

Subject:	WIOA Title I Supportive Services
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Distribution:	Arapahoe/Douglas Works! Workforce Center Leadership and Employees

The Arapahoe/Douglas Workforce Board (ADWB) has designated Arapahoe/Douglas Works! 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).

### CITATIONS/REFERENCES

- Workforce Innovation and Opportunity Act, P.L. 113-128 – July 22, 2014
- Wagner-Peyser Act of 1933 amended by Title III of WIOA
- WIOA Regulations at 20CFR, parts 680 and 681
- TEGL 19-16: Guidance on Services Provided through the Adult and Dislocated Worker Programs under WIOA and the Wagner-Peyser Act
- TEGL 21-16: Third WIOA Title I Young Adult Formula Program Guidance
- Program Guidance Letter (PGL) MIS-2017-01: Guidance on Data Integrity and the Customer Participation Cycle for WIOA Title I and TAA Programs
- PGL WIOA-2017-11: WIOA Title I Supportive Services

### PURPOSE

To provide comprehensive guidance that ensures compliance with the Workforce Innovation and Opportunity Act (WIOA) requirements for the provision of supportive services to Adult, Dislocated Worker, and Young Adult participants.

### BACKGROUND

WIOA provides for a workforce system that is universally accessible and customer centered, with an emphasis on work-based learning and classroom training that is job driven. Among the many service options available to WIOA participants are supportive services, which WIOA defines in Section 3(59) of the law as follows:

*“The term ‘supportive services’ means services such as transportation, child care, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under the Act.”*

WIOA encourages the use of supportive services whenever appropriate to ensure successful program participation. It has aligned the allowable supportive services among the Adult, Dislocated Worker, and Young Adult programs, but has identified different standards for the use of supportive services during participation and during follow-up. This policy provides guidance to ensure that the specific supportive services requirements for Adults and Dislocated Workers, versus those for Young Adults, are clearly delineated and can be understood by all staff and partners in the workforce system.

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## POLICY/ACTION

### ALLOWABLE SUPPORTIVE SERVICES

- Linkages to community services
- Assistance with transportation
- Assistance with child care and dependent care
- Assistance with housing
- Assistance with educational testing
- Reasonable accommodations for individuals with disabilities
- Legal aid services
- Referrals to health care
- Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes, and
- Payments and fees for employment and training-related applications, tests, certifications, and licenses.

### Supportive Services during Participation for Adults and Dislocated Workers

Supportive Services may be made available to any Adult or Dislocated Worker participating in Title I career or training services that is unable to obtain supportive services through other programs providing such services. Additionally, the supportive service must be necessary to enable the individual to participate in career or training services. Of special note:

- A supportive service does not trigger participant status and cannot be used to extend participation. A supportive service must always be coupled with a career or training service.
- Initial assessment of Adults and Dislocated Workers must include an assessment of supportive service needs.
- The provision of accurate information about the availability of supportive services in Arapahoe/Douglas area, as well as referral to such services, is one of the career services that must be available to Adults and Dislocated Workers through the one-stop delivery system.
- Employees need to become familiar with the availability of supportive services for Adults and Dislocated Workers through community agencies, co-enrollments with partner programs, other grants received by Arapahoe/Douglas Works!, and Memoranda of Understanding executed with local partners, so that alternative resources can be accessed first or leveraged with WIOA funding.
- Supportive Services may be provided to participants who are employed or unemployed.
- Supportive Services **must** be provided when individuals are participating in a transitional job, but **may** be provided when individuals are participating in registered apprenticeships, other work-based learning or classroom training.
- Data entry of a supportive service in Connecting Colorado must include a note identifying how it is needed to support the potential success of a WIOA career or training activity and what was done to verify that such service was not available through other sources.
  - Arapahoe/Douglas Works! researches and documents partner organizations providing supportive services, which may include, but is not limited to: their requirements, limitations, and restrictions. This "Community Supportive Services" list is revisited quarterly. Workforce Specialists (WFS) review this list in order to help prevent duplication of services.

### ➤ Supportive Services during Follow-up for Adults and Dislocated Workers

Although the United States Department of Labor (USDOL) has interpreted the law to mean that supportive services may not be provided to Adults and Dislocated Workers during follow-up, they have encouraged states to set policies that allow supportive services during follow-up under limited and clearly defined circumstances.

The Participation Cycle for WIOA Title I and TAA Programs' PGL states that:

*"The State is establishing the following definition of follow-up services for WIOA Adults and Dislocated Workers: **"Any career or supportive service (but not a training service) that directly supports the continued employment of the adult or dislocated worker customer."** It is the expectation of CDLE (Colorado Department of Labor and Employment) that "such services are called follow-up services in case management and Connecting Colorado, and that they are reported to USDOL as follow-up services."*

Such services will be entered in Connecting Colorado with the regularly assigned service code, but with the addition of the **FL** (follow-up) code (entered in the Related Activity field) for tracking and reporting purposes. WFS will identify how the follow-up service supports the continued employment of the customer. This is to be entered in the notes section of the service data entry screen and must identify purposes such as "needed to provide transportation to and from the work site" or "needed to help resolve an on-the-job work issue," etc.

### SUPPORTIVE SERVICES DURING PARTICIPATION FOR YOUNG ADULTS

Supportive services can be provided to enable any Young Adult to participate in WIOA activities. Of special note:

- WIOA identifies Supportive Services as one of the 14 Young Adult program elements that can trigger participant status and can extend participation in the Young Adult program.
- The WIOA Young Adult program design requires an objective assessment of academic levels, skill levels, and service needs of each participant, which includes a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs.
- When the objective assessment determines the need for supportive services, such services should be included in the Individual Service Strategy (ISS) that is developed, and linked to other WIOA Young Adult activities.
- Data entry of a supportive service in Connecting Colorado should include a note identifying how it is needed to support the potential success of a WIOA activity.

### Supportive Services during Follow-up for Young Adult

Follow-up services are critical services provided following a Young Adult's exit from the program to help ensure the Young Adult is successful in employment and/or post-secondary education and training. Follow-up services may include the following Young Adult program elements:

1. Supportive services;
2. Adult mentoring;
3. Financial literacy education;
4. Services that provide labor market and employment information about in-demand industry sectors or occupations in the local area, such as career awareness, career counseling, and career exploration;
5. Activities that help Young Adults prepare for and transition to post-secondary education and training.

CDLE has established the following definition of follow-up services for WIOA Young Adults:

*“Any career or supportive service (but not a training service or other than the five (5) allowed youth program elements) that directly supports the continued employment or post-secondary success of the youth customer.”*

It is the expectation of CDLE that “such services are called follow-up services in case management and Connecting Colorado, and that they are reported to USDOL as follow-up services. Such services will be entered in Connecting Colorado with the regularly assigned service code, but with the addition of the **FL** (follow-up) code (entered in the Related Activity field) for tracking and reporting purposes. Arapahoe/Douglas Works! will identify how the follow-up service supports the continued employment or post-secondary success of the customer. This is to be entered in the notes section of the service data entry screen and must identify purposes such as “needed to provide transportation to and from the work site” or “needed to support continued attendance in post-secondary school,” etc.

### USE OF WAGNER-PEYSER FUNDS

Wagner-Peyser formula funds may not be used for supportive services. However, Wagner-Peyser 10% discretionary funding may be used for supportive services if the program policy or the funding provisions for the program allow it.

### COORDINATING SERVICES

Coordinating services across the WIOA core programs (Adult, Dislocated Worker, Young Adult, Wagner-Peyser, Adult Education, and Vocational Rehabilitation), as well as non-core partner programs, is vital to help individuals with barriers to employment to participate in and complete WIOA career and training services, and ultimately obtain unsubsidized employment. Arapahoe/Douglas Works! has established procedures for referral to supportive services available from core and non-core partners, in addition to identifying how such services will be funded when they are not available from other sources.

### REFERRALS

Arapahoe/Douglas Works! maintains a list of, and referral links to, entities throughout the community that provide supportive services in the local area. In addition, Arapahoe/Douglas Works! 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 Arapahoe/Douglas Works! 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)
- What was done to verify that no such funds/services are available through other sources?
- If so, amount of funding available through community resource:

## SUPPORTIVE SERVICES LIMITS/CAPS

Maximum supportive services listed by category below are per participant, not per program year and/or household, and will follow the applicable 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 the Individual Employment Plan (IEP)/ISS. Exceptions to this policy will be considered on a case-by-case basis and will require approval from the Talent Development Manager.

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

With any supportive services provided at Arapahoe/Douglas Works!, 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.

**NOTE:** Both the "Participation Cycle Cap" and "Lifetime Cap" mentioned below are applicable and inclusive of all agency programs provided at Arapahoe/Douglas Works!, 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 Arapahoe/Douglas Works! grant funded initiatives, may not exceed \$6,000 during the participant's participation cycle.

\*Per the "Guidance on Data Integrity and the Customer Participation Cycle for WIOA Title I and TAA Programs" PGL, and for the purpose of this guidance, participation cycle is "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 Arapahoe/Douglas Works! WIOA Classroom Training Policy), should a customer re-enroll into a WIOA Title I program, and/or any other grant initiative at Arapahoe/Douglas Works!, the previous amount provided in supportive services during any previous enrollments will be applied towards the above mentioned lifetime cap. As an example, consider the following scenario:

*John Smith, an Arapahoe/Douglas Works! 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 Arapahoe/Douglas Works! 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.

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**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 Arapahoe/Douglas Works! employees.

### **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 division manager.

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### 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 division manager.

### Other Allowable Supportive Services

In order for a participant to receive any allowable supportive service, he/she must be in compliance and accordance with eligibility and documentation requirements. Other allowable supportive services may include, but are not limited to:

- Telephone;
- Utilities;
- Health Aids (for example, corrective lenses, eye examinations, hearing aids, etc.);
- Medical and Dental Needs;
- Clothing (note: designer items will not be funded by Arapahoe/Douglas Works!);
- Hygiene (note: salon products, and/or nail polish and perfume, will not be funded by Arapahoe/Douglas Works!);
- Tools (note: firearms and/or knives will not be funded by Arapahoe/Douglas Works!).

**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 division manager prior to issuance.

### DISALLOWED SUPPORTIVE SERVICES

Per the Office of Management and Budget (OMB) Uniform Guidance 2 CFR, Part 200, Arapahoe/Douglas Works! 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 & ARAPAHOE/DOUGLAS WORKS! EMPLOYEES

ADWB members as well as Arapahoe/Douglas Works! employees are not eligible for any Arapahoe/Douglas Works! supportive services funding. In addition, relatives of ADWB members as well as Arapahoe/Douglas Works! employees are not eligible for any Arapahoe/Douglas Works! 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 Arapahoe/Douglas Works! 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 Arapahoe/Douglas Works! Program Manager and/or Arapahoe/Douglas Works! Division Manager may grant exceptions to provisions within this policy.