



CENTRAL ARKANSAS Workforce Development Board

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Policy Number: Section 2 Policy 7

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Supportive Services Policy

Purpose:

The purpose of this policy is to describe and to detail the regulations concerning Supportive Services

References:

WIOA § 3(59); 134(c)(2)(A)(iv); 134(d)(2)
20 CFR 679.430, 680 & 681
TEGLs 19-16 & 21-16
ADWS Policy No. – 3.9 (Supportive Services)

Policy:

The term “supportive services” is defined as payments for services that are necessary to enable an individual to participate and be successful in activities authorized under WIOA. Supportive services are designed to provide a participant with the resources necessary to enable an individual to participate in WIOA Title I-B Adult, Dislocated Worker, or Youth activities. The activities need not be provided with WIOA funds, but the program provider must be allowed to provide such activities by federal and state laws, regulations, policies, and guidance [WIOA § 3(59); 20 CFR 680.910(b) 681.570; TEGLs 19-16 & 21-16]. Supportive services are Program Element 7 of the Youth program, and such services must be available to Youth as when needed, appropriate, and in accordance with the local Supportive Service Policy. Supportive services may be provided with WIOA Title I-B funds when such services are not available through non-WIOA funding sources.

The Central Arkansas Workforce Development Board in consultation with the American Job Center partners and other community service providers, ensures resource and service coordination in the Central area. The Central Arkansas Workforce Development Board has the discretion to provide supportive services as deemed appropriate, subject to WIOA’s limitations.

Supportive services may include, but are not limited to [WIOA § 3(59); 20 CFR 680.900, 681.460(a)(7), & 681.570; TEGLs 19-16 & 21-16]:

- Linkages to community services
- Assistance with transportation
- Assistance with childcare and dependent care
- Assistance with housing
- Needs-related payments
- Assistance with educational testing

- Reasonable accommodations for individuals with disabilities
- Legal aid services
- Referrals to health care
- Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education or training classes
- Payments and fees for employment and training-related applications, tests, and certifications.

Partnering with American Job Center partners and other entities that can provide supportive services to participants is highly encouraged. [WIOA § 134(d)(2); 20 CFR 680.910; 20 CFR 681.460(c); 20 CFR 681.470; TEGLs 19-16 & 21-16]. The WIOA staff must work with the other entities to ensure that participants receive coordinated service to create an appropriate total package [20 CFR 681.470; TEGLs 19-16 & 21-16].

Eligibility for Supportive Services

For any individual to receive supportive services, he or she must meet all eligibility requirements for a WIOA Title I-B program. The need for supportive services to participate in an eligible activity of the program may be determined through an interview, an evaluation or assessment, or the development of either an individual service strategy (ISS) or and individual employment plan (IEP). Documentation of the need for supportive services must be maintained in the participant file.

Adults & Dislocated Workers

The primary requirements for an Adult or Dislocated Workers to receive a supportive service are [WIOA § 3(59) & 134(d)(2); 20 CFR 680.140, 680.900 & 680.910; TEGL 19-16]:

- The participant is participating in an activity authorized as a WIOA Title I-B Adult or Dislocated Worker (DLW) career (except follow-up) or training service. (There is no requirement that WIOA fund the service or activity, but WIOA Title I-B must be authorized by WIOA § 134 and/or the appropriate other sections of the Final Rule or TEGLs to fund the service or activity.)
- The supportive services must be necessary to enable the participant to participate in the activity or training service.
- The participant is unable to obtain the needed supportive services through another program providing such services [WIOA § 134(d)(2) 20 CFR 680.910(a)].

Youth

The primary requirements for a Youth to receive a supportive service are [WIOA § 3(59); 20 CFR 681.570 & 681.580; TEGL 21-16]:

- The participant is participating in an activity authorized as a WIOA Title I-B Youth activity or service, including follow-up services. (There is no requirement that WIOA fund the service or activity, but it must be one of the 14 program elements or a follow-up service.)
- The supportive services must be necessary to enable the participant to participate in the activity or training service.
- The participant is unable to obtain the needed supportive services through another program providing such services.

Needs Related Payments

Needs-related payments may be provided to Adults and Dislocated Workers to enable them to participate in training services. Needs-related payments may not be provided for participation in Career Services [WIOA § 134(d)(3)(A); 20 CFR 680.930]. To receive needs-related payments, an Adult must meet all of the following bulleted eligibility requirements [WIOA § 134(d)(3)(A); 20 CFR 680.940]:

- Be unemployed
- Not qualify for, or have ceased qualifying for, unemployment compensation
- Be enrolled (registered for classes) in a WIOA Title I-B training service

To receive needs-related payments, a Dislocated Worker must meet one of the following two numbered eligibility requirements [WIOA § 134(d)(3)(A); 20 CFR 680.950]: 1. For DLWs who qualified for unemployment benefits or trade readjustment allowance under TAA, meet all of the following bulleted requirements:

- Be unemployed
- Have ceased qualifying for, unemployment compensation or trade readjustment allowance under TAA
- Be enrolled (registered for classes) in a program of WIOA Title I-B training service by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility for the DLW program, OR if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months

For DLWs who did not qualify for unemployment benefits or trade readjustment assistance under TAA, meet all of the following bulleted requirements:

- Be unemployed
- Did not qualify for unemployment benefits or trade readjustment assistance under TAA.
- Be enrolled (registered for classes) in a WIOA Title I-B training service

Needs-related payments may be paid while a participant is waiting to start training classes, provided he or she has been accepted into a training program and enrolled in (registered for) classes and provided the classes will begin within 30 days.

The level of a needs-related payment made to an eligible Dislocated Worker may not exceed the greater of:
 (a) the applicable level of unemployment compensation; or
 (b) if the DLW did not qualify for unemployment compensation, an amount equal to the poverty line for an equivalent period, adjusted to reflect changes in total family income, as determined by the CAWDB policies [WIOA § 134(d)(3)(C); 20 CFR 680.970].

Supportive Services may be the key to assisting the hard-to-serve participants enrolled in WIOA programs. There are numerous agencies and programs providing health care, temporary shelter, financial counseling, transportation, childcare and other support, which are well suited to customer needs. WIOA staff will make referrals to other programs prior to providing supportive services with WIOA funds. When a determination is made that no other services are available, staff will make a request to a supervisor to provide such services. Staff must document that the participant has exhausted all other means of providing the supportive services requested by completing a verification form.

Continued eligibility – at a minimum each semester staff will revisit a participant's need for continued supportive services and will document that the review has occurred and the results of that review. Supportive services are designed to provide a participant with the resources necessary to enable their participation in career and training services, are governed by the DOL-only Final Rule at 20 CFR 680.900 through .970.

Supportive services may be available to any youth, adult or dislocated worker participating in Title I career services or training activities who is unable to obtain supportive services through other programs providing such services. Supportive services may NOT be provided to an adult or dislocated worker participant once

they exit WIOA program or during follow-up. This does not apply to youth participants. They may still receive supportive services during follow-up if it is deemed necessary and appropriate.

Definitions and approved supportive services limits.

Combined funding for training and supportive services is limited to \$10,000 per eligible WIOA participant. However, this limit may be increased up to \$15,000 with approval from the Executive Director of the Central Arkansas Planning and Development District, Inc.

A. Clothing

Must be required for employment, training, or participation in a WIOA program activity.

- Example 1: Purchase of steel-toe boots and flame-resistant clothing required for participation in a welding or construction training program.
- Example 2: Assistance with professional interview or work attire (e.g., slacks, dress shirt, or blazer) when such attire is required by the employer or training provider.

B. Counseling

Must directly support the participant's ability to engage in training or employment activities.

- Example 1: Payment for career counseling sessions or assessments required by the training provider as part of a workforce readiness program.
- Example 2: Referral to and funding for mental health counseling when a licensed provider recommends it to support training participation and the participant lacks access to other services.

C. Childcare

Must be necessary for the participant to attend training or work and not otherwise available.

- Example 1: Payment for licensed childcare services during scheduled class or work hours so the participant can attend a WIOA-approved training program.
- Example 2: Assistance with registration fees or deposits for a childcare facility when required to secure a spot for consistent care that supports regular attendance in training or employment.

D. Residential (Housing Assistance)

Must be necessary to stabilize the participant's living situation to prevent disruption in training or employment.

- Example 1: Temporary emergency housing assistance to prevent homelessness when a participant is actively enrolled in training and would otherwise be unable to continue.
- Example 2: Payment toward first month's rent or security deposit when relocation is necessary to attend a training program or job placement not available in their current area

E. Health

Must be directly tied to the participant's ability to complete training or engage in employment.

- Example 1: Payment for a mandatory physical exam or immunizations required for entry into a healthcare training program.
- Example 2: Coverage for prescription safety glasses or corrective lenses when necessary for safely operating equipment in a training or work-based learning program.

F. Healthcare

Must be required to meet conditions of training or employment and not otherwise available through public assistance.

- Example 1: Payment for a TB test or drug screening that is required for program or job placement in a health or safety-sensitive position.
- Example 2: Assistance with dental treatment when a participant is experiencing acute pain or a visible issue that prevents them from participating in training or employment activities.

G. Transportation

Must be necessary for the participant to access training or employment activities.

- Example 1: Provision of a gas stipend, calculated based on mileage to and from an approved training site, when reimbursement is not feasible and pre-approved by the Executive Director.
- Example 2: Assistance with bus passes or ride-share credits when the participant lacks reliable transportation to attend a job interview or daily training sessions.

The primary method for providing supportive services under WIOA is through participant reimbursement. Career consultants are responsible for clearly explaining the reimbursement process to participants, including the required documentation and timelines. Participants, in turn, are responsible for submitting all necessary documentation along with their reimbursement requests.

In situations where reimbursement is not feasible and an advance of funds is necessary, the request must follow the Exception to Reimbursement Process and receive proper approval prior to any funds being issued.

Exception to the Reimbursement Process

While the primary method of providing supportive services under the Workforce Innovation and Opportunity Act (WIOA) is through participant reimbursement. There may be instances where a participant is unable to initially cover the cost of gas required to travel to an approved training, worksite,

or career service. In such cases, an advanced gas stipend may be issued under the conditions outlined below.

Exceptions Procedure:

1. Eligibility and Calculation of Mileage:

- A gas stipend may be provided only when reimbursement is not feasible for the participant due to documented financial hardship or other exceptional circumstances.
- The career consultant will calculate the necessary mileage from the participant's residence to the approved training or worksite location.
- Mileage will be reimbursed at the approved standard mileage rate in effect at the time of service

2. Documentation Requirements:

- This service must be fully documented using the Supportive Services Agreement Form.
- The career consultant is responsible for:

Discussing the agreement with the participant.

- Ensuring the participant understands the terms and conditions of receiving the stipend.
- Obtaining signatures from all required parties, including the participant, prior to any services being rendered.

3. Participant Responsibilities:

- The participant is responsible for using the stipend solely for the purchase of gasoline required for travel to and from their approved training or worksite.
- The participant must retain and submit receipts for gas purchases to their career consultant by Friday of each week.
- Failure to provide receipts or misuse of the stipend may result in the participant being required to reimburse the WIOA program for the full amount received. And no additional payments will be rendered.

4. Approval Process:

- Any request for advancement of funds (i.e., gas stipend) must be approved in advance by the Executive Director of the CAWDB administrative entity.
- The request must include documentation justifying why reimbursement is not feasible, and evidence of the calculated mileage.

This exception does not replace the standard reimbursement process but is a limited alternative to address verified needs. Career consultants must ensure that supportive services provided in advance are:

- Properly authorized,

- Well-documented, and
- In compliance with all applicable federal, state, and local regulations.

H. Emergency Food

Must be necessary to stabilize the participant and allow continued participation in training or employment activities.

- Example 1: Provision of a grocery store gift card or food box when a participant reports food insecurity that is preventing attendance or engagement in training.
 - Example 2: Emergency meal vouchers for a participant attending a full-day certification program that does not provide food and where the participant has no access to meals.
- I) Needs-related payments will be awarded only when the provision of the other supportive services does not provide the assistance the participant needs. The forms are an attachment to this document. WIOA regulations will be followed when providing this service.
- J. Other services may be provided if allowable within WIOA and regulations with management approval as situations arise.
- a. In situations where a computer, or similar item, may be deemed a necessity for an individual to participate in an approved training program, the following elements must be met:
 - The training provider must provide a written explanation for the necessity of the equipment.
 - Costs of the equipment must be identified and included on the ITA.
 - The Workforce Center Manager must submit a written request to the Executive Director for approval.
 - The workforce staff must ensure the participant understands that the voucher can only be used for the intended purpose, and that the participant promptly submits the purchase receipt.
 - The participant must provide written acknowledgement that he/she must return the equipment if he/she does not complete the course, for whatever reason.

K. Assistance with Educational Testing

Must be a requirement for the training or program and not just a nice-to-have item.

- Example: Payment for a pre-enrollment assessment (e.g., ACCUPLACER or TABE test) that is required for entry into a post-secondary training program.
- Example: Covering the cost of a state-required entrance exam such as the TEAS test for nursing programs or HESI for healthcare-related training, when those scores are part of the admissions criteria.

Must be a documented need related to a disability that affects the participant's ability to participate in or complete training or employment activities.

- Example: Purchase of adaptive technology such as a screen reader or voice-to-text software that is required to access online training content or complete coursework for a participant with a visual or learning disability.
- Example: Funding a specialized ergonomic chair or desk for a participant with a documented physical disability when the equipment is necessary to participate in training or work experience activities.

L. Assistance with Uniforms, Work Attire, and Work-Related Tools

Must be a requirement for the job or training program and not just a nice-to-have item.

- Example 1: Purchase of non-slip shoes and black slacks required for a participant entering a culinary training program that mandates specific attire.
- Example 2: Provision of protective safety gear, such as hard hats or safety goggles, for participants entering a certified construction pre-apprenticeship where such items are required for participation and safety compliance.

M. Assistance with Books, Fees, School Supplies, and Other Necessary Items for Post-Secondary Education

Must be a requirement for the training program and not just a nice-to-have item.

- Example 1: Payment for required textbooks listed on the course syllabus for a participant enrolled in a WIOA-approved post-secondary training program.
- Example 2: Purchase of specific school supplies, such as a scientific calculator or lab kit, when these are listed as mandatory by the training provider and essential for coursework completion.

N. Payments and Fees for Employment and Training-Related Applications, Tests, and Certifications

Must be a requirement for participation in the training or employment opportunity.

- Example 1: Payment of a background check fee required for acceptance into a certified nursing assistant (CNA) training program.
- Example 2: Purchase of a CDL test packet and permit fee necessary for entrance into a commercial truck driving training program.

O. Legal Aid Services

Must directly support the participant's ability to engage in employment or training.

- Example 1: Payment of court fines or fees related to a minor traffic violation in order for a participant to reinstate a suspended driver's license, which is required for a job offer or training program that involves travel.

- Example 2: Assistance with legal document processing fees to expunge a non-violent misdemeanor from a participant's record when the offense presents a barrier to employment in a regulated industry such as healthcare or security.

Procedures

Supportive Services will be rendered in accordance with WIOA Section 134(d)(2) and (3), 20 CFR §680.900-970 for Adult and Dislocated Workers and 20 CFR §681.570 for youth, TEGL 21-16, TEGL 19-16, and DOL's Final Rules (from 2016)

- Supportive services must be necessary for participation in WIOA activities.
- Participants must not have other resources available to cover the cost (e.g., Pell Grants, public assistance).
- Decisions on the type, length and financial amounts of services are made on a case-by-case basis.

1. Participant Assessment for Supportive Services Needs

Intake and Initial Assessment

- Eligibility must be established
- An objective assessment must be conducted
- Upon enrollment, conduct a comprehensive needs assessment to identify potential barriers to training and employment.
- Document all identified supportive service needs in the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

2. Prioritization of Referrals to Partner Agencies

Resource Coordination

- Staff must first explore community and partner agency resources that may provide the needed service(s) at no cost to the program.
- Use local resource directories and memoranda of understanding (MOUs) with partner agencies to identify available services.

Referral Process

- Document at least two referral attempts to partner agencies, community and faith-based organizations
- Provide participant with contact information, referral forms, or referrals to appropriate partners.
- Record all referral activity in case notes and the participant's file, including outcomes.

Exceptions

- If no partner agency can meet the need in a timely or adequate manner, staff may initiate the process to use WIOA funds.
- Justification must be documented, including names of contacted agencies, dates, and outcomes.

3. Determination and Authorization of WIOA Supportive Services

Eligibility Confirmation

- Confirm participant is:
 - Enrolled in a WIOA Title I program
 - Actively participating in career or training services
 - Unable to obtain supportive services through other programs

Service Request and Approval

- Complete a Supportive Service Agreement outlining:
 - Type of support requested
 - Justification and unsuccessful referral attempts
 - Cost estimate
- Submit agreement to program supervisor or designated staff for approval prior to service provision.
- No retroactive payments will be made without prior approval from the Executive Director unless due to documented emergency.
- All measures to utilize other funding must be exhausted before utilization of WIOA funds can be considered

4. Allowable Supportive Services

Examples include but are not limited to:

- Transportation
- Childcare
- Dependent care
- Housing assistance
- Work-related tools or uniforms
- Technology and Internet Access
- Healthcare and Medical Services
- Legal Aid Services
- Books, Fees, and School Supplies

5. Documentation and Case Management

Documentation

- The supportive service agreement must be completed and routed through the in-house approval process.
- Maintain documentation of all referrals, decisions, approvals, invoices, and receipts in the participant's files.
- Use AJL to record supportive service activities and funding used.

6. Follow-Up

- Monitor the effectiveness and impact of supportive services on participation and progress.
- Adjust services as needed based on participant feedback and case manager judgment.

7. Modification of the Supportive Service Agreement

Internal Review

- Program managers will review supportive services usage to ensure compliance with policy and funding priorities.

Audit Preparedness

- Ensure all files are audit-ready with proper documentation of need, referrals, and approvals.

8. Staff Training

- Provide regular training to staff on:
 - Identifying supportive service needs
 - Navigating local resources and partner networks
 - Proper documentation and compliance standards

Modifications to the Supportive Services Agreement shall be made in accordance with:

- WIOA Section 134(d)
- 20 CFR § 680.900–970
- State and local workforce development board guidance
- Local area policy and fiscal controls

1. Initiation of Modification

A modification to the Supportive Services Agreement may be initiated by:

- Program monitoring findings (internal or external)
- Staff recommendations
- Changes in federal or state regulations
- Identified service delivery challenges
- Partnering program feedback

The request must be submitted in writing to the WIOA Program director or designated authority.

2. Drafting the Modification

Draft the proposed policy modification, highlighting any changes to:

- Eligibility criteria
- Types of supportive services
- Payment methods (e.g., reimbursement vs. direct provision)
- Required documentation
- Internal controls and safeguards

The draft modification will be reviewed by:

- Director of Workforce Programs

Final approval is obtained from:

- WIOA Program Director

Partnering Program Notification and Training

Once approved:

- All WIOA relevant program staff will be notified in writing.
- The participant will be notified, and the revised agreement will be reviewed to ensure understanding and correct implementation.
- Partner agencies and service providers will be notified of relevant changes.

Implementation and Documentation

- The modified policy will take effect on the stated effective date.
- Documentation of the change, including approval records and partnering program communications, will be maintained for monitoring and audit purposes.

Recordkeeping

- All documentation related to the policy modification process, including drafts, approval records, communications, and training materials, will be retained according to the organization's record retention policy and applicable WIOA guidelines.

Approved by: <u></u>	Date: <u>09/15/2025</u>
Title: <u>CAWDB Chairperson</u>	

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