

South Central Workforce Development Board (SCWDB)



POLICY: SUPPORT SERVICES POLICY

EFFECTIVE DATE: JULY 1, 2016

POLICY NUMBER: 2016-13

REVISION 1: JANUARY 18, 2018

SUBJECT: SUPPORT SERVICES POLICY

PURPOSE:

To provide Workforce Innovative and Opportunity Act (WIOA) staff and vendors with policy and procedures for the provision of Support services for adult, dislocated workers and youth, under WIOA and the Montgomery County Workforce Development Board's WDB's Local Plan.

EFFECTIVE DATE:

July 1, 2016;

Revised and effective as of January 18, 2018

ACTION REQUIRED:

Within 15 days of the receipt of this policy it is the recipient's (e.g., vendors, partners) responsibility to ensure all staff are informed of the policy and to create an internal process to ensure accountability.

BACKGROUND:

WIOA defines supportive services as services such as child care, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under the Act.

POLICY:

This policy addresses the use of Workforce Innovation and Opportunity Act (WIOA) funds for supportive services to eligible participants enrolled in WIOA Adult, Dislocated Worker and Youth programs. Procedures include documentation requirements to show that the supportive service is allowable, reasonable and not otherwise readily available to the participant. Support services are not entitlements and are designed to enable individuals to participate in and successfully complete activities authorized under WIOA programs. Support services must be approved by WIOA program staff before they are received. Support Services are to be provided only when they are determined necessary and the participant is unable to readily obtain the support service through any other resource or program providing such services. The Contractor must explore with the participant viable alternatives available before providing these services.

Support services are not entitlement services or automatic assistance. Supportive services are based on financial need and participants are not automatically entitled to supportive services. The guiding principle for the provision of any support service shall be based on the participant's demonstrated need that would otherwise result in creating barriers to full participation or leaving the

program. It is the responsibility of the Contractor to ensure allowable, reasonable, and appropriate utilization of support service funds and determine if such assistance is available through other community service providers. Supportive services may be provided to eligible WIOA participants who:

1. Are enrolled in WIOA career or training services; or,
2. Have exited and need post-program supportive services as follow-up services (for up to 12 months after exit); and,
3. Are unable to obtain the supportive service through any other resource or program providing such services.

WIOA supportive services are limited and must be coordinated with other community resources. In every instance of providing supportive services, case managers must ensure that no other resource exists or that the resource is not readily available and that the need is so urgent that referrals to other resources would delay the provision of the support service and create a hardship to the participant.

A. Administration and Approval of Support Services

All support services are administered through WIOA staff. Support services include, but are not limited to, the items identified in this policy. All customer requests are reviewed and approved based upon allowable, reasonable, and necessary services. These funds are allowed only for the purposes intended and are to be considered life-time maximum amounts. The use of these funds is based on their availability.

South Central Kentucky Workforce Board WIOA program staff may only approve funds for the types of support services and amounts described in this policy. The WIOA Director or their designee must approve all requests for services or costs that exceed the limits in this policy and may make exceptions to this policy on a case by case needs basis.

All support services are contingent upon the customer's satisfactory performance while participating in and completing WIOA career services or training activities as well as upon available funding. To maintain satisfactory performance, a customer who is in training must maintain good attendance and passing grades and be in compliance with all other program requirements. For a customer who is participating in career services, they must be in compliance with program requirements, including active participation and at least monthly contact with a case manager.

B. Support Services Assessment

WIOA program staff will ensure that an assessment to determine support service needs is documented in the customer's individual plan for all customers who are eligible for and registered in WIOA programs. Customers who are unable to obtain services from other sources and who are registered in career and/or training services may be provided South Central Kentucky WDB WIOA funded support services.

C. Allowable Support Services

The range of support services available to WIOA customers includes childcare, transportation, workplace/training accessibility tools, work clothes, minor work tools, and other discretionary items determined by the WIOA program staff.

Funds for these services are intended to support customer's efforts in training or career services or to assist with job placement needs. These funds are not intended to fully cover all costs associated with certain activities. The following list provides examples of supportive services and is not intended to be an exhaustive or exclusive list of allowable services.

- Assistance with local transportation costs and limited private auto repairs associated with work or training;
- Assistance with child care and dependent care costs;
- Assistance with housing and food;
- Assistance with utility payments;
- Assistance with medical and prescription services;
- Assistance with uniforms or other appropriate work attire, hygiene and haircuts, eyeglasses, and work or training related material costs;
- Assistance with employment related professional memberships;
- Assistance with translations;
- Assistance with work and training related licenses and permits;
- Assistance with disabilities including learning disabilities;
- Assistance with educational testing and accommodations;
- Assistance with out-of-state job search and relocation to a new job; and
- Incentive payments.

D. Limits

The WDB will provide support service funds for the following **five categories only, child care, transportation, work/training clothes/uniforms, certification testing fees under certain conditions, and/or minor tools or supplies**. Based on **documented need** as specified elsewhere in this policy, case managers may allocate up to \$2,000 in support service payments per individual while they are enrolled in services. If support service funds are used, case managers must document in case notes how the need was determined for each area support service funds were used. They must also document how much was allocated for which of the four areas and how the amount was determined.

The following provides specific documentation requirements. Also, for some areas a guideline for determining an allocated amount is provided.

1) Child Care

Documentation Requirement: Customers who may be eligible for childcare support services must certify, in writing, the costs of the care and provide the name and address of the provider.

Guideline for determining the amount, based on documented need: To determine an appropriate amount, case managers may wish to use estimates of the average cost of child care for infants and children in the state of Kentucky. (Source: Child Care Aware of America, <http://childcareaware.org/>)

2) Transportation

Documentation Requirement. Customers may be issued reimbursement funds for public transportation costs to and from employment (e.g., OJT, customized training, internships) and training sites. In addition, program staff may issue a gas card, bus pass or bus tokens.

Customers may be reimbursed for driving expenses in the amount of the federal business mileage rate as set by the US Internal Revenue Service for mileage reimbursements to and from training sites and to and from required appointments with their case managers. The purpose for which

transportation is being reimbursed must be documented along with receipts that support the reimbursement.

3) Work / Training Clothes / Uniforms

Documentation Requirement. Documentation must specify what the items are for and that the items are for a work or training related activity.

4) Educational Testing and Industry Based Certifications

Documentation Requirement. It is expected that case managers will seek other funding sources, including scholarships, before requesting the use of WIOA funds to pay educational testing fees. Fees to enable a customer to take an industry based certification within the WDB's targeted industries may be provided if the customer has not been approved for an ITA through policy #2016-6, as fees for tests are covered as part of the ITA.

Testing fees to take the GED may also be provided to eligible WIOA enrolled participants, per policy #2016-5 (Youth Eligibility) and #2016-8 (Adult and Dislocated Worker Eligibility). Testing fees for the GED will be covered one time only.

Documentation must be presented to the WDB Director for approval before any funds will be authorized in this category. Documentation must include what other resources were explored before making WIOA funds necessary.

5) Minor Tools or Supplies

Documentation Requirement. If tools or supplies are needed to participate in training or become employed, staff may provide financial assistance only if it is required by the training provider or an employer. Customers must be enrolled in training or have a firm employment offer before this expense can be approved by staff.

NOTE: Training related expenses for WIOA eligible adults or older youth that may be covered by an Individual Training Account do not count against the supportive services limit for each registered participant. ITA related training expenses may include, but are not limited to: assistance with the purchase of tools required for a specific course; current school admission fees, computer and lab fees; and books and supplies.

Needs Related Payments (NRP)

WIOA (Section 134(d)) defines these payments as support services. Funds may be used for adults and dislocated workers who are unemployed and do not qualify for or who have ceased to qualify for unemployment compensation for the purposes of enabling individuals to participate in training services.

In addition, to be eligible for NRPs a dislocated worker who has ceased to qualify for unemployment compensation must be enrolled in training services 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 or if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months.

Payments may not exceed the greater of their applicable level of unemployment compensation or if the worker did not qualify for unemployment compensation, an amount equal to the poverty line, for an equivalent period.

Needs Related Payments (NRPs), must be authorized and approved by the SCWDB Director. NRPs will be made available, at the discretion of the SCWDB, based on availability of funds within any Program Year.

E. Disallowed Supportive Services

In most cases, supportive services may not be utilized to pay for expenses incurred prior to the participant's enrollment into the WIOA program. Program management approval will be required and documented in case notes in EKOS (or its replacement).

1. Fines and penalties such as traffic violations, late finance charges, and interest payments;
2. Entertainment including tips;
3. Contributions or donations;
4. Vehicle or mortgage payment;
5. Refundable deposits;
6. Alcohol or tobacco products;
7. Pet food;
8. Items for family members or friends; or
9. Out-of-state job search and relocation expenses that are paid for by the prospective employer.

F. Procedures and Documentation Requirements for Reimbursement

- Case Managers will determine a participant's need for supportive services as a part of the initial and on-going assessment.
- Case Managers will determine whether other community resources are available to cover necessary expenses and show evidence of referrals to other resources, including, when feasible, outcomes of the referral. These efforts to obtain other resources before expending WIOA funds must be specifically documented in the case notes in the file and in EKOS (or any replacement).
- Career Planners will submit a written supportive services request to the program manager for approval. The request must include the participant's name, EKOS (or its replacement) ID, date of service, vendor's name, justification for the service, evidence that other non-WIOA sources were explored and signatures of the case manager and program manager, or other staff who has been delegated signature authority.
- Case managers must maintain a supportive service tracking log located in the participant's file that tracks the date of the service, type of service, amount of the service disbursed to the participant and a current total of supportive services spent-to-date.
- Determination of need must include documentation regarding the reasonableness of the support service and how the associated cost was determined. It must be documented in the Individual Service Strategy and included in the case folder.
- Reimbursement payments will be made only with the submission of original sales receipts that show itemization of the service and products provided or in the case of mileage, through the submission of a mileage tracking form.
- Mileage reimbursement may be paid directly to the participant or to the person who provides the transportation. The driver of the vehicle must provide a copy of the following: 1) a valid driver's license 2) automobile liability insurance 3) current automobile registration and; 4) verification of travel distance.
- Mileage reimbursement shall not exceed the current Internal Revenue Service authorized per mile rate.
- Child care reimbursement will be made only with the submission of documentation that

includes verification from the child care provider regarding the number of hours of care and that the hours correspond with the hours in the work experience/training activity.

- For incentive payments, the case manager must have copies of awards of attainments such as certificates or diplomas or other documentation verifying successful completion of the activity. Case notes must document why the incentive was provided, the amount of the incentive, and the date the participant received the incentive.

In general, all supportive services payments must have a receipt from the vendor/provider that clearly shows the amount that was paid.

REFERENCES:

- Workforce Innovation and Opportunity Act (Public Law 113-128) - Section 3(59), Section 134(d)(2) - Adults and Dislocated Workers; 20 CFR 680.330, 680.900, 680.910 and 680.920 - Adults and Dislocated Workers; WIOA Section 129(c)(2)(G) - Youth; 20 CFR 681.570 – Youth.
- Kentucky Career Center Workforce Innovation and Opportunity Act (WIOA) Preliminary Policy Supportive Services, Policy Number: 16-004, Date of Issue: April 1,2016, Effective Date: April 1,2016

Approved:

6-22-2017
Date of WDB Approval

6-9-2017
Date of Governance
Committee Approval

Signed by:


Ron Sowell, WDB Chairman