

OAHU WORKFORCE DEVELOPMENT BOARD
CITY AND COUNTY OF HONOLULU

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**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #09-25**

SUBJECT: FOOD AS A SUPPORTIVE SERVICE IN THE WIOA YOUTH PROGRAM

PURPOSE:

The purpose of this policy is to provide guidance on the criteria for food as a supportive service in the Workforce Innovation and Opportunity Act (WIOA) Youth program.

BACKGROUND:

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.

POLICY:

On a limited basis and in certain situations, food at a reasonable cost may be provided to youth-serving 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 to reach his/her employment and training goals, thereby achieving the program's overall performance goals. The use of grant funds for food should be limited to reasonable and necessary purchases that are coordinated, when possible, with other community, state, or federal services that provide food for low-income individuals. All food supportive services must be documented in HireNet Hawaii.

GUIDELINES:

All food related expenditures must:

Food may be considered an allowable supportive service when:

- Program activities occur during a standard mealtime (e.g., 11:00 AM–1:00 PM)
- Youth are engaged in program services for more than 3 consecutive hours;
- Participation in events such as training, orientations, job readiness workshops, work-based learning, or career exploration activities requires nourishment to maintain engagement and retention;
- The provision of food reduces barriers to participation for youth who may be experiencing food insecurity.
- Program staff should make reasonable efforts to accommodate dietary restrictions, including allergies and cultural or religious dietary practices. This may include offering alternative food options or clearly labeling food items.
- Directly benefit WIOA Youth participants;
- Be pre-approved through proper internal procedures;
- Be supported by documentation

Food must not be provided solely for convenience, staff meetings, or general office events

1. Cost Limitations:

- All food purchases must be equated to a per-participant cost.
- Daily student cost for food cannot exceed \$15

2. Frequency:

The provision of food must be time-limited and justified based on the nature and duration of the program activity. Food should not be provided on a recurring or daily basis unless it is part of a structured, approved program design that addresses a specific participant need (e.g., a six-week work readiness academy with daily sessions that include lunch as part of the service delivery plan).

3. Required Documentation:

All food expenses charged to the WIOA Youth grant must be supported by the following documentation:

- Original itemized receipts or invoices for all purchases;
- Sign-in sheets listing all participants who received food; including date, name, cost per participant, and supervisor approval
- Event agendas or service plans showing the date, time, and duration of the activity;
- Approval forms or pre-authorization (as required by internal fiscal procedures);
- Justification memo,

All documentation must be retained in accordance with records retention schedule and available upon request for monitoring or audit reviews.

1. Expense Submission:

- Provide completed sign-in sheet and receipts for all participant food purchased during the training activity within 30 days.

- Ensure that the items submitted for reimbursement are clearly specified.
- Reimbursement requests must include proper documentation.
- Must be necessary, reasonable, allocable

Staff Training and Oversight:

- All staff involved in administering, authorizing, or overseeing youth program costs must be trained on this policy annually.
- Monitoring will include a review of food-related expenses to ensure compliance with this policy.

Non-Compliance:

Improper use of WIOA funds for unallowable food costs may result in disallowed costs and required repayment. Continued non-compliance may lead to corrective action or contract modification

Definitions:

Agenda: A program schedule outlining the structure and duration of services or events provided to WIOA participants.

Allowable Cost: A cost that is permissible under federal regulations (2 CFR Part 200 – Uniform Guidance), WIOA program rules, and OWDB policies. The cost must be necessary, reasonable, allocable, and properly documented.

Documentation: Records (digital or physical) that validate the need for and use of program funds, such as receipts, sign-in sheets, agendas, and approval forms.

Food and Refreshments: Items intended for immediate consumption such as meals, snacks, and non-alcoholic beverages. This does not include grocery items intended for later use or meals provided for staff-only events.

Meal Period: A defined window of time generally recognized as a typical mealtime (e.g., lunch from 11:00 AM–1:00 PM). Activities occurring during these hours may justify the provision of food if they exceed 3 hours or interfere with access to meals.

Necessary Cost: A cost that is essential to the delivery of WIOA Youth services and directly contributes to the achievement of program goals and participant outcomes.

Participant: An individual who has been determined eligible and enrolled in WIOA Title Youth services and is receiving program services beyond initial intake and eligibility determination.

Pre-Approval: Formal authorization required before incurring a food-related expense. This may involve submission of a justification and cost estimate to program management or fiscal staff.

Program Activity: Any structured service, training, workshop, orientation, or event provided as part of a participant's WIOA Youth service plan, including but not limited to work-readiness training, job search assistance, GED prep, career exploration, or work-based learning.

Reasonable Cost: A cost that does not exceed what a prudent person would pay under similar circumstances and is consistent with the market value of the goods or services received.

Sign-in Sheet: A dated record listing names of participants who attended a program activity where food was provided. Used to verify attendance and support cost allocation.

Subrecipient: An entity that receives WIOA funds from OWDB to carry out part of the grant-funded program. Subrecipients are responsible for following applicable WIOA regulations, Uniform Guidance, and OWDB policies.

Supportive Services: Services provided to eligible WIOA participants that are necessary to enable participation in program activities. Supportive services may include transportation, childcare, housing assistance, and food under allowable circumstances.

Uniform Guidance (2 CFR Part 200): A set of federal regulations that govern the use of federal grant funds, including cost principles, administrative requirements, and audit requirements. All WIOA-funded expenditures must comply with the Uniform Guidance.

WIOA (Workforce Innovation and Opportunity Act): A federal law designed to help job seekers access employment, education, training, and supportive services. WIOA Title I specifically addresses services to youth, adults, and dislocated workers.

REFERENCES:

- WIOA Tip Sheet Food as a Supportive Service in the WIOA Youth Program
- TEGL 09-22
- Uniform Guidance 2 CFR 200.403

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov



Harrison Kuranishi
Executive Director