

## **Subject: Supportive Services and Needs-Related Payments Policy**

**Policy No: 2015-02**

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### **Purpose:**

This policy addresses the use of Workforce Innovation and Opportunity Act (WIOA) Title I and select discretionary funds administered by the Benton-Franklin Workforce Development Council (BFWDC) for supportive services and Needs Related Payments (NRPs) to support adults, dislocated workers, and youth participating in WIOA Title I and select discretionary funded activities. While WIOA guidance is referenced throughout this policy, subrecipients shall adhere to these requirements when providing supportive services to all program participants.

### **Background:**

WIOA provides program guidelines for supportive services for adults and dislocated workers defined in WIOA Sections 3(59) and 134(d)(2) and (3). Support services such as transportation, childcare, dependent care, housing, assistance with uniforms, other appropriate work attire, and work-related tools, including glasses, protective eyewear, assistance with books, fees, school supplies, and NRPs, enable individuals to participate in WIOA Title I activities.

Supportive services for youth, as defined in WIOA Section 129(c)(2)(G), can additionally include assistance with educational testing, reasonable accommodations for youth with disabilities, and referrals to healthcare.

**At this time, the BFWDC does not allow Needs Related Payments (NRPs)**

## Operational Procedure

### A. Identification of and Linkages to Supportive Service Programs and Work Supports

WIOA requires coordination with other resources in the community to ensure that supportive services are provided only when they are not otherwise available. WorkSource Columbia Basin (WSCB) partners, Tri-Cities (TC) Futures, and other community service providers shall identify and develop linkages with various supportive services programs available in the local area. Accurate and up-to-date community resource information shall be available on the Washington Information Network 2-1-1, [www.211.org](http://www.211.org), or by dialing 211 on the telephone.

### B. Access and Referral

The network of community resource programs shall be easily and readily accessible to adults, dislocated workers, and youth through the One-Stop delivery system and the comprehensive youth center. All individuals shall be provided referral assistance to these activities as part of career services.

### C. Provision of Services to Participants

1. Supportive services may only be provided when they are necessary to enable individuals to participate in Title I activities (WIOA sec. 124(d) (2) (A) and WIOA sec. 3 (59)).
2. Supportive services may only be provided to individuals who are:
  - a) Participating in career and training services as defined in WIOA sec. 134(c) (2)(3) and 20 CFR 680.910; and
  - b) Unable to obtain supportive services through other programs providing such services (WIOA sec.134 (d)(2)(B)).
3. Supportive services during follow-up are allowable for WIOA Adult and Dislocated Workers that have completed the program to help them retain unsubsidized employment per [WIOA Title 1 Policy 5620 Revision 1](#). For additional information, see [BFWDC Policy 2015-16, Adult and Dislocated Worker Follow-up Services](#).
4. Per [TEGL 19-16](#), supportive services cannot be provided as stand-alone Title I services for adults and dislocated workers.
5. **YOUTH ONLY-**
  - a) Supportive services that enable WIOA participants to participate in work experience can now count toward the work experience expenditure requirement.
  - b) Follow-up services may include supportive services per 20 CFR 681.580(b). For additional information, see [BFWDC Policy 2015-15, Youth Follow-up Services](#).
  - c) Per [TEGL 21-16](#) and [WorkSource System Policy 1020, Revision 1](#) supportive services can be provided to youth participants either during participation as Program Element 7 (Supportive Services) or after exit as a

component of Program Element 9 (Follow-Up Services), though the former triggers and extends participation while the latter does not.

6. Workforce Preparation Services are **not** considered Supportive Services. For additional information, see BFWDC Policy 2015-04 - Individual Training Accounts and Workforce Preparation Services.

#### **D. Educating Participants about Support Services**

Participants need to understand that supportive services are not meant to be ongoing and can only be provided when funding is available. Supportive services enable participants to participate in the program; therefore, bills/invoices shall be in their name. If not, they shall provide information about the person named on the bill (relative, roommate, significant other, etc.).

At the beginning of their participation, participants need to be informed of other resources available in the community that may be able to help them with their needs and understand that it is their responsibility to apply for these community resources before WIOA supportive services are used. Participants should be informed that although a supportive service may be allowable, the WIOA program may not be able to commit to paying for the entire cost of a supportive service. In some cases, a participant may need to make arrangements to pay for costs above the amount the WIOA program can provide.

The subrecipient shall strive to be equitable in providing supportive services to all participants in a program. Because each participant's situation is considered when determining the need for supportive services, the amount of supportive services provided will not always be the same. Participants have been known to share information about the type and amount of supportive services they have received through WIOA programs with other participants. Should a participant express their belief that they are entitled to the same type and/or amount of supportive service that the WIOA program provided to another participant, they need to be educated to the fact that:

1. The WIOA program is not an entitlement program; therefore, they are not guaranteed any specific amount or type of supportive service.
2. The WIOA program will provide participants with supportive services based upon an examination of their situation and their needs to be able to participate in employment and training activities.
3. Supportive services are dependent upon the funding available in the WIOA program at any given time, which may change throughout the program year.

#### **E. Documentation**

The subrecipient shall maintain appropriate documentation to verify eligibility to participate in WIOA and justify the types and duration of services provided to

participants. The following documentation is required in all participant files and the State Management Information System (MIS):

1. Upon enrollment, the subrecipient shall document educating the participant about supportive services.
2. Case notes shall document efforts to use other community resources before WIOA supportive service dollars were authorized.
3. The participant's request for supportive services shall be documented in case notes stating the reason services are necessary.
4. Participant requests for supportive services shall be documented in case of notes prior to the expenditure.
5. Supporting documentation, including approved purchase orders/vouchers and itemized receipts to verify the goods or services were purchased, shall be legible and uploaded in the State MIS.
6. Purchase orders/vouchers shall be modified and reissued to reflect changes in vendors and when the total dollar amount listed on the receipt exceeds the authorized purchase order amount. An authorized supervisor, manager or designee shall approve modified purchase orders/vouchers.
7. Exception - Direct vendor payments shall have supporting documentation available.

## **F. MIS Data Entry Requirements**

Adult and Dislocated Worker participants - Supportive services *do not* trigger nor extend participation. A Title I-funded career or training service shall be taken to trigger a participation episode. Each time a participant receives a supportive service, a supportive service touchpoint shall be recorded in state MIS in conjunction with a qualifying career or training service.

Program-completed WIOA Adult and Dislocated Worker Program participants - Follow-up services do not trigger or extend participation and are not durational; therefore, a qualifying career or training service *does not* need to be recorded in MIS to trigger a participation episode.

Youth participants - Supportive services trigger and extend participation; therefore, a Title 1-funded career or training service *does not* need to be recorded to trigger a participation episode.

## **G. Types of Supportive Services and Required Documentation**

### **Certification, Screening, and Testing Fees**

Employment-related fees, including but not limited to testing fees, drug screening, background checks, security clearance, fingerprinting, commercial and business licenses, or other fees if required by law or not paid for by the employer to accept or maintain employment or participate in WIOA activities.

### **Childcare**

Childcare may be paid to ensure proper care of children and enable the participant to participate in WIOA-funded program activities. However, WIOA programs will not have sufficient funding to pay for childcare on an ongoing basis; therefore, participants should be informed of other known childcare resources. The subrecipient shall encourage participants to develop a long-term plan for childcare that includes a backup plan for emergencies. Reimbursement shall not be made for childcare if the participant has an unemployed spouse at home.

Childcare providers shall be certified by the Washington State Department of Social and Health Services (DSHS) to ensure that childcare providers provide safe and adequate services at the lowest cost.

### **Clothing**

Assistance with clothing is available when a participant:

1. Begins to job search and/or secures an interview
2. Begins classroom training, Work Experience (WEX), or On-the-Job Training (OJT)
3. Begins employment

### **Dental**

Dental assistance is allowable when the subrecipient determines that a dental condition is a severe barrier to employment. It is not allowable to provide supportive services for ongoing dental maintenance, such as cleaning.

### **Driver License Expenses or State Picture Identification**

Driver license expenses (e.g. driver's education courses, acquiring or renewing a driver license) or obtaining State Picture Identification are allowable expenditures.

Documentation for Driver's Education Courses shall include a copy of the invoice or receipt listing:

- Participant's name
- Service(s) provided
- Date(s) of service
- Cost of service

### **Equipment/Tools**

Equipment and tools may be purchased when required during training or for a job. A request shall be accompanied by an employer hire letter, intent to hire, or school tool list.

### **Food/Groceries**

Food and groceries are not allowable expenditures under WIOA (for Adult and Dislocated Worker participants). Participants shall be referred to other community

services such as Temporary Assistance for Needy Families (TANF), the DSHS, food banks, and other local resources available on [211info.org](http://211info.org).

**YOUTH ONLY:** Per [TEGL 09-22](#)- Food may be provided as a supportive service to WIOA Youth program participants to assist or enable them to participate in employment and training activities. Case notes shall document coordination with other community partners such as Temporary Assistance for Needy Families (TANF), the DSHS, food banks, and/or other local resources available on 211 info.org to ensure that WIOA supportive services are provided only when they are not otherwise available. If Title I-B funds are ultimately used to purchase food, documentation shall include the following:

1. Unsuccessful efforts to first secure food for the youth through federal, state, and community food assistance programs and services; and
2. The immediate need for Title I-B funds to be used to purchase food for the youth to enable effective participation in youth program activities.

### **Hygiene**

Personal hygiene items are allowable if needed for the participant to participate in the program and obtain or maintain employment.

### **Medical Services**

When providing supportive services for health/medical care, the subrecipient shall determine if the participant has other insurance benefits available such as a spouse's health insurance, WA Basic Health, or available through the Department of Social Health Services (DSHS).

### **Mortgage Assistance**

Home mortgage payments are allowable, including applicable principal, interest, and escrow. Mortgage assistance is allowable for up to two (2) previous months but cannot include expenses incurred before the program enrollment date. A copy of the mortgage statement documenting the monthly amount due and the participant's name is required. If the mortgage statement is not in the participant's name, a self-attestation form shall be completed explaining the relationship between the participant and the person named on the mortgage statement.

### **Optical**

Supportive service expenditures for eye exams and prescription glasses are allowable when necessary for a participant to participate in training or accept or keep a job.

### **Rental Assistance**

Rental expenses are allowable for up to two (2) previous months but cannot include expenses before the program enrollment date. Deposits, cleaning fees, or late fees are not eligible. Documentation shall show the participant as a tenant of the premises. The following required documentation shall be included with the request:

1. A copy of the current rental/lease agreement, signed and dated by the participant and landlord/owner, with a completed W-9; **or**
2. Documentation signed and dated by the landlord/owner (e.g., Company letter/Memo) outlining the participant's financial obligation, and a completed W9; **or**
3. A Rental/Lease Confirmation form signed by the landlord/owner and a completed W-9.

Rental assistance is not allowable when a family member (related by blood, marriage, or adoption) of the participant is the landlord.

### **School Books**

A book order list shall be attached to the request.

### **Transportation**

1. Gas assistance requires proof of a valid driver's license and current auto insurance before approval.
2. Car insurance requires documentation showing the participant as a covered driver.
3. Car repairs may be approved for safety and reliability issues when:
  - The participant has obtained three written estimates from licensed businesses (repairs will be made by the lowest bidder).
  - The vehicle is the participant's only mode of transportation to attend school, training, work, or participate in a job search.
  - The vehicle is registered in the participant's name. If the participant is a youth under the age of 18 and not the vehicle's registered owner, the subrecipient shall obtain documentation identifying the parents or legal guardians (as supported by court documentation) as the vehicle's registered owners. Case notes shall document when the vehicle is repaired and that it will be available to the participant during their program participation.
4. Vehicle payments are not an allowable expenditure.

### **Utilities (Heat/Water/Phone/Internet)**

Utility assistance is allowable for up to two (2) previous months but cannot include expenses incurred before enrollment. Cell phone assistance is covered if it is the only phone the customer has to contact/receive calls from employers. Cable service is not an allowable expenditure.

### **H. Disallowed Supportive Services**

- Alcoholic beverages or cigarettes/tobacco products
- Cable Services
- Contributions and donations
- Entertainment
- Finance and interest charges resulting from late fees and or penalties.

- Fines and penalties, such as traffic violations
- Food/groceries (for Adult and Dislocated Worker participants)
- Gift cards and prepaid gas cards
- Installment loan payments
- Legal expenses
- Membership fees such as fitness and social clubs
- Pet food/supplies
- Tips for services

Other similar types of requests may be approved or denied on a case-by-case basis and the intent of WIOA regulations.

### **I. Limits for Supportive Services**

Limits are not imposed on supportive services, including the maximum amount of funding or the length of time. The funding level and length of time supportive services are available to a participant shall be on a case-by-case basis. The subrecipient shall establish internal controls that result in equitable (fair and equal) treatment in access to and the provision of supportive services to participants.

### **J. Disallowed Costs**

The subrecipient under contract with the BFWDC is required to comply with the BFWDC policies, WIOA, and applicable federal, state, and local laws, regulations, rules, policies, and procedures pertaining to the obligation for or expenditure of supportive services funds. The subrecipient shall bear the responsibility of repayment of said funds upon determination of any disallowed cost(s).

### **K. Needs Related Payments**

BFWDC does not allow needs-related payments at this time.

### **L. Definitions**

**Disallowed Cost** - Disallowed Costs include any expenses of WIOA or discretionary contract funds that are determined to be unallowable or unreasonable based upon federal or state law, regulations, policies, or other contract authorities.

**Public Assistance** - Federal, state, or local government cash payments for which eligibility is determined by a needs or income test (WIOA Section 3(50)).

**Supportive Services** - Services such as transportation, childcare, dependent care, housing, tools, payment for employment and training-related applications, tests, certifications, books, fees, and school supplies, and NRPs necessary to enable individuals to participate in activities authorized under WIOA Title I. [WIOA Section



3(59)]. **Note:** A housing-related supportive service can include assistance with mortgage payments.

**Unemployed Individual** - An individual who is without a job and who wants and is available for work. The determination of whether an individual is without a job, for purposes of this paragraph, shall be made in accordance with the criteria used by the Bureau of Labor Statistics of the Department of Labor in defining individuals as unemployed (WIOA Section 3(61)).

## **M. References**

- [Washington WorkSource System Policy 5602, Revision 4](#)
- [WIOA Section 3\(59\) and WIOA 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](#)
- [Training and Employment Guidance Letter \(TEGL\) 19-16](#)
- [Training and Employment Guidance Letter \(TEGL\) 21-16](#)
- [Training and Employment Guidance Letter \(TEGL\) 09-22](#)