SUPPORTIVE SERVICES

Policy Number: 217, Revision 11
Effective Date: July 1, 2019
Revision Date: June 17, 2026

I. BACKGROUND

The Workforce Innovation and Opportunity Act (WIOA), Sec. 3(59), 129(c)(2)(G), 134(d)(2) and (3) defines supportive services as 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 Title I**. Supportive Services may be provided through in-kind or cash assistance, or by arrangement with another human service agency when necessary to enable an individual who is eligible for training under a WIOA assisted program, but who cannot afford to pay for such services, to participate in such WIOA-assisted programs. These services shall be provided in the absence of other resources and must be stated on the Support Service Form and in a corresponding case note.

Supportive services may only be provided to individuals who are:

1. Participating in career or training services; and
2. Unable to obtain supportive services through other programs providing such services.

Financial assistance (cash payments) is not available prior to registration.

Support services **are** allowed for Adults, Dislocated Workers, and Youth during follow-up and after program exit to assist in retaining employment (see Administrative Bulletin 219 Exits from WIOA).

II. POLICY

Supportive services must be necessary for the success of the training plan and the need documented in the participant's employment plan. They must be beyond the ability of the participant to pay and unavailable from other sources within the community. Supportive Services are not entitlements and should be provided to participants based on a documented financial assessment, individual circumstances, the absence of other resources, and funding limits.

Justification for the provision of support services shall be documented on the WIOA Supportive Service Form and in case notes. Supportive service forms that are attached to this bulletin are required. Contractors may re-create the support service forms with their company logo on them if the language is the same.

In 2020, DOL clarified that food may be purchased with Title I-B funds for eligible youth on a limited and reasonable basis if necessary to assist or enable them to participate in allowable youth program activities and reach their employment and training goals. However, Contractors must first coordinate the purchase of food for Title I-B youth with other community, state, or federal services that provide food to low-income individuals and document the coordination efforts undertaken. This includes pursuing food assistance available through the Supplemental Nutrition Assistance Program (SNAP), which is a required WIOA one-stop partner, as well as through local food banks and at-risk youth organizations, whether they are partners in local one-stop systems.

Contractors must establish internal controls that result in equitable treatment in access to and the provision of support services to participants.

These services **may include, but are not limited to**, the following:

A. Linkages to community services: A non-financial supportive service.
B. Transportation/Automobile Repairs/Maintenance: Assistance may include bus tokens, mileage allowance, gas vouchers, or other travel assistance that is considered reasonable and necessary. Assistance may be provided for vehicles used as the primary source of transportation for training or work. The participant should be the registered owner of the vehicle. Contractors must document who owns the vehicle and a valid reason why the vehicle cannot be registered to the participant.
C. Relocation/Pre-Employment Interview Assistance: Assistance is available as an Intensive Service to participants who are registered in WIOA Adult or Dislocated Worker Programs to enable them to become permanently employed. Services for relocation/pre-employment interview assistance are not entitlements and should be provided to participants based on documented need, the absence of other resources and funding limits. This assistance shall only be provided to enrollees who: cannot obtain employment within their commuting area that meets their skill level and/or has significant wage earnings; and for relocation have secured suitable, long-duration employment, verified in writing, outside of their commuting area; or for pre-employment interview assistance, have secured a pre-employment interview for a bona fide job opening, documented by a job announcement or letter from the prospective employer outside their commuting area. See Administrative Bulletin 215.
D. Childcare or Dependent care: The following childcare stipulations apply:
    1. Participant shall access “Working Child Care Connections” at DSHS before authorization of WIOA funding for Childcare.
    2. Priority will be given to single heads of household. Reimbursement will not be made for daycare if the participant has an unemployed spouse at home. Special cases, such as handicapped spouses unable to work, shall receive individual consideration and be documented by the contracting agency.
    3. Childcare services shall be paid to a licensed vendor unless the vendor is providing services in the participant's home. Exceptions can be made if it is demonstrated (documentation must be maintained) that childcare as described above is not readily

available due to the child's age, the child's needs requiring special care, or lack of childcare in the area. This exception is intended as a temporary measure to allow the client to participate in training until acceptable childcare can be found.

4. Childcare payments are based on either a full-day or half-day rate. The payment may be two times per month and will be based upon actual costs but may not exceed those listed in the Child Care rates for Washington State. For more information on Child Care rates in Washington State, visit subsidy-LC-2023.pdf (wa.gov)

E. Housing Assistance: Includes payments for overdue electricity, home heating fuel, and water bills, temporary shelter, and/or mortgage.

When providing rental assistance, a copy of the rental agreement from the landlord must be maintained in the file. If a rental agreement is not available, the landlord must complete and sign the Emergency Rental Assistance Request form. The Emergency Rental Assistance Request form must be maintained in the file. Each emergency will be dealt with on an individual basis.

F. Needs-related Payments: See Administrative Bulletin 218
G. Reasonable Accommodations for Individuals with Disabilities
H. Legal Aid Services

I. Referrals to health care: Assistance for medical or dental services not covered by other insurance policies or by the State Labor and Industrial Insurance may be provided. Contractors must exhaust all other resources for medical assistance before using WIOA funds.

J. Work and/or training-related clothes or tools: A participant may receive additional supportive services, computers/laptops, clothing/uniforms, boots, helmets, gloves, glasses, and tools required for participation in training or to succeed in their employment. Contractors are required to have a tool policy in place to safeguard property, which outlines the requirements for tool ownership. Contractors may use Attachment 7 Tools and Equipment Agreement and Attachment 8 Tools and Equipment Inventory in their policy.

K. Post-Secondary Education Classes Expense: Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes.

L. Applications, Tests, and Certifications: Assistance with payments and fees for employment and training-related applications, tests, and certifications.

M. Out-of-Area Training Expenses: Participants' allowable out-of-area training expenses may include temporary housing and other incidental expenses, which are necessary to enable individuals to participate in training outside of their commuting area. Support for this purpose will pay for actual expenses, which are **reasonable and necessary.**

N. Food Assistance (Youth Only): Assistance with food. If Title I-B funds are ultimately used to purchase food, DOL expects case files to amply document:

1. Unsuccessful efforts to first secure food for the youth through federal, state, and community food assistance programs and services; and
2. The immediate need for Title I-B funds to be used to purchase food for the youth to enable effective participation in youth program activities.

Supportive Services as an Allowable Work Experience Expenditure:
TEGL 21- 16 stated that "supportive services are a separate program element and cannot be counted toward the work experience expenditure requirement even if supportive services assist the youth in participating in the work experience." However, ETA's policy on this issue has evolved. ETA recently determined that supportive services that enable WIOA participants to participate in training can count toward training expenditures. Therefore, to be consistent with this policy, supportive services that enable WIOA participants to participate in work experience can now count toward the work experience expenditure requirement.

Allowable Training Expenses as Supportive Services
Allowable training expenses affiliated with training paid by programs other than WIOA Title I (such as Vocational Rehabilitation (VR), Trade Adjustment Assistance (TAA), or community and technical colleges through Worker Retraining (WRT)) can be funded by WIOA Title I as supportive services if:

- The participant is also eligible to enroll in a WIOA Title I program.
- A non-WIOA Title I program was selected and is paying the tuition for the training.
- Costs for allowable training expenses are not covered by Pell, other financial aid programs, or private scholarships.
- The WIOA Title I program, and case manager had no direct involvement in the process of selecting the training, which precludes the establishment of a WIOA-funded ITA.

However, since supportive services do not trigger or extend participation for Adults and Dislocated Workers, there must be an accompanying Title I-funded career service to trigger a participation episode.

Documentation of training-related expenses as supportive services through case notes will prevent the appearance of duplicate spending between WIOA and other federally funded programs (see WIN 0088, WIOA Title I Case Note Guidance).

Therefore, any ITA-related support service provided does not require documentation in MIS database system. They must be documented in case notes explaining how the supportive service connects to the training service. Expenditures directly related to training that qualify to be paid through ITAs are tuition, books, transportation assistance, academic fees, educational testing and certification, tools, and supportive services.

Changing Circumstances
Changing circumstances (e.g., ending scholarships or financial aid) may necessitate a reassessment of funding sources and training providers by the case manager and the participant, which may result in the consideration of an ITA. Per 20 CFR 680.300 and Section 7 of TEGL 19-16, an ITA is triggered through an intentional process between a WIOA Title I participant and the

participant's WIOA Title I case manager. That process, which leads to the selection of a training provider eligible to receive WIOA Title I fund via an ITA, is a condition of establishing a WIOA-funded ITA. (See WIOA Title I Policy 5601, Revision 2, Individual Training Accounts).

III. ACTION REQUIRED

Contractors should ensure that appropriate documentation via the Support Service Form is maintained in each participant file to justify the expenditure of Supportive Service funds. Contractors are required to provide a monthly, or upon request, to the South Central Workforce (SCW) detailing supportive service types and amounts.

Requests for Supportive Services for exceptional circumstances and amounts must be made in writing to SCW. Documentation must include:

1. Written justification that the support service is necessary and reasonable,
2. Advance approval by authorized contractor staff, and
3. A Personal Resource Worksheet (Attachment 6) documenting income and monthly living expenses.
   a. The Personal Resource Worksheet must be reviewed when support services are provided and updated, as needed. Updates must be signed by the participant.
   b. The Personal Resource Worksheet must be updated as financial circumstances change. Updates must be signed by the participant.
   c. All Personal Resource Worksheets must be updated at the start of a program year. Updates must be signed by the participant.

- Attachment 1: Supportive Service Form
- Attachment 2: Application for Childcare
- Attachment 3: Request for Payment for Child Care
- Attachment 4: Travel Application for Mileage Reimbursement Form
- Attachment 5: Emergency Rental Assistance Request Form
- Attachment 6: Personal Resource Worksheet
- Attachment 7: Tools and Equipment Agreement
- Attachment 8: Tools and Equipment Inventory
- Attachment 9: Incentive Payments Policy
- Attachment 9a: Request for Approval of Incentive Payments to WIOA Title I Adult or Dislocated Worker Participants

REFERENCES

All Contractors will be monitored for compliance with the MIS procedures for timeliness, accuracy and completeness of all forms and documents.

- 20 CFR § 680.900 Adult & DW
- 20 CFR § 681.570 Youth
- TEGL 19-16 – Guidance on Services Provided Through Adult and Dislocated Worker Programs

- TEGL 21-16, Change 1 – WIOA Youth Program Guidance
- TEGL 09-22 – Workforce Innovation and Opportunity Act Title I Youth Formula Program Guidance
- WorkSource System Policy 1020, Revision 3 – Data Integrity and Performance Policy and Handbook
- WorkSource System Policy 5602, Revision 5 – Supportive Services and Needs-Related Payments

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