

**Comprehensive Case Management and Employment Program (“CCMEP”)
Supportive Services Policy
for WIOA Funding Streams
Northeast Ohio Consortium Council of Governments
Workforce Innovation and Opportunity Act Policy**

POLICY B-04

I. Purpose.

This policy governs the general terms and conditions associated with the provision of WIOA CCMEP supportive services. In addition to this policy, the Workforce Area, in procuring and contracting with its CCMEP providers, may establish additional terms and conditions in provided for within their written agreements with those providers that govern the provision of specific incentives and/or stipends. The terms and conditions of those written agreements shall apply as if written as part of this policy, so long as they are consistent with and not contradictory towards all applicable federal and state laws, regulations, and guidance, and this policy.

In adopting this policy, the Workforce Development Board for Area 19 encourages each of the county CCMEP lead agencies to adopt this policy or one that is substantially similar, that governs the terms and conditions of the provision of CCMEP supportive services using TANF CCMEP funding streams.

II. Background.

Supportive services are those necessary supports needed by a participant that are reasonable and necessary and that enables them to participate in the CCMEP program or enables them to secure and retain employment. The provision of supportive services must be determined on an individual basis and must be deemed as reasonable and necessary for success in the program. Supportive Services can include, but are not limited to:

- linkages to community services;
- assistance with transportation; assistance with child care and dependent care;
- assistance with housing; needs-related payments; assistance with educational testing;
- reasonable accommodations for youth with disabilities; referrals to health care;
- and assistance with uniforms or other appropriate work attire and work-related tool costs.

Supportive services may be provided to youth both during participation and through follow up.

III. Permitted Supportive Service Expenses.

A. In general.

This policy is meant to apply where the supportive service is being procured/provided by a CCMEP 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 CCMEP 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 CCMEP 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 CCMEP 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 CCMEP Youth, to successfully place the CCMEP Youth in education and/or employment. In applying and administering this policy, in all instances the following shall apply to all supportive services:

1. CCMEP 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 CCMEP funding, these funds shall be applied and used first, with CCMEP funding only being used when other funding sources are either not available, or alternately have been exhausted.
2. CCMEP funds cannot be used for any expense that was incurred by the CCMEP Youth, or on his/her behalf, before the CCMEP Youth was enrolled for the purpose of receiving services.

3. The total costs of all CCMEP Youth supportive services provided are attributable towards the total amount authorized to be spent by the CCMEP Youth Sub-Recipient/Vendor during the contract year set forth within the written Agreement entered into between the CCMEP Youth Sub-Recipient/Vendor and the Area 19 Administrative Agent.
4. The total cost of all CCMEP Youth supportive services provided are restricted and limited by the individual line item amount set forth within the CCMEP Youth Sub-Recipient/Vendor's budget, which is attached to an incorporated as part of the written Agreement, where the budget has a line item attributed towards that supportive service.
5. 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.
6. Where a supportive service involves the purchase of an item for an eligible CCMEP Youth, unless specifically stated otherwise, all purchases of goods and services must adhere to the Area's and/or Sub-Area's procurement policies.

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 CCMEP 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/HSE 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. HSE 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 CCMEP 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 CCMEP Youth Provider must first achieve permission from the 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 CCMEP Youth program, and the CCMEP Youth does not have ready access to IT Equipment elsewhere. Total expense not to exceed Five Hundred and 00/100 Dollars per CCMEP Youth (\$500.00) during the entire CCMEP 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 CCMEP Youth program, and the CCMEP Youth does not have ready access to the Software elsewhere. Total expense not to exceed Two Hundred Fifty and 00/100 Dollars per CCMEP Youth (\$250.00) during the entire CCMEP 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 CCMEP 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 Five Hundred and 00/100 Dollars per CCMEP Youth (\$500.00) during the entire CCMEP Youth Program enrollment on this item.

4. Text books. Books that are required for youth enrolled in post-secondary education may be purchased when it is absolutely required to in order to be successful in the CCMEP program. If purchases have already been made, the youth may be reimbursed for the costs with proof of purchase. Total expense not to exceed \$250 (five hundred dollars) per youth per quarter/semester.

E. Extraordinary Transportation Expenses.

This policy is not meant to supplant or replace the written Agreement entered into between the Sub-Recipient/Vendor and the administrative Agent for Area 19. The expenses associated with transporting CCMEP Youth for services are to be governed by that written Agreement. However, there are certain additional expenses, in rare and limited circumstances that may be provided for by the CCMEP Youth provider.

In all cases under this policy, these expenses may not be incurred unless:

1. the CCMEP Youth can establish that s/he has access to a vehicle;
2. the CCMEP Youth can provide proof of insurance at the state minimum requirements, unless insurance is the item being supplied/purchased; and
3. the CCMEP Youth 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 (primarily for beginning a policy, but as needed, such as covering premiums if a youth becomes unemployed and risks losing insurance).
4. Car repair (Must be done at a repair shop with at least one estimate being provided before repairs occur. Expenses may not exceed Five Hundred and 00/100 Dollars (\$500.00) during the lifetime of the CCMEP Youth's

enrollment. No car repair expenses may be incurred without first securing the written approval of the CDJFS.)

5. Purchase of an approved used bicycle or minor repair of a currently owned bicycle if said bicycle is used for the purposes of getting to and from a work experience site, place of employment, school or a post-secondary training program or another activity associated with active participation in the program as defined on the IOP, not to exceed One Hundred Fifty and 00/100 Dollars (\$150.00).

F. 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.

G. 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 CCMEP 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 CCMEP Youth provider as a reimbursable expense.

8. Limited liability insurance and/or bonding (including financial responsibility bonds).

H. Short to Intermediate Basic Needs of a Youth.

In those instances where a CCMEP Youth has emergency or short to intermediate term basic needs excluding medical services, 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 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, for CCMEP Program participants that are not receiving OWF and/or not currently employed. Basic needs expenses shall be capped at four (4) months and Five Thousand and 00/100 Dollars (\$5,000.00) per youth for the entire time that they are within the program.

I. Provision of Food in General during Programming Activities.

Where there is group activity lasting more than two (2) hours, the CCMEP Youth Provider may, but is not required, to purchase and provide a meal for the CCMEP Youth. For every four (4) hours that the CCMEP Youth is in the presence of the CCMEP Youth Provider after the first meal is provided, an additional meal may be provided, not to exceed the provision of three (3) meals in any twenty-four (24) hour period.

The amount spent on each meal is at the discretion of the CCMEP Youth Provider, which must recognize, that the total spent must come out of its contractual budget with the Area WIB. 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 CCMEP Youth Provider shall adhere to the limits set forth according to the meal being provided. As an example, in 2014, the maximum limits were as follows:

\$ 7.00	Breakfast
\$11.00	Lunch
\$23.00	Dinner.
\$41.00	Per day.

J. Incentives.

An incentive is allowable to encourage behavior for participation and/or otherwise to promote successful results in any CCMEP Youth Program. These incentives and/or stipends shall be provided pursuant to Area Workforce WIOA Policy B-5.

K. Miscellaneous 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. For purposes of this policy, once the CDJFS approves a general type of service or plan to serve more than one youth, the CCMEP Youth Provider does not have to secure approval of the expense again, prior to incurring it. 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 youth supportive service not expressly specified in one of the categories (B-J) 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;
- b. real estate including land and buildings;
- c. funds associated with adoption assistance, and foster care maintenance;
- d. illegal substance or alcohol testing required by educational institutions or employers;
- e. criminal or credit background checks required by employers.

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.

Also, as TANF CCMEP funds are not intended to provide benefits for recurrent or ongoing needs, and in no case should TANF funding be used to pay for supportive services considered "assistance" as defined by 45 CFR 260.31, for a period extending beyond four (4) months, all sub-grantees and contractual providers are encouraged (but not required) to limit the provision of any one type of WIOA supportive services that could be considered "assistance" to a period of four (4) months, unless extraordinary specifics require the provision of the same.

VI. Procedures for Approving these Expenditures.

Each CDJFS Lead Agency and/or Provider responsible for providing for supportive services shall establish their own internal procedures governing the approval and booking of all expenditures, accruals, and obligations of supportive services provided to Youth.

VII. Monitoring.

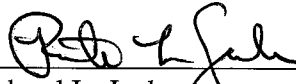
To the extent that the CCMEP WIOA Incentive and Stipend is used in conjunction with an unpaid work experience, it should be counted by the Sub-Area's fiscal agent as part of program expenditures on the WIOA work experience program element which are subject to the 20 percent (20%) minimum work experience expenditure requirement.

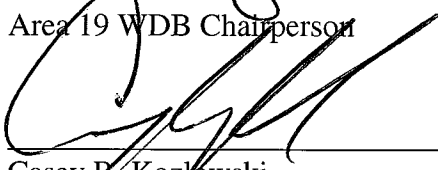
VIII. Technical Assistance.

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: WIAQNA@jfs.ohio.gov; and by copying your request to the Executive Director of the NOC COG.

X. Signatures.


 _____ Date 9/21/20
 Richard L. Jackson
 Area 19 WDB Chairperson


 _____ Date 9/18/20
 Casey R. Kozlowski
 Ashtabula County Commissioner
 Northeast Ohio Consortium Council of Governments,
 Chief Elected Official

Original Version Approved: July 1, 2015

Subsequent Revisions: Effective July 1, 2018.
 Effective August 1, 2018
 March 4, 2020