Area: Program Operations and Service Delivery	
Title: PROWD III Supportive Services	**Number:** POS-PSS-26-V1
Effective Date: 11/16/2026 **Approval Date:** 2026-11-10	☑ Policy ☐ Guidance ☐ Standard Operating Procedure
Approved By: Scott A Adkins	**Next Review:** 11/16/2027 **Revised Date:**

1. Purpose

The purpose of this policy is to issue state-level regulatory directives governing the eligibility, approval, and financial administration of supportive services for PROWD Stage 3 post-release participants. This policy establishes compliance standards for WorkForce West Virginia (WFWV), Local Workforce Development Boards (LWDBs), and their designated service providers—whether delivered in-house, through subrecipients, or by contractors—to ensure grant funds support authorized activities, comply with Uniform Guidance (2 CFR Part 200) and WIOA, and prevent disallowed costs.

2. Scope

This policy applies to all personnel administering or delivering PROWD Stage 3 supportive services funded under the federal grant, including WFWV staff, LWDB personnel, subrecipients, contracted service providers, and career planners.

2.1. **Scope Limitation:** This policy applies strictly to PROWD Stage 3 participants – individuals who have been released from Bureau of Prisons (BOP) Custody and Residential Reentry Centers (RRCs) and are actively living in the community and are co-enrolled in WIOA Title I. **Services for PROWD Stage 2 (RRC/Home Confinement) are governed under separate operational policies.*

3. References

2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Subpart E – Cost Principles).
2 CFR § 200.403 – Factors Affecting Allowability of Costs.
2 CFR § 200.404 – Reasonable Costs.

2 CFR § 200.405 – Allocable Costs.
2 CFR § 200.441 – Fines, Penalties, Damages, and Other Settlements.
20 CFR § 680.900 – § 680.970 – WIOA Supportive Services Regulations.

4. Required Materials / Tools / Systems

- State Case Management System (e.g., MACC) for PROWD Stage 3 case notes and financial tracking.
- Participant PROWD Stage 3 PDP/WIOA IEP documentation reflecting post-release community barriers and career goals.
- Official, itemized vendor invoices or billing statements.
- PROWD Stage 3 Supportive Service Authorization Request Form. (Appendix A)
- PROWD Stage 3 Participant Acknowledgment of Received Supportive Services. (Appendix B)

5. Definitions & Acronyms

- **Allocability:** The accounting principle dictating that a cost must be charged to the specific grant that directly benefits from the expenditure (2 CFR § 200.405). Under PROWD Stage 3, supportive services required for PROWD-funded occupational training, On-the-Job Training (OJT), or job search activities are 100% allocable to the PROWD Stage 3 grant.
- **Reasonable:** A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost (2 CFR § 200.404).
- **Coordination of Services / Non-Duplication:** The federal requirement (20 CFR § 680.910) mandating that WIOA funds for supportive services be provided to individuals participating in career or training services and may only be provided when comparable services are unavailable to individuals through other programs or agencies.
- **IEP:** Individual Employment Plan
- **PDP:** PROWD Development Plan
- **PROWD Stage 3:** The post-release phase of the WV PROWD initiative where participants reside in the community and receive full WIOA-aligned community reentry, training, and job retention services.
- **Supportive Services:** Financial or logistical assistance (including services such as transportation, childcare, housing, and other services identified in TEGL 19-16) provided to enable a post-release participant to engage in, maintain, and complete training or employment activities.

- **Legal Aid Services:** Legal assistance provided through qualified legal aid organizations to resolve legal barriers directly impeding a participant's ability to secure or retain employment (authorized under 20 CFR § 680.900(h)). This is strictly limited to non-criminal administrative and civil matters (such as record expungement, driver's license restoration, and vital record correction) that have presented a documented barrier to employment.
- **Minor Vehicle Repairs:** A repair or maintenance expense that is necessary to eliminate a documented transportation barrier to a participant's participation in an approved career or training activity. Allowable repairs are those needed to correct safety or reliability, and repairs may not improve the vehicle beyond its pre-existing functionality.
- **Member of Participant's Household:** An individual who shares a primary physical residence with the enrolled participant and shares income, expenses, or primary transportation needs. This includes individuals related by blood, marriage, or decree of court, as well as unmarried long-term partners or adult children residing in the same home.

6. Roles and Responsibilities

6.1. **WorkForce West Virginia (WFWV):** Issues overarching PROWD Stage 3 policy, monitors state-level grant performance, conducts administrative, fiscal and programmatic monitoring, and manages federal reporting.

- **PROWD Program Manager / Reentry Liaisons:** Reviews, verifies, and approves PROWD Stage 3 supportive service drawdown requests and reimbursement packages submitted by regional fiscal staff; ensures strict alignment with participant IEP goals, itemized vendor billing standards, and non-duplication requirements.

6.2. **Local Workforce Development Boards (LWDBs) / Subrecipients:** Administer PROWD Stage 3 grant funds at the regional level and oversee local program execution. LWDBs are responsible for establishing supportive services policies and procedures, internal controls, workflow procedures, and oversight mechanisms to ensure that all local operations and contracted Program Operators comply with federal cost principles (2 CFR Part 200) and state policy standards.

- **Regional Program Execution & Compliance Functions:** Regardless of local administrative structure, regional operations must ensure the following mandatory compliance requirements are met and documented prior to issuing supportive services or submitting reimbursement requests:
    - **Barrier Verification & Non-Duplication:** Conduct post-release barrier assessments and document efforts in the state case management system

(MACC) to verify that supportive services do not duplicate other available resources.
    - **Audit-Ready Documentation:** Obtain itemized vendor invoices and secure signed participant receipt acknowledgments.
    - **System of Record Uploads:** Maintain a complete electronic record by uploading all required supporting invoices, receipts, and verification forms directly into MACC.
    - **Compliant Drawdown Packages:** Compile and submit verified reimbursement and drawdown packages that align fully with federal cost principles and state reimbursement standards.

7. Procedure

7.1. Needs Assessment & Activity Verification

- Verify the participant is officially in PROWD Stage 3 status (released into the community), is co-enrolled in the WIOA Title I Adult program, and has completed an initial intake and Individual Employment Plan (IEP) or is actively participating in authorized grant-funded services (such as comprehensive assessment, career planning, job readiness, occupational training, or job search). Supportive services may be issued immediately upon enrollment to address urgent transition and stabilization needs necessary to enable ongoing program participation.
- Identify the specific community barrier preventing the participant from engaging in or completing the activity (e.g., transportation to work sites, housing instability, missing vital records, required trade tools).
- Document the barrier and the required supportive service intervention directly in the participant's PROWD Stage 3 PDP/WIOA IEP.

7.2. Non-Duplication Mandate

- Explore non-federal and community partner resources, such as Community Action Agencies, Low Income Energy Assistance Program (LIEAP), local rapid rehousing providers, philanthropic reentry funds, or employer-provided benefits before using WIOA funds.
- Document the exploration of these resources in the state case management system (MACC). If other resources are not available the case notes must include the organization contacted, the support requested and the reason support could not be extended (e.g, funding constraints, unable to secure timely support, leading to disruption)

7.3. Federal Cost Principles Evaluation

- Every PROWD Stage 3 request must be evaluated against the four federal cost standards (2 CFR **§** 200.403):
    - **Allowability:** The expense must be permissible under WIOA, and federal cost principles.
    - **Necessity:** The item or service must be indispensable for the participant's success in approved PROWD Stage 3 activities.
    - **Reasonableness (2 CFR § 200.404):** The cost must reflect fair market value. Under federal rules, the "prudent person" test applies strictly to the administrative entity authorizing the public funds, ensuring taxpayer dollars are spent efficiently on core barrier removal rather than avoidable administrative penalties.
    - **Allocability (2 CFR § 200.405):** All charges to federal awards must be charged in accordance with the relative benefits received. Supportive service tied to PROWD Stage 3 funded classroom training, On-the-Job Training (OJT), active employment retention, career advancement or job search activities must be allowable under WIOA Title I and charged directly to the PROWD Stage 3 grant. Only when designated PROWD Stage 3 funding is depleted can WIOA Title I funds be utilized.
        - *Co-Enrollment Boundaries & Funding Allocation:* When participants are co-enrolled in both WIOA Title I and PROWD Stage 3, staff must ensure that supportive services are properly allocated and are not charged to multiple funding sources for the same purpose.

7.4. **Individual Participant Funding Cap**

- **Supportive service assistance:** Subject to a lifetime cumulative maximum cap of $5,000.00 per participant for the duration of their enrollment and ***active participation*** in PROWD Stage 3.
- **Not an Entitlement:** This cap represents a maximum allowable threshold, not an entitlement. All requested amounts up to this cap must be individually evaluated, justified based on verified barrier removal needs, and documented in the participant's PDP/IEP.
- **Cumulative Tracking:** LWDB Career Planners and program staff must track all cumulative supportive service disbursements in the state case

7.5. Arrears and Deposits

- **Handling Utility/Housing Arrears:** TEGL 19-16 allows for "assistance with housing" as a supportive service. This assistance may include past-due rent or

utility balances accumulated prior to or during incarceration to achieve community emergency stabilization.

- **Deposits:** "Assistance with housing" may also include deposits for housing or utilities for participants.
- LWDBs must utilize the state's management information system (MACC) to ensure total grant expenditures do not exceed the $5,000.00 limit per individual.

7.6. Minor Vehicle Repairs: Operational Criteria and Limitations

When public transit or alternative transportation options are unavailable or inadequate to support a participant's approved training, career, or employment activities, assistance with minor vehicle repairs may be authorized subject to the following mandatory standards:

- **Participant and Vehicle Eligibility:**
  - **Direct Link to Activity:** Case notes must confirm that personal vehicle use is necessary to participate in or complete approved PROWD Stage 3 activities and that alternative transit options (e.g., public buses, rideshare, carpooling) are unavailable, unviable, or would disrupt participation.
  - **Ownership & Legal Compliance:** The vehicle must be registered to the participant or a qualifying member of the participant's household. Staff must verify and upload copies of the following into MACC prior to repair authorization:
    - Valid state driver's license (for both the participant and the registered owner, if different);
    - Current vehicle registration; and
    - Current, statutory motor vehicle liability insurance policy.
- **Allowable vs. Unallowable Repair Scope:**
  - **Allowable (Safety & Operability):** Essential mechanical, electrical, or structural repairs required to pass state safety inspection or ensure safe, reliable commuting (e.g., cracked suspension mount , brakes, tires, battery, starter, alternator, steering/suspension components, exhaust repairs, windshield wiper motors, mandatory safety inspection fees).
  - **Unallowable:** Routine preventative maintenance (such as standalone oil changes or standard tune-ups, unless bundled into a mandatory safety repair), cosmetic bodywork, detailing, glass tinting, sound system repairs, performance upgrades, towing costs unrelated to an authorized repair, or non-essential accessories.
- **Cost Reasonableness & Estimate Requirements:**
  - **Threshold for Estimates:**

        - Repairs estimated under **$500.00** require at least one (1) written, itemized diagnostic estimate from a licensed commercial repair facility.
        - Repairs estimated at **$500.00 or greater** require two (2) independent written, itemized diagnostic estimates from licensed commercial repair facilities. The grant will authorize the lower of the two quotes unless the higher estimate is justified in writing based on immediate availability or documented warranty considerations.
    - **Diagnostic Fee Coverage:** Reasonable and customary diagnostic fees incurred to obtain these estimates are eligible for coverage under PROWD III Supportive Services funds. .
    - **50% Fair Market Value (FMV) Limitation:** To satisfy the federal "prudent person" reasonableness test, the total cost of the authorized repair must not exceed **50% of the vehicle's current fair market value**, as determined and documented by staff using Kelley Blue Book (KBB) or NADA fair trade-in value. If repairs exceed 50% of the vehicle's value, grant funds may not be utilized.
        - **Exception for Older Vehicles:** If repairs exceed 50% of the vehicle's value, grant funds may be utilized *only if* staff obtain written approval from the Local Workforce Development Board (LWDB) Executive Director and upload documentation explaining why repairing the vehicle is the most cost-effective transportation solution for the participant.
- **Category Funding Limits:**
    - **Category Sub-Cap:** Assistance for minor vehicle repairs is capped at a total maximum of **$1,000.00** per participant. All disbursements count toward the participant's $5,000.00 lifetime supportive services maximum.
    - **No Duplicate Repairs:** Grant funds will not pay for the re-repair or replacement of a part or system previously funded by PROWD Stage 3.
- **Disbursement & Payment Controls:**
    - **Direct Vendor Payment Only:** All payments must be issued directly to the licensed automotive repair facility. Under no circumstances may cash, checks, or electronic reimbursements be issued directly to the participant.
    - **Unlicensed Work Strictly Prohibited:** Grant funds cannot be disbursed to private individuals, informal mechanics, family members, or backyard repair shops.

- **Post-Service Verification:** Prior to final payment release, staff must obtain an itemized final invoice showing all parts, labor, applicable warranty terms, and the signed participant acknowledgment confirming work completion.
- **Mandatory MACC Documentation & Uploads:** All supporting records—including initial diagnostic estimates, Kelley Blue Book/NADA valuation documentation, proof of vehicle registration and insurance, final itemized invoices, signed receipt forms, and an explanatory case note narrative—must be fully entered and uploaded into the participant's electronic file in the MACC prior to issuing payment or submitting reimbursement requests.

7.7. PROWD Stage 3 Supportive Services Allowability Matrix

Disclaimer: The following matrix provides common examples of allowable and unallowable supportive services but is not an all-inclusive list. Any requested service, item, or fee not explicitly listed below must still be evaluated against and adhere to all federal cost principles (2 CFR Part 200)—specifically necessity, reasonableness, and allocability—prior to authorization.

Category	**Allowable**	**Unallowable (Strictly Prohibited)**
Transportation	• Gas cards or mileage reimbursement. • Public transit passes. • Minor emergency vehicle repairs strictly necessary to enable travel to and participation in approved PROWD Stage 3 training, career services, or employment activities. • State administrative driver's license renewal fees. • Mandatory state vehicle safety inspection fees.	• Vehicle purchases, or down payments.

Minor emergency vehicle repairs	*Essential safety and mechanical repairs required for legal roadworthiness or to pass state safety inspection:* ● Brakes ● Starter ● Alternator ● Battery ● Tires ● Cracked suspension mount	● Cosmetic repairs, bodywork, paint, detailing, or glass tinting. ● Performance upgrades, non-essential accessories, sound systems, or convenience modifications. ● Routine preventative maintenance (e.g., standalone oil changes, wiper blades, fluid top-offs) unless bundled into a mandatory safety repair. ● Repairs exceeding 50% of the vehicle's fair market value (FMV). ● Labor or services performed by unlicensed mechanics, private individuals, or family members
Emergency Housing & Utilities	● Past-due rental arrears necessary to prevent imminent eviction. ● Temporary emergency shelter or lodging during authorized training. ● Past-due utility usage balances (electric, gas, water).	● Mortgage payments or principal reductions.

Vital Records & Work Identification	*Official state or federal statutory fees for:* ● Certified Birth Certificates (state or county vital statistics offices). ● Replacement Social Security Cards (standard administrative fees, where applicable). ● State Identification Cards or standard Driver's Licenses . ● Official marriage/divorce certificates required strictly to document a legal name change on work authorization records.	● Expedited processing, rush delivery, or courier fees driven by avoidable or non-essential timelines. ● Court filing fees or attorney representation costs associated with formal petition-based legal name changes.
Training & Tools	● Required course textbooks and training manuals. ● Essential trade tools and equipment mandated for training completion. ● Required personal protective equipment (PPE) and safety gear (e.g., steel-toed boots). ● Certification, licensing, credentialing, and examination fees directly tied to approved Stage 3 training.	● Luxury or non-standard gear.
Legal Aid Services	● Driver's license reinstatement advocacy and state administrative restoration fees. ● Criminal record expungement, record sealing, or pardon application assistance.	● Criminal Proceedings & Penalties. ● Unauthorized Civil & Personal Matters.

Employment Required Items	● Required uniforms, scrubs, and specialized workwear. ● Trade toolkits required as a condition of employment. ● Professional interview or workplace attire. ● Required pre-employment physical examinations or drug screenings. ● Personal care services strictly necessary for interview readiness or employment retention (e.g., a standard haircut prior to a scheduled job interview).	● General casual, leisure, or everyday street clothing. ● Non-work tools, equipment, or personal hobby items. ● Personal hygiene products or care services unrelated to verifiable employment requirements.

8. Disbursement Controls, Fee Mitigation, and Receipt Verification

- **Vendor Fee Waiver Protocol:** When a qualifying participant bill or expense includes secondary fees—such as late penalties, interest charges, or administrative collection fees—program staff must actively collaborate with the participant to contact the billing entity. Staff must advocate for a fee reduction or waiver by confirming the participant's PROWD Stage 3 community reentry status and verifying that grant funds will promptly satisfy the primary base balance. Staff must make every reasonable effort to eliminate non-essential fees before disbursing funds, ensuring supportive service grant dollars are maximized to address core participant stabilization needs.
- **Receipt Verification:** Obtain participant signature or electronic confirmation of receipt for physical items (e.g., gas cards, toolkits, textbooks) maintained in MACC/local records.

9. Compliance & Quality Assurance

- **Monitoring:** LWDBs, and PROWD Program Leadership will conduct periodic programmatic and fiscal audits of PROWD Stage 3 supportive service files to ensure strict adherence to 2 CFR Part 200 and WIOA.
- **Consequences of Non-Compliance:** Expenditures found to be unallowable will result in a formal audit finding. As the direct funding recipient, the LWDB is

liable for all disallowed expenditures and will be required to repay these costs using non-federal, unrestricted funds.

10. Recordkeeping & Documentation

- All itemized vendor bills, receipts, request and acknowledgment forms must be uploaded to the participant's electronic file in MACC.
- Comprehensive case notes documenting the identified barrier, non-duplication research, IEP alignment, and vendor fee waiver negotiation outcomes must be entered into MACC.
- All records must be maintained and retained for a minimum of three (3) years, unless a longer period is required due to audit, review, investigation, or legal action. In such cases, records must be retained until all matters are fully resolved and official notice is given that normal retention periods may resume.

Version Control

Version #	Effective Date	Description of Changes	Author/Editor	Approval Date
1.0	*11. 16.2026*	*Initial release establishing state-level regulatory directives, eligibility criteria, internal controls, and financial administration standards for PROWD Stage 3 supportive services under WIOA and Uniform Guidance (2 CFR Part 200).*	*Workforce Unit*	2026-11-10

PROWD STAGE 3 SUPPORTIVE SERVICE REQUEST & AUTHORIZATION FORM

PARTICIPANT & PROGRAM IDENTIFICATION

Participant Name: _____

MACC ID: _____

Community Release Date: _____

BOP Facility/RRC Released From: _____

Assigned Reentry Liaison: _____

LWDB Career Planner: _____

1. PARTICIPANT NEED & STAGE 3 IEP ALIGNMENT

Active Stage 3 Activity:

[ ] Career Services [ ] Training Services [ ] Job Search

Specific Community Barrier Identified: _____

Requested Item/Service: _____

Vendor/Payee Name: _____

2. COST PRINCIPLES & FINANCIAL EVALUATION (OFFICE USE ONLY)

[ ] *Necessity*: Item/service is indispensable to remove a verified barrier and enable participation in the approved activity.

[ ] *Reasonableness*: Cost reflects fair market value, and satisfies the "prudent person" standard.

[ ] *Allowability*: Is an authorized supportive service category under PROWD Stage 3 and WIOA Title I guidelines.

[ ] *Allocability*: Expenditure directly benefits the participant's active PROWD Stage 3 employment or training activity.

[ ] *Itemization Check*: Vendor bill has been reviewed for accuracy.

3. PAYMENT SUMMARY

Total Vendor Invoice Amount: $_____

Less Negotiated Fees/Penalties/Deposits: $_____

Total Approved PROWD Stage 3 Disbursement: $_____

4. REQUIRED SIGNATURES & AUTHORIZATION

Participant Attestation: I certify that I am currently living in the community, that the requested supportive service is necessary to support my participation in PROWD Stage 3 activities, and that I have no other financial means to obtain this service.

Participant Signature: _____

Date: _____

Career Planner Signature: _____

Date: _____

PROWD PARTICIPANT ACKNOWLEDGMENT OF RECEIVED SUPPORTIVE SERVICES

Participant Name: _____

MACC ID: _____

Career Planner Name: _____

Date Issued: _____

ITEM / SERVICE RECEIVED:

Item / Service Description: _____

Vendor / Provider / Serial / Card #: _____

Value / Amount: $_____

Item / Service Description: _____

Vendor / Provider / Serial / Card #: _____

Value / Amount: $_____

Item / Service Description: _____

Vendor / Provider / Serial / Card #: _____

Value / Amount: $_____

PARTICIPANT ACKNOWLEDGMENT

I acknowledge receipt of the supportive service item(s) or vendor payment authorization listed above. I confirm that:

1. These items/services were provided solely to support my active participation in my approved PROWD Stage 3 community employment and training activities.
2. Physical items (such as gas cards, bus passes, tools, clothing, or state IDs) are for my personal use in program activities and CANNOT BE SOLD, TRANSFERRED, TRADED, OR REFUNDED FOR CASH.
3. I understand that misuse of these items may result in loss of supportive service eligibility under the PROWD Stage 3 program.

Participant Signature: _____

Date: _____

Staff Signature (Witness): _____

Date: _____