



POLICIES AND PROCEDURES

POLICY TYPE:	Workforce Services Participant Supportive Services
EFFECTIVE:	August 1, 2023
REVISED:	July 1, 2024

REVISIONS FROM PREVIOUS VERSION

- Adds content to comply with TEGL 10-23 – Reducing Administrative Barriers to Improve Customer Experience

PURPOSE

The purpose of this policy is to establish procedures and limits for providing Supportive Services to adults and dislocated workers participants of workforce services. While implementation of this policy pertains to all funding sources provided by Lane Workforce Partnership, the Workforce Innovation and Opportunity Act (WIOA) provides primary governance. WIOA regulations require a policy on Supportive Services that ensures equitable resource and service coordination in the local area. As the Local Workforce Development Board (Local WDB), the Lane Workforce Partnership (LWP) Board of Directors has established a system-wide policy for the provision of supportive services. This policy and implementing procedures contain guidelines for referral to such services, including researching first sources for participants. The provision of accurate information about the availability of and referral to other programs where support services are accessible in the local area, is one of the key elements that must be researched and made available to adults and dislocated workers through *WorkSource Oregon Lane* service delivery system.

REFERENCES

- Workforce Innovation and Opportunity Act (WIOA) - Public Law 113-128, Section 134 (d) (2) Permissible Local Employment and Training Activities
- [20 CFR 680.900](#) - What are Supportive Services for Adults and Dislocated Workers
- [20 CFR 680.910](#) - When may Supportive Services be provided to participants
- [20 CFR 680.920](#) - Are There Limits on the Amounts or Duration of Funds for Supportive Service
- Training and Employment Guidance Letter (TEGL) 19-16 Guidance on Services through Adult and Dislocated Worker Programs under WIOA.
- 2 CFR Part 200 → Subpart E Cost Principles
- Training and Employment Guidance Letter (TEGL) 10-23 Reducing Administrative Barriers to Improve Customer Experience

BACKGROUND

Supportive Services is the use of funds to pay for services that are necessary to enable an individual to participate in activities authorized under the Workforce Innovation and Opportunity Act (WIOA) and special grant funds issued by Lane Workforce Partnership.

POLICY

Supportive Services may only be provided to eligible individuals who have completed registration and WIOA eligibility and enrollment in I-Trac and are specifically enrolled in Individualized Career or Training services. There must be documentation in the participant file in eBridge that supports the participant's eligibility and enrollment as well as documentation that they are unable to obtain support services through their own means or through other programs which provide such services. Supportive Services are only allowable when they are necessary to enable eligible individuals to participate or remain in authorized training or job search services.

All *WorkSource Oregon Lane* program staff and subcontractors will be trained to understand this policy and carry it out in a uniform and equitable manner. Participants will be provided information concerning the availability of Supportive Services for their program area, to assure understanding of the terms and conditions of assistance.

WIOA mandates partnering at the local area. Staff will work with partner agencies to provide support service packages made up of assistance from different sources to complete the provision of the participant's service needs, without which the participant would be unable to continue in training and career services activities. (For more information on LWP's requirements for braiding resources, reference the WIOA Co-Enrollment and Coordination of Services Policy.

In Lane County, services related to training costs and supportive services are delineated between Direct Training Costs, General Supportive Services, and Supportive Services for Special Circumstances. Direct training costs shall be included in the scholarship award for training. General support services and support services for special circumstances shall be included in the supportive services award. Neither service category may exceed the limits as set in the Funding Caps and Limitations Policy. (See Attachment A Support Services Guidance)

NOTE: Per TEGL 10-23, grantees may deliver many services without proof of the participant's work authorization. However, WIOA Section 188(a)(5) and Title IV of the Personal Responsibility and Work Opportunity Reconciliation act (PRWORA) restricts the eligibility of non-U.S. citizens and non-U.S. nationals to receive what the law defines as "federal public benefits." TEGL 10-23 states "Supportive services that represent a direct financial benefit such as a voucher or reimbursement, relocation expenses, or needs-related payments" require verification of work authorization documents. In compliance with TEGL 10-23, participants who are not able to verify their work authorization status shall not be eligible to receive direct supportive services. LWP's policy includes one exception for assisting a person who is believed to have work authorization, but does not have the requisite documents, to obtain their documents as stated below under Work Authorization Documents. (See the Lane Workforce Partnership's WIOA Adult Services Policy for more information on the provision of adult services.)

CATEGORIES OF SUPPORTIVE SERVICES

- A. General Supportive Services (see attached detailed table with specific items of cost)
 - 1. Child Care Reimbursement
 - 2. Mileage Reimbursement (Actual Miles)
 - 3. Public Transportation (Bus Passes)
 - 4. Clothing/Uniforms for Job Search or Employment
 - 5. Work-Related Equipment/Tools Required for Employment

B. Support Services for Special Circumstances

1. Work Authorization Documents:
 - a. Driver's License – New, Reinstatement, & Fees
 - b. Copy of Birth Certificate or Naturalization Certificate
2. Counseling and Referral Services
3. Tutoring Services
4. Out-of-area job search assistance
5. Needs Related Payments

GENERAL SUPPORTIVE SERVICES

In order to receive Supportive Services, eligible participants must be enrolled in LWP funded Individualized Career Services or Training Services (excluding OJT). This policy pertains to all funded supportive services regardless of the funding source/special grant unless otherwise stipulated in the Service Provider Contract.

The following reimbursement/payment criteria will apply:

- A. Child Care. Participants enrolled in Training may request to receive child care reimbursements based on individual need. Before requesting supportive service funds for child care, participants must document that they have explored other options. If other resources are not available or appropriate, and supportive service funds are authorized for child care, reimbursement will be made to the participant. Reimbursement to the participant requires verification that one of the following Oregon approved child care providers are being used: 1) a licensed child care provider; or 2) a registered child care provider; or 3) a child care provider operated by a school district or government agency. Reimbursement will only be made for times when the participant is actually participating in or attending a training or authorized service.
- B. Mileage Reimbursement. Participants may request to receive a mileage reimbursement based on their specific individual need. Participants must document in writing that public transportation is not available or would create an undue hardship based on school hours, work, distance traveled for interviews, distance traveled for employment prior to receipt of the first pay check, and/or childcare commitments. Mileage reimbursement will be paid on actual miles traveled for scheduled activities. The mileage reimbursement rate is designed to cover fuel costs only. A mileage rate and limit will be published in the Funding Caps and Limitations Policy.

For participants in need, a gas card may be provided for the initial support of the service. This shall be limited to only one gas card. The receipt for purchase of gasoline must be provided by the participant and uploaded into eBridge within one week of the provision of the service. All subsequent transportation support services shall only be provided through mileage reimbursements.

- C. Public Transportation. Participants will be encouraged to use public transportation to attend authorized activities whenever feasible. [Note: For those students who attend Lane Community College this service is paid for through student fees and shall not be provided

through LWP funding sources.] Participants outside the community college system who are accessing public transportation to attend school may request a monthly bus pass.

- D. Clothing/Uniform. Participants may request specialized clothing required for employment or while in job search (such as scrubs or welding clothes). Those who successfully complete their training program and are engaged in job search activities such as internships, externships, and/or clinicals may request assistance for the purchase of clothing to attend job interviews and/or clothing to begin work.
- E. Work-Related Tools/Equipment. Special tools or equipment required for employment such as stethoscope, welding tools, special gear.

SUPPORTIVE SERVICES FOR SPECIAL CIRCUMSTANCES

If, during the participant's active engagement in services, it is determined that the participant needs additional assistance in order to successfully complete training and/or gain employment in his/her field of study, the participant may request assistance in the following areas: Driver's license reinstatement; Counseling and Referral Services; Tutoring; Reasonable Accommodations; and/or Out-of-Area Job Search.

The WIOA also allows for Needs Related Payments, which are addressed in this policy. However, the Local Workforce Development Board's Policy does not currently allow for the provision of Needs Related Payments.

Requests for Special Circumstances Supportive Services must be submitted in writing to the Workforce Services Program Supervisor for consideration. Awards will be based on the following criteria: 1) justification of need; 2) documentation of "resource of last resort" and; 3) funding availability.

- A. Driver's License. Participants who are eligible for Oregon Department of Motor Vehicles Driver's License Reinstatement may make a one-time request for reinstatement of their Driver's License and fees.
- B. Counseling and Referral Services. Participants may request to receive counseling and referral services. Generally, these services can be obtained free of charge from partner agencies. However, if the career advisor determines that the participant needs additional assistance, outside of our partner programs, he/she may submit a written request to the Workforce Services Program Supervisor for the type of counseling service in which they are in need.
- C. Tutoring Services. Participants enrolled in training may request to receive reimbursement for tutoring services. These services may be reimbursed from any Oregon Registered business or educational institution. Payment will not be made for the receipt of this service from friends, family members, peers, or other students.
- D. Reasonable Accommodations. Reasonable accommodations for participants with documented disabilities may be provided.
- E. Out-of-Area Job Search Assistance This service is designed to assist participants in seeking employment outside of Lane County. The Workforce Services Program Supervisor may authorize out-of-area job search assistance for participants enrolled in training under the following circumstances:

1. The Participant must be enrolled in training or have successfully completed a funded training program.
2. The participant must have a reasonable expectation of securing employment in the job search area, and must provide the career advisor with verification of employer contacts.
3. The career advisor must include a case log or other participant file documentation which shows evidence that the employment sought by the participant in this activity is not available in the local labor market area.
4. Transportation for out-of-area job search will be by the most economical means available which reasonably meets the needs of the participant at the established rates.
5. Costs associated with this activity must be approved prior to the participant's job search. Costs incurred that did not receive prior approval will not be reimbursed. The participant must provide lodging, gasoline, and miscellaneous purchase receipts to obtain reimbursement for the agreed upon items. Anticipated expenses may not be pre-paid.

For more information on allowable support services, refer to Attachment A – Supportive Service Guidance.

- F. Needs Related Payments WIOA funds may be used to provide needs-related payments to adults and dislocated workers, respectively, who are unemployed and do not qualify for (or have ceased to qualify for) unemployment compensation for the purpose of enabling such individuals to participate in programs of training services under subsection (c)(3) of WIOA. A dislocated worker who has ceased to qualify for unemployment compensation may be eligible to receive needs-related payments only if such worker was enrolled in the training services 1) by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility for employment and training activities for dislocated workers; or 2) if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed six (6) months.

Currently, the Local Workforce Development Board policy does not allow for the provision of Needs-Related Payments. If needed, based on economic conditions and the availability of WIOA funds, a Supplementary Needs Related Payments Supportive Services Policy will be activated.

CATEGORIES THAT ARE DIRECT TRAINING

All direct training costs shall be included in the Scholarship award and shall not be included as part of the support service award.

Direct Training Payments. The following costs are NOT supportive services. The cost of direct training may include: tuition, fees, lab fees, training certifications, class required books, occupational testing or licensing fees, training related certification/exam/licensing preparation or fees, uniforms or other items required by a training/educational institution or provider necessary to participate in or successfully complete a training program.

Participants enrolled in Training may include the costs associated with Communications Technology to access the Internet as part of their training Scholarship Award.

APPROVAL PROCESS

Once it has been determined that supportive services are appropriate and not available from other resources or agencies, the following processes will be followed:

- A. Reimbursement for Child Care - Participant must complete a child care reimbursement form with days, hourly/daily rate, number of children, and reason for childcare. The form is approved by the career advisor and submitted for reimbursement to the participant. (See Childcare Support Reimbursement Request)
- B. Mileage - The participant completes a mileage form stating days, odometer readings, total miles, and purpose of travel. The form is approved by the Workforce Programs Supervisor and submitted for reimbursement. (See Request for Mileage Reimbursement)
- C. Reimbursements/Payment for other items such as uniforms, computers and tools will be provided by a check made payable to the participant when required documentation has been collected supporting the provision of the service or direct payment to the vendor following the Service Providers Purchase Card Policy. The participant request must include a receipt with the request form and be approved by the Career Advisor and the WIOA Program Manager/Supervisor. If the Contractor/Service Provider Staff purchases the item on behalf of the participant, they must collect the receipt at the time of purchase. (See Request for Training and Other Training Related Items Reimbursement/Payment)

REQUIRED DOCUMENTATION FOR SUPPORT PAYMENTS

The following documentation requirements apply to each supportive services request:

- A. All forms must be completed with original ink. Signatures shall be original ink or electronic signatures, which may include e-mail confirmations. The use of pencil or erasable ink will disqualify the request.
- B. Requests must be on Lane Workforce Partnership approved forms.
- C. Requests must have all required attachments as outlined in this policy to adequately support the expenditure and must be available for all monitoring and audit requests.
- D. Receipts must be an official vendor receipt that clearly states the date of purchase, the vendor's name, and the amount.
- E. Child care reimbursements made under this policy shall be based on actual amount(s) as verified via participant signature. Original receipts must be provided for all child care paid in advance and be made out in the name of the participant. Additionally, the receipt must display the name, address, and phone number of the provider.

NOTE: All reimbursements to participants shall be made within 60 calendar days from the date of purchase and within the program year. Reimbursements to participants older than 60 calendar days cannot be made.

RESPONSIBILITIES

- A. In applying the provisions of this policy system-wide to *WorkSource Oregon Lane*, the responsibilities listed below may be delegated upon written application to an outside subcontractor or agency. The request shall contain the name(s) and position titles of those persons delegated responsibility and identify specific areas of responsibility. Upon approval by the LWP Director of Workforce Programs, the subcontractor or agency shall be authorized to administer this policy.
- B. The Lane County Workforce Services Program Supervisor is responsible for administering this policy and ensuring compliance with procedures.
- C. The LWP Chief Operating Officer is responsible for ensuring compliance with the Act, Rules and Regulations under the Act including the allowable, allocable, and reasonableness of costs.
- D. The LWP Director of Workforce Programs may approve exceptions to categories and limits upon the written request of the Lane County Workforce Services Program Supervisor. Such approval will be documented in the accounting records of Lane Workforce Partnership.
- E. The LWP Executive Director is the final authority for the approval of Exceptions to this policy. **The Executive Director may delegate approval authority as necessary to implement this policy including the approval of Exceptions.**

IMPLEMENTATION

The LWP Director of Workforce Programs will annually issue limits applied to payments made for Supportive Services and Training Payments. When necessary, the LWP Director of Workforce Programs may modify this policy through the issuance of procedural memorandum or formal policy modification. These documents shall be considered a part of this policy issuance.

SUPPORTIVE SERVICE FORMS

- Attachment A - Supportive Service Guidance
- Request for Training and Training Related Items Reimbursement/Payment Form
- Request for Training and Training Related Items Form Instructions
- Request for Mileage Reimbursement Form
- Request for Mileage Reimbursement Form Instructions
- Request for Childcare Reimbursement Form
- Request for Childcare Reimbursement Form Instructions
- Mileage and Childcare Request Calculation Worksheet
- Request for Support Services for Special Circumstances Form
- Request for Support Services for Special Circumstances Form Instructions

SUPPORT SERVICES GUIDANCE

The following accompanies the Support Services Policy and provides guidance about the items that may or may not be allowable under LWP programs.

SUPPORT SERVICE	YES / NO / MAYBE	GUIDANCE
Automobile Insurance	MAYBE	<p>Automobile Insurance may be reimbursable if it frees funds to help them pay for something else that is not a support service but needed in order to be successful in their training / employment plan.</p> <p>For instance, if they had a \$200 car repair and a \$200 auto insurance payment, could we pay for the insurance freeing that money they would be using for insurance for them to put toward their car repair?</p> <ul style="list-style-type: none"> • Is their car the only way to get to training? • Could they take the bus? • If we were able to pay for something else, could they then pay for their insurance? • Insurance deposits for initial set up may be made. • Ongoing expenses are reimbursable. • Fees associated with insurance payment may be included. • SR-22, Past dues or past fees are not allowable.
Automobile Ownership / Operator Taxes	NO	<ul style="list-style-type: none"> • Not allowable: Automobile Purchase, Operator Taxes, Roadside Assistance, Impound Fees, Rental Car Fees, Lease Agreements.
Automobile Repairs	NO	<ul style="list-style-type: none"> • Automobile Repairs are not allowable.
Bicycles	MAYBE	<ul style="list-style-type: none"> • Community Bike Rentals (transportation support) – ie. Blue Bikes in Eugene. Customers may be supported through transportation if they are using the community bike rental for travel to and from their training program. • Helmets (clothing support) • Not Allowable: <ul style="list-style-type: none"> ○ Bicycle and bike lock purchase.
Books, Supplies, Software	YES	

		<p>Participants may receive assistance with textbooks, training materials, and other reasonable and necessary school supplies for training. This may include but is not limited to:</p> <ul style="list-style-type: none"> • Required software to participate in class(es) or training(s). • Calculator • Pen, paper, notebooks. • Copy paper, printer. • Personal organizer (Daily Planner, binder).
Business Expenses	Maybe	<p>Business expenses may be reimbursable in some instances. The following may be allowable for reimbursement especially when the service is for a customer in Onward Eugene’s Entrepreneurial Training Program:</p> <ul style="list-style-type: none"> • Transportation support to attend classes. • Business license fees.
Clothing	YES	<p>Clothing necessary for interviewing, training, and employment.</p>
Course Registration Fees	YES, BUT	<ul style="list-style-type: none"> • Course registration fees for Scholarship and WorkEx tuition are paid first from the Tuition fund then from Support Services, if needed. • For Career Services with Support Services (ie. DWG Fire), participants may receive assistance with education related costs necessary for training such as Lab Fees, Student Activity Fees, and Administrative Fees. • Past due fees of any sort are not allowable.
Childcare Expenses	YES	<p>Childcare expenses are reimbursable and need to be provided by a licensed provider.</p> <ul style="list-style-type: none"> • Childcare supports may include ERDC co-payments.
Driver License Testing Fee & Standard License Fee	YES	<p>Driver’s License supports include:</p> <ul style="list-style-type: none"> • CDLs including endorsements • Oregon ID card or Driver’s License if required for training or with a job offer.

		<ul style="list-style-type: none"> • Penalties, fines, and fees for driving related costs or services are NOT allowable.
Drug / Alcohol Counseling	NO	Drug and alcohol counseling or therapy expenses are not allowable.
Drug Tests / Medical Tests	NO	Drug tests and medical tests are not allowable. Healthcare of any kind is not allowable.
Fingerprinting	YES	Fingerprinting is an allowable cost only if required for training or with a job offer and the employer is unwilling to pay.
Food Staples & Groceries	NO	Food staples and groceries are not allowable.
Housing	NO	Housing, such as rent / mortgage, are not allowable.
Internet & Cell Phone Service	YES	<p>Internet and cell phone service are allowable if needed for training and / or job search. *</p> <p>*In order to receive payment, participant needs to submit documentation outlining expenses (copy of statement/bill) BEFORE payment is made. For services that are combined into a single bill, itemized expenses must be determined in order to provide payment for allowable costs.</p> <p>Allowable as part of internet service:</p> <ul style="list-style-type: none"> • Base service plan fees • Taxes and fees for internet • Rental fees for modem • Purchasing modem • Router or internet equipment including connection cords <p>Allowable as part of cell phone service:</p> <ul style="list-style-type: none"> • Base service plan fees • Taxes and fees • Hot spot • Minutes when not in a plan

		<ul style="list-style-type: none"> • Phone chargers • Battery pack • Reasonable phone accessories including headphones and protective phone cases. <p>Past dues or past fees are not allowable for internet or cell phone service.</p>
Legal Fees	MAYBE	<p>Legal services are limited to costs associated to legal documentation needed in order to obtain employment.</p> <p>This may include:</p> <ul style="list-style-type: none"> • Fees associated with obtaining copy of birth certificate in order to obtain Oregon ID or DL required by employer. <p>Expungement fees or services are not allowable.</p>
Loan Payments	NO	<p>Loan payments are not allowable. This includes outstanding debts, or other repayment loans such as:</p> <ul style="list-style-type: none"> • Student loans • Car loans • Payday loans • Credit Card bills • Personal loans • Past due utility, rent, mortgage • Past due fees, penalties, or fines.
Medical Expenses / Healthcare	NO	<p>Medical or healthcare expenses are not allowable This includes:</p> <ul style="list-style-type: none"> • Drug testing required for training or employment • DOT Physical or other physical required for training or employment • Eye exams • Medications • Medical care <p>If a participant has a financial need in this area, explore another cost that is allowable (such as utilities) to free up funds for them to pay for this item.</p>
Medical Expenses / Healthcare	YES	<p>Eyeglasses or protective eye wear are allowable when required for a job or training.</p>
Mental Health Treatment	NO	<p>Mental health treatment is not allowable.</p>

Other permits and fees	YES	<p>Other permits and fees not already mentioned in this document when required for training or employment. These include:</p> <ul style="list-style-type: none"> • Background checks for training and only for employment when not covered by the employer. • License fee related to training certificate. <p>The following are not allowable:</p> <ul style="list-style-type: none"> • Union dues • Aptitude testing, skills tests • Bonding fees (free bonding program exists through OED)
Personal Computers	YES	<p>Personal computers when needed for training, job search, or employment. There is currently a \$500 cap for computers. Requests for a greater amount may be requested to LWP for case-by-case approval. Items eligible include:</p> <ul style="list-style-type: none"> • Laptops • Chromebooks • Tablets • Desk top computers <p>Allowable supplies not included in the \$500 cap are:</p> <ul style="list-style-type: none"> • Computer cords • Computer mouse • Protective carrying case • Software for employment or training • Hardware including USB storage device and headphones • Printers <p>WIOA Scholarship awardees can receive computers through the tuition support of their fund.</p>
Personal Hygiene	NO	Personal hygiene products and services are not allowable.
Personal Identification	YES	<p>Personal identification when these items are needed for employment and training. These may include:</p> <ul style="list-style-type: none"> • State ID • Birth Certificates • Driver's License

Reasonable Accommodations	YES	Reasonable accommodations to participants with a disability when they are needed for a job and the employer cannot pay. Please consult with Workforce Supervisor for guidance for disability related accommodations.
Short Term Training	YES	Short-term training is a support service. Short-term training is typically less than 40 hours and leads to a license or certificate. This may include: <ul style="list-style-type: none"> • Pre-requisites needed for a training program • Forklift Certification • CPR / First Aid training • Flagger • Security Guard
Transportation	YES	May include: <ul style="list-style-type: none"> • Daily or monthly bus passes • Gas Cards – one-time only • Mileage Reimbursement • Ride sharing such as Uber or Lyft, with receipt • Taxi service, with receipt • Shared community rental transportation such as bicycle, with receipt. <p>Verification of valid driver’s license and car insurance is NOT required for transportation payments.</p>
Utilities	YES	Utilities can be paid when the participant needs to free funds in order to pay for something not allowable with support services. For instance, if they have a \$200 car repair, need their car for work / training, do not have the resources to pay for it, we could pay their utility bill that would enable them to redirect money they would pay for utilities to car repair. Utility costs may include: <ul style="list-style-type: none"> • Water • Sewer • Electric • Gas • Garbage <p>Cable services, streaming services, arrears, or late fees are not allowable.</p>

Weapons	NO	<p>Weapons are not allowable. No item that is intended to inflict bodily harm on/or suppress others is allowable. This includes but is not limited to:</p> <ul style="list-style-type: none"> • Guns • Ammunition • Mace • Tasers • Law enforcement or security guard baton • Knives (culinary knives are acceptable in “Work & Training Tools” below)
Work and Training Tools	YES	<p>Tools needed for engagement with training or employment may include but is not limited to:</p> <ul style="list-style-type: none"> • Culinary knives • Safety equipment • Safety clothing • Specialized tools • Alarm clock • Tutoring services • Personal equipment needed for long haul driving <p>Not allowable:</p> <ul style="list-style-type: none"> • All items related to self-employment.