



# COUNTY OF LOS ANGELES WIOA ADULT, DISLOCATED WORKER AND YOUTH PROGRAMS DIRECTIVE



DATE: April 28, 2017

NUMBER: WIOA D16-09

## WIOA SUPPORTIVE SERVICES POLICY AND PROCEDURES

### EXECUTIVE SUMMARY

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This directive provides direction to County of Los Angeles America's Job Centers of California (AJCCs) administering Workforce Innovation and Opportunity Act (WIOA) Adult, Dislocated Worker and Youth programs on the County's policy, along with procedural information concerning the provision of supportive services to individuals enrolled in WIOA Title I Adult, Dislocated Worker and Youth programs.

This policy is intended to ensure that County of Los Angeles AJCCs and Youth Service Providers make available and coordinate supportive services to promote the ability of Adult, Dislocated Worker and Youth participants to participate in WIOA activities. The County encourages the provision of supportive services to WIOA participants to the extent that they are necessary to promote participants' participation in WIOA Title I services leading to employment or other performance outcomes.

AJCCs and Youth Service Providers have considerable discretion as to the amount of funds and length of time they devote to a participant's supportive services so long as an assessment determining participant's need and inability to pay for such services is documented, and services provided are reasonable and follow the guidelines set forth in this directive. This policy does not establish specific limits on the amount or duration of funds for supportive services; such limits may be imposed by AJCCs and Youth Service Providers to ensure the reasonableness of amount and duration in accordance with their written policies and procedures, within the parameters described herein.

Furthermore, participation in WIOA shall not be construed as an avenue to provide any participant with an entitlement to supportive services.

This Directive supersedes Directive LACOD-WIAD08-10.

### REFERENCES

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- Workforce Innovation and Opportunity Act (WIOA) (Public Law 113-128), Title I,

Sections 3(59), 134(d)(2) – (3), 129 (c)(2)(G)

- WIOA Regulations at 20 CFR parts 677.150(a), 677.150(a)(2), 680.900, 680.910, 681.570, 681.460, 680.150
- Uniform Guidance at 2 CFR part 200
- Department of Labor Employment and Training Administration Training and Employment Guidance Letter (TEGL) WIOA No. 21-16: Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance
- Department of Labor Employment and Training Administration Training and Employment Guidance Letter (TEGL) WIOA No. 19-16: 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

## BACKGROUND

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As stated in 20 CFR §680.900, supportive services for Adults and Dislocated Workers are defined in WIOA §3(59) and §134(d)(2) and (3). Local Workforce Development Boards (WDBs), in consultation with the one-stop partners and other community 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 such services, including how such services will be funded when they are not otherwise available from other sources. The provision of accurate information about the availability of supportive services in the local area, as well as referrals to such activities, is one of the career services that must be available to Adults and Dislocated Workers through the one-stop delivery system. In addition, as defined in WIOA §3(59) and further delineated in 20 CFR §681.570 supportive services shall be made available to Youth in order to enable participation in WIOA activities.

## POLICY AND PROCEDURES

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### Definitions

*Participant (Adult & Dislocated Worker programs)* - A participant is a reportable individual who has received WIOA services other than self-service or information-only activities, after satisfying all applicable programmatic requirements for the provision of services, such as eligibility determination.

*Participant (Youth program)* - A participant is a reportable individual who has satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, and development of an individual service strategy,

and received at least 1 of the 14 WIOA Youth program elements identified in sec. 129(c)(2) of WIOA.

*Supportive Services* - 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 WIOA. (WIOA Sec. 3(59)). Supportive services for Adult, Dislocated Worker and Youth program participants may include, but are not limited to, the following:

- (a) Linkages to community services;
- (b) Assistance with transportation;
- (c) Assistance with child care and dependent care;
- (d) Assistance with housing;
- (e) Needs-related payments;
- (f) Assistance with educational testing;
- (g) Reasonable accommodations for individuals with disabilities;
- (h) Legal aid services;
- (i) Referrals to health care;
- (j) Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear;
- (k) Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and
- (l) Payments and fees for employment and training-related applications, tests, and certifications.

## **Policy**

### *Provision of Supportive Services*

1. The provision of accurate information about the availability of supportive services in the local area, as well as referrals to such activities, is one of the services that must be available to Adults, Dislocated Workers, and Youth at all County AJCCs.
2. Supportive services may only be provided to:
  - a. WIOA enrolled Adult or Dislocated Worker program participants who are participating in a career and/or training service; WIOA enrolled Youth participants participating in WIOA activities, including the 14 WIOA Youth Elements; and
  - b. are unable to obtain supportive services through other programs providing such services.

3. Supportive services may only be provided when they are necessary to enable Adult and Dislocated Worker program participants to participate in career services or training activities, and Youth program participants to participate in WIOA activities, including the 14 WIOA Youth Program Elements.
4. A financial needs assessment must be completed for Adult, Dislocated Worker, and Youth participants prior to providing supportive services. The financial needs assessment must be conducted when a supportive service need is identified, it must indicate a participant's total monthly income compared to total monthly expenses, and demonstrate a need for support and inability to pay for requested service.
5. Recipients of Public Assistance are exempt from the financial needs assessment, unless their public assistance status has changed at the time that a supportive service need arises. Proper documentation to verify receipt of Public Assistance must be on file.
6. AJCCs and Youth Service Providers must maintain, and make available to County upon request, a listing of community resources to be utilized for referral to any supportive services not provided by the AJCC or Youth Service Provider. Exploration of available resources and referral to them must be documented in the case file, prior to approval and delivery of WIOA funded supportive services.
7. Supportive services must be approved and provided within 3 business days of identifying the need for supportive services. If supportive services are not approved and provided within this required timeframe, an explanation must be provided in case notes as to why the requirement was not met.
8. Request for and approval of supportive services must be in place prior to expending supportive services funds or instructing a participant to expend funds for reimbursement at a later date.
9. Supportive services provided must be reasonable, necessary, appropriate and allowable under the provisions herein and federal guidelines, as cited in the References section of this document, as well as any guidance released subsequently.
10. Supportive Services funds cannot be expended or reimbursements made for goods or services received or purchased prior to enrollment and participation in WIOA.
11. Participation in WIOA shall not be construed to provide any participant with an entitlement to supportive services.

12. AJCCs and Youth Service Providers shall make every effort to enter into direct vendor agreements for provision of supportive services and may only provide direct payments/reimbursement to participants in cases where a vendor agreement could not be obtained. Documentation showing that every effort was made to secure direct payment mechanisms before resorting to reimbursement to participant must be provided in the case file and discussed in case notes. Direct payments to participants must be the method of last resort for provision of Supportive Services.

13. A listing of the AJCC's and Youth Service Provider's vendor agreements for the provision of supportive services must be maintained at all times and be made available to the County upon request. Each listing should identify the vendor, vendor location(s), vendor contact information, type(s) of supportive service to be provided, and payment system utilized (i.e. voucher program, direct vendor payment).

#### Provision of Incentives (Youth Program Only)

Incentive payments (in cash or a cash-valued certificate/card) to WIOA Youth participants are permitted to reward participants for completing or achieving a milestone or goal, which is tied directly to a performance outcome. The Youth Service Provider must have written policies and procedures in place governing the award of incentives and must ensure that such incentive payments are:

- Tied to the goals of the specific program;
- Outlined in writing before the commencement of the program that may provide incentive payments;
- Align with the AJCC's and Youth Service Provider's organizational policies; and
- Be in compliance with the requirements in 2 CFR §200. For example, Federal funds may not be spent on entertainment costs. Therefore, incentives may not include entertainment, such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment. Additionally, under 2 CFR §200, there are requirements related to internal controls to safeguard cash which also apply to safeguarding of gift cards, which are essentially cash.

Note: WIOA funds cannot be used for incentives for recruitment and completion of the eligibility documentation process.

#### Supportive Services Documentation Requirements

1. Supportive services must be fully documented in a participant's file and case notes in the CalJOBS system. Documentation shall include proof of a clear assessment of need

for the service; justification for supportive services (whether this service is necessary for the participant to participate in a WIOA activity), a statement and documentation indicating other resources have been sought prior to the provision of supportive services, amount of planned and approved funding, verification that services are appropriate for participant's WIOA activity, and verification that services were received (i.e. proof of checks, vendor payments, or vouchers provided).

2. Assessment of need for supportive services must be part of the Initial Assessment process. If need is established at this time, delivery of the necessary services to participate in WIOA activities should be coordinated. In the event that a participant's circumstances change during the course of program participation and need for supportive services arises after the Initial Assessment process has been completed, subsequent assessment(s) must be done to re-examine and re-document the need and benefit of the service. All assessment tools and results must be included in participant's case file and discussed in case notes.
3. Appropriate supporting documentation to validate participation in the WIOA activity for which a supportive service is provided is required for any supportive services furnished (i.e. transportation supportive services may require: participant training attendance records, records of job interviews attended, or records of job search activities conducted).
4. The need for supportive services must be recorded in case notes and documented in the Individual Employment Plan (IEP), if applicable, in the CalJOBS system and in the participant case file for Adult and Dislocated Worker participants or the Individual Service Strategy (ISS) for Youth participants.
5. Original receipt(s) or payment/billing statement(s) are required for any participant reimbursements. Receipts or payment/billing statements must contain the following:
  - Vendor/Service Provider name, address, and telephone number
  - Purchase/Service date(s)
  - Itemized list of merchandise and/or service (i.e. gas receipts: gallons pumped and price per gallon; clothing receipts: garment(s) purchased, description, and price per item). Please note, reimbursements based on receipts that are not itemized are not allowed.
  - Total cost
  - Method of payment (cash, check, charge)
  - Zero balance, "paid in full", "paid", etc. receipts only (i.e. prepaid gas receipts are not acceptable documentation)

6. Participants receiving supportive services must have the appropriate supportive service activity code open in CalJOBS along with the WIOA activity code for which supportive services are being provided. The activity in CalJOBS must include appropriate projected start and end dates, as well as actual start and end dates updated when they become known.

### Follow-up Supportive Services

1. Follow-up career services are not a qualifying service for the receipt of supportive services for **WIOA Adult and Dislocated Worker** program participants. 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.
2. Supportive Services for **WIOA Youth** participants may be received throughout the period that the participant is enrolled in WIOA and up to a maximum of 12 months after exiting the program, provided the service is necessary to retain employment or continue in post-secondary education or training, and there is a financial need documented in the participant file.

### **Procedures**

Los Angeles County AJCCs and Youth Service Providers must adopt and implement procedures that address all aspects of the above described policy, which will include, but not necessarily be limited to, the following:

- A process to identify the supportive service needs of WIOA enrolled participants to enable their participation in WIOA Title I activities. This process must also include a financial needs assessment.
- A process to identify and refer WIOA participants to non-WIOA resources that may be available within the local area.
- A process to refer WIOA participants to WIOA supportive services.
- Processes for accurately recording the provision of WIOA funded supportive services and the referral of participants to non-WIOA funded supportive services.
- A process to provide supportive services within the required timeframe provided within

this policy. The County strongly encourages AJCCs and Youth Service Providers to develop agreements with individual vendors for the provision of supportive services through voucher programs and recommends this as the primary way to provide supportive services throughout the AJCC system.

- A policy to set limits on the amount and duration of supportive services funds provided to any one participant. Any such policy must not restrict the ability of participants, for whom a need has been determined, to access supportive services within the established limits.

## **ACTION**

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Los Angeles County AJCCs and Youth Service Providers must ensure that the policies and procedures described herein are communicated throughout the operations, management and governance structure of the contractor organization and that this Directive is appropriately maintained until further notice.

Los Angeles County AJCCs and Youth Service Providers must develop and implement written internal controls and procedures incorporating all of the requirements written in this directive.

## **INQUIRIES**

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Inquiries regarding this directive and the policies and procedures described herein should be directed to [wioaops@wdacs.lacounty.gov](mailto:wioaops@wdacs.lacounty.gov).



**Jose Marquez, Assistant Director  
Workforce and Community Services Branch**