



Green Country Workforce Development Board

Supportive Services Policy

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Telephone Relay Service is available by dialing 711 or (800) 722-0353

The Green Country Workforce Development Board (GCWDB) is the policy and guidance board for the Workforce Oklahoma system in Oklahoma. We are business leaders with a commitment to lead a highly skilled, productive workforce in our 18-county area.

The Green Country Workforce Development Board (GCWDB) complies with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, the basis of citizenship status or participation in a WIOA Title-1 financially assisted program or activity.

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Green Country Workforce Development Board

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Supportive Services

Pursuant to WIOA §3(59), WIOA §134(d)(2) & (3), 20 C.F.R. Section 680.900 – 970, 20 C.F.R. Section 681.570

Approved and Published:

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Purpose

As indicated in 20 CFR 680.900 through 970, and 20 CFR 681.570, Local Workforce Areas have been given the authority to make policy and administrative decisions, and the flexibility to tailor the workforce system to the needs of the local community. This guidance defines a local policy on the coordination and delivery of supportive services, subject to WIOA's limitations.

Authority

The authority for this policy is derived from the following:

- WIOA 3(59)
- WIOA 134 (d)(2) & (3)
- 20 CFR 680.900 through .970
- 20 CFR 681.570
- Federal Register/Vol. 81, NO 161 pg. 56336
- Training and Employment Guidance Letter (TEGL) WIOA No. 19-16 Operation and Guidance for the Workforce Innovation and Opportunity Act (March 1, 2017)
- Training and Employment Guidance Letter (TEGL) WIOA 9-22 Workforce Innovation and Opportunity Act Title I Youth Formula Program Guidance (March 2, 2023)
- Training and Employment Guidance Letter (TEGL) WIOA No. 10-23 Reducing Administrative and Training Administration (ETA) (February 21, 2024)
- WSD #80-2024 Adult Dislocated Worker Programs (April 1, 2024)
- WSD #12-2024 WIOA Title I Youth Program Guidance (November 1, 2024)

Background

Supportive Services are designed to enable an individual to participate in career services and/or training services and are governed by 20 CFR 680.900 through .970, and 20 CFR 581.570. The U.S. Department of Labor provides clarification for Supportive Services and their administration in TEGL 19-16, TEGL 9-22 and TEGL 10-23, and the Oklahoma Employment Security Commission offers further guidance through WSD #80-2024 and WSD #12-2024. The Green Country Workforce Development Board, in consultation with its One-Stop Operator, and its service providers must develop a policy on supportive services that ensures resource and service coordination in the local area. The policy should address procedures for referral to services, including how such services will be funded when they are not otherwise available from other sources, and may establish limits on supportive services. Supportive services are based on financial need and participants are not automatically entitled to supportive services.

What are supportive services?

Supportive Services may include but are not limited to:

Supportive Services may include but are not limited to:

- Assistance with transportation (i.e., bus pass, bicycle, tire, small car repair, etc.)
- Assistance with childcare and dependent care;
- Linkages to community services;
- Assistance with housing and utilities (i.e., electric bill, internet, phone bill, etc.)
- Reasonable accommodations for individuals with disabilities
- Assistance with educational testing;
- Referrals to health care;
- Assistance with uniforms or other appropriate work attire and work-related tools including such items as eyeglasses and protective eye gear;
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes;
- Payments and fees for employment and training-related applications, tests, and certifications
- Legal aid services
- Needs-Related Payments (available only to individuals enrolled in training services and must be consistent with specific criteria as indicated in 20 CFR § 680.940 for Adult program participants and in § 680.950 for DLW program participants).

When may supportive services be provided to Adults, Dislocated Workers, and Youth?

Supportive Services are available for WIOA Title I Adult, Dislocated Worker, and Youth participants participating in Title I career service (excluding follow-up career service) or training services. A Youth Support Service is one of the 14 youth elements that must be made available to participants and may be provided as a follow-up service if needed. Supportive Service needs may be identified through the Initial/Objective Assessment process and outlined in the IEP/ISS. Supportive Services do not set participation, nor do they extend the date of exit for performance accountability purposes. WIOA Title I will only pay for expenses incurred while a participant is enrolled in a WIOA Title I program and actively participating in activities authorized under WIOA, and provided that:

- Supportive services are NOT AVAILABLE through other programs providing such services.
- The supportive service is reasonable and necessary to enable the individual to participate in career services or training activities.

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- The supportive service is adequately documented.

The decision on which supportive services to be provided, and the timing of their delivery, shall be made at the local level on a case-by-case basis depending upon the needs of the individual. Each barrier should be reviewed and determined. If it is a barrier to participation in a career or training service, then a decision needs to be made on whether it would be appropriate to provide a referral or a supportive service. To ensure the highest quality, most comprehensive service provision possible, supportive services funds may be used in coordination with career and training services provided by other partner programs and entities jointly responsible for workforce and economic development, educational, and other human resource programs.

Local Policy

Coordinating with Non-WIOA-Funded Services

It shall be the responsibility of GCWDB to assure that supportive services provided under this policy shall be properly coordinated with services, resources, and activities that are available from other sources. In every instance of providing supportive services, the case manager must ensure that no other resource exists or that the need is so urgent that referral to other resources would delay the provision of the support service and create a hardship for the participant. Supportive services funded with WIOA Title I funds are funds of last resort, and when possible, must be coordinated/braided with other supportive services, career services and/or training services, funded by partner programs, community-based organizations, and entities jointly responsible for workforce and economic development, educational, and other human resource programs. The separate and simultaneous provision of resources from multiple funding streams will help ensure the highest quality and most comprehensive service provision possible for individuals requiring supportive services to enable their participation in training services. The details of the coordination of services and resources must be documented in the IEP/ISS and Program Notes.

GCWDB and its contracted service providers shall ensure that a minimum of forty percent (40%) of Adult and Dislocated Worker formula funds are expended on allowable training activities consistent with WSD 82-2024. Allowable training expenditures include ITAs, OJT, customized and incumbent worker training, registered apprenticeships, and supportive services directly linked to training participation. Staff wages, administrative, and indirect costs are excluded from this calculation. **Expenditure compliance shall be tracked quarterly and reviewed by GCWDB to ensure continued alignment with state requirements.**

The One-Stop Operator, in conjunction with the Service Provider, is authorized to establish appropriate linkages with programs such as child support, the Earned Income Tax Credit program (EITC), SNAP, Medicaid, and the Children's Health Insurance Program (Sooner Care), which serve as key supports for customers making the transition to self-sufficiency.

The Trade Adjustment Assistance (TAA) program, coordinated by OESC, provides additional benefits for dislocated workers laid off by companies directly affected by increased imports or certain shifts of production to other countries. Upon notification that USDOL has certified a business as "trade impacted", affected individuals should contact the local Oklahoma Works AJC for TAA information. 20 CFR 618325(a)(1)] of the TAA Final Rule requires co-enrollment between the TAA Program and the WIOA DLW Program if the trade-affected worker is eligible for the DLW program. Data shows that co-enrollment between the TAA and Title I Dislocated Worker (DLW) programs results in better performance outcomes that are significant and consistent over time. Coordination between the Title I case manager and OESC's TAA staff is essential to ensure successful training completion and allows for

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the timely provision of individualized career services while improving the effectiveness of both the DLW and TAA Programs. When ES staff identify any supportive needs necessary for the success of TAA participants, they must refer TAA-eligible individuals to the appropriate Title I staff member. WIOA staff must then provide supportive services as per this issuance and local supportive services policy. Additional information regarding TAA and DLW co-enrollment may be found in the following documents:

https://www.doleta.gov/tradeact/taa-data/participant-reporting/docs/Co-Enrollment_FAQ-1.pdf

and

https://www.doleta.gov/tradeact/taa-data/participant-reporting/docs/Co-Enrollment_FAQ-2.pdf

A trade-affected worker has the choice of declining co-enrollment with the WIOA DLW program. However, AJC staff must thoroughly explain the benefits of co-enrollment to individuals whose employment is affected by foreign trade. It is recommended that AJC staff obtain a written statement from trade-impacted workers who wish to decline enrollment in the WIOA Dislocated Worker program. The statement should be uploaded to the virtual case management system. Regardless of whether a written statement to decline co-enrollment was provided, AJC staff must document in case/program notes that the benefits of co-enrollment were explained, as well as the individual's stated reason for declining DLW services (i.e., co-enrollment). TAA covers 100% of tuition, course fees, books, required supplies, and equipment for eligible participants. TAA can also pay training-related mileage above 50 miles (one way) when the participant must travel outside their commuting area, as well as required tolls. However, mileage costs and toll fees must be considered as part of the training approval process to ensure the costs do not result in more than the maximum allowed/approved for training.

The TAA program utilizes the virtual IEP located in virtual case management system. As with IEPs developed for all adults and dislocated workers, all significant changes to the initial IEP require the IEP to be updated/modified and must be signed by the participant. More information on TAA, including who may qualify for a job search allowance or a relocation allowance, may be found on the Oklahoma.gov website at <https://oklahoma.gov/oesc/individuals/programs/taa.html>

When establishing linkages with other programs and agencies in the Green Country Workforce Development Board for Oklahoma area, the One-Stop Operator, in conjunction with the Service Provider, should consider entering into letters of agreement or memoranda of understanding which may describe service delivery and procedures for referrals.

Providing Accurate Information to Participants

Information about proper supportive services will be made available to all participants:

- Through the participant orientation process; or
- By providing access to electronic or printed community resource directories and information

Determining the Need for Supportive Services on an Individual Basis

Supportive services may be provided when they are necessary to enable an individual to participate in activities authorized under WIOA sec. 134(c)(2) and (3). Supportive services may only be provided to individuals participating in career and training services.

Needs Determined During Initial Assessment

When an adult, dislocated worker, or youth is participating in career or training services, as defined in WIOA secs. 134(c)(2) and (3), supportive services may be provided only after an initial/objective assessment has been conducted verifying the need for such services. The GCWDB, in conjunction with the One-Stop Operator and the Service Provider, shall implement local procedures for conducting initial assessments. The local procedures shall be developed in consultation with the One-Stop Partner agencies and shall ensure that initial assessment procedures conform to all State and federal guidance regarding the assessment of individual needs.

Development of Supportive Services in the Individual Employment Plan/Individual Service Strategy

When an WIOA participant is participating in career or training service as defined in WIOA, supportive services may be provided only as part of an Individual Employment Plan (IEP) / Individual Service Strategy (ISS).

Consistent with the GCWDB's established Policy on Assessment and IEP's and ISS's for WIOA Participant's the service provider shall ensure that each identified barrier to participation in a WIOA activity is adequately documented and described in the individual's IEP/ISS. The determination regarding referrals or supportive service delivery must be documented and described in the IEP/ISS prior to provision of services.

Supportive services may be provided to address identified needs that interfere with the participant's ability to successfully participate in a WIOA career or training activity. These services may be addressed whenever the need is identified whether at initial IEP/ISS development or at any time during participation in the WIOA program. The participant's IEP/ISS should always reflect a clear picture of circumstances and services provided.

Providing Supportive Services Using WIOA Funds

The local procedure must ensure that similarly situated customers are treated in a similar manner. As set forth in the regulations (29 CFR part 37) implementing Section 188 of WIOA, a WIOA Service Provider must not discriminate in a way it delivers any aid, benefits, services, or training under a WIOA Title I-funded program or activity. If a need has been documented, then supportive services may be provided using WIOA resources consistent with the following guidelines:

Non-Duplication of Resources

Definition of "Not Available". When considering whether supportive services are available through other agencies, WIOA Service Provider staff should consider whether the services offered by another agency or program are:

- Accessible – that is, capable of being reached by the participant; and
- Obtainable – that is, capable of being attained by a planned action or effort.

The Green Country Workforce Development Board recognizes that many supportive services are offered through non-WIOA sources; however, not all of these services may be available to a WIOA participant at the time of his/her need. For example, some services are available only after a lengthy application process (which may include a waiting period). Other services are present, but not available during the hours required by the WIOA program participant. Additionally, some services may be offered by non-WIOA providers, but they are not present in a suitable or accessible geographic location. Therefore, it is understood that the "availability" of an identified supportive service must often be determined on an individual basis, taking into consideration the needs of those participants who are enrolled in a WIOA program of services.

The primary criteria for evaluating whether a service is "available" through another program or agency shall be whether the service is "present or ready for immediate use." (Source: Merriam-Webster Online Dictionary).

Documentation that "supportive services are not available from another program" is required. Such documentation must be in the form of:

- The use of a "No Other Service Available (**NOSA – Included as Attachment 1**)" form.

Limits on the Amount and Duration of Service

The maximum TOTAL amount of any supportive services for a participant enrolled in WIOA Title I and participating in career and training services is \$5,000.00 per participant during their lifetime. The GCWDB Executive Director, on a case-by-case basis, has the authority to increase this limit by \$1000.00. To request the additional supportive service amount, a detailed email request must be sent to the GCWDB Executive Director that includes all supporting documentation and justification for the request. All supportive documentation must be uploaded and/or input into the virtual case management system, after the GCWDB Executive Directors approval. The service provider must provide documentation in writing that all other avenues and resources have been thoroughly explored prior to requesting board approval for additional funding. In establishing such limits, GCWDB, in consultation with the One-Stop Operator and the service provider, are encouraged to offer necessary and reasonable supportive services (consistent with approved contract budgets and this local policy). Specific limitations on the types, amount, and duration of supportive services should be reviewed frequently, considering the availability of program resources and the aggregate demand for supportive services in the area.

To the extent possible, parameters for the delivery of supportive services should be:

- Developed in collaboration with the GCWDB's Staff and One-Stop Partners; and
- Tailored to meet the evolving needs of the Green Country workforce investment area.

Below is further guidance on some potential supportive services that may be provided to participants that meet the requirements:

Utilities Assistance:

Program funds may be utilized to assist the participant with a one-time payment per program year of utilities (one per utility type/company) not to exceed \$500.00. GCWDB considers utilities to be: electric, natural gas and/or propane, and water & sewage. GCWDB will NOT pay late fees assigned to any utility account or reconnection fees or new service fees/deposits. The participant must provide a written statement of a plan to keep the utility type in good standing.

Transportation Assistance:

Mileage Reimbursement

Program funds can be utilized to assist but must only be on a monthly basis and based on actual mileage. Documentation of attendance must be recorded, signed, and collected from each participant and uploaded to the state data system. Transportation reimbursement will be 50% of the IRS Standard Mileage Rate for self-employed & business. Destination maps must also be included in the documentation detailing the start and end locations. The shortest route must be used when determining the distance of travel. Transportation is capped at 60 travel days; additional days may be provided with advance approval from the GCWDB Executive Director or their designee. As

part of the supporting documentation the service provider will include a printout of the current IRS standard mileage rate and verification of attendance in WIOA sponsored activities. Mileage will only be paid to the participant.

Vehicle Repairs and Maintenance

A one-time expenditure for each of the following is permissible:

- Vehicle repairs—including documentation of service/parts required to return the vehicle to working condition. Costs not to exceed \$1000 for items in this subcategory. Deductible payments related to insurance are not allowable. Vehicle repairs are only allowable for repairs that are essential for operational or safety-related purposes (i.e., replacing car stereos would not be allowable).
- Vehicle maintenance—including documentation of service/parts necessary to maintain the working condition of the vehicle. Examples include tires, tune-up, battery, oil change, etc. Costs not to exceed \$1000 total for items in this subcategory.
- Vehicle registration/tags (excluding penalties).
- Current/past due vehicle payment not to exceed 2-months. Future months' payments are not allowable costs

WIOA funds may not be used to provide any down payment or used to purchase in full a vehicle. Such payment would be a disallowed cost.

Documentation Requirements for Transportation Assistance

To receive transportation assistance, the participant must own the vehicle for which the assistance is being provided. A title for the vehicle which includes the participant's name must be provided.

Housing Assistance:

GCWDB program funds may be provided to assist participants who need assistance with current and/or back rent/mortgage for no more than 3-months and not to exceed \$5000 in total housing assistance.

- Permanent Housing: a participant is the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long.

Housing assistance cannot be provided for future months. The participant must provide a written statement of a plan to keep the rent or mortgage payment in good standing.

Supporting documentation must include verification of occupancy/residence that specifies the amount of current/back amount owed, which may include:

- A current and fully executed lease agreement, or
- A statement current monthly statement from a landlord, lender/bank, or leasing agent, or
- An eviction notice.

Uniforms/ Work Attire: Program funds not to exceed \$1000.00 can be utilized to assist participants who need assistance with acquiring uniforms/ work attire needed to either participate in training or obtain/maintain employment. For training purposes, the items needed should be documented by the training institution. For employment attire the following documentation will be accepted:

- Letter from employer outlining attire expectations; or
- Employee Handbook that provides dress attire.

Needs-Related Payments:

Needs-related payments are a form of supportive services designed to provide a participant with financial assistance to enable them to participate in training services. Many individuals in need of training services lack the resources to meet their non-training expenses and therefore cannot participate in the training needed to attain employment. Needs-related payments can help individuals meet their non-training expenses and help them to complete the training successfully.

To be eligible to receive needs-related payments, Adult program participants must:

- Be unemployed,
- Not qualify for, or have ceased to qualify for, unemployment compensation, and
- Be enrolled in a training program described in this issuance and section 134(c)(3)(D) of WIOA.

To receive needs-related payments, dislocated workers must:

- Be unemployed, and:
- have ceased to qualify for unemployment compensation or trade readjustment allowance under TAA; and
 - be enrolled in a training program described in section 134(c)(3) of WIOA 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 if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months; or
- Be unemployed and:
 - did not qualify for unemployment compensation or trade readjustment assistance under TAA; and

Needs-related payments for dislocated workers must not exceed the greater of:

- the applicable weekly level of the unemployment compensation benefit, for participants who were eligible UI because of the qualifying dislocation; or
- for participants who did not qualify for UI benefits because of the qualifying layoff, an amount equal to the poverty level for an equivalent period, which must be adjusted to reflect changes in total family income, as outlined by GCWDB policies.

Cost of Meals:

Providing meals for youth in all-day WIOA-approved activities must be adequately documented to support the necessity and reasonableness of the meal.

Food allowances for youth participants attending all-day workshops will be paid and documented in the same manner as other allowable supportive services.

- Actual attendance in training must be verified.
- A signed Time and Attendance sheet will serve as a self-attestation of participant attendance.

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- the Service Provider will be required to document the actual cost of meals each day;
- the meal allowance per day shall not exceed \$20 per participant per day;
- Remember the reimbursement of tips is unallowable.
- Each day's meal will require three price quotes.
 - If you know you are going to have 3 workshops in the summer, you may procure from the same vendor to cover the entire timeframe after you receive your 3 price quotes.
 - if you do outings, call ahead, and obtain quotes; and
- The cost of each meal must be included in the total supportive services provided to each participant and cannot exceed GCWDB's supportive service limits for such costs.

Documentation of Supportive Service Payment

Supportive services are usually provided through a voucher system or payments made directly to a vendor (i.e., to pay for clothes, rent or utilities). A completed and current participant budget verifying that the participant does not have the financial resources to obtain the service attached to the request form must be uploaded with all supporting documents. Case managers will submit the Supportive Services Request ([Attachment H found on the GCWDB website](#)) to their supervisor for approval.

The supervisor will converse with their designated staff to obtain a supportive service voucher number. The Supportive Service Voucher number must be in the following format: SS- [first 2 letters of county]- [Program Year, as ##]- [sequential number, as ###]- [A, D, or Y for Adult, Dislocated Worker, or Youth] For example, an Adult participant's Supportive Service Voucher is the 4th Supportive Service Voucher issued in Creek County during Program Year 2022. That Youth participant's Supportive Service Voucher number, as obtained from designated staff, would be SV-CR-22-004-A.

A Supportive Services Voucher ([Attachment I found on the GCWDB website](#)) must be issued, and the case manager must be informed of the outcome of the request. Case managers must maintain a Supportive Service Tracking Tool ([Attachment J found on the GCWDB website](#)) uploaded to the online system that tracks the date and type of supportive services. When uploading an updated Supportive Service Tracking Tool, do not delete the old ones. Case managers will enter all supportive services into S&T on the date the service was provided. Supportive services will be provided within two business days. The case manager will ensure all documents are uploaded into the on-line system and documentation details are in case notes.

Support Documentation

- For bus tickets, bus passes, or gift cards, a copy of the front and back of the card and both the participant and case manager signatures.
- For rental assistance, a copy of the current rental or lease agreement in the participant's name, with signatures.
- For assistance with car repair, a gas card or mileage reimbursement, a copy of the vehicle registration, registered in the participant's or family member's name, a copy of participant's current vehicle insurance card; a copy of the participant's valid driver licenses; and a copy of the printed estimate for repairs from the vendor. Need should be based on:

- Other available transportation, bus, carpool, bicycle, etc.
- Distance from work or training to residence; and
- Current participant supportive services budget.

All supportive services payments must have a receipt from the vendor that clearly shows the amount that was paid. If the participant loses the receipt from the vendor, the participant, and the case manager must show due diligence in obtaining the receipt, sign a statement saying the participant received the supportive service and document in full detail in a case note in the on-line case file, and GCWDB staff must be notified of the situation to see if other assistance could produce a copy of the receipt.

If a participant is co-enrolled in the WIOA Adult or DLW programs and supportive services are being supplied by Adult or DLW funds, supportive services qualifying as related to training must be entered into the state forty percent (40%) Minimum Training Expenditure Rate Tool by the service provider. Transportation and childcare costs are specifically excluded.

Supportive Service Case Notes must include:

Participant's request for supportive service prior to the participant's incurring the expenditure.

- Justification for the requested service, telling the reason the service is needed and the barrier the assistance is resolving for the participant to participate in WIOA activities.
- Detail that assistance is not available from other sources and outline services provider's efforts to use other relevant community resources before WIOA funds were authorized, including notation of uploaded documents as needed (i.e., phone verification, quotes, self-attestation, etc.) and the name of the person contacted from the other resource
- Name the cost of supportive services provided and how the participant will pay these expenses in the future, including uploaded budget information.
- The date the supportive service was provided.
- The outcome of the supportive service

Upload Documents Should Include:

- All documents related to the detailed case note.
- Referral to Partner or Community Resource
- Supportive Services Request ([Attachment H found on the GCWDB website](#))
- Supportive Services Voucher ([Attachment I found on the GCWDB website](#))
- Supportive Services Tracking Tool ([Attachment J found on the GCWDB website](#))
- Verification of three (3) sources consulted: e-mail, written and signed statement from the partner or community resource, Non-Competitive Purchase Form, or Telephone Verification Form. Forms are available for download at <https://www.greencountryworks.org/resources/policy-research-bestpractices/>.
- Paid receipt from the vendor

Service and Training Plan should include:

- Supportive Services service entry

If a supportive service is not a reimbursement, three (3) quotes must be obtained and uploaded in

support of the purchase.

Disallowed Supportive Services

The GCWDB will not pay for any type of late fees, fines, damages, penalties, or restoration charges incurred by a participant in any program. This also includes past Federal/State/Local taxes, past due credit card bills, and hospital bills. Examples of disallowed supportive services include, but are not limited to:

- Federal/State/Local taxes, past due credit card bills, and hospital bills
- Fines and/or penalties, which may include, but is not limited to, traffic violations, late finance charges, and interest payments;
- Entertainment, including gratuity;
- Child support payments;
- Contributions or donations;
- Refundable deposits;
- Alcohol and/or tobacco products;
- Marijuana and/or other related paraphernalia
- Prescription drugs
- Firearms and/or knives
- Excessive and/or costly food purchases beyond normal dietary needs;
- Out-of-state job search relocation expenses that are paid for by the prospective employer or by the employer who has laid-off the individual.

Equal Opportunity and Nondiscrimination Statement

All Recipients, and Sub-recipients / Sub-grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

Addenda / Revisions

The GCWDB Executive Director may issue additional instructions, guidance, approvals, and/or forms to further implement the requirements of policy, without making substantive change to the policy, except in situations when a new or updated state and federal guidance is issued.