

# Hennepin-Carver Workforce Development Board

Hennepin-Carver Workforce Development Board Action Request: 2025-1 Topic: Local Youth Support Service Policy Board Meeting Date: March 12, 2025

### **Item Description**

Revised policy governing access to support services that follow federal regulations and state statutes and provides guidance on the issuance of support services and relative funding limits for WIOA Youth and Minnesota Youth Program eligible participants.

### **Action Needed**

A motion (and second) to approve revisions to the Local Youth Support Services Policy.

### Background

Per the Department of Employment and Economic Development (DEED), local areas are required to have a local policy that governs access to support services for program participants. WDA 09 (Hennepin-Carver) currently has a Local Youth Support Service policy (effective 5/8/2024) in place that governs WIOA Youth and Minnesota Youth programs within the Local Area.

The revised policy includes language clarifying the Local Youth Support Services policy governs both the WIOA Youth and Minnesota Youth Program; and provides additional information regarding the use of support services in the Minnesota Youth Program.

Additionally, per guidance received from the Minnesota Department of Employment and Economic Development (DEED), the policy was updated to modify overly-restrictive language and to clarify that supportive services may be provided to WIOA Youth participants at any time during program enrollment, including during enrollment and follow-up.

Finally, the policy was updated to allow subgrantee's internal policies to vary from the Local Youth Support Services policy based on special circumstances, with review and written approval from Hennepin County program staff.

Support Services must be administered following the parameters outlined in these policies by all WIOA Youth and Minnesota Youth Program service providers of the Hennepin-Carver WDA 09.

#### **Staff Recommendation**

Adopt the revised Local Youth Support Services Policy to better align local policies with guidance from DEED and to provide increased clarification to WDA 09 partners and providers on the administration of support services to youth program participants.

### Attachments

Draft Policy: Local Youth Support Services Policy



# Policy: Local Youth Support Services

Effective Date: X/XX/XXXX La

Last Reviewed Date: X/XX/XXXX

## Summary

The Workforce Innovation and Opportunity Act (WIOA) allows eligible program participants of WIOA Title I-B Youth to access supportive services that ensure resource and service coordination in the local area. Supportive services may be provided to participants that are unable to obtain similar or equivalent supportive services through other programs or resources; and supportive services may be provided at any point during a participant's time in the program, including during enrollment and follow-up services.

The Minnesota Youth Program does not require grantees to offer or provide supportive services to youth participants. However, it is generally a best practice to offer supportive services to youth participants to help ensure successful completion of programming. Per MN Statute 116L.561, Supportive services include items that are necessary for a youth to participate in the program, such as transportation, clothing, tools, childcare, housing/rental assistance, school-related expenses, etc. These expenses may be paid directly to the youth or to a third-party vendor, or may be provided through referral to another organization.

# Relevant Laws, Rules, or Policies

Workforce Innovation and Opportunity Act (WIOA), §3(59) and 134(d)(2) and (3) 20 CFR 680 Subpart G 20 CFR 681 Subpart C §681.570 TEGL 19-16 DEED's Financial Assistance for Computer Hardware and Similar Technology Policy TEGL 09-22 TEN No. 12 - 21 MN Statute 116L.561

### Purpose

This policy outlines the allowable Support Services and funding limits for the **WIOA Youth** and **Minnesota Youth programs.** Individuals who are eligible for and are enrolled in the WIOA Youth and Minnesota Youth programs may be eligible to receive Support Services so long as they meet the criteria outlined in DEED's policies pertaining to <u>allowable activities</u>. This policy includes additional criteria that has been established by the Hennepin-Carver Workforce Development Area (WDA).

This policy also serves as guidance to govern the use of support service and/or training service dollars to fund purchases of computer hardware or similar technology (i.e. software purchases, repairs, etc.) for the Hennepin-Carver Workforce Area per the requirement in DEED's Financial Assistance for Computer Hardware and Similar Technology policy.

Additionally, this policy serves as guidance to govern the use of support service dollars to provide food for program participants for the Hennepin-Carver Workforce Area per the requirement in DEED's WIOA Youth Policy Chapter 11: Program Elements and in accordance with Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200.40).

This policy amends the prior policy issued by Hennepin-Carver WDA, titled "Policy: Local Youth



Support Services" effective 5/8/2024.

Hennepin-Carver subgrantees' internal Support Service policies may vary based on special circumstances. Any deviation from the standards established by this Local Policy must be submitted in writing and approved by the appropriate staff at Hennepin County prior to the policy being implemented.

# Policy

An employment counselor must determine eligibility for support services when it is identified that a program participant requires additional assistance outside of career and training services in taking the necessary steps towards self-sufficiency. Eligibility and the need for support services must be documented in the Individual Employment Plan (IEP) or Individual Service Strategy (ISS) and signed by both the program participant & employment counselor prior to obligating support services.

Support Services are subject to the following conditions and must be documented in the participant record:

- A. Employment counselors must coordinate with community resources to provide linkage to community services in the local area to ensure that any services that are available, are used <u>before program funds</u>. Program resources may not be used unless no other available resources can be secured and attempts to secure other available resources are documented in the case notes of the participant's file.
- B. If unable to obtain support services through other community resources providing such services, support services may only be provided when necessary to enable the <u>enrolled individual</u> to actively participate in career or training activities;
- C. Delivery of support services must be documented in the participant case file/Workforce One record. Copies of receipts or expenditure back-up documentation must also be maintained in the participant file.
  - i. Support service transactions must also be included in the case note (the support service type, amount, participant needs identified, and expenditure rationale described) in Workforce One.
- D. Support services cannot be incurred, obligated or distributed until after the participant is enrolled and the participant and employment counselor have signed and dated the IEP (past due bills cannot be paid upon program enrollment);
- E. Support services may be included in WIOA Youth follow-up services and must be coded as follow-up services post exit in Workforce One when provided as such.
- F. Support service payments should be made directly to the vendor (i.e. car repair shop, property owner, utility company, bookstore, clothing store, etc.). On rare occasions, participants may be reimbursed if the expense is clearly tied back to the participant and valid documentation (i.e. receipt) is provided. It is best practice to encourage support service expenses to be pre-approved by service provider.
- G. If there is uncertainty about whether a purchase can be made using support services funds, contact the WIOA Youth/MYP Program Manager with the Hennepin County Office of Workforce Development.
- H. Support services are not an entitlement and may be offered at the discretion of the employment counselor and funding is subject to availability of funds and limited *up to* the following maximums per program year or to the discretion of the service provider(s) of the Hennepin-Carver WDA:

Participants receiving Training and/or Work Experience services:	\$2,000.00
Participants NOT receiving Training and/or Work Experience services:	\$1,500.00



Exceptions to these limits may be at the discretion of the service provider(s) of the Hennepin-Carver WDA on a case-by-case basis for participants who are most in need. To consider exceeding the limits, the participant's specific exceptional needs and/or barriers must be identified in the IEP and case notes. Requests for exceptions must be submitted in writing by the employment counselor and are subject to review and approval by the supervisor of that agency. If, after supervisory review, there is any question about the provision of a particular request, the service provider will consult with the appropriate program staff at Hennepin County Workforce Development. If an exception to these limits is approved, it must be documented in the participant's case notes.

TEGL 21- 16 stated that "supportive services are a separate program element and cannot be counted toward the work experience expenditure requirement even if supportive services assist the youth in participating in the work experience." However, ETA's policy on this issue has evolved. ETA recently determined that supportive services that enable WIOA participants to participate in training can count toward training expenditures. Therefore, to be consistent with this policy, **supportive services that enable WIOA participants to participants to participants to participate in work experience can now count toward the work experience expenditure requirement.** 

Allowable Support Services	*Can be covered in training costs?	**Can be covered in Work Experience costs?	Funding limit per participant	
<ol> <li>Books, Fees and Supplies for Post-Secondary Students</li> </ol>	Y	N	Funding limits are to the discretion of the service provider(s) of the Hennepin-Carver WDA based on availability of funding and determined on a	
2. Child & Dependent Care	Ν	Y	case-by-case basis and must supply an internal policy	
3. Transportation	N	Y	that references funding limits for each category. The total funding limits by Program Year cannot exceed	
4. Counseling – Personal, Financial & Legal	N	N	the amounts set forth this policy- the only exception is the case-by-case determination of a participant's	
5. Dental	N	N	exceptional need that has been clearly documented in the participant's WorkforceOne record, as described	
6. Drug & Alcohol Counseling	N	N	above.	
7. Educational Testing	Y	N	Hennepin County maintains the right to require — service providers to pay back funds that are	
8. Employment and Training- Related Fees	Y	Y	determined unallowable per the law and policies referenced above and/or due to the lack of	
9. Emergency Financial Assistance	N	N	justification for an amount that exceeds the	
10. Emergency Health Insurance	N	N	established funding limits set in this policy or the service providers' internal policies.	
11. Health Care	Ν	N	Bulk purchases of gift cards, cash cards, and/or gas	
12. Housing or Rental Assistance	Ν	N	cards (as support services) cannot be submitted for reimbursement requests at the time of purchase.	
13. Out-of-area job search	Ν	N	Reimbursement requests must be made after the	
14. Professional Membership	Y	N	service (gift, cash or gas card) is provided to the individual participant.	
15. Reasonable accommodations for individuals with disabilities	Ν	Y		
16. Relocation	Ν	N		



17. Tools & Clothing	Y	Y	
<ul> <li>17. Tools &amp; Clothing</li> <li>18. Financial assistance for computer hardware and related technology</li> </ul>	Y	Y	<ul> <li>To qualify for financial assistance for computer hardware and related technology, a participant must meet the following requirements and the file must contain supporting documentation for the need:</li> <li>1) The participant must be enrolled in a training program that requires specific use of a computer/technology</li> <li>2) The computer/technology should be required to complete training or successfully participate in the participant's Work Experience.</li> <li>3) There must be specific supporting documentation that the use of particular technology is needed to complete the training or Work Experience Activity.</li> <li>4) Documentation should be from the school/training vendor or Employer/Site Supervisor evidencing the technology is required and how the student will use the technology</li> <li>5) There must be documentation that the participant does not own or have reasonable access to the technology required</li> <li>• This can be documented in writing by the participant stating that they do not have access to the technology required to meet training or Work Experience requirements. Not owning a computer is not sufficient basis alone as schools generally provide access to technology as well as libraries, CareerForce centers, etc.</li> <li>6) Documentation should support evidence that the cost is the lowest, reasonable price that still meets the needs of the technology is preferred if available).</li> </ul>
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			that still meets the needs of the technology required (accessing refurbished technology is
			outlined in this policy as well as requirements 5-8 above. Funding limit for computer hardware and related technology up to: \$750.00 per participant



<ul> <li>(IEGL 09-22) states that on a limited basis and in certain situations, food. at a reasonable cost, may be provided to WIOA Youth program participants as a supportive service. Food may be provided to WIOA youth participants when it will assist or enable the participant to participants when it will assist or enable the participant to participant as a support services, the following requirements must be meet and documented in the participant case file:</li> <li>1) Program should provide food directly to youth during a program activity. Sign-in attendance sheets, agendas, timecards should document that the food was provided to WIOA youth participant case file:</li> <li>2) Support Service funds may not be used to provide food direct yo quart that the food was provided to WIOA youth participant file.</li> <li>3) Original receipts or invoices for the food purchase must be included in the participant file.</li> <li>4) Food may NOT be provided for celebrations, or events. Food should only be provide to WIOA Youth participant to enable program participation.</li> <li>5) There must be documentation that the participant is on thave reasonable access to the food necessary to participate in program activities. This may be self-attested by the participant is as file.</li> <li>6) All documentation should be submitted to designated service provider and included in the participant is case file.</li> <li>6) All documentation should be submitted to designated service provider and included in the participant is case file.</li> <li>6) All documentation should be submitted to designated service provider and included in the participant is case file.</li> <li>7) There must be documentation that the odd has submitted to designated service provider and included in the participant is case file.</li> <li>8) All documentation should aberees to the following limits on expenditures per meal per participant:</li> <li>8) Food may be provided as a supportive service provider and included in the participant is one spenditures per meal pe</li></ul>	19. Food as a Support Service	N	Ν	Training and Employment Guidance Letter 09-22
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• Lunch \$13.00				
				Dinner \$19.00

\* To establish whether a service can be covered by training funds, the file must contain documentation that indicates the equipment, materials, tools, additional fees and/or exams are a necessity and are required in order for an individual to successfully complete the training correlated with said items.



\*\* To establish whether a service can be covered by Work Experience funds, the file must contain documentation that indicates the equipment, materials, tools, transportation or childcare costs are a necessity and are required in order for an individual to successfully attend and complete their Work Experience.

# Contact:

Hennepin County, Disparity Reduction Administration Office of Workforce Development

Youth Programs Manager Brianna Steirer Brianna.Steirer@hennepin.us Hennepin-Carver Workforce Development Board Director Erik Aamoth <u>Erik.Aamoth@hennepin.us</u>