



CENTRAL OKLAHOMA WORKFORCE INNOVATION BOARD

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Supportive Services

Pursuant to WIOA §3(59), WIOA §134(d)(2) & (3), 20 C.F.R. Section 680.900 – 970, 20 C.F.R. Section 681.57

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The Central Oklahoma Workforce Innovation Board (COWIB) is the policy and guidance board for the Workforce Oklahoma system in Central Oklahoma. We are business leaders with a goal to establish a highly skilled, productive workforce in our 9-county area.

The Central Oklahoma Workforce Innovation Board (COWIB) complies with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, the basis of citizenship status or participation in a WIOA Title-1 financially assisted program or activity.

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Table of Contents

Supportive Services.....	1
Purpose.....	3
Authority	3
Background.....	3
What are supportive services?	4
When may supportive services be provided to Adults, Dislocated Workers, and Youth?	4
Local Policy	5
Coordinating with Non-WIOA-Funded Services	5
Providing Accurate Information to Participants.....	5
Determining the Need for Supportive Services on an Individual Basis.....	5
Needs Determined During Initial Assessment	5
Development of Supportive Services in the Individual Employment Plan/Individual Service Strategy	6
Providing Supportive Services Using WIOA Funds	6
Non-Duplication of Resources	6
Limits on the Amount and Duration of Services.....	7
Documentation of Supportive Service Payments.....	10
Disallowed Supportive Services.....	10
Equal Opportunity and Nondiscrimination Statement	11
Addenda / Revisions.....	11
Central Workforce Board NO OTHER SERVICES AVAILABLE	12

Purpose

As indicated in 20 CFR 680.900 through 970, and 20 CFR 681.570, Local Workforce Areas have been given the authority to make policy and administrative decisions, and the flexibility to tailor the workforce system to the needs of the local community. This guidance establishes a local policy on the coordination and delivery of supportive services, subject to WIOA's limitations.

Authority

The authority for this policy is derived from the following:

- WIOA 3(59)
- WIOA 134 (d)(2) & (3)
- 20 CFR 680.900 through .970
- 20 CFR 681.570
- Federal Register/Vol. 81, NO 161 pg. 56336
- Training and Employment Guidance Letter (TEGL) WIOA No. 19-16 Operation and Guidance for the Workforce Innovation and Opportunity Act (March 1, 2017)
- Training and Employment Guidance Letter (TEGL) WIOA No. 9-22 Workforce Innovation and Opportunity Act Title I Youth Formula Program Guidance (March 2, 2023)
- Training and Employment Guidance Letter (TEGL) WIOA No. 10-23 Reducing Administrative Barriers to Improve Customer Experience in Grant Programs Administered by the Employment and Training Administration (ETA) (February 21, 2024)
- WSD #80-2024 Adult Dislocated Worker Programs (April 1, 2024)

Background

Supportive Services are designed to provide a participant with the resources necessary to participate in career services and/or training services and are governed by 20 CFR 680.900 through .970, and 20 CFR 581.570. The U.S. Department of Labor provides clarification for Supportive Services and their administration in TEGL 19-16, TEGL 9-22, and TEGL 10-23, and the Oklahoma Employment Security Commission offers further guidance through WSD #80-2024. Accordingly, the Central Oklahoma Workforce Innovation Board, in consultation with its One-Stop Operator, and its service providers must develop a policy on supportive services that ensures resource and service coordination in the local area. The policy should address procedures for referral to services, including how such services will be funded when they are not otherwise available from other sources, and may establish limits on supportive services.

What are supportive services?

Supportive Services may include but are not limited to:

- Assistance with transportation (i.e. bus pass, bicycle, tire, small car repair, etc.)
- Assistance with child care and dependent care;
- Linkages to community services;
- Assistance with housing and utilities (i.e. electric bill, internet, phone bill, etc.)
- Reasonable accommodations for individuals with disabilities
- Assistance with educational testing;
- Referrals to health care;
- Assistance with uniforms or other appropriate work attire and work-related tools including such items as eye glasses and protective eye gear;
- 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
- Needs-Related Payments (available only to individuals enrolled in training services and must be consistent with specific criteria as indicated in 20 CFR § 680.940 for Adult program participants and in § 680.950 for DLW program participants).

When may supportive services be provided to Adults, Dislocated Workers, and Youth?

Supportive Services are available for WIOA Title I Adult, Dislocated Worker and Youth participants participating in title I career service (excluding follow up career service) or training services. A Youth Support Service is one of the 14 youth elements that must be made available to participants and may be provided as a follow up service if needed. Supportive Service needs are identified through the Initial/Objective Assessment process and outlined in the IEP/ISS. Supportive Service do not set participation, nor do they extend the date of exit for performance accountability purposes. WIOA Title I will only pay for expenses incurred while a participant is enrolled in a WIOA Title I program and actively participating in activities authorized under WIOA, and provided that:

- Supportive services are NOT AVAILABLE through other programs providing such services.
- The supportive service is reasonable and necessary to enable the individual to participate in career services or training activities.
- The supportive service must also be adequately documented.

The decision on which supportive services to be provided, and the timing of their delivery, shall be made at the local level on a case-by-case basis depending upon the needs of the individual.

COWIB Policy on Supportive Services – Adult, Dislocated Worker, & Youth

Each barrier should be reviewed and determined if it is a barrier to participation in a career or training service, then a decision needs to be made on whether it would be appropriate to provide a referral or a supportive service.

Local Policy

Coordinating with Non-WIOA-Funded Services

It shall be the responsibility of the COWIB to assure that supportive services provided under this policy shall be properly coordinated with services, resources, and activities that are available from other sources.

The One-Stop Operator, in conjunction with the service provider are authorized to establish appropriate linkages with programs such as child support, the Earned Income Tax Credit program (EITC), SNAP, Medicaid, and the Children’s Health Insurance Program (Sooner Care), which serve as key supports for customers making the transition to self-sufficiency.

When establishing linkages with other programs and agencies in the Central Oklahoma area, the One- Stop Operator, in conjunction with the service provider, should consider entering into letters of agreement or memoranda of understanding which may describe service delivery and procedures for referrals.

Providing Accurate Information to Participants

Information about appropriate supportive services will be made available to all participants:

- Through the participant orientation process; or
- By providing access to electronic or printed community resource directories and information

Determining the Need for Supportive Services on an Individual Basis

Supportive services may be provided when they are necessary to enable an individual to participate in activities authorized under WIOA sec. 134(c)(2) and (3). Supportive services may only be provided to individuals who are participating in career and training services.

Needs Determined During Initial Assessment

When an adult, dislocated worker, or youth is participating in career or training services, as defined in WIOA secs. 134(c)(2) and (3), supportive services may be provided only after an initial/objective assessment has been conducted verifying the need for such services. The COWIB, in conjunction with the One-Stop Operator and the service provider, shall implement local procedures for conducting initial assessments. The local procedures shall be developed in

COWIB Policy on Supportive Services – Adult, Dislocated Worker, & Youth

consultation with the One-Stop Partner agencies and shall ensure that initial assessment procedures conform to all State and federal guidance with regard to the assessment of individual needs.

The decision on which supportive services to be provided, and the timing of their delivery, shall be made at the local level on a case-by-case basis depending upon the needs of the individual. Each barrier should be reviewed and determined if it is a barrier to participation in a career or training service, then a decision needs to be made on whether it would be appropriate to provide a referral or a supportive service.

Development of Supportive Services in the Individual Employment Plan/Individual Service Strategy

When an WIOA participant is participating in career or training service as defined in WIOA, supportive services may be provided only as part of an Individual Employment Plan (IEP) / Individual Service Strategy (ISS).

Consistent with the COWIB's established Policy on Assessment and IEP's and ISS's for WIOA Participant's, the One-Stop Operator, in conjunction with the service provider shall ensure that each identified barrier to participation in a WIOA activity is adequately documented and described in the individual's IEP/ISS. The determination regarding referrals or supportive service delivery must be documented and described in the IEP/ISS prior to provision of services.

Supportive services may be provided to address identified needs that interfere with the participant's ability to successfully participate in a WIOA career or training activity. These services may be addressed whenever the need is identified, whether at initial IEP/ISS development or at any time during participation in the WIOA program. The participant's IEP/ISS should always reflect a clear picture of circumstances and services provided.

Providing Supportive Services Using WIOA Funds

The local procedure must ensure that similarly situated customers are treated in a similar manner. As set forth in the regulations (29 CFR part 37) implementing Section 188 of WIOA, a WIOA Service Provider must not discriminate in a manner in which it delivers any aid, benefits, services, or training under a WIOA Title I-funded program or activity. If a need has been documented, then supportive services may be provided using WIOA resources consistent with the following guidelines:

Non-Duplication of Resources

Definition of "Not Available". When considering whether supportive services are available through other agencies, WIOA Service Provider staff should consider whether the services

COWIB Policy on Supportive Services – Adult, Dislocated Worker, & Youth

offered by another agency or program are:

- Accessible – that is, capable of being reached by the participant; and
- Obtainable – that is, capable of being attained by a planned action or effort.

The Central Oklahoma Workforce Innovation Board recognizes that many supportive services are offered through non-WIOA sources; however, not all of these services may be available to a WIOA participant at the time of his/her need. For example, some services are available only after a lengthy application process (which may include a waiting period). Other services are present, but not available during the hours required by the WIOA program participant. Additionally, some services may be offered by non-WIOA providers, but they are not present in a suitable or accessible geographic location.

Therefore, it is understood that the “availability” of an identified supportive service must often be determined on an individual basis, taking into consideration the needs of those participants who are enrolled in a WIOA program of services.

The primary criteria for evaluating whether a service is “available” through another program or agency shall be whether the service is “present or ready for immediate use.” (Source: Merriam-Webster Online Dictionary).

Documentation that “supportive services are not available from another program” is required. Such documentation must be in the form of:

- The use of a “No Other Service Available (**NOSA – Included as Attachment 1**)” form.

Limits on the Amount and Duration of Services

The maximum TOTAL amount of any supportive services for a participant enrolled in WIOA Title I and participating in career and training services is \$3,000.00 per participant per enrollment. An additional \$3,000.00 of supportive services may be approved on a case-by-case basis if given prior board approval. The service provider must provide documentation in writing that all other avenues and resources have been thoroughly explored prior to requesting board approval for additional funding.

In establishing such limits, COWIB, in consultation with the One Stop Operator and the service provider are encouraged to offer necessary and reasonable supportive services (consistent with approved contract budgets and this local policy). Specific limitations on the types, amount and duration of supportive services should be reviewed frequently, taking into consideration the availability of program resources and the aggregate demand for supportive services in the area.

COWIB Policy on Supportive Services – Adult, Dislocated Worker, & Youth

To the extent possible, parameters for the delivery of supportive services should be:

- Developed in collaboration with the COWIB's Staff and One-Stop Partners; and
- Tailored to meet the evolving needs of the Central Oklahoma workforce investment area.

Below is further guidance on some potential supportive services that may be provided to participants that meet the requirements:

Mileage Reimbursement:

Program funds can be utilized to assist but must only be on a monthly basis and based on actual mileage. Documentation of attendance must be recorded, signed, and collected from each participant and uploaded to the state data system. Transportation reimbursement will be at the COWIB mileage rate (50% of federal reimbursement rate). Destination maps must also be included in the documentation detailing the start and end locations.

Utilities Assistance:

Program funds may be utilized to assist the participant with a one-time payment per program year of utilities (one per utility type/company) not to exceed \$300.00. The utility bill may not have a past due amount for late payments. The participant must provide a written statement of a plan to keep the utility type in good standing.

Housing Assistance:

Program funds may be utilized to assist participants who need assistance with rent or mortgage payments. The participant may not have rent or mortgage payments past due or have eviction notices for late payments. A one-time expenditure may be made for housing assistance not to exceed \$500.00. The participant must provide a written statement of a plan to keep the rent or mortgage payment in good standing.

Uniforms/ Work Attire:

Program funds can be utilized to assist participants who need assistance with acquiring uniforms/ work attire needed to either participate in training or obtain/ maintain employment. For training purposes, the items needed should be documented by the training institution.

Needs-Related Payments:

Needs-related payments are a form of supportive services designed to provide a participant with financial assistance to enable them to participate in training services. Many individuals in need of training services lack the resources to meet their non-training expenses and therefore

COWIB Policy on Supportive Services – Adult, Dislocated Worker, & Youth

cannot participate in the training needed to attain employment. Needs-related payments can help individuals meet their non-training expenses and help them to complete the training successfully.

To be eligible to receive needs-related payments, Adult program participants must:

- Be unemployed,
- Not qualify for, or have ceased to qualify for, unemployment compensation, and
- Be enrolled in a training program described in this issuance and section 134(c)(3)(D) of WIOA.

To receive needs-related payments, dislocated workers must:

- Be unemployed, and:
 - have ceased to qualify for unemployment compensation or trade readjustment allowance under TAA; and
 - be enrolled in a training program described in section 134(c)(3) of WIOA by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility for employment and training activities for dislocated workers; or if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months; or
- Be unemployed and:
 - did not qualify for unemployment compensation or trade readjustment assistance under TAA; and
 - be enrolled in a program of training services under WIOA 134(c)(3).

Needs-related payments for dislocated workers must not exceed the greater of:

- the applicable weekly level of the unemployment compensation benefit, for participants who were eligible UI as a result of the qualifying dislocation; or
- for participants who did not qualify for UI benefits because of the qualifying layoff, an amount equal to the poverty level for an equivalent period, which must be adjusted to reflect changes in total family income, as determined by COWIB policies.

Cost of Meals:

Providing meals for youth in all-day WIOA-approved activities must be adequately documented to support the necessity and reasonableness of the meal.

Food allowances for youth participants attending all-day workshops will be paid and

COWIB Policy on Supportive Services – Adult, Dislocated Worker, & Youth

documented in the same manner as other allowable supportive services.

- Actual attendance in training must be verified.
- A signed Time and Attendance sheet will serve as a self-attestation of participant attendance.
- the Service Provider will be required to document the actual cost of meals each day;
- the meal allowance per day shall not exceed \$20 per participant per day;
- Remember the reimbursement of tips is unallowable.
- Each day's meal will require three price quotes.
 - If you know you are going to have 3 workshops in the summer, you may procure from the same vendor to cover the entire timeframe after you receive your 3 price quotes.
 - if you do outings, call ahead, and obtain quotes; and
- The cost of each meal must be included in the total supportive services provided to each participant and cannot exceed COWIB's supportive service limits for such costs.

Documentation of Supportive Service Payments

All assistance provided to individuals for education or training purposes, including assistance from other workforce partners, educational entities, or other grant assistance, must be documented in the IEP. The Coordination of Training Funds (CoTF) form must also include all assistance provided, with the exception of loans and VA benefits for education and training. The completed CoTF (or comparable, institution approved or validated documentation of the training period covered, the cost of training attendance broken down by cost category, and coordination of training funds) must be uploaded to OKJobMatch.

If a supportive service is not a reimbursement, three (3) quotes must be obtained and uploaded in support of the purchase.

Disallowed Supportive Services

The COWIB 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 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;

COWIB Policy on Supportive Services – Adult, Dislocated Worker, & Youth

- Entertainment, including gratuity;
- Child support payments;
- 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.

Equal Opportunity and Nondiscrimination Statement

All Recipients, and Sub-recipients / Sub-grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

Addenda / Revisions

The COWIB Chief Executive Officer is authorized to issue additional instructions, guidance, approvals, and/or forms to further implement the requirements of policy, without making substantive change to the policy, except in situations when a new or updated state and federal guidance is issued.

**Central Workforce Board
NO OTHER SERVICES AVAILABLE**

Participant: _____ Participant ID: _____

Identified Support Service Needed:

Services to address identified needs are not available because:

Source of Information regarding no other service:

Name of Agency: _____ Date of Contact: _____

Agency Representative: _____

Career Navigator Signature

Date