

**Supportive Services Policy for Special Grants
(Opioid Trade and Transition, Opioid Disaster Recovery, and State Opioid Response)
Northeast Ohio Consortium Council of Governments
Workforce Innovation and Opportunity Act Policy**

POLICY A-13

I. Purpose

This policy governs the general terms and conditions associated with the provision of supportive services for those participants determined eligible for and enrolled within the OWCMS system as participating within the following special grants:

1. State Opioid Response Grant (SOR).
2. Trade and Transition National Dislocated Worker Grant (Opioid #2).
3. Disaster Recovery National Dislocated Worker Grant (Opioid #3).

II. Effective Date

August 1, 2019.

III. Background to Individual Training Accounts

Assessments completed by mental health service providers, other stakeholder partners, and/or the OhioMeansJobs staff will be used to customize supportive services to each participant's needs. This policy is to be liberally construed to allow for a wide array of grants to provide for the needs of those eligible and enrolled participants of Area 19's special grants.

IV. Requirements

A. General Conditions

The use of special grant allocated funding to provide supportive services for eligible special grant populations is limited to the terms and conditions set forth within this policy. Generally, the use of funding for supportive services is permitted when all of the following conditions exist:

1. the eligible individual is a registered/enrolled participant within the special grant;
2. the provider:
 - a. determines the service is necessary to advance the career services or training to be received by participants;
 - b. determines the cost of the service is reasonable;
 - c. documents within the case notes of the individual the efforts taken to determine need and reasonableness of cost.

Because of the significant needs of the population eligible for these grants, participants are not required to be enrolled in training to receive supportive services. Any eligible, registered and enrolled participant receiving a triggering career service of any kind may receive these supportive services.

Note that in all cases, payment to the participant in the form of cash or a check or other negotiable instrument is not allowed. All of the expenses for allowable expenses (except where bearer cards such as gas cards or bus passes are provided to cover transportation) must be invoiced or expensed to the Area 19 contractor/provider by a third party who will pay the third party provider directly.

B. All of the Supportive Services provided and allowed for within Area 19's Adult and D.W. Supportive Services Policy, Policy A-04.

All of the Adult and D.W. supportive services provided for within Area Policy A-04.

Where supportive services provided for within Area Policy A-04 conflict with those set forth within Sections IV. C-G, the more permissive or generous policy shall control unless it is expressly prohibited by this policy. Where a supportive service is expressly prohibited by this policy, it may not be provided even if allowed by Area Policy A-04.

C. Extraordinary Transportation Expenses

In all cases under this policy, the extraordinary expenses under Section C. of this policy may not be incurred unless:

1. the special grant participant can establish that s/he owns or is leasing the vehicle to be repaired;
2. the special grant participant can provide proof of insurance at the state minimum requirements, unless, insurance is the item being supplied/purchased; and
3. the special grant participant can otherwise demonstrate eligibility to operate a motor vehicle.

Items covered under this policy include:

1. Driver's education course costs (one time only).
2. Driver's license fees (one time only).
3. Insurance premiums on a month to month basis while the participant is actively receiving program services and registered/enrolled within OWCMS, with premiums not to continue for more than six (6) months.
4. Car repair (Must be done at a repair shop with at least one estimate being provided before repairs occur. Expenses may not exceed = One Thousand and 00/100 Dollars (\$1,000.00) during the lifetime of the special grant

participant's enrollment. No car repair expenses may be incurred without first securing the written approval of the Area 19 contractor/provider, except and unless the participant's vehicle is being held via a lien by a mechanic due to previously unpaid repair bills.

5. The costs associated with retrieving a vehicle that has been impounded by law enforcement authorities to the extent that the expense/fees are classified as storage or other non-punitive expenses. Expenses may not exceed Five Hundred and 00/100 Dollars (\$500.00) during the lifetime of the special grant participant's enrollment.

D. Finding and Maintaining Employment/Continuing Education Expenses.

Expenses related to finding and maintaining employment and/or continuing education, including but not limited to:

1. Clothing for job interviews, and appropriate work attire or required uniforms.
2. Personal protective equipment.
3. Bus passes.
4. Gas cards provided to the participant to cover needed transportation expenses or to a third party who is transporting the participant.
5. The costs associated with providing door to door transportation for a participant using any and all commercially recognized transportation carrier (i.e., taxi service, towncar, Lyft, Uber, etc.) for transportation to and from:
 - the OhioMeansJobs Center for the provision of services;
 - the County Department of Job and Family Services;
 - mental health and/or illegal/intoxicating substance use treatment facility;
 - their place of residence or any of the places listed above to their place of education/training and/or employment.
6. Childcare. Childcare expenses shall be capped at four (4) months and Five Thousand and 00/100 Dollars (\$5,000.00) per participant for the entire time that they are within the program; and shall only be paid with special grants if and when there are no other available sources
7. Necessary tools and equipment required for employment.
8. Criminal background checks desired by the Area's providers to determine whether the convictions of the participant will or will not serve as barriers to employment in certain industries and/or occupations. This is to be distinguished from a criminal background check desired by an employer with whom the participant is to be placed. In those instances the employer must pay for the same.

9. The following where required by the profession, and where there is no employer to pay for the same (the participant is an independent contractor), and/or the employer legally requires all of its employees to pay for the same:
- Limited liability insurance and/or bonding (including financial responsibility bonds);
 - Professional licensure fees;
 - Union dues.

E. Short to Intermediate Basic Needs of a Participant.

In those instances where a special grant participant has emergency or short to intermediate term basic needs excluding medical services, and the emergency services cannot be borne by any other program.

Basic needs include food, clothing, shelter, utilities, household goods, personal care items and general incidental expenses (excluding medical care and/or services) can be covered with a four (4) month limit only measured from the beginning of the provision of the services to the end of the same. Basic needs expenses shall be capped at four (4) months and Five Thousand and 00/100 Dollars (\$5,000.00) per participant for the entire time that they are within the program.

As with all supportive services, except for the provision of gas cards or bus passes, no cash, any other bearer instrument, or any negotiable instrument (i.e. check), may be provided directly to the participant. All payments must be paid for by the Area 19 provider via issued payment to the third party that is providing the goods or service to the participant.

F. Provision of Food During Programming Activities.

Provision of food during a day in which the participant is actively participating in career services and/or training. The provision of food during programming may be done without counting the same against the cap provided for within Section E. of this policy.

The amount spent on each meal is at the discretion of the Area 19 WDB contractual provider. With that being said, the maximum that may be spent on each meal shall be the current per diem expense allowance recognized by the U.S. General Services Administration as set forth at their website www.gsa.gov for the Cleveland, Ohio Area. The special grant participant Provider shall adhere to the

limits set forth according to the meal being provided. As an example, in 2019, the maximum limits were as follows:

\$13.00	Breakfast
\$14.00	Lunch
\$23.00	Dinner.
\$50.00	Per day.

G. Substance Abuse Treatment.

Where a registered/enrolled eligible participant is diagnosed and has provided demonstrable proof of the existence of a substance use disorder, the following services may be provided:

- Addiction and other out-patient treatment so long as there is not another available payer. Before there can be payment there must be a determination there is no private insurance available to pay for the same, and Medicare and/or Medicaid cannot/will not pay must be determined.

H. Miscellaneous Supportive Service Expenses.

This section pertains to other expenses deemed necessary by service provider to enhance a participant's self-sufficiency, assist with finding and maintaining employment, moving toward independence and maintaining successful participation in the WIOA program. For instance, this would include, but not be limited to:

1. Payment for attendance at courses which increase the likelihood of successful program outcomes, such as approved classes that lead to successful attainment of a High School Equivalence ("HSE") Diploma.
2. Payment of performance-based stipends for work or other leadership-development activities.

IV. Supportive Services not Specifically Addressed within this Policy

A participant supportive service not expressly specified in one of the categories (B-H) of this policy, is not automatically excluded and disallowed except for those items listed below, which are per se prohibited. 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 lead agency, prior to the expense being incurred.

Prohibited Supportive Services List

- a. medical services excluding out-patient intoxicating substance use/abuse services (see /Section G of this policy);
- b. real estate including land and buildings;
- c. funds associated with adoption assistance, and foster care maintenance;
- d. intoxicating substance or alcohol testing;
- e. criminal or credit background checks required by employers;
- f. any and all court costs, fines, judgments, or penalties imposed by a criminal or civil court;
- h. child support or other payments due to others due to an order of the court or administrative body;
- i. legal fees or expenses of any kind including attorney's fees associated with any civil or criminal proceeding.

V. Usage and Caps on Funding

Unless otherwise specified in this policy, allowable dollar amounts for any supportive service shall not be capped as to the amount to be expended or the time period over which the support may be provided. However, all expenses must be established to be reasonable and necessary, and meet the terms and conditions set forth within the expensing sub-grantee and/or contractual provider's written Agreement, and/or this Policy.

V. Reporting Requirements.

As recipients of WIOA funds, the Area Workforce, the OMJ operators, partners, and providers will be required to maintain and report accurate program and financial information. Pursuant to rule 5101:9-30-04 of the Ohio Administrative Code, information regarding WIOA participants and their activities and performance must be entered into Ohio Workforce Case Management System ("OWCMS") accurately and timely. OWCMS may be used to assist in the determination of eligibility. However, OWCMS cannot be used as verification of eligibility. The **Area Workforce WIOA Policy C-09**, regarding Source Documentation for WIOA, lists the type of acceptable documentation to verify eligibility for the WIOA adult and dislocated worker programs.

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 pursuant to **Area Workforce Policy D-03**. Any issues discovered will be handled through the area's monitoring resolution process.

VII. Technical Assistance.

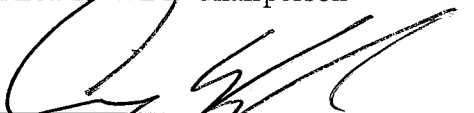
To get questions answered and technical assistance regarding this policy or issues regarding administration of WIOA, you are urged to contact the Executive Director of the NOC COG at craigsernik@neohio.twcbc.com.

The question/issue will be researched, analyzed, and a formal written response will be provided. If a second opinion is required, the director is not available, or there is no clear answer to the question/issue, either the Executive Director or any OMJ Center or provider staff may seek additional guidance by submitting the same to the Office of Workforce Development: WIAQNA@jfs.ohio.gov; and by copying your request to the Executive Director of the NOC COG.

X. Signatures.


Richard Jackson
Area 19 WDB Chairperson

9/4/2019
Date


Casey R. Kozlowski
Ashtabula County Commissioner
Northeast Ohio Consortium Council of Governments,
Chief Elected Official

Date

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Subsequent Revisions: