

THE OREGON CONSORTIUM & OREGON WORKFORCE ALLIANCE
POLICY MEMORANDUM #WIA-25-04/04

DATE: April 16, 2004

SUBJECT: Support Services

REFERENCE: WIA Sections 101(46), 129 (a)(4), 134(e)(2)
20 CFR 663.800 through 663.810

PURPOSE:

To provide support services for adults and dislocated workers under the Workforce Investment Act of 1998 to enable an individual to participate in activities authorized under the Workforce Investment Act (WIA). The WIA regulations require a policy on supportive services that ensures equitable resource and service coordination in the local area. This policy provides guidance in establishing Support Service Procedures for local programs.

POLICY:

Supportive Services may only be provided to individuals who are participating in Core, Intensive or Training services and are unable to obtain supportive services 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 WIA Title I activities.

The Workforce Investment Act mandates partnering at the local area. Regional sub-grant recipients will work with partner agencies and/or the one-stop operator to provide supportive service packages made up of assistance from different sources to complete the provision of these services. The provision of accurate information about the availability of and referral to supportive services in the local area is one of the key elements that must be available to adults and dislocated workers through the One-Stop delivery system.

GENERAL GUIDELINES:

Provision of support services is dependent upon several factors. These factors include but are not limited to, the needs of the participant, coordination with other resources and the availability of funds.

Support Services Procedures will be written in compliance with the following guidelines.

- All support service payments must be tied to activities authorized under WIA.
- Efforts must be made to ascertain that support service payments provided to participants are not available through another resource.
- Payments must be calculated on a case-by-case basis to allow a participant to overcome a barrier to training or employment.
- Documentation must be written in the participant's file to ensure the reasonableness, allowability and allocability of the expenditure by stating what, when and why a product or service is required/provided.
- All documentation related to support services must be maintained on site and be made available to TOC/OWA staff during Quality Assurance Reviews, annual audits, and State and DOL monitoring audits.
- Source documentation should allow tracking of funds to a level of expenditure adequate to establish that funds have not been used in violation of applicable laws and regulations, adequately support the expenditure at audit and be in accordance with generally accepted accounting principles.

SUPPORTIVE SERVICES PROHIBITIONS:

- A. Any disbursement of WIA funds is prohibited prior to the participant's enrollment.
- B. Fines and/or penalty payment may not be paid with WIA funds under any circumstances.
- C. Bad debts cannot be paid with WIA funds; debts meet this definition at the point they are turned over to a collection agency for further action.
- D. . Generally, interest on borrowed capital is unallowable. Regional sub-grant recipients should be familiar with how their respective circular addresses interest expenses, as differences exist across circulars.
- E. The purchase of goods or services that are illegal under any federal, state, local or municipal law or statute cannot be made with WIA funds.
- F. The purchase of capital assets for a privately owned business venture where in title to the asset is not held or does not accrue to the public domain.
- G. All costs associated with employment generating activities.
- H. The purchase of tobacco products and/or alcoholic beverages is prohibited.

POST EXIT SERVICES (FOLLOW-UP):

Supportive services may be provided to a participant after exiting from the program when provided as part of the follow-up activities designed to assist the individual in remaining employed or obtaining employment.

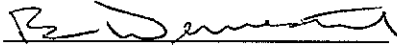
While a wide variety of services may be offered during follow-up, these services should be limited to those necessary to ensure job retention, wage gains and career progress for participants. The need for services should be clearly documented in the participant's Employment Plan or case notes.

ACTION:

The TOC/OWA administrative office and regional sub-grant recipients shall follow this policy. This policy will remain in effect from the date of issue until such time that a revision is required.

INQUIRIES:

Inquires should be addressed to the TOC/OWA Director for Operations at 1-866-888-4TOC.



Bill Demestihis
Executive Director