

AREA 8 WORKFORCE DEVELOPMENT BOARD
Workforce Innovation and Opportunity Act

Policy number	302
Subject	Youth Supportive Services Policy
Ohio WIOA Policies addressed	WIOA 15-10 Youth
May apply for waiver	NA
Board approved	8/16/18
Effective date	8/1/18
Replaces	Supportive Services Cap 07-01-09

I. Purpose.

This policy is intended to provide guidance about allowable youth program supportive services. It is intended to cover those supportive services that are most likely to be needed and to provide direction in determining whether a supportive service not specifically mentioned in this policy is or is not allowable.

II. Effective Date

8/1/2018

III. Background.

WIOA in general allows youth program providers to pay for supportive services for youths who otherwise might be unable to complete a provider’s educational or work training program if funds were not made available to those individuals. **“Supportive Services” is defined in WIOA as follows:**

III. Permitted Supportive Service Expenses.

A. In general.

This policy is meant to apply where the supportive service is being procured/provided by a Youth provider. However, where the service can be defined as a service required as part of the provision of an Individual Training Account (“ITA”) (i.e. books, supplies, lab fees), that service will be written into the ITA as part of the ITA expense and reported as part of the expense of the ITA, and not as a supportive service expense.

Pursuant to the terms and conditions of this policy, all of the following supportive services will be allowed, and a Youth provider will be eligible to be reimbursed for the actual expenses that it

incurs in procuring and providing the supportive services that are listed within this policy. In order for an expense to be reimbursable, it must be listed within one of the categories enumerated below. In addition to being enumerated within this policy, **the Youth Provider must also be able to demonstrate that the expense is reasonable and necessary.**

The reasonableness of the expense shall be established with a demonstration of proof that the total cost for a good or service was a fair market price for whatever particular good or service was purchased. In other words, if the actual expense is higher than what the good or service can readily be procured for within the community without justification for why the higher price was paid, the Youth Provider will not be reimbursed for the actual expense incurred, but instead for the fair market price.

The necessity of the expense will be determined in relation to whether the good or service purchased was necessary in order to advance the Individual Service Strategy of each enrolled and eligible Youth, to successfully place the Youth in education and/or employment. In applying and administering this policy, in all instances the following shall apply to all supportive services:

1. **WIOA funds are to be the source of funding as a last resort.** For the purposes of this policy, this shall mean that where there are other funding sources that could be used instead of WIOA funding, these funds shall be applied and used first, with WIOA funding only being used when other funding sources are either not available, or alternately have been exhausted.
2. WIOA funds **cannot** be used for any expense that was incurred by the Youth, or on his/her behalf, before the Youth was enrolled for the purpose of receiving services.
3. The total cost of all Youth supportive services provided are restricted and limited by the provider budget each individual line item amount set forth within the Youth Sub-Recipient/Vendor's budget.
4. In all instances in which both the written Agreement and this policy address reimbursement for a particular supportive service, the written Agreement shall be controlling should there be a conflict between the two.
5. Where a supportive service involves the purchase of an item for an eligible Youth, the Youth Sub-Recipient/Vendor shall adhere to **the local CDJFS policy on procurement.**

B. Items and Supplies Needed in Relation to Completing an Educational Program.

Items, including but not limited to toolkits and consumable supplies are required for some vocational education programs, (for instance in carpentry and cosmetology programs). Providers shall be allowed to cover the cost of these for all eligible, students so that all students have the same opportunity to own the tools and supplies of trade for which they are training. In all cases, the expenses associated with items and supplies shall be considered allowable on a case by case basis and shall only be permitted when the Youth is in a vocational program requiring the use of the items/supplies.

C. Miscellaneous Costs Associated with Completion of a Training or Educational Program.

Such fees typically are related to course completion, diploma/GED attainment and licensure/certification but are not paid by the school and cannot be waived pursuant to Ohio law. Examples of fees payable under this policy include:

1. Online Occupational Safety and Health Administration courses.
2. Independent testing service for certification.
3. Summer school classes.
4. Alternative-education courses.
5. State licensure/certification exams (such as STNA or cosmetology).
6. GED testing.
7. Inoculations/shots for those individuals within health care programs.
8. Gas cards for transportation expenses.
9. Other miscellaneous costs, fees, and/or expenses.

D. Fees and Expenses Associated with Postsecondary Education Courses.

The fees and expenses associated with making a Youth successful in postsecondary educational courses are permitted, but only in rare, limited circumstances, when all of the terms and conditions set forth within this policy. **In all of these instances, the Youth Provider must first achieve permission from the local CDJFS.**

1. Information Technology (“IT”) Equipment. For the purposes of this policy, IT equipment is defined as computers, and other electronic data management or analysis devices, regardless of the portability configuration (desktop, laptop, tablet, etc.) including all associated peripherals such as cords, cables, mice, monitors, keyboards, etc. The purchase of IT Equipment may only be approved when it is absolutely required in order to be successful in the Youth program, and the Youth does not have ready access to IT Equipment elsewhere. Total expense not to exceed Five Hundred and 00/100 Dollars per Youth (\$500.00) during the entire Youth Program enrollment.
2. Software for use on IT Equipment. The purchase of Software may only be approved when it is absolutely required in order to be successful in the Youth program, and the Youth does not have ready access to the Software elsewhere. Total expense not to exceed Two Hundred Fifty and 00/100 Dollars per Youth (\$250.00) during the entire Youth Program enrollment.
3. One post-secondary educational entrance exam (i.e. ACT or SAT until the state Ohio commences their program of paying for the same), and up to three (3) postsecondary educational application fee in case of need. Up to Fifty and 00/100 Dollars per application fee, shall be allowed. However, once the Youth has received acceptance into a post-secondary education program that s/he could enroll, no more application fees shall be permitted. Total expense

not to exceed One Hundred Fifty and 00/100 Dollars per Youth (\$150.00) during the entire Youth Program enrollment on this item.

E. Finding and Maintaining Employment/Continuing Education Expenses.

Expenses related to finding and maintaining employment and/or continuing education:

1. Clothing for job interviews (including appropriate work attire or required uniform)
2. Personal protective equipment
3. Bus passes
4. Gas cards associated with transportation
5. Child care (finding and maintaining employment/education expenses)
6. Necessary tools and equipment required for employment
7. Vaccinations, TB tests, physical examinations, background checks, etc. However, in no instances, may the Youth provider pay for controlled substance/alcohol test/screenings. Where there is an employer who is making a conditional offer to hire the individual based upon the results of a test, exam, having a vaccination, and the employer has indicated that it will pay for the costs, the expense will be borne by the employer. Where there is no hiring employer, the costs may be borne by the Youth provider as a reimbursable expense.
8. Limited liability insurance and/or bonding (including financial responsibility bonds)

H. Incentives.

An incentive is allowable to encourage behavior for participation and/or otherwise to promote successful results in any Youth Program. See Area Workforce WIOA Policy 301.

I. Miscellaneous/Emergency Supportive Service Expenses.

This section pertains to other expenses deemed necessary by service provider to enhance a youth's self-sufficiency, assist with finding and maintaining employment, moving toward independence and maintaining successful participation in the WIOA program. If not expressly provided for in the policy, then the provider must demonstrate the reasonableness and necessity, and achieve some type of written documentation or approval of the expense before incurring the same from the County Department of Job and Family Services.

In those instances where a Youth has emergency needs, and the youth provider has received written approval from the County Department of Job and Family Services before incurring the expense, in the provision of emergency services and those costs cannot be borne by any other program.

IV. Supportive Services not Specifically Addressed within this Policy.

A youth supportive service not expressly specified in one of the categories (B-I) of this policy, is not automatically excluded and disallowed. If a supportive service meets all of the general terms and conditions of this policy set forth within Section III of this policy, it may be allowed on a case-by-case basis upon the review and approval of the applicable County Department of Job and Family Services, prior to the expense being incurred.

IV. Allowable Dollars Amounts.

Allowable dollar amounts for any supportive service shall not exceed \$2000. However, all expenses must be established to be reasonable and necessary, and meet the terms and conditions set forth within this Policy.

The local OMJ Director may approve exceptions on a case by case basis for extenuating circumstances. Documentation explaining the extenuating circumstances must be maintained in the participant's file along with the signature of the OMJ Director, case manager and local OMJ fiscal staff and be allowable within WIOA guidelines and the OMJ budget.

VI. Monitoring.

The area will conduct oversight and monitoring of the implementation of all WIOA programming by all OMJ Center operators, partners, and/or providers.

VII. Technical Assistance.

Additional guidance can be obtained from the Office of Workforce Development: WIAQNA@jfs.ohio.gov;

Date: 8/16/2018 **Executive Committee** _____

Motion made by: Michelle Steinke _____

Motion seconded by: Rob Radway _____

Vote 4 **aye** 0 **nay** 0 **abstain** X **motion carries** **motion rejected**