

FOOD AS A SUPPORTIVE SERVICE IN THE WIOA YOUTH PROGRAM

The consequences of food insecurity are significant, far reaching, and disproportionately impact historically underserved communities and in particular the youth population. According to the [Department of Education](#), having consistent meals that include breakfast, lunch, and healthy snacks for food insecure youth and young adults impact their ability to learn and socialize. The Workforce Innovation and Opportunity Act (WIOA) Youth program allows providers to pay for food as a supportive service when needed to enable youth and young adults to fully participate in the program.

Guidance concerning costs for Federal Awards are outlined in what is called [Uniform Guidance at 2 CFR 200.403](#). This guidance provides details and questions that must be considered when determining whether it would be reasonable, necessary, and allocable to use funds to pay for food for youth participants. See the Uniform Guidance section below for more information.

Common Questions Related to Food as a Supportive Service in the WIOA Youth Program

Questions often come up related to food as a supportive service. Below are a few of the more frequently asked questions.

Can WIOA Youth Program Funds Pay for Food for Eligible Program Participants?

Training and Employment Guidance Letter 09-22 ([TEGL 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 participate in youth program activities and to reach their employment and training goals, thereby achieving the program's overall performance goals.

Youth service providers should coordinate with other programs to ensure that participants who are eligible for the [Supplemental Nutrition Assistance Program \(SNAP\)](#) or other food services are enrolled in such programs.

Do we need to have a written policy in place to provide food as a supportive service?

Yes. The organization must have written policies and procedures in place for purchasing and distributing food to ensure consistent treatment of these types of expenses. Such policy should be distributed to all offices offering such service and training of staff should be rolled out to ensure consistent treatment. Like all grant expenses, these policies and procedures must:

- Identify the determining factors or criteria (see Uniform Guidance references above) to consider before incurring a grant expense;
- Define the factors for consideration and limitations to establish reasonableness;
- Establish dollar thresholds (maximums and minimums) on how much, in total or per participant, to spend on food and refreshments;
- Establish the steps to collect to store and save documentation such as receipts and contracts to support the costs;
- Demonstrate evidence that these costs benefit DOL grant participants;
- Applicable or consistent with similar policies for other Federally funded or non-Federally funded grants and programs; and
- Ensure the written policy will identify how recipients will be provided food under various conditions and situations.

The organization should specify in its written policy that any documents must be retained or provided to justify or support such food related expenses to the grant. Supporting documentation may be but is not limited to original receipts, sign in attendance sheets, agendas, and invoices. The organization must ensure that all staff members that are part of the decision-making process regarding participant costs are trained in these policies and procedures.

It is important to have a written policy in place that states when, how and for how long support may take place. For example, the policy might explain that food may be provided as a supportive service when program services occur over a mealtime or when program services are of a duration greater than X hours (3 hours). Additionally, strong written policies explain expectations around documenting the use of funds.

When a grant recipient considers charging food costs to its WIOA Youth funds, the organization needs sufficient safeguards in place to avoid misuse among staff or offices.

Who is eligible to receive food as a supportive service?

WIOA Youth participants may receive food as a supportive service when it will assist or enable their participation in allowable youth program activities.

What is the “limited basis,” “certain situations,” and “food at a reasonable cost” in which food is eligible as a supportive service?

DOL does not define these terms because needs and resources vary across the country. When developing written food policies for the WIOA Youth programs, states, local areas, and providers must consult Uniform Guidance. See Attachment A.

How would local programs go about providing food as a supportive service to a participant, if needed?

Local programs would provide food directly to youth during a program activity. While WIOA Youth program funds can pay for food, DOL recognizes that WIOA Youth program resources are limited and encourages partnerships with various entities to assist with providing food for young adults in WIOA youth programs. See the resource section below.

Can WIOA Youth funds be used to provide food at events, such as a graduation celebration?

No. Food funded by the WIOA Youth program is not permitted for celebrations, such as a graduation celebration. Food, if necessary, should only be provided to WIOA Youth participants to enable program participation.

How do programs report food as a supportive service in the WIOA Youth program?

Food provision should be reported in the same manner as other supportive services, through a program’s state/local management information system. Supportive services are one of the required program elements to be reported and is element 1409 in the [Participant Individual Record Layout \(PIRL\)](#).

Do these same clarifications pertain to the WIOA Adult program?

No. these clarifications are specific to the WIOA Youth program.

Uniform Guidance

Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200), commonly referred to as the "Uniform Guidance", requires that incurred costs to an award must meet the factors of allowability criteria (2 CFR 200.403). The following details questions that organizations must consider.

Allowability:

Have all the factors of allowability been met?

The eight guiding factors determining the allowability of a cost as found in the Uniform Guidance at 2 CFR 200.403 are as follows:

- (a) Be reasonable for the performance of the award and be allocable thereto under these principles.
- (b) Conform to any limitations or exclusions set forth in these principles or in the award as to types or amount of cost items.
- (c) Be consistent with policies and procedures that apply uniformly to both Federally-financed and other activities of the organization.
- (d) Be accorded consistent treatment.
- (e) Be determined in accordance with generally accepted accounting principles (GAAP).
- (f) Not be included as a cost or used to meet cost sharing or matching requirements of any other Federally-financed program in either the current or a prior period.
- (g) Be adequately documented.
- (h) Cost must be incurred during the approved budget period.

Necessary:

Is the cost vital to carrying-out the program's goals and objectives?

Reasonableness (Prudent Person):

When providing such payments, reasonableness is determined by using the prudent person theory. 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).

Would a prudent person use Federal funds to purchase such items?

Allocability:

Can these costs be allocated based on relative benefit received? And are these costs allocable to a particular Federal award or other cost objectives? (2 CFR 200.405).

Resources for Providing Access to Food Services

DOL encourages WIOA Youth programs to identify local resources and establish partnerships to assist with on-going or short-term food services prior to utilizing WIOA funds when feasible. Partners may include social service organizations, faith-based organizations, food pantries, food banks, farms, farmer's markets, grocery stores, and more. In addition to the resources provided here, DOL-ETA recommends using [TEN 12-21](#) as another resource to help jobseekers find and apply for financial assistance and other supportive services.

Food Banks

- [Feeding America](#) aims to feed America's hungry through a nationwide network of member [food banks](#) and engage our country in the fight to end hunger.

Supplemental Nutrition Assistance Program (SNAP)

- Through the U.S. Department of Agriculture (USDA), SNAP benefits, provide a monthly electronic debit card to be used to purchase food and nutrition. To find out if a youth may be eligible for SNAP benefits, [review the eligibility documentation](#). To apply for benefits, find local offices and each state's application, or for information about SNAP, visit the [SNAP State Directory](#).

Summer Food Service Program

- USDA's [Summer Food Service Program](#), also known as the Summer Meals Program, provides free meals to kids and teens in low-income areas when school is not in session

Women, Infants, and Children Program (WIC)

- The Special Supplemental Nutrition Program for Women, Infants, and Children - better known as the [WIC Program](#) - serves to safeguard the health of low-income pregnant, postpartum, and breastfeeding women, infants, and children up to age 5 who are at nutritional risk by providing nutritious foods to supplement diets, information on healthy eating including breastfeeding promotion and support, and referrals to health care. To apply for WIC [contact the state or local agency](#) to set up an appointment. [Use the Pre-Screening Tool](#) to determine if a youth is eligible for WIC benefits.

Find Shelter Tool

- The U.S. Department of Housing and Urban Development's (HUD) [Find Shelter tool](#) provides information about food pantries, shelter, health care, and clothing resources in communities across the country.

DISCLAIMER: This document is technical assistance and is not intended to be official DOL guidance. This document is not providing a blanket approval for the purchasing of food as a supportive service and grant recipients should seek further guidance from their Federal Project Officer when in doubt about the allowability of grant costs.