restoration charges incurred by a participant in any program. This also includes past due Federal/State/Local taxes, past due credit card bills, and hospital bills. Examples of disallowed supportive services include, but are not limited to:

- Federal/State/Local taxes, past due credit card bills, and hospital bills
- Fines and/or penalties, which may include, but is not limited to, traffic violations, late finance charges, and interest payments;
- Entertainment, including gratuity;
- Internet;
- Child support payments;
- Legal fees (applicable for Road to Work Initiative)
- Contributions or donations;
- Refundable deposits;
- Alcohol and/or tobacco products;
- Marijuana and/or other related paraphernalia
- Prescription drugs
- Firearms and/or knives
- Excessive and/or costly food purchases beyond normal dietary needs;
- Out-of-state job search relocation expenses that are paid for by the prospective employer or by the employer who has laid-off the individual.

ADWB MEMBERS & ADW! EMPLOYEES

ADWB members as well as ADW! employees are not eligible for any ADW! supportive services funding. In addition, relatives of ADWB members as well as ADW! employees are not eligible for any ADW! supportive services funding.

Relatives are defined as:

- Parents, spouses, children, cousins, grandparents, siblings, nephews, nieces, aunts, uncles, in-laws; please note, this is inclusive of step-family.

All participants in this category will be referred to other outlining counties for program-attached services. Any ADWB board member relatives and/or ADW! employee relatives enrolled prior to July 1, 2008 will adhere to Local Policy #2008-21.

CONFLICTS OF INTEREST

Employees shall not have a personal interest in any actions in which they may be involved in selecting the vendor, executing a contract or purchase order, or negotiating or administering the contract or purchase order. Employees will not be allowed to solicit, obtain, accept, or retain any personal benefit (gift, favor, service, compensation, or discount) from any supplier, vendor, or any individual or organization doing or seeking business with the County. Employees having a potential personal interest in a County contract, purchase, payment, or other financial or monetary transaction shall give 72 hours written advance notice of the conflict to the County Attorney. Failure to disclose a conflict will not be tolerated. "Personal interest" includes an interest held by the individual or relatives. Relatives are defined as: parents, spouses, children, cousins, grandparents, siblings, nephews, nieces, aunts, uncles, in-laws; please note, this is inclusive of step-family).

CONNECTING COLORADO

All Supportive Services will be entered into the Connecting Colorado database using the appropriate data entry.

Only the ADW! Talent Development Manager and/or ADW! Deputy Division Manager may grant exceptions to provisions within this policy.

ADWB-01-2017, **Change 1**: Supportive Services for WIOA Title I and other Grant Funded Initiatives

Page 8 of 8