

Employment System Administration and Policy

Policy-rel	ated	Performance	□ Q&A		Other Ex	Number: WIN 0111, Change 6 Date: May 3, 2022 piration Date: March 31, 2023
TO:	Washington WorkSource System Partners					

FROM: Gary Kamimura, Policy Manager

SUBJECT: Temporary suspension of prohibition on food as a supportive service for WIOA Title I-B youth program participants

Purpose:

To communicate the temporary suspension of the prohibition of food as an allowable supportive service for WIOA Title I-B youth program participants under the definition of "supportive services" in WIOA Title I Policy 5602, Revision 3 Supportive Services and Needs-Related Payments, due to the COVID-19 emergency.

Action Required:

Local Workforce Development Boards (LWDBs) and their contractors must distribute this guidance broadly throughout the system to ensure that WorkSource System staff are familiar with its content and requirements.

Content:

Due to the COVID-19 emergency, food may be provided as a supportive service to WIOA Title I Youth program participants on a limited basis and in certain situations.

Food may be provided to eligible youth when it will assist or enable them to participate in allowable youth program activities and reach their employment and training goals. The focus of the program is to train youth and the use of WIOA Title I-B grant funds for food should be limited to reasonable and necessary purchases.

Local Workforce Development Boards (LWDBs) must coordinate the purchase of food for WIOA Title I-B youth with other community, state, or federal services that provide food to low-income individuals and document the coordination efforts undertaken.

The U.S. Department of Labor (DOL) has clarified an expectation that youth files include ample documentation of (1) efforts to first secure food for the youth through federal, state, and community

The WorkSource System is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Language assistance services for limited English proficient individuals are available free of charge.

food assistance programs and services and (2) the immediate need for WIOA funds to be used to purchase food for the youth to enable effective participation in youth program activities.

To that end, LWDBs and their WIOA Title I-B youth providers must first pursue food assistance that might be available through the Supplemental Nutrition Assistance Program (SNAP), called Basic Food in Washington, which is a one-stop partner in Washington's 2020-24 WIOA Combined State Plan, as well as food assistance available through local food banks and at-risk youth organizations whether or not they are partners in local one-stop systems.

To prepare to provide food as a supportive service for WIOA Title I Youth participants, LWDBs are encouraged to review local policy guidance regarding internal controls and documentation requirements, as well as assess or establish partnerships with other entities that will be necessary to provide food to WIOA Title I-B youth.

This guidance is in effect through the expiration date noted in this guidance, unless DOL rescinds its COVID-19 FAQ guidance. If that happens, the rescinding of this WIN will be communicated through GovDelivery and other appropriate communication channels. Depending on the COVID-19 situation, this guidance may also be further extended beyond the posted expiration date. If that happens, the extension will be broadcast via GovDelivery as a change to this WIN and through other appropriate communication channels.

References:

- WIOA Title I Policy 5602, Revision 3, Supportive Services and Needs-Related Payments
- ETA Coronavirus (COVID-19) FAQs for Workforce Innovation and Opportunity Act General; U.S. Department of Labor, Employment and Training Administration; FAQs April 29, 2020
- WTECB Meeting, November 9, 2022

Website:

https://wpc.wa.gov/policy/state/win-state-guidance

Direct Inquiries To:

Employment System Administration and Policy Employment System Policy and Integrity Division Employment Security Department P.O. Box 9046 Olympia, WA 98507-9046 SystemPolicy@esd.wa.gov

Attachments:

<u>Attachment A</u> – ETA Coronavirus (COVID-19) FAQs for Workforce Innovation and Opportunity Act - General, U.S. Department of Labor, Employment and Training Administration, April 29, 2020.

Attachment A

Excerpted from page 2 of ETA Coronavirus (COVID-19) FAQs for Workforce Innovation and Opportunity Act - General as of 4/29/20.

(New as of 4/29/20) Q: Can grants purchase food that can be made available to individuals seeking assistance?

Response: ETA grant funds cannot be used to provide general food assistance to individuals in the community, regardless of the age of the individual. Employment and training programs are not intended as and cannot be converted to income or food support programs. At times, certain supportive services and needs related payments may be issued to a participant, in general, to allow them to participate in training and employment services that will allow more of their personal funds to be used to cover food purchases. Written policies and procedures must be in place that outline the factors or criteria that will be considered by the case manager or staff person to ensure fair and equitable distribution of such expenses to participants is also reasonable, necessary, allowable, and allocable to the ETA grant award.

In programs specifically serving youth, on a limited basis and in certain situations ETA grant funds may be used on food for youth program participants as a supportive service. Food may be provided to eligible youth when it will assist or enable the participant to participate in allowable youth program activities and reach his/her employment and training goals. The focus of the programs is to train youth and the use of grant funds for food should be limited to reasonable and necessary purchases and must be coordinated with other community, state, or Federal services that provide food for low-income individuals.