

Subject:	TALENT DEVELOPMENT - Supportive Services for Arapahoe/Douglas Works!
Policy Number:	ADWDB-01-2024
Replaces:	ADWDB-05-2023
Implementation Date:	January 4, 2024
Distribution:	Arapahoe/Douglas Works! Workforce Center Leadership and Employees

ALL NOVEMBER 2023 PGL UPDATES ARE HIGHLIGHTED IN YELLOW

The Arapahoe/Douglas Workforce Board (ADWDB) 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, Temporary Assistance for Needy Families (TANF), Employment First (SNAP) and Parents to Work.

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 20 CFR, 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 Youth Formula Program Guidance, Change 1](#)
- [TEGL 09-22: WIOA Title I Youth Formula Program](#)
- [TEGL 21-22: Increasing Equitable Service Access and Employment Outcomes for All Jobseekers in Workforce Innovation and Opportunity Act Adult and Dislocated Worker Programs](#)
- [TEN 12-21: Practitioners Guide to Supportive Services](#)
- [Policy Guidance Letter \(PGL\) WIOA-2017-13, Change 1: Needs-Related Payments](#)
- [PGL WIOA-2021-04, Remaining COVID Policy Relief](#)
- [Policy Guidance Letter \(PGL\) MIS-2020-03, Change 2: Data Integrity and the Participation Cycle for WIOA and TAA Programs](#)
- [Policy Guidance Letter \(PGL\) WIOA-2018-02, Change 3: WIOA Work Experience](#)
- PGL WIOA-2017-11, **Change 3** - WIOA Title I Supportive Services
- Colorado Department of Human Services Staff Manual Volume 4B, Food Assistance, 10 CCR 2506-01, section 4.310 – 4.310.25
- 9 CCR 2503-6 COLORADO WORKS PROGRAM
- Arapahoe County Department of Human Services "Employment Focused Post-TANF" Policy, effective January 1, 2015

ATTACHMENTS:

- Attachment A: Talent Development/WIOA Specific
- Attachment B: Talent Enhancement Specific

ADWDB-01-2024: Supportive Services for Arapahoe/Douglas Works!

Page 4 of 4

PURPOSE

To provide comprehensive guidance that ensures compliance with program requirements for the provision of supportive services to Arapahoe/Douglas Works! participants.

Another purpose is to update this policy with the latest guidance from the United States Department of Labor (USDOL) that:

- Encourages the use of supportive services to increase equitable access to WIOA services and to promote successful training and employment outcomes;
- Allows food as a supportive service for youth; and
- Allows supportive services to be counted for the youth 20% work experience expenditure requirement.

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.

Arapahoe/Douglas Works! encourages the use of supportive services whenever appropriate to ensure successful program participation. It has aligned the allowable supportive services among all 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 specific supportive services requirements are clearly delineated and can be understood by all staff and partners in the workforce system.

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 customers based on specific program requirements.
- Coordinating services across Arapahoe/Douglas Works! programs is vital to help individuals with barriers to employment to participate in and complete program activities, and ultimately obtain unsubsidized employment.
- These supportive services may only be provided to participants who are unable to obtain supportive services through other external programs.
- Arapahoe/Douglas Works! has established procedures for referral to supportive services available from partners.
- Arapahoe/Douglas Works! has established procedures for the coordination of supportive services for co-enrolled customers.

POLICY/ACTION

- Expenditures submitted for processing prior to the implementation date of this policy will follow previous applicable policies as it pertains to spending limits.
- Arapahoe/Douglas Works! will assess supportive services for program participants on a case-by-case basis. Barriers to employment requiring financial assistance will be based on actual or estimated costs and within the caps described below.
- Supportive services will only be provided to individuals who are participating in an approved component based on program requirements, in order to ensure successful participation and/or completion.
- Wagner-Peyser formula funds may not be used for supportive services.
- Wagner-Peyser 10% discretionary funding may be used for supportive services if the program policy or the funding provisions for the program allow it.
- Exceptions may be considered and require approval from the Division Manager and/or Workforce Administrator(s).

Using Supportive Services to Increase Equitable Access to Training

As a result of President Biden's Executive Order on Advancing Racial Equity and Support for Underserved Communities through the Federal Government, the USDOL is encouraging new strategies to ensure greater access to and success in WIOA programs for underserved adult and youth populations. Among the strategies are providing supportive services to training participants to help remove barriers, increase equitable access to training opportunities, and improve training and employment outcomes. Studies have demonstrated that the provision of supportive services is strongly linked to an increase in participation and completion of career and training services.

SUPPORTIVE SERVICES LIMITS/CAPS

Quotes and Procurement Limits

Quotes are not needed for one-time purchases under \$10,000. In the event a vendor receives more than \$10,000 throughout the program year, it is necessary to obtain quotes for each purchase. Vendor purchases totaling \$25,000 or more require a solicitation or waiver.

Annual Cap

Participants will have an annual cap of \$2,500 per year based on their enrollment date. If the participant is enrolled in more than one Arapahoe/Douglas Works! program, the cap is extended to \$4,500 annually.

Lifetime Cap

Participants will have a lifetime cap of \$5,000. If the participant is enrolled in more than one Arapahoe/Douglas Works! program, the cap is extended to \$6,500.

- 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 of the participant.
- Rental assistance and transportation assistance are excluded from both annual and lifetime caps. Refer to Supportive Service Matrix for allowable limits.
- Exceptions to this policy will be considered on a case-by-case basis and will require approval from the Division Manager and/or Workforce Administrator(s).

[ADWDB-01-2024: Supportive Services for Arapahoe/Douglas Works!](#)

Page 4 of 4

DOCUMENTATION/REQUESTING SUPPORTIVE SERVICES

- The cost of supportive services must be both reasonable and competitive in cost.
- In some cases, it may be necessary to request multiple vendor quotes; for example, costs exceeding limits described in the matrix below.
- Other types of support services exceeding the limits described in the matrix below and that are allowable for participants may be considered on a case-by-case basis and must be approved by the 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;
- 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.

ADWDB MEMBERS & ARAPAHOE/DOUGLAS WORKS! EMPLOYEES

ADWDB members as well as Arapahoe/Douglas Works! employees are not eligible for any Arapahoe/Douglas Works! supportive services funding. In addition, relatives of ADWDB 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 ADWDB 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,

[ADWDB-01-2024: Supportive Services for Arapahoe/Douglas Works!](#)

Page 4 of 4

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).

DATA ENTRY

All Supportive Services will be entered into the appropriate database using the appropriate data entry as described in the procedures guidelines.

NOTE

Needs related payments are not currently an allowable supportive service and may not be provided until such time as a local needs related payments policy is developed and approved.

SUPPORTIVE SERVICE MATRIX

See attached.

Only the Arapahoe/Douglas Works! Division Manager and/or the Workforce Center Administrator(s) may grant exceptions to provisions within this policy.

ADWDB-01-2024: Supportive Services for Arapahoe/Douglas Works!

Page 4 of 4

ATTACHMENT: TALENT DEVELOPMENT SPECIFIC

POLICY/ACTION

ALLOWABLE SUPPORTIVE SERVICES FOR ADULTS AND DISLOCATED WORKERS

Supportive Services for Adults and Dislocated Workers include, but are not limited to:

- Linkages to community services
- Assistance with transportation
- Assistance with child care and dependent care
- Assistance with housing
- Needs-related payments (as defined by WIOA)
- 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 participants enrolled in post-secondary education classes
- Payments and fees for employment and training-related applications, tests, certifications, and licenses
- **Digital literacy services, electronic devices, and broadband service**

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. **Even if supportive services are needed to address urgent or emergency situations, such as rental or mortgage assistance, local areas must still link those supportive services to customer participation in a career or training service.** Of special note:

- A Supportive Service does not trigger participant status and cannot be used to extend participation. As a result, it cannot be the last service provided within the participation cycle. Supportive services are intended to enable an individual to successfully participate in career and training activities and must not be provided unless they support such activities.
- Initial assessment of Adults and Dislocated Workers must include an assessment of supportive service needs.
- The Individual Employment Plan (IEP) must be updated to reflect the supportive services that are going to be provided. This may be accomplished in a separate section of the IEP that is initialed by the case manager.
- **Should there be concern about potential participant complaints when the supportive services they receive differ from those of others, CDLE is providing a sample Supportive Services Equity Statement that may be added to a participant's IEP:**

ADWDB-01-2024: Supportive Services for Arapahoe/Douglas Works!

Page 4 of 4

(Local Area)'s Supportive Services Policy ensures equity and fairness when providing supportive services to eligible program participants. To implement this policy, we assess each participant's unique needs and develop a customized set of supportive services that is included in their individual plan of services. This process determines the amount and type of services you may receive, and may result in other participants receiving different amounts and types of services based on their unique needs.

I have read and I understand this statement: (participant initials or signature)

- The provision of accurate information about the availability of supportive services in the local 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.
- Staff need to become familiar with availability of supportive services for Adults and DWs through community agencies, co-enrollments with
- partner programs, other grants received by the local area, 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 is not available through other sources. This applies to all types of supportive services allowed in local policy.
 - 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 and will document in the case note when this list was a source that was reviewed in determining the provision of a supportive service. This case note will serve as the required documentation to indicate that no other resources are available and WIOA Adult or Dislocated Worker funding needs to be utilized.

Supportive Services during Follow-up for Adults and Dislocated Workers

Although USDOL has interpreted the law to mean that supportive services may not be provided to Adults and DWs during follow-up, they have encouraged states to set policies that allow supportive services during follow-up under limited and clearly defined circumstances. PGL [MIS-2020-03, Change 2: Data Integrity and the Participation Cycle for WIOA and TAA Programs](#) states that:

The State is establishing the following definition of follow-up services for WIOA Adults and Dislocated Workers:

ADWDB-01-2024: Supportive Services for Arapahoe/Douglas Works!

Page 4 of 4

“Any career or supportive service (but not a training service) that directly supports the continued employment of the adult or dislocated worker customer.” In summary, we encourage the use of supportive services during follow-up for these purposes. We expect 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. In addition, Local Areas 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 for Youth may include, but are not limited to:

- Linkages to community services
- Assistance with transportation
- Assistance with child care and dependent care
- Assistance with housing
- Needs-related payments (as defined by WIOA)
- Assistance with educational testing
- Reasonable accommodations for individuals with disabilities
- Legal aid services
- Referrals to health care
- Assistance with uniforms or other 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, and certifications
- Digital literacy services, electronic devices, and broadband service

Food as a Supportive Service for Youth

- Reasonable and necessary purchase and distribution of food, or serving of meals, which are coordinated with other federal agencies and local community organizations providing food support, are allowable costs when it will enable youth program participants to participate in allowable youth program activities and to achieve training and employment goals. This does not include gift cards for food and does not apply to Adults or Dislocated Workers.
- Local areas should have policies in place to ensure consistent and equitable application of food expenditures to youth participants.
- It should be noted that Needs Related Payments are an allowable type of supportive service for participants and could include emergency payments for rent, food, etc.
- USDOL has provided additional guidance to clarify the requirements of TEGL 09-22, which allows food as a supportive service:
 - Food costs for supportive services are only allowable for WIOA youth program participants, not for adults or dislocated workers.
 - Costs of gift cards for food are not allowable under any circumstances.

Supportive Services During Participation for Youth

Supportive services can be provided to enable any youth to participate in WIOA activities. Even if supportive services are needed to address urgent or emergency situations, such as rental or mortgage assistance, local areas must still link those supportive services to customer participation in a career or training service. Of special note:

- WIOA identifies Supportive Services as one of the 14 youth program elements that can trigger participant status and can extend participation in the youth program.
- The WIOA youth 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 must be included in the Individual Service Strategy (ISS) that is developed, and linked to other WIOA youth activities.
- The ISS must be updated to reflect the supportive services that are going to be provided. This may be done in a separate section initialed by the case manager.

Should there be concern about potential participant complaints when the supportive services they receive differ from those of others, CDLE is providing a sample Supportive Services Equity Statement that may be added to a participant's ISS: *(Local Area)'s Supportive Services Policy ensures equity and fairness when providing supportive services to eligible program participants. To implement this policy, we assess each participant's unique needs and develop a customized set of supportive services that is included in their individual plan of services. This process determines the amount and type of services you may receive, and may result in other participants receiving different amounts and types of services based on their unique needs.*

I have read and I understand this statement: (participant initials or signature)

- 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. This applies to all types of supportive services allowed in local policy.
- Supportive services that enable youth to participate in training can count toward training expenditures that are reported as a sub-category of program expenditures.
- Similarly, supportive services that enable youth to participate in work experiences can count toward the 20% work experience expenditure requirement. See PGL WIOA-2018-02, Change 3: WIOA Work Experience for more details.

Supportive Services During Follow-up for Youth

Follow-up services are critical services provided following a youth's exit from the program to help ensure the youth

ADWDB-01-2024: Supportive Services for Arapahoe/Douglas Works!

Page 4 of 4

is successful in employment and/or post-secondary education and training. Follow-up services may include the following youth program elements:

- Supportive services
- Adult mentoring
- Financial literacy education
- 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
- Activities that help youth prepare for and transition to post-secondary education and training.

The State has established the following definition of follow-up services for WIOA Youth:

“Any career or supportive service (but not a training service or other than the 5 allowed youth program elements) that directly supports the continued employment or post-secondary success of the youth customer.” We expect 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. In addition, local areas 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, DW, Youth, 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. Local areas are expected to establish procedures for referral to supportive services available from core and non-core partners and to identify how such services will be funded when they are not available from other sources.

Local Supportive Services Policy Requirements

Local workforce development boards are responsible for developing supportive service policies that include, but are not limited to:

1. Alignment with local and regional plans
2. Coordination of resources and services with core and non-core partners in the local area

3. Procedures for referrals to such services and how they will be funded
4. Identification of supportive services that will be provided
5. Establishment of limits regarding the amount of funding for supportive services or length of time services will be provided
6. Procedures defining when exceptions will be allowed and how these will be approved
7. What documentation is required to indicate that no other resources are available and WIOA Adult or Dislocated Worker funding needs to be utilized
8. Additional case file documentation required, as well as any signature requirements or other proof demonstrating receipt of supportive services. **See Supportive Services Matrix for WIOA.**
9. Local policy may include allowability for postage costs to mail supportive service vouchers, etc.
10. Local policy may allow rental or mortgage assistance, as well as child care assistance, preferably in the form of vouchers or direct payments to vendors.
11. Local areas are encouraged to allow flexibility in their supportive services policies regarding caps on service costs or types of supportive services that can be provided when grant funding is available with requirements that may be different from WIOA Title I programs.
12. Regarding Needs-Related Payments (Not Applicable)

Only the Arapahoe/Douglas Works! Division Manager and/or the Workforce Center Administrator(s) may grant exceptions to provisions within this policy.

ADWDB-01-2024: Supportive Services for Arapahoe/Douglas Works!

Page 4 of 4