

The Seventh Planning District Consortium Workforce Development Board

Administrative Office

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Matt Wheeler, Chairman | Candle Sattler, Interim Director of Workforce Development

GUIDANCE LETTER ISSUED DECEMBER 4, 2020

Subject: Allowable and Unallowable Supportive Services for Adults, Dislocated Workers and Youth

Purpose: The purpose of this Technical Guidance Letter is to clarify the difference between allowable and unallowable supportive services as defined in WIOA Title I Adult, Dislocated Worker and Youth program. In addition, this Technical Guidance Letter reviews the maximum mileage for reimbursement and Youth Incentive and Stipend clarification.

Procedure: LWDA 70 Staff should refer to Workforce Innovation and Opportunity Act (WIOA) Title I, Section 3 (59) and 134 (c) (2) and (3), 20 CFR 681.570 and 680.900, LWDB 70 Supportive Services Policy for Adult, Dislocated Worker, and Youth Participants, Louisiana Workforce Commission policies OWD 4-20, Department of Labor TEGLs 19-16 and 21-16 for full eligibility requirements.

Background: The WIOA provides program guidelines for supportive services for WIOA eligible adult and dislocated workers and youth participants. Supportive services are provided to eligible WIOA adults, dislocated workers and youth when the supportive service will assist participants in helping remove barriers with the intent to help participants reach employment and training goals.

Effective Date: December 4, 2020

Supportive Services are services that are necessary to enable an individual to participate in activities authorized under WIOA Sec. 134(c)(2) and (3).

Supportive Services may include, but are not limited to (20 CFR 681.570):

Allowable Supportive Services:

Supportive services may include but are not limited to:

Linkages to community services;

Assistance with transportation;

- The most economical public or private transportation is allowable if it will reasonably meet the participant's need to participate in program activities. Payments may not exceed the IRS mileage rate;

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Bossier City, LA 71111
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□ **Caddo Parish**
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Coushatta, LA 71019
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□ **Sabine Parish**
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(318) 256-2698

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EQUAL OPPORTUNITY EMPLOYER/PROGRAM AUXILIARY AIDS AND SERVICES ARE AVAILABLE UPON REQUEST TO INDIVIDUALS WITH DISABILITIES.

- Other forms of public or private transportation services may be paid for at cost which is reasonable based on local market price conditions, such as taxi, bus fare, or as provided by another local transportation organization.
- Travel from the participant's residence to the training for the beginning of training and for the return trip at the completion of the training is allowable at the IRS mileage rate. Mileage will be reimbursed up to 100 miles bi-weekly. The copy of the original Supportive Service Request, Google Map, along with the Transportation Supportive Service Reimbursement Procedure Form must be submit at the time of bi-weekly request.
- Auto repair, including the purchase of tires, is an allowable cost if the vehicle is needed for participation in employment and training activities or for the participant to seek, accept or retain employment. A description of repairs needed must be maintained in the participant file.
- Auto repair will not exceed the value of the automobile; documentation of the vehicle value must be in the participant's case file under Document (staff). The vehicle must be owned by the participant or spouse. Vehicle registration and proof of liability insurance must be obtained and included in participant's case file under Document (staff) as documentation. Participant must provide three quotes or bids for repairs.

Assistance with childcare and dependent care:

- Child and dependent care assistance is a supportive service provided to participants if it is determined that without it a participant will not be able to participate in services or transition to employment. Childcare assistance will not be provided when a competent adult (over the age of 18 years) residing at the same address as the participant is available to provide childcare. Only participants in Work Experience, an ITA or an OJT or Youth participants attending Adult Education are eligible to receive child/dependent care assistance.
- Participants must prove that they are not receiving assistance from any other organization. Participants may only utilize licensed childcare/dependent care providers who have been pre-approved by LWDA 70 staff. Participants must submit original receipts for reimbursement. Reimbursement will not be approved for care provided by a member of the immediate family. Participants who access services from a childcare/dependent provider not approved by LWDA 70 staff will be held responsible for any incurred costs.

Assistance with housing;

- Funds may be used for emergency payment of rent. An eviction notice along with a signed rental or lease agreement must be completed and maintained in the participant file prior to issuance of payment.

Needs-related payments;

- Needs-related payments provide financial assistance to individuals, enabling them to participate in training. See Needs-related section in LWDB 70 Supportive Services Policy for Adult, Dislocated Worker, and Youth Participants for details.

Assistance with educational testing;

- Funds may be used for application fees and HiSET or State Approved High School
- Equivalency program fees or tests.
- Funds may be used for occupational testing.

Reasonable accommodations for individuals with disabilities;

Legal aid services;

- Legal aid services may only be provided when the service is not available through other agencies or organization and the service is necessary for the individual to participate in WIOA activities. Coordinating legal aid service, including expungement services, will require working with local bar associations, referral to Louisiana Legal Services Association as well as private counsel. Assistance may only be provided in civil, non-criminal legal problems.

Assistance with uniforms or other appropriate work attire and work-related tools and equipment;

- Clothing includes clothing for interviews and/or clothing required as personal protective equipment not otherwise supplied by the business.
 - WIOA participants (Adult/DW/Youth) receiving Individual Career services, may be aided in purchasing clothing, tools, protective gear, scrubs, stethoscope, protective eye gear, blood pressure cuff certifications, licenses, and other needs in order to become employed. If tools or supplies are needed to participate in training or become employed, staff may provide financial assistance only if it is required by the training provider or an employer. Participants must be enrolled in training or have a firm employment offer before this expense can be approved by staff.
 - NOTE: Training related expenses for WIOA eligible adults or youth that may be covered by an Individual Training Account do not count against the supportive services limit for each registered participant. ITA related training expenses may include but are not limited to assistance with the purchase of tools required for a specific course; current school admission fees, computer and lab fees; and books and supplies
- Tools that are required to obtain or continue employment are an allowable cost. LWDA 70 staff must first determine that the requested tools cannot be provided by any other source such as the prospective employer or participant.
 - Tools may be purchased for participants if the tools are required to continue a training program or obtain employment. Staff must determine that the tools are required and that they cannot be provided by any other source, such as the prospective employer or training provider. Participants must be enrolled in training or have a firm employment offer before this expense can be approved by staff.

Assistance with books, fees, school supplies and other necessary items for students enrolled in training services;

- Tools that are required to begin or continue a training program are an allowable cost.
- LWDA 70 staff must first determine that the requested tools cannot be provided by any other source such as the training provider or participant.
- Tools become the property of the participant upon satisfactory completion of the WIOA training outlined in the participant's IEP, ISS or upon employment.
- Computer purchases, in limited cases, are approved expenses. This is most typically, but not exclusively, in online or distance learning situations LWDA 70 staff must complete the Supportive Service Form with the participant and submit the form to the supervisor for approval prior to purchase for any computer or Chromebook with a value of \$350.00 or more.

Payments and fees for employment and training-related applications, tests and certifications;

- Allowable costs drug testing; background checks; an Assessment,
- Course, and Treatment (ACT) class, and/or tools and equipment needed for self-employment.

Other supportive services may be provided as determined by the service provider. Such goods and services will be reasonable and necessary for the participant to remain in training and/or obtain or retain employment. These services may include but are not limited to:

- Haircuts, personal grooming and hygiene needs;
- Financial counseling or assistance;

Unallowable Supportive Services:

- Payments are not allowed for titled or deeded items or when recovery of the expense is anticipated. Such items include but are not limited to:
 - Rent deposits or housing deposits;
 - Mortgage payments, homeowner's insurance, and property taxes;
 - Car payments;
 - Purchase of vehicles;
 - Fines; and
 - Late fees.
- Other unallowable expenses include:
 - Household items
 - Alcohol or tobacco products; and
 - Onsite meals.
- Contributions and donations
- Payments are not allowed for expenses incurred prior to enrollment in a WIOA program.
- Supportive service payments may not be paid to an Adult or Dislocated Worker participant while enrolled in follow-up.
- Out-of-state job search and relocation expenses that will be paid by the prospective employer.
- Business start-up costs that would be considered capitalization or the acquisition of business assets are not allowed.

INDIVIDUAL SUPPORTIVE SERVICE LIMITS

Supportive services are contingent upon funding availability and approval of request. Based on documented need as specified elsewhere in this guidance or in LWDB 70 Supportive Services Policy for Adult, Dislocated Worker, and Youth Participants, LWDA 70 staff may allocate up to \$1,000 in supportive service payments per participant, per program year while they are enrolled in WIOA services. If supportive service funds are used, LWDA 70 staff must document in case notes how the need was determined for each area support service funds were used. Youth Incentives and Youth Stipends do not have a cap or limit and LWDA 70 staff may use their own discretion in approval request. LWDA 70 staff must keep track of all Youth Incentives and Youth Stipends.

EXCEPTIONS

Prior approval is required for any requests exceeding funding or duration limits set forth in this guidance or in LWDB 70 Supportive Services Policy for Adult, Dislocated Worker, and Youth Participants. Participants must submit such request in writing with reasonable justification and supporting documentation when appropriate to LWDA 70 staff for approval. Exceptions for extreme circumstances may be approved at the discretion of the Director.

ACTION

Bring this directive to the attention of all LWDA 70 staff.

INQUIRIES

If you have any questions, contact the LWDA 70 Management 318-632-2022.



Candle Sattler

Interim Director of Workforce Development