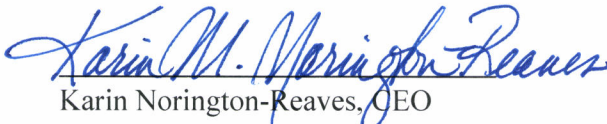




**Workforce Investment Act Policy No. 2013-PL-05**

**To:** All Delegate Agencies, One Stops and Sector Centers

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

**Subject:** Supportive Services

**Date:** April 1, 2013

**Purpose:**

The purpose of this communication is to establish policy for the delivery of Supportive Services pursuant to Title I of the Workforce Investment Act (WIA).

**References:**

WIA Section 101(46); 134(e) (2) and (3)

WIA Implementing Rule Subpart H- Supportive Services

Department of Commerce and Economic Opportunity Policy Letter No. 07-PL-40- Training Expenditure Requirement

Department of Commerce and Economic Opportunity Policy Letter No. 06-PL-28- Incident Reporting

**Background:**

Supportive services enable WIA registrants to overcome barriers that would otherwise prohibit their participation in WIA 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 the appropriate use of supportive services and to ensure that the WIA registrants receiving supportive services are eligible to do so. The policy is also meant to promote effective management of services and to prevent misuse of WIA funds.

**Summary Policy Statement:**

Supportive services as defined in WIA Sections 101(46) and 134(e) are available to WIA registrants to enable them to participate in core, intensive or training 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 WIA registrants 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 WIA registrants in their program. Some supportive services may be provided to WIA registrants 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 registrant's IEP/ISS.

**Purpose and Intended Uses:**

The intent of supportive services is to enable a WIA registered adult, dislocated worker or youth to participate in WIA-funded activities, including core, intensive and training services. Supportive services may be provided to address needs that if unmet would prevent participation in WIA activities and reduce the chance for the WIA registrant to achieve the goals established in their IEP/ISS. This includes supports such as transportation, child care, uniforms, work-related tools, 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 WIA registrant to supportive services. The provision of supportive services to WIA registrants is at the discretion of the delegate agency within the guidelines of this policy, the requirements of the law, and based upon the availability of funds.

**Needs Assessment:**

All WIA 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, family budget requirements, transportation and childcare needs during the planned period of participation. The IEP/ISS for each WIA registrant must include a plan of how the individual's supportive service needs will be met during participation.

**Referral:**

Contractors must maintain information on the 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.

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

**Eligibility:**

To be eligible for supportive services paid for with WIA Title I adult, dislocated worker or youth funds, and individual must:

1. be a registrant in WIA Title I-funded Adult or Dislocated Worker core services or Youth services;
2. require supportive services in order to be able to participate in WIA Title I-funded Adult or Dislocated Worker core, intensive and 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 registrant's IEP/ISS. This need must be properly recorded in the registrant'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 WorkNet Centers and Service Providers:**

Delegate agencies must include funds for supportive services as part of their annual contract budgets. All providers 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 WIA registrants in training (ITA, OJT or Customized Training) or in the twelve-month follow-up period subsequent to job placement 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 registrants who are *not* receiving training services are not considered training expenses and should be budgeted as a non-training expenditure.

Delegate agencies may establish an account with CTA/PACE and METRA to purchase passes in bulk quantities. If this is done, procedures must be in place to ensure:

- a) passes are kept in a secure location;
- b) registrants sign for their passes each time they obtain them;
- c) utilization of the passes is tracked; and
- d) an inventory report is prepared on a monthly basis which records the acquisition and disposition of all passes.

Delegate agencies must document supportive service expenditures (such as invoices, receipts and cancelled checks) and these 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 registrant's IEP/ISS. Questions or concerns regarding the allowability 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 of the cost,
2. registrant's IEP (adult) or ISS (youth); and
3. delegate agency's budget.

Whenever such expenditures are being considered, the delegate agency must contact their Regional Manager and explain the proposed expenditure. The Regional Manager will then follow up with the contractor 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 WIA registrant's case file.

**Actions Required:**

Contractors must (1) review this Policy Letter; (2) transmit this letter to all staff with responsible 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 this policy; and (5) ensure that management controls are in place to promote implementation of this policy.

**Inquiries:**

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

**Effective Date:**

Effective immediately upon approval of the Chicago Cook Workforce Investment Board