3.4.4 SUPPORTIVE SERVICES

I. Definition

Supportive services are defined as services such as transportation, childcare, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under WIOA.

WIOA §3 (59)

II. Supportive Services

Supportive services are services which are reasonable and necessary to enable a WIOA participant who cannot afford to pay for such services to participate in career and training activities funded under WIOA. The provision of supportive services must be determined on an individual basis. Limited supportive services may be provided to individuals receiving Basic Career Services; however, such individuals must be registered as a WIOA participant and are subject to performance outcomes.

NOTE: Follow-up career services are not a qualifying service for the receipt of supportive services; therefore, an adult/dislocated worker who is only receiving follow-up services may not receive supportive services. Supportive services also may not be used to extend the dat of exit for performance accountability purposes. Supportive Services, like follow-up services, do not make an individual a participant or extend participation (TEGL 19-16). Youth follow-up services also may include the following program elements: (1) Supportive Services (WIOA §681.580).

All supportive services must have been approved and recorded in GWROPP prior to the participant receiving or obtaining the goods or services. Backdated requests for services will not be approved.

A participant may waive WIOA payments (except for Work Experience) if accepting payment would mean the loss of benefits. The participant may request the payment to start at a later date, but may not claim retroactive payments. Advances against future payments are not allowed.

A. To be eligible for any WIOA financial assistance payments, a participant must have been determined WIOA eligible and:
   i. be participating in career services and/or training services. Exception: Limited supportive services may be provided to eligible applicants (e.g., paying for a birth certificate), before they are enrolled as participants, to permit participation in assessment activities;
   ii. be unable to obtain supportive services through other programs providing such services; and
   iii. must comply with program regulations and policies during the period of training and/or enrollment.

Service providers should provide no further payments to participants that fail to participate without good cause.

The use of supportive services is encouraged to enable hard-to-serve populations to participate in longer-term interventions. The provision of supportive services must be determined on an individual basis.

III. LWDA Supportive Services Policy

In order to ensure that supportive services are provided in the most consistent, effective and efficient manner throughout the state, OWD will require each LWDA to develop a comprehensive supportive service policy, which receives local board approval prior to implementation. Each LWDA will develop a policy that complies not only with all applicable federal regulations, but also meets the requirements mandated by the SWDB and OWD. This process will provide more consistency in the provision and documentation of supportive services across the state, while allowing LWDAs to develop a policy which takes into account unique circumstances that are present in the area.

A. Along with complying with all applicable sections of WIOA law, CFRs, and TEGL/TEN's, the local board-approved policy must meet requirements in each of the following categories:
   i. Eligibility and determination of need for supportive services;
   ii. The local board-approved supportive service policy must establish a process by which participants are determined eligible and in need of supportive services;
   iii. Federal law states that supportive service costs should be necessary to enable an individual to participate in activities authorized under WIOA; and
   iv. Eligibility and determination of need for supportive services should be conducted by a case manager or appropriate LWDA staff on a case-by-case basis to determine if the participant is eligible for and in need of supportive services.

B. Documentation of eligibility and determination of need for supportive services:
   i. The local board-approved supportive service policy must establish a process by which documentation of a participant's eligibility and determination of need is collected and included in each participant's GWROPP case file.
   ii. The documentation must cover:
      1. Financial/physical need: There must be documentation in each electronic case file in GWROPP that participants are incapable of providing these services for themselves. Examples of acceptable documentation include, but are not limited to, the following: low income status as documented by family/household income determination, receipt of federal or state public assistance, UI benefits, documentation of skill upgrading that would lead to employment in a local or state in-demand occupation, documentation of lack of employment or underemployment, separation notice, birth certificates for children receiving childcare, and documentation of transportation distance to attend training.

2. Resource coordination: There must be documentation supporting that these services or funds for these services were not available from any other state and/or federal grant/program/funding stream/agency. There should be an analysis of all federal/state/local resources available in the LWDA and how they are being coordinated to promote the most efficient use of resources. Examples of acceptable documentation include, but are not limited to, the following: UI records or application for applicable state and federal funds.
3. Type of supportive service requested and how the supportive service will assist their participation in WIOA activities. An example of acceptable documentation includes, but is not limited to, an LWDA created supportive service request form.
4. Amount requested and justification for the amount being necessary and reasonable to enable participation in qualifying WIOA activities. Examples of acceptable documentation include, but are not limited to LWDA created supportive service request form and case notes in GWROPP.
5. Establishment of a timeframe that the supportive services will be provided to assist participation in WIOA activities. Examples of acceptable documentation include, but are not limited to LWDA created supportive service request form and case notes in GWROPP.

iii. This documentation should be collected and included in the participant's GWROPP case file.

C. Allowable supportive services

i. The local board-approved policy must state specifically what types of supportive services the local board will provide to participants, as well as which WIOA-participant group qualifies for the stated services (this includes incentives provided to Youth participants).

ii. Allowable supportive services provided during career and training services include, but are not limited to:

1. Assistance with transportation;
2. Assistance with childcare and dependent care;
3. Assistance with housing;
4. Reasonable accomodations for individuals with disabilities;
5. Assistance with uniforms or other appropriate work attire and related tools, including eyeglasses and protective eye gear;
6. Emergency auto repair (LWDA policy must ensure that the repair is necessary for the participants to attend training and the most economical option for the participant's transportation needs);

7. Emergency healthcare and medical services (LWDA policy must ensure that these types of payments are only provided when necessary for the participant to participate in training).

iii. Allowable supportive services provided after training in order to obtain employment include, but are not limited to:

1. Assistance with uniforms or other appropriate work attire and related tools, including eyeglasses and protective ear gear;
2. Tools, work clothing, and boots/shoes required for employment;
3. Drug testing required by employer;
4. Financial counseling; and
5. Auxiliary aides and services necessary for persons with disabilities to obtain and retain employment.

D. Process for provision of supportive services

The local board-approved policy will need to state the process by which participants will receive supportive service payments. The policy will need to address whether the LWDA, subrecipient, or vendor will be providing the payment to participant and in what form the payment will be provided (voucher, check, direct payment, or other). The policy should also include how often supportive services are provided to participants.

E. Documentation of the provision for supportive services

i. All supportive service information for participants must be entered in GWROPP (type of supportive service, amount, date of service etc.). All supporting documentation for a participant's supportive services must be scanned into GWROPP (Examples of this supporting documentation include but are not limited to: participant time sheets, income determination, UI records, supportive service request form, etc.).

ii. All participant's supportive service information is required to be accurate in GWROPP. The budgeted amount, type of service and timeframe in which the supportive service was given must be accurate. No payment can be made to the participant until that amount has been updated in GWROPP. Supporting documentation of the participant's qualifying WIOA activity, for which the participant is receiving supportive services, must bescanned into the participant's GWROPP profile. Examples of this supporting documentation include but are not limited to: in-training participant time sheets signed by the instructor/supervisor, and documents proving participation in other types of intensive or training services.

~~F. Financial cap to be placed on supportive services~~

~~i. An LWDA can spend no more than 35% of their allocation for a particular funding stream (i.e., adult, dislocated worker, or youth.) The 35% determination will be taken from that program year's total allocation per funding stream.~~

~~ii. All supportive services costs which are expended on participants affected by a declared emergency situation will be exempt from the 35% cap.~~

iii. ~~Waivers to this policy will be issued by OWD on a case-by-case basis by the OWD Grants Director.~~

~~G.~~F. Unallowable Supportive Services

i. Payments are not allowed for titled or deeded items or when recovery of the expense is anticipated. Such items include:

1. Rent deposits or housing deposits;
2. Mortgage payments;
3. Car payments;
4. Purchase of vehicles; and
5. Fines

~~H.~~G. Supportive Services for Youth

Supportive Services for youth, as defined in WIOA sec. 3(59), are services that enable an individual to participate in WIOA activities. These services include, but are not limited to, the following:

i. Linkages to community services;
ii. Assistance with transportation;
iii. Assistance with child care and dependent care;
iv. Assistance with housing
v. Needs-related payments;
vi. Assistance with educational testing;
vii. Reasonable accommodations for youth with disabilities;
viii. Legal aid services;
ix. Referrals to health care;
x. Assistance with uniforms or other appropraite work attire and work-related tools, including such items as eyeglasses and protective eye gear;
xi. Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and,
xii. Payments and fees for employment and training-related applications, tests, and certifications (WIOA §681.570).

~~I.~~H. Youth Incentive Payments

Incentive payments to youth participants are permitted for recognition and achievement directly:

1. Tied to the goals of the specific program
2. Outlined in writing before the commencement of the program tha may provide incentive payments;

3. Align with the local program's organizational policies; and,

4. Are in accordance with the requirements contained in 2 CFR part 200 (WIOA §681.640)

WIOA regulations comments narrative include: "The USDOL has included the reference to the Uniform Guidance at 2 CFR part 200 to emphasize that while incentive payments are allowable under WIOA, the incentives must be in compliance with the requirements in 2 CFR part 200. For example, Federal funds may not be spent on entertainment costs. Therefore, incentives may not include entertainment, such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment. Additionally, there are requirements related to internal controls to safeguard cash, which also apply to safeguarding of gift cards, which are essentially cash. While the Department recognizes the importance of incentives as motivators for various activities such as recruitment, submitting eligibility documentation, and participation in the program, the USDOL concluded that incentives must be connected to recognition of achievement of milestones in the program tied to work experience or training. Such incentives for achievement could include improvements marked by testing or other successful outcomes. While WIOA funds cannot be used for incentives for recruitment and eligibility documentation, local areas may leverage private funds for such incentives."

J.I. Needs-Related Payments

LWDAs must have an LWDB approved Needs-related Payment policy prior to makin any determintations of Needs-related payments. Needs-related payments are only available to individuals enrolled in training services and must be consistent with 20 CFR 680.930-970.

Needs-related pamynet provide financial assistnace to participants for the purpose of enabling them to participate in training and are a supportive service authorized by WIOA sec. 134(d)(3). Unlike other supportive services, in order to qualify for needs-related payments, a participant must be enrolled in training.

Eligibility requirements for adults to receive needs-related payments include:

a) Be unemployed;

b) Not qualify for, or have ceased qualifying for, unemployment compensation; and,

c) Be enrolled in a program of training services under WIOA sec. 134(c)(3).

Eligibility requirements for dislocated workers to receive needs-related payments include:

a) Be unemployed, AND

1. Have ceased to qualify for unemployment compensation or trade readjustment allowance under TAA; and,
2. Be enrolled in a program of training services under WIOA sec. 134(c)(3) be the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, 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

b) Be unemployed and did not qualify for unemployment compensation or trade readjusment assisantce under TAA and be enrolled in a program of training services under WIOA sec. 134(c)(3).

Needs-related payments may be provided if the participant has been accepted in a training porgam that will begin within 30 calendar days. Extension of the 30-day period (to address appropriate circumstances) requires approval from TCSG.

Establishing payment levels for needs-related payments:

a) The payment level for WIOA adults must be established by the LWDB.
b) For statewide projects, the payment level for adults must be established by the State WDB.
c) For dislocated workers, payments must not exceed the greater of either of the following levels:
    1. The applicable weekly level of the unemployment compensation benefit, for participants who were eligible for unemplopyment compenstation as a result of the qualifying dislocation; or
    2. The poverty level for an equivalent period, for participants who did not qualify for unemployment compensation as a result of the qualifying layoff.

    The weekly payment level must be adjusted to reflect changes in total family income, as determined by LDWB policies. WIOA §680-970.