



Local Workforce Innovation and Opportunity Act (WIOA) Policy No. 2017-PL-10

To: Delegate Agencies, American Job Centers and Sector Centers

From: 
Karin Norington-Reaves, CEO
Chicago Cook Workforce Partnership

Subject: SUPPORTIVE SERVICES

Date: December 14, 2017

Purpose:

The purpose of this communication is to establish policy for the delivery of Supportive Services pursuant to Title I of the Workforce Innovation and Opportunity Act (WIOA).

References:

WIOA sec. 3(59) and secs. 134(d) (2) and (3).
20 CFR 680.900
DCEO WIOA Policy 5.4

Background:

Support services enable WIOA participants to overcome barriers that would otherwise prohibit their participation in WIOA or reduce their opportunity to successfully achieve the goals established in their Individual Employment Plans (IEP) or Individual Service Strategies (ISS). This policy is to ensure that the WIOA participants receiving supportive services are eligible to do so. This policy is also meant to promote effective management of services and to prevent misuse of WIOA funds.

Summary Policy Statement:

Supportive services as defined in WIOA Sections 3(59) and 134(d) (2) and (3) are available to WIOA participants to enable them to participate in Adult and Dislocated Worker career and training services and Youth services. These include services such as transportation and child care.

Delegate agencies are required to maintain information about the availability of supportive services and must have referral relationships in place with agencies and organizations that provide these services. When WIOA participants are unable to obtain needed supportive services through one of these other agencies or organizations, The Partnership policy permits the payment of supportive services costs, within certain limits as described in this policy letter. The delegate agency will provide on-site, short-term supportive services for WIOA participants in their program. Some supportive services may be provided to WIOA participants directly by the delegate agency or through the purchase of specific services from vendors without needing

approval from The Partnership. Supportive services must be reasonable, necessary, and consistent with the participant's Individual Employment Plan or Individual Service Strategy.

Purpose and Intended Uses:

The intent of supportive services is to enable a registered Adult or Dislocated Worker to participate in career and/or training services or for a registered Youth to participate in WIOA-funded activities. Supportive services payments may be provided to address needs that if unmet would prevent participation in WIOA activities and reduce the chance for WIOA participants to achieve the goals established in their IEP/ISS. This includes costs such as transportation, child care, uniforms, work-related tools, and licenses, and provision of eye exams and glasses. Delegate agencies must have the ability to make referrals for services such as emergency housing and children's health insurance.

This policy does not create an entitlement on the part of any WIOA participant to supportive services. The provision of supportive services to WIOA participants is at the discretion of the delegate agency within the guidelines of this policy, the requirements of the law, and based on the availability of funds.

Needs Assessment:

All WIOA registered adults, dislocated workers and youth must be assessed to determine their needs for supportive services. This assessment must include a determination of the available income supports and family budget requirements, transportation and childcare needs during the planned period of participation. The IEP/ISS for each participant must include a plan for how the individual's supportive service needs will be met during participation.

Referral:

Delegate agencies must maintain information on supportive service availability within the local workforce investment area, including but not limited to services such as child care, food pantries, mental health services, emergency and subsidized housing, Supplemental Nutrition Assistance, Medicaid and children's health insurance.

Delegate agencies must establish referral relationships with agencies and organizations that offer supportive services, and they must refer participants to these services when such services are needed.

Eligibility:

To be eligible for supportive services paid for with WIOA Title I Adult, Dislocated Worker or Youth funds, an individual must:

1. be a registered participant in WIOA Title I-funded Adult, Dislocated Worker or Youth services;
2. require supportive services in order to be able to participate in WIOA Title I-funded Adult, Dislocated Worker career or training services or Youth services. This need must be justified based on a documented assessment of the individual's needs in relationship to the goals established in the participant's IEP/ISS. This need must be properly recorded in the participant's case notes and identified in the IEP/ISS; and
3. be unable to obtain the needed services through other programs providing such services.

Budget and Payment Procedures for Delegate Agencies:

Delegate agencies must include funds for supportive services as part of their annual contract budgets. All delegate agencies must implement procedures to ensure that total payments for supportive services do not exceed this budgeted amount unless a formal modification of the budget has been approved in advance.

Payments for supportive services for WIOA participants in training services are defined as training expenses under the state minimum training expenditure policy and should be budgeted as a training expenditure. Payments for supportive services for WIOA participants who are *not* receiving training services are not considered training expenses and should be budgeted as a non-training expenditure.

Delegate agencies must document supportive services expenditures (such as invoices, receipts and cancelled checks) and must be available for review by The Partnership, the State or DOL upon request. Supporting documentation must be maintained by the agency providing the service.

Approval Process:

Supportive services must be reasonable, necessary, and consistent with the participant's IEP/ISS. Questions or concerns regarding the allow ability of supportive services expenditures, particularly where the cost is unusually high must be referred to The Partnership for review and final determination The Partnership's review will consider the:

1. reasonableness and necessity if cost,
2. participant's IEP or ISS; and
3. delegate agency's budget.

Whenever such expenditure is being considered, the delegate agency must contact their Regional Manager and explain the proposed expenditure. The Regional Manager will then follow up with the delegate agency with a determination regarding the allowance of the proposed expenditure. A written determination will be provided. The delegate agency should retain this determination in the participant's case file.

Actions Required

Delegate Agencies must (1) review this Policy Letter; (2) transmit this letter to all staff with responsibility for case management and referral to supportive services; (3) ensure that procedures for approving and paying for supportive services are fully in compliance with this policy; (4) ensure that appropriate staff are trained in the revised policy; and (5) ensure that management controls are in place to promote implementation of this policy.

Inquiries:

All inquires should be directed to the delegate agency's Regional Manager.

Effective Date:

Immediately upon Board approval.