



Administrative Guideline

To: Area 7 Sub-grantees

From: John Trott, Executive Director

Date: 05/12/09, revised 01/15/10

RE: AG-801: Expanded Services

Purpose

This administrative guideline will serve as an expanded list of supportive and other services available to Area 7 sub-grantees for use with either Workforce Investment Act (WIA) formula funds **or** American Recovery & Reinvestment Act of 2009 (ARRA or “Recovery Act”) funds.

Background

On February 17, 2009, H.R. 1 (ARRA) was signed into law. Supportive services for adults, dislocated workers, and youth are defined in WIA Section 101(46), 129(c)(2)(G), and 134(e)(3), as well as 20 CFR 663.800 and §664.440. WIA Section 134(D)(2)(c) requires that core services to adults and dislocated workers include an initial assessment of supportive service needs. WIA Section 129(C)(a) requires an eligible youth’s objective assessment include an evaluation of the supportive services needs as one of the ten required youth program elements. Also see Area 7 policy P7-400: Supportive Services.

On December 16, 2009, the Ohio Department of Job and Family Services (ODJFS) issued a memo prohibiting Needs-Based Payments.

Action

Due to the urgent nature of the Recovery Act funds, Area 7 is issuing this administrative guideline to amplify the kinds of supportive and other services available for sub-grantees, participants, and employers with both WIA formula and Recovery Act dollars.

Allowable Activities

Per Area 7 policy P7-400: Supportive Services policy, supportive services paid, provided, or reimbursed with WIA funds may include, **but are not limited to**, assistance with:

- ◆ Books or other class materials required by the training provider
- ◆ Child care or dependent care
- ◆ Counseling, mentoring, or tutoring services
- ◆ Fees
 - Does not apply to legal or court fees & fines
 - Participants are expected to apply for fee waivers whenever available
- ◆ Grooming assistance
- ◆ Linkages to community services
- ◆ Needs-related payments, except as a post-placement or follow-up activity
- ◆ Payment for vocationally-necessary exams, certificates, or permits, including GED (Sub-grantees may establish procedures that pay for or reimburse costs related to exam retakes, one time only, if the participant is able to establish a reasonable plan to pass the test upon second attempt.)
- ◆ Transportation, including vehicle repair and mileage reimbursement
- ◆ Work-related expenses, uniforms, tools

Due to the expanded funding capacity, sub-grantees may be able to strengthen their menu of services available to employers and participants. Other examples of services that **can be** provided by the sub-grantee to employers or eligible participants with either WIA formula or Recovery Act funds include:

- ◆ Assessments
- ◆ Background checks & fingerprinting
- ◆ Bonuses
- ◆ Child care
- ◆ COBRA payments (1-3 months)
- ◆ Customer service education
- ◆ Customized training
- ◆ Driver's education
- ◆ Entrepreneurship training
- ◆ Equipment for the One-Stop (using administrative funds)
- ◆ Equipment for work sites; lawnmowers, tillers, etc. (must become property of the participant or remain the property of the One-Stop and subject to equipment disposal rules of the sub-grantee)
- ◆ Extended/Saturday One-Stop hours
- ◆ Eye glasses
- ◆ Fidelity bonding (i.e. bad credit, ex-offenders; see USDOL TEN 37-07)
- ◆ Field trip (if part of ISS, job shadowing, or other youth program element)
- ◆ Financial planning/management workshops
- ◆ Food/lunch
- ◆ Gas cards

- ◆ Higher wages for work experience
- ◆ Hire staff
- ◆ Incentives for good attendance, high performance, good supervisor reviews, etc.
- ◆ Incumbent Worker Training (IWT); 10% of Adult and Dislocated Worker WIA & ARRA funds (layoff aversion only)
- ◆ Individual Training Accounts (ITA); short-term only
- ◆ Insurance (auto & medical)
- ◆ Internet-based social networking
- ◆ Lease pickup truck & trailer to haul work site equipment
- ◆ Lease vehicles/vans and hire drivers to transport participants to and from work sites
- ◆ Needs-related payments (financial assistance to enable individuals to participate in training)
- ◆ On-the-Job Training (OJT); up to 50% wage subsidy
- ◆ Open a bank account (incentives for direct deposit of work experience pay)
- ◆ Payroll service (must be procured)
- ◆ Physicals (if required by training provider or work site/employer)
- ◆ Prepaid cell phones (strict sub-grantee policy would need to be developed; i.e. loading 30 minute cards at a time, if participant abuses phone privileges no new time will be loaded)
- ◆ Relocation costs (participant), with some restrictions
- ◆ Rental/housing payment
- ◆ “STAFF” shirts for work experience participants
- ◆ State IDs for participants ineligible for a driver’s license
- ◆ Statewide projects like Project HIRE and Recovery Conservation Corp (ODNR)
- ◆ Tools
- ◆ Transportation/bus passes/gas cards (purchase of a vehicle is not permitted)
- ◆ Uniforms or work attire
- ◆ Utilities payment (participant)
- ◆ Work experience

Limitations

Area 7 has not established a ceiling on the amount of support services that can be provided to individuals or businesses. However, sub-grantees may establish ceilings.

Some supportive services and other activities **not allowed** under formula or ARRA WIA funds include:

- ◆ Alcoholic beverages
- ◆ Court judgments, legal fees, debts, fines, interest, penalties
- ◆ Entertainment or social/intramural student activities
- ◆ Firearms and ammunition
- ◆ Foreign travel
- ◆ Fundraising (including investment management costs) or donations
- ◆ Lobbying & political activity

- ◆ Needs-based payments (financial assistance for participants to enable them to participate in any WIA activity)
- ◆ Refundable deposits (i.e. rent, utilities deposits)
- ◆ Relocation costs (business)
- ◆ Taxes (participant or business)
- ◆ Union dues
- ◆ Vehicle purchases