



To: Indiana's Workforce Investment System

From: Indiana Department of Workforce Development (DWD)

Date: October 8, 2021

Subject: DWD Policy 2021-02
Workforce Innovation and Opportunity Act (WIOA) Supportive Services for Title I
Adult and Dislocated Workers

Purpose

To provide guidance and context regarding supportive services for WIOA Title I Adult and Dislocated Workers including individuals participating through Dislocated Worker Grants (DWGs).

References

- WIOA Sec. 3, 129, and 134
- 20 CFR § 680.900-970
- TEGL 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 Services (ES), as amended by Title III of WIOA, and for Implementation of the WIOA Final Rules*

Content

Background

Title I of the WIOA provides for the use of supportive services for individuals participating in Adult, Dislocated Worker, and Youth services.¹ Local Workforce Development Boards (WDBs) are required to coordinate supportive services in their Local Plan. This policy provides guidance on the provision of supportive services for the Adult and Dislocated Worker programs².

Definition

Supportive services are provided to participants when it is necessary to enable an individual to successfully participate in activities authorized under WIOA. Supportive services may include, but are not limited to, the following:

¹ 20 CFR §§ 680.900-970 discusses supportive services predominantly in relation to the Adult and Dislocated Worker programs; however, the State requires that local supportive services policy must also address supportive services for Youth.

² Please refer to DWD's *WIOA Title I Youth Program Elements* policy for guidance on supportive services for the Youth program.

- (a) Assistance with transportation;³
- (b) Assistance with childcare and dependent care;
- (c) Assistance with housing;
- (d) Needs-related payments;
- (e) Assistance with educational testing;
- (f) Reasonable accommodations for individuals with disabilities;
- (g) Assistance with uniforms or other appropriate work attire and work-related tools, including such items such as work boots, eyeglasses, protective eye gear, and other personal protective equipment;
- (h) Assistance with books, fees, school supplies, and other necessary items, such as electronic devices⁴, for students enrolled in postsecondary education classes; and
- (i) Payments and fees for employment and training-related applications, tests, and certifications.

Needs-Related Payments⁵

Needs-related payments provide financial assistance to eligible participants for the purpose of enabling them to participate in training.⁶ Local areas must ensure eligibility is established and documented for each adult⁷ and dislocated worker⁸ participant. Additionally, local areas must determine the payment level for the Adult program and ensure payments to dislocated workers do not exceed the level restrictions established for that program⁹.

Unlike other supportive services, local WDBs may only provide needs-related payments to eligible WIOA participants who are enrolled in training or accepted in a training program that will begin within 30 calendar days¹⁰.

Local areas must ensure case managers review eligibility requirements and inform the participant that they (participant) are required to report any changes to their employment status and/or eligibility for unemployment compensation or Trade Readjustment Assistance.

Incentives

Supportive services must **not** be used as incentive payments for Adult and Dislocated Worker participants. Incentive payments are allowable for youth participants only in recognition of achievements directly tied to training activities and work experiences¹¹.

Local WDB Policy Requirements

The local WDBs must create policies and procedures describing how the local area provides supportive services. The local policies and procedures need to address coordination with partners to ensure non-

³ Examples of transportation assistance include mileage reimbursement, bus pass purchases, or vehicle registration fees.

⁴ Examples of electronic devices include computers, laptops, tablets, phones, and portable Wi-Fi if needed.

⁵ As described in 20 CFR § 680.900-970.

⁶ Training services can be found in WIOA 134(c)(3).

⁷ 20 CFR § 680.940

⁸ 20 CFR § 680.950

⁹ 20 CFR § 680.970

¹⁰ 20 CFR §680.960.

¹¹ As described in DWD's *WIOA Title I Youth Program Elements policy*.

duplication of resources and services; WIOA funds for Adult and Dislocated worker supportive services should only be used if other programs cannot provide supportive services¹². Limitations on funding and duration of supportive services must be included in the local policies and procedures.

For example, if a local Supportive Service policy permits the provision of electronic devices, such as computers, laptops, and tablets for training participants, the policy must contain:

- A process for determining the device is necessary to successfully complete the program (e.g., providing justification of necessity due to participant not already owning or having access to an adequate device needed for program completion) and the device cannot be obtained through other resources;
- Cost limits for the electronic devices which are consistent with market prices for comparable goods;
- Disposition of the electronic device upon completion of the training, specifying whether the participant may retain the device as well as expectations if a participant does not complete training. This information must be communicated to the participant; and
- Documentation that the electronic device is necessary in case notes within the state's case management system.

Provision of Supportive Services

Supportive services may only be provided to Adults and Dislocated Workers who are participating in career or training services authorized under WIOA and who are unable to obtain supportive services through other programs providing such services. Local WDBs must ensure participants are provided accurate information about the availability of supportive services in the local area, as well as referral to such programs.

A participant who is receiving follow-up services cannot obtain supportive services. Participants can only receive ongoing supportive services if they maintain participation in career services and/or training activities. Supportive services cannot be used to extend the date of completion for career services or training activities.

Determination of Need

Staff must first establish a participant has a financial need of supportive services before they are provided. Supportive services should be used to address the participant's barriers identified through the assessment process. The plan for addressing these barriers, including the Local WDB's provision of supportive services, must be documented in the participant's Individual Employment Plan (IEP). Local WDBs are encouraged to develop and use additional supporting documentation that demonstrates the participant's financial need.

Limits to the Amount or Duration of Supportive Services

A supportive service must be reasonable and necessary. Supportive services are not intended to meet every need of the participant. Rather, they provide temporary assistance. Local WDBs may establish limits on the provision of supportive services, including a maximum amount of funding and maximum length of time for supportive services to be available to participants.

¹² Note that this restriction does NOT apply to Youth Supportive Services.

Payment Methods for Supportive Services

Local WDBs may use a variety of payment methods such as vouchers, gift cards, or prepaid debit cards for the provision of supportive services, depending upon the type of supportive service given. For each supportive service, the Local WDB must opt to use a payment method that allows the Local WDB to exercise the highest level of oversight, accountability, and internal controls to ensure the supportive service is used for the intended purpose. For example, transportation assistance could be in the form of a vendor-specific gas card or assistance with uniforms could be provided in the form of a voucher/direct payment to the selected vendor.

Documentation for Supportive Services

As supportive services are paid directly to or on behalf of eligible participants, local WDBs are required to maintain documentation in the state's electronic case management system to demonstrate the need and ensure that funds are allowable and used for the intended purpose. Local policies and procedures should include determination of the participant's need for supportive services in the IEP, case notes either confirming that the needed supportive services are not available through other programs or that the urgency of the needed service is such that referrals to other resources would delay the provision of the supportive service and create a hardship for the participant, and records of payments.

Action

Each local area must update and/or develop policies and procedures that clearly enable staff to implement the contents of this policy. Applicable staff must be trained on local policy and procedures. Local areas must monitor effective training has taken place and procedures are consistently being followed by staff. Contents of the policy will be part of the regular WIOA monitoring conducted by DWD.

Effective Date

Immediately.

Ending Date

Upon rescission.

Additional Information

Questions regarding the content of this publication should be directed to DWD Policy: policy@dwd.in.gov.