


<b>Workforce Connections Programs, Services and Activities Supportive Services</b>	<h1 style="margin: 0;">YTH-040-04</h1>
	<b>Revision No. 2 – Effective 01-23-2017</b>
<b>Policy Approved By:</b> WC Executive Director <b>Policy Adopted on:</b> November 2013	

**Purpose:**

To provide guidelines on established standards for the provisions of supportive services in youth programs funded under Title I of the Workforce Innovation and Opportunity Act (WIOA).

**Background:**

As indicated in Sec. 3 (59) of WIOA, 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 activities authorized under Title I of WIOA. 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 youth program participant. Providers of WIOA Title I youth services must develop and implement written policies and procedures that align with the requirement of this policy and to ensure coordination with system partners and entities to prevent duplication of resources and services.

**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 and allowable and cannot result in direct payment to program participants. Supportive services must be documented at all times in participant records, (e.g., Individual Service Strategy (ISS), participant support services log, case notes) and properly and timely recorded in Workforce Connections' (WC) authorized data Management Information System (MIS).

For the rationale of provision of services, supportive services are to be provided only to program participants that:

- Have been determined eligible and have been properly enrolled;
- Are unable to obtain supportive services through other programs providing such services; and
- Services are considered to be necessary, reasonable and allowable.

**Reference:**

P.L. 113-128 WIOA [Secs. 3, 107, 121, 123, 129, 189]  
[20 CFR §678]; [20 CFR §681]; [20 CFR §683]  
[State TAG 15-3]; [SCP 2.2]; [SCP 2.5]; [State TAG 14-2]

All information required by Federal, State and local reporting requirements must be collected for each individual receiving service. The appropriateness of any service provided to an eligible program participant should be documented in the ISS and should show a clear linkage with program participant career/objective goals.

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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 1) transportation; 2) child care; 3) assistance with housing; 4) referrals to medical services; 5) assistance with uniforms or other appropriate work attire or work related tools, including such items as eye glasses and protective eye gear. Payments must be reasonable, allowable and necessary to enable an individual to participate in training, educational and employment 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 ISS is an ongoing strategy jointly developed by the participant and career coach that identifies the participant's educational and employment goals; the appropriate achievement objectives; and the combination of services to achieve his/her career goals. When supportive services are determined necessary for the participant to achieve the goals outlined in the ISS, it is imperative that identified supportive services are properly listed on the ISS; 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 \$3,000 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 costs directly related to training, such as books, materials, etc.). Providers of youth 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 ISS, and the availability of program funds.
- D. Approval**  
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, educational or employment activities. Supportive services shall not be provided to offset costs incurred by an individual prior to enrollment in WIOA Title I programs.

## II. Common Categories for Supportive Services

### A. Transportation (e.g., bus pass, gas voucher)

1. Providing transportation for a participant enables him/her to get to and from WIOA Title I related activities.
2. Public and private transportation is payable only if it will reasonably meet the participant's needs for participating in WIOA Title I related activities.
3. Gas vouchers must be used in lieu of direct payment to youth participants. Justification for this support service must reflect the youth participant's circumstances, anticipated needs, and other sources of support in the community.

**B. Childcare**

1. A service provided to ensure proper care of a child 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 childcare must be maintained in the participant's file.
2. 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 oversight staff.
3. Exceptions can be made if it is clearly demonstrated that such care is not available due to the child's/parent's age or special needs, or in instances when there is not appropriate care available in the area. Such exceptions are intended as a temporary measure to allow the youth participant to engage in WIOA program activities until acceptable care can be found, and prior approval from WC staff is required.
4. Child care costs may be subject to procurement requirements.

**C. Employment related tools and/or supplies**

1. Work related tools will be authorized only when they are needed for the participant to accept/start or retain employment.
2. A description of needed and provided tools must be maintained in participant's file.
3. Supporting documentation from employer and/or training provider addressing required tools or materials needed.
4. The provider of services must document that the tools are required and that they cannot be provided by any other source, such as the prospective employer or the participant.
5. Job listing paperwork, Labor Market Information (LMI).

**D. Work cards (e.g., health/sheriff/alcohol awareness card)**

1. Work related cards will be authorized only when needed for WIOA Title I related activities.
2. A description of needed and provided cards must be maintained in participant's file.
3. Supporting documentation from employer addressing the need and listing of all required cards.
4. Job listing paperwork, LMI.

**E. Housing (e.g., rent)**

1. 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.
2. Copy of signed rental or lease agreement.
3. Rental receipts shall be maintained in participant's file with other lease or rental documentation.
4. Payment shall be made directly to the landlord.
5. Any additional documentation to support provided services to the participant.

## F. Utilities

1. Utility payments will be authorized only when needed for the participant to commence or retain employment or to participate in educational, training or employment activities.
2. When supportive services funds are used to pay this expense, support documentation must be in the participant's file to verify address and due amount.
3. Copy of utility bill shall be maintained in participant's file and utility bill must be under youth participant's name.
4. Utilities payment receipts shall be maintained in participant's file.
5. Payment shall be made directly to utility company.

## G. Minor Car Repair

1. Minor auto repair payments will be authorized only if the vehicle is needed for the participant to seek, accept or retain education or employment. The vehicle being repaired must be under the ownership of the youth program participant. This shall be documented by obtaining a copy of the vehicle registration and insurance. 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.
2. Requested auto repair cost shall not exceed the vehicle's total value.
3. Estimates of the repairs are needed and must become part of the participant's file.
4. Minor car repair costs may be subject to procurement requirements.

## H. Other Supportive Services

Other supportive services may be provided as determined by WC. Such goods and services should be reasonable, necessary and allowable, and most important, will enable the participant to commence or retain employment or to participate in training, educational or employment activities.

These services may include, but are not limited to:

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

### **III. Additional Provisions**

#### **A. Responsibility**

Providers of youth 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 ISS;
4. Justification and support documentation;
5. Request and approval process; and
6. Granting of exceptions.

#### **B. Training Related Supportive Services**

1. 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.)
2. Sub-recipients must ensure that attendance records are present prior to the approval of supportive services directly linked to training activities.

#### **C. Exceptions**

An exception to the established criteria may be granted by WC oversight staff when:

1. Referral to other community organizations fails;
2. Upon individual case review, services are determined to be necessary, reasonable and allowable;
3. WIOA Title I funds are available; and
4. Support documentation is provided. Information related to the approved exception must be timely and properly recorded in WC authorized MIS.

#### **D. 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 programs;
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.

**IV. 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](http://www.snvwc.org).

**V. Data and Support Documentations 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.

<b>Program Participant File Acceptable Documentation</b>	
Service Activity <i>(Ensure and verify proper completion)</i>	Required support documentation*
Support Services	<ul style="list-style-type: none"> <li>▪ Properly completed support services log</li> <li>▪ Copy of properly completed, signed, and dated voucher(s)</li> <li>▪ Copy of financial record(s) related to payment(s)</li> <li>▪ Copy of request and signed and dated receipt of service forms</li> <li>▪ Copy of determination of need</li> <li>▪ Copy of shared cost (if any)</li> <li>▪ Case noted justification</li> </ul>
<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.

**VI. 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.

**VII. Supportive Services during Follow-up:** Supportive services may be made available to program participants as long as the individual is fully engage in follow up services. The need for these services must be clearly described in the participant ISS.