Supportive Services Policy for Adult and Dislocated Worker Grants (Formula and Special) Northeast Ohio Consortium Council of Governments Workforce Innovation and Opportunity Act Policy

POLICY A-04

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 in Adult and Dislocated Worker formula grants, and/or special grants where the source is Adult and/or Dislocated Worker.

II. Effective Date

March 3, 2021.

III. Background.

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 grant, meaning that the individual received a triggering career service or training of any kind;
- 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.

Any eligible, registered and enrolled participant receiving a triggering career service of any kind may receive the following supportive services, unless the supportive service is said to be reserved for an individual being trained or placed in employment (I. E. section B. and C. below). 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.

B. Training Supportive Services.

- 1. The following are allowable costs when the individual has been successfully enrolled within an educational program. When an item or service must be purchased as a condition of participating in the training (i.e., books, supplies, lab fees, etc.), those mandatory expenses must be included as part of the ITA, and not considered a supportive service. The expense justified within this section is for an item or service that is necessary and reasonable, but not otherwise mandatory. Whenever possible a letter from the training provider or the provider's published course requirements should be in the case file showing the need and the cost for the expense.
 - a. Books, texts, and other miscellaneous educational documents.
 - b. Miscellaneous and reasonable additional fees associated with the training not otherwise included within tuition.
 - c. Electronic technological hardware and software, and/or tools required in order to successfully participate in the training, with each item not to exceed a total of \$200.00, and with all items not to exceed \$1,000.00 for the entire life of an individual's Individual Training Account.
 - d. Any and all other reasonable items needed by an individual to succeed in their training.
 - e. Lodging. An individual participating in an educational or on-the-job training program that is more than fifty (50) miles from the participant's permanent residence, may apply for in advance of incurring the expense, for reimbursement for lodging of up to One Hundred Twenty-five and 00/100 Dollars (\$125.00) per day for every day that the individual is required to be in attendance at the educational and/or on-the-job training. Reimbursement will only be provided for the actual cost incurred by the participant, after documentation demonstrating that the individual has incurred and paid for the expense. During an individual's Individual Training Account and/or On-the-Job Training, the maximum amount of expense that can be approved for the life the program is Five Thousand and 00/100 Dollars (\$5,000.00).

- f. Bus passes.
- g. 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.
- h. The costs associated with providing door to door transportation for a participant using any and all commercially recognized transportation carrier (i.e., taxi service, town car, 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.
- i. Transportation Reimbursement Expenses where Public or Other Transportation is Not Provided. An individual participating in any training program may apply for and receive partial reimbursement for the expense that they incur in traveling to and from their primary residence to the program on a date that attendance is required according to the schedule of reimbursement that appears below:

Number of Travel Days per Month Maximum Monthly Reimbursable Expense

1-5	\$25.00
6-10	\$50.00
10-15	\$100.00
16 or more	\$150.00

As an alternative to providing for transportation reimbursement in the form of gas cards using the table provided for above, a County Job and Family Services Contractor providing for Adult and/or Dislocated Worker Programming Career Services, may adhere to its own adopted written policy for reimbursing Job and Family Services participants and provide reimbursement pursuant to the terms and conditions of the same, even if they exceed the amount of monthly expenses allowed for herein. In order for the County Job and Family Services Contractor to adhere to its policy, it must simply request that its contract be amended to incorporate that policy as the terms and conditions for providing for transportation reimbursement during the remaining term of the Agreement.

C. Placement/Employment Supportive Services.

- 1. The following are allowable costs when the individual had demonstrated a good faith attempt to be placed with an employer, and/or has accepted an offer of employment from an employer, and the employer is not legally bound or offering to pay for the expense provided for below. Whenever possible a letter from the employer should be in the case file showing the requirement for the expense and the cost. If a letter is not available, a documented telephone conversation or e-mail with name and title of employer contact person and needed information is acceptable.
 - a. Uniforms.
 - b. Tools.
 - c. Safety Glasses.
 - d. Safety Shoes and other personal protective equipment.
 - e. Licensure Fees.
 - f. Mandated Exams.
 - g. Any and all other reasonable items including tools needed by an individual to succeed in their position of employment.
 - h. Clothing for job interviews, and appropriate work attire or required uniforms.
 - i. Bus passes.
 - j. Gas card for one month not to exceed \$75.00 provided to the participant to cover needed transportation expenses or to a third party who is transporting the participant.
 - k. 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.
 - 1. 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.
 - m. 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.

- n. The costs associated with providing door to door transportation for a participant using any and all commercially recognized transportation carrier (i.e., taxi service, town car, 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.

D. Miscellaneous/Employment Supportive Services.

These supportive services are permitted to anyone who:

- receives a triggering career service;
- is registered and enrolled into the state's data management system; and
- is enrolled in education, actively searching for employment, and/or has an offer of employment; and
- there are no other sources of funds to pay for the expenses associated with the same.
- 1. Eye exams/glasses. Whenever possible a letter from the participant explaining the need should be maintained in their file. During an individual's Individual Training Account and/or On-the-Job Training, only one exam and one pair of eye glasses/lenses may be provided. The expense for exams and glasses is not to exceed:
 - a. Eye Exams-maximum of \$70.00.
 - b. Frames/lenses-maximum of \$150 (Bifocals-maximum of an additional \$50, or \$200.00 total).
- 2. Vehicle Repair and Extraordinary Transportation Related Expenses.
 - a. No expenses may be incurred under this section of the policy unless all of the following terms and conditions are met:
 - i. the individual must own/lease, and have the vehicle registered, licensed, and insured in his/her name and be licensed to drive, unless that is the service being sought below; and
 - ii. no vehicle may be repaired until proof of ownership, registration, license, insurance, and drivers' license have first been obtained.
 - b. Items covered under this policy include:
 - i. Driver's education course costs (one time only).
 - ii. Driver's license fees (one time only).

- iii. 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.
- iv. Car repair (Must be done at a repair shop with at least two estimates being provided before repairs occur. Expenses may not exceed = One Thousand and 00/100 Dollars (\$1,000.00) during the lifetime of the participant's enrollment. The expense must be required in order to make a vehicle that is not otherwise able to be safely operated, to be operated. The expense cannot include any expense for any regular maintenance items including replacement of vehicle fluid, tires, and/or tire balancing/installation.

 No car repair expenses may be incurred without first securing the written approval of the Area 19 provider, except and unless the participant's vehicle is being held via a lien by a mechanic due to previously unpaid repair bills.
- v. 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.
- 3. Emergency Dental Care. Whenever possible a letter from the participant explaining the need should be maintained in their file. During an individual's Individual Training Account and/or On-the-Job Training, emergency dental care not to exceed \$1,000.00 in the following instances:
- a. After a reasonable search, no other funds are available to pay for the same.
- b. The nature of the care is emergency and not cosmetic. The participant is in sufficient pain, that if the care is not provided, s/he will experience absences and not otherwise be able to successfully engage in his/her training, education, and/or keep their employment.
- 4. 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.

5. Supportive Services not Specifically Addressed within this Policy.

A participant supportive service not expressly specified in one of the categories 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 provider, prior to the expense being incurred.

Prohibited Supportive Services List

- a. medical services;
- 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;
- g. child support or other payments due to others due to an order of the court or administrative body;
- h. 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.

VI. 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 the state's data management system accurately and timely. That data management system may be used to assist in the determination of eligibility. However, that data management 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.

VII. 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.

VIII. 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: <a href="https://www.wisenerge.com/wis

IX. Signatures	ζ.	Signatures.
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Ned Sherry

Area 19 WDB Chairperson

9-28-2022

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Date

Jim Dvorak Geauga County Commissioner

Northeast Ohio Consortium Council of Governments

Chief Elected Official

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