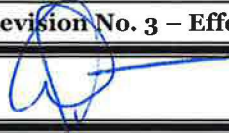


Workforce Connections Programs, Services and Activities Supportive Services	ADW-030-06
Supersedes Policy 3.4 dated March 26, 2009	Revision No. 3 – Effective: 04-27-2017
Policy Approved By: WC Executive Director Policy Adopted on: August 01, 2013	

Purpose:

To provide guidance on established standards for the provision of supportive services in adult and dislocated worker programs funded under Title I of the Workforce Innovation and Opportunity Act (WIOA).

Background:

As indicated on WIOA Sec. 3 (59), supportive services are defined as services such as transportation, child care, dependent care, housing, and needs related payments that are necessary to enable an individual to participate in career and training activities authorized under WIOA Title I. Referrals to supportive services are one of the career services that must be made available to adults and dislocated workers through the one-stop delivery system. Supportive services that are **allowable, necessary** and **reasonable**, and which the participants are unable to provide for themselves or obtain from another agency, shall be available to every eligible WIOA Title I program participant.

Policy:

Supportive services may be made available to assist program participants in removing barriers to participate in WIOA Title I activities. Supportive services must always be reasonable, necessary and allowable, and cannot result in direct payment to program participants. Supportive services must be documented at all times in participant records (e.g., IEP, participant support services log) and properly and timely recorded in Workforce Connections' (WC) authorized data Management Information System (MIS).

For the rationale of provision of services, supportive services may only be provided to individuals who are: [20 CFR §680.910]

- Participating in career or training services as defined in WIOA Sec. 134; and
- Unable to obtain supportive services through other programs providing such services;
- Supportive services may only be provided when they are necessary to enable individuals to participate in career service or training activities.

Reference:

PL 113-128 WIOA [Secs 3, 122, 134, 189, 503]; [20 CFR Part 680]; [20 CFR Part 683]; [TEGL 19-16]; [State TAG 15-3]; [SCP 3.6]; [SCP 1.15]; and [State TAG 14-2].

All information required by Federal, State and local reporting requirements must be collected for each individual receiving services other than basic career services, including documentation of each eligibility requirement for the type of service that the individual has received. The participant's determination of need and the type of supportive service must be based upon the results of assessment and the development of the IEP.

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I. General Provisions for Supportive Services

A. The extent of supportive services provided will vary based on participant specific needs and availability of funds and resources. Supportive services payments are requested individually and for specific needs. Supportive services may include transportation, child care, housing, and needs related payments that are reasonable, allowable and necessary to enable an individual to participate in employment and training activities authorized under Title I of WIOA. The justification for WIOA Title I supportive services payments must be properly and timely recorded in WC authorized MIS.

B. The Individual Employment Plan (IEP) shall identify the participant's employment goals, the appropriate achievement objectives, and the combination of services to achieve the employment goals. When supportive services are determined necessary for the participant to achieve the goals outlined in the IEP it is imperative that identified supportive services are properly listed on the IEP, therefore they are consistent with what the participant intends to achieve.

C. Cost Limits and Availability

WC has established a dollar cap amount for the provision of supportive services which is not to exceed \$2,500 for each eligible WIOA Title I program participant for the duration of the program participant's enrollment in the WIOA Title I program, including follow-up (with the exception of cost directly related to training, such as books, materials, etc.). Providers of WIOA Title I services are to base the amount and type of supportive services approved on each eligible program participant's needs and circumstances, as specified in the participant's IEP, and the availability of program funds.

D. Approval

1. In all cases, approval for provision of supportive services shall be made only when it is based on participant specific needs and availability of funds and resources, when needed for the participant to accept/start or retain employment or to participate in training or employment activities. Supportive services shall not be provided to offset costs incurred by an individual prior to enrollment in WIOA Title I programs.

2. Note that follow-up career services are not a qualifying service for the receipt of supportive services; therefore, an individual who is only receiving "follow-up" services may not receive supportive services. Individuals identified as needing ongoing supportive services must still be participating in career services (other than follow-up), training activities, or both to continue to receive supportive services. Supportive services also may not be used to extend the date of exit for performance accountability purposes. Supportive services, like follow-up services, do not make an individual a participant or extend participation.

E. Common Categories for Supportive Services

1. Transportation (e.g., bus-pass, gas voucher)
 - a) Providing transportation for a participant enables him/her to get to and from WIOA Title I related activities.
 - b) Public and private transportation is payable only if it will reasonably meet the participant's needs for participating in WIOA Title I related activities.

2. Childcare
 - a) A service provided to ensure proper care of children while the parent or guardian is participating in an employment and training program. The child care provider must be licensed or registered, or documentation of adequacy of alternative child-care must be maintained in the participant's file.
 - b) A person in the participant's immediate or extended family may perform child care only after all other sources of day care have been exhausted (must be an adult). The payment shall be made to the child care provider not the participant. This must be approved by WC.
3. Employment related tools and/or supplies
 - a) Work related tools will be authorized only when they are needed for the participant to accept/start or retain employment.
 - b) A description of needed and provided tools must be maintained in participant's file.
 - c) Supporting documentation from employer and/or training provider addressing required tools or materials needed.
 - d) Job listing paperwork, Labor Market Information (LMI).
4. Work cards (e.g., health/sheriff/alcohol awareness card)
 - a) Work related cards will be authorized only when needed for WIOA Title I related activities.
 - b) A description of needed and provided cards must be maintained in participant's file.
 - c) Supporting documentation from employer addressing the need and listing of all required cards.
 - d) Job listing paperwork, LMI.
5. Housing
 - a) Housing assistance includes payment for rent. When supportive service funds are used to pay this expense, documentation must be in the participant's file to verify address and rental amount.
 - b) Copy of signed rental or lease agreement.
 - c) Rental receipts shall be maintained in participant's file with any other valid lease or rental documentation.
 - d) Payment shall be made directly to the landlord.
 - e) Any additional documentation to support provided services to the participant.
6. Utilities
 - a) Utility payment will be authorized only when needed for the participant to accept/start or retain employment or to participate in training or employment activities.
 - b) When supportive services funds are used to pay this expense, documentation must be in the participant's file to verify address and amount due.
 - c) Copy of utility bill shall be maintained in participant's file.
 - d) Utilities payment receipts shall be maintained in participant's file.
 - e) Payment shall be made directly to utility company.

7. Minor car repair
 - a) Minor auto repair payment will be authorized only if the vehicle is needed for the participant to seek, accept or retain employment.
 - b) The vehicle being repaired must be under the ownership of the program participant. This shall be documented by obtaining a copy of the vehicle registration. Exceptions may be made if the vehicle belongs to another family member and is the only means of transportation available to the participant. Exceptions must be documented at all times in WC MIS and participant's file.
 - c) Requested auto repair cost must not exceed the vehicle total value.
 - d) A description of the repairs needed and provided must be maintained in participant's file.

F. Other supportive services

Other supportive services may be provided as determined by WC. Such goods and services must be reasonable, necessary and allowable, and most important will enable the participant to accept/start or retain employment or to participate in training or employment activities. These services may include, but are not limited to:

1. Linkages to community services;
 2. Haircuts;
 3. Work related clothing: job interview and employment related clothing for business, construction, healthcare and hospitality/gaming occupations;
 4. Eyeglasses and protective eye gear, DMV physical exam;
 5. Payments and fees for employment and training-related applications, tests, and certifications;
 6. Reasonable accommodations/auxiliary aids and services for participants with disabilities;
 7. Food cards - issued only for establishments where alcohol and tobacco is not sold;
 8. Drug testing - depending on circumstances this may be paid out of training related fees or work related items instead of other supportive services;
 9. Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education;
 10. Background checks - depending on circumstances this may be paid out of training related fees or work related items instead of other supportive services;
 11. Referral to health care; and
 12. Legal aid services which will uniquely address barriers to employment including: expungement and/or seal of records; access to Nevada State driver's license.
- Additional items may be approved with written prior approval from WC.

G. Responsibility

Providers of WIOA Title I services must establish within their written policies and procedures:

1. Amount and duration of supportive services;
2. System for coordination of benefits with other community organizations;
3. Use of supportive services in support of participant's IEP;
4. Justification and support documentation;
5. Request and approval process; and
6. Granting of exceptions.

H. Training related supportive services

Consistent with SCP 2.5 and State TAG 14-2

Sub-recipients must ensure that the “Sector Information Tab” is properly and timely completed any time supportive services are provided for, or linked to, training activities (e.g., on-the-job training, occupational skills training, apprenticeship programs, etc.)

Sub-recipients must ensure that attendance records are present prior to the approval of supportive services directly linked to training activities, e.g., data cross match, telephone verification, training provider attendance documentation.

I. Exceptions

Providers of WIOA Title I services must submit a written request to the appropriate Program Manager/oversight WC staff.

1. An exception to the established criteria may be granted by WC when:
 - a) Referral to other community organizations fails;
 - b) Upon individual case review, and services are determined to be necessary, reasonable and allowable;
 - c) WIOA Title I funds are available; and
 - d) Support documentation is provided.
2. Source support documentation must become part of the program participant’s file. Information related to the exceptions must be timely and properly recorded in WC authorized MIS.

J. WC has established that the items listed below are considered unallowable and shall not be procured for any individual with WIOA Title I funds (the list is not all inclusive):

1. Payments towards goods or services incurred or received prior to participant’s enrollment in WIOA Title I program;
2. Initial deposit (rental – utilities);
3. Late fees;
4. Legal fees;
5. Penalties/fines;
6. Bad debts;
7. Mortgage payments;
8. Homeowners insurance;
9. Car payments;
10. Car insurance;
11. Interest expenses;
12. Property taxes;
13. Foreign travel or training;
14. Entertainment costs. Cost of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as: tickets to shows or sports events; meals; lodging; rentals; transportation and gratuities) are unallowable;
15. Purchase of vehicles;
16. Fire arms;
17. Union dues;
18. Purchase of tobacco products, alcoholic beverages;
19. Participants memberships, dues and subscriptions are not allowed unless it is a specific requirement of a training program, or necessary and reasonable as a condition of employment; and

20. Goods or services in general that are illegal under any Federal, State, local, or municipal law or statute.

II. Needs-Related Payments (NRPs)

NRPs provide financial assistance to program participants for the purpose of enabling them to participate in training. Unlike other supportive services, in order to qualify for NRPs a program participant must be enrolled in a program of training services authorized under Sec. 134 (c) (3) on WIOA.

A. Prior Written Approval

In order to avoid disallowance or dispute based on unreasonableness the provider of WIOA Title I services must seek prior written approval from WC for the provision of NRPs service. The written request must be directed to WC program manager for review and consideration, final approval may be authorized by WC Executive Director.

1. NRPs may be approved only when: a) it has been demonstrated that they are the most effective and appropriate form of support for the participant to complete the training program and attain employment; b) reasonableness is established and program funds are available; and c) it has been demonstrated that other funds are not available or have been exhausted. The IEP must contain and properly reflect the justification for NRPs provision.
2. Prior written approval request must include:
 - a) Determination of need;
 - b) Reasonableness;
 - c) The specific circumstances, which must match those circumstances identified during the initial assessment at the time of enrollment and projected outcome;
 - d) Recommended level of needs-related payment;
 - e) Proof of enrollment in a program of training services;
 - f) Name of the industry sector recognized credential the individual will obtain; and
 - g) Authorized signatory approval.

B. WC Established Requirements:

The participant must be registered in a program of training services that: a) leads to the attainment of a recognized post-secondary credential and/or certificate¹; or b) is aligned with in-demand industry sectors or occupations within the Southern Nevada Workforce Development Area (SNWDA); and c) must be outcome oriented and result in full time employment placement.

C. Eligibility Requirements for Adults to Receive NRPs [20 CFR §680.940]

Adults must:

1. Be unemployed;
2. Not qualify for, or have ceased to qualifying for, unemployment compensation; and
3. Be enrolled in a program of training services authorized under Sec. 134 (c) (3) of WIOA Title I.

¹ Certificate of completion by itself will not be accepted.

D. Eligibility Requirements for Dislocated Workers to Receive NRPs [20 CFR §680.950]

Dislocated Workers must:

1. Be unemployed; and
2. Have ceased to qualify for unemployment compensation or trade readjustment allowance under TAA; and
3. Be enrolled in a program of training services under Sec. 134 (c) (3) of WIOA Title I, by 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 lay-off will exceed six (6) months; or
4. Be unemployed and did not qualify for unemployment compensation or trade readjustment assistance under TAA and be enrolled in a program of training services under Sec. 134 (c) (3) of WIOA Title I.

E. If above eligibility requirements are met, and requirements of this policy are met, individuals may be provided NRPs from WIOA Title I funds prior to the start date of training classes for the purpose of enabling them to participate in the approved training program.

F. Level of Payment Determination

1. The payment level for adults [20 CFR §663.840(a)]
WC has established a dollar cap amount for the provision of NRPs which is not to exceed \$500 (five hundred dollars) for each eligible WIOA Title I program participant for the duration of the program participant's enrollment in the WIOA Title I program, including follow-up.
2. For dislocated workers, payments must not exceed the greater of either of the following levels:
 - a) The applicable weekly level of the unemployment compensation benefit, for participants who were eligible for unemployment compensation as a result of the qualifying dislocation; or
 - b) The poverty level for an equivalent period, for participants who did not qualify for unemployment compensation as a result of the qualifying layoff.

G. Required documentation includes:

1. Copy of a UI entitlement decision or confirmation of UI benefits being exhausted;
2. Copy of training program proposal;
3. Verification of enrollment/registration, properly completed by training provider offices;
4. A signature by the participant attesting to his/her request for NRPs;
5. A comprehensive justification for NRPs; and
6. All eligibility determinations must be properly documented and recorded.

H. Responsibility

Providers of WIOA Title I services must develop and implement written policies and procedures that align with the requirements of this policy and to ensure coordination with system partners and entities to prevent duplication of resources and services.

III. Undistributed Items

- A.** For the purpose of this policy, undistributed items means any gift cards or items with a monetary value that is purchased under a WC sub-award and not distributed to any participant by the termination of a funding relationship with WC.
- B.** WC has established that the below listed items are considered inventory and must be accounted for (this list is not all inclusive):
 - 1. Gift cards (anywhere/anytime cash such as gift cards/certificates or prepaid credit cards that are redeemable for a large variety of commodities, such as Walmart, Target or any grocery store);
 - 2. Bus pass;
 - 3. Gas cards;
 - 4. Work related tools; and
 - 5. School supplies and materials.
- C.** Sub-recipients must keep supporting documentation that is sufficient to permit the preparation of reports whenever required by the LWDB and to permit the tracking of expended funds to a level of expenditure adequate to ensure that funds have been spent in accordance with established cost principles. WC will ensure that all undistributed items are accounted for and will report any discrepancies to the sub-recipient.
- D.** Undistributed items must be safeguarded at all times. Sub-recipients are responsible for overseeing internal systems of controls. All undistributed items must be properly identified and listed on an “undistributed items log” which must include, at a minimum, the following:
 - 1. Item description;
 - 2. Date purchased;
 - 3. Value; and
 - 4. Brief description indicating the reason why the item was not distributed.
- E.** Sub-recipients must coordinate the return of “undistributed items” with WC prior to sub-recipient/WC relationship end, normally during the closeout period. All undistributed items must be returned to WC together with WC “Closeout Form – Inventory” located at: www.snvwc.org.

IV. Data and Support Documentation Requirements

Supporting documents must be retained in compliance with established record retention requirements. Such records may include, but are not limited to: financial records; statistical records; and program participant records.

Program Participant File Acceptable Documentation	
Service Activity <i>(Ensure and verify proper completion)</i>	Required support documentation*
Support Services	<ul style="list-style-type: none"> ▪ Properly completed support services log ▪ Copy of properly completed, signed, and dated voucher(s) ▪ Copy of all financial record(s) related to payment(s) ▪ Copy of request and signed and dated receipt of service forms ▪ Copy of shared cost (if any) ▪ Case noted justification ▪ Any other additional support documentation
<p>*List is not all inclusive. Additional support documentation may be included as necessary or required for auditing purposes.</p>	

Case notes must be sufficient to demonstrate:

1. Provided supportive services;
2. Total cost;
3. Justification with regard to the participant’s inability to obtain such services through other programs or elsewhere in the community; and
4. Enough narrative to demonstrate that the cost of supportive services are reasonable and necessary.

V. Coordination and Referral

WC encourages WIOA Title I service providers to establish and implement a referral process that will promote good working relationships among system partners and will facilitate a rational and efficient use of available resources by avoiding duplication of efforts and services.

The provider of WIOA Title I services must properly document all efforts made with respect to the provision of referrals to, and coordination with, other programs and services including those within the one-stop delivery system and, whenever applicable, the inability of such programs and services or system partners to provide the needed supportive services.