

## Mountain Area Workforce Development Board

Policy Statement: 2019 Number 1

Effective Date: November 5, 2019

### Policy Statement

- Purpose:** To rescind Local Area Policy Statement 2018, Number 2 and to transmit a new WIOA Supportive Services policy for Adults, Dislocated Workers and Youth. The purpose of this policy is to establish the guidelines for providing supportive services for Adults, Dislocated Workers, and Youth. WIOA requires coordination with other resources in a community to ensure that support services are provided *only* when they are not otherwise available.
- Reference:** [Workforce Innovation and Opportunity Act \(WIOA\) Final Rule Section 134\(d\)\(2\); TEGL 19-16 Section 14; 20 CFR 680.900 through .970](#)
- Background:** Supportive services are designed to provide a participant with the resources necessary to enable their participation in career and training services. The Workforce Innovation and Opportunity Act (WIOA) provides local boards with the authority to make policy and administrative decisions, and the flexibility to tailor the workforce system to the needs of the local community. WIOA allows local boards discretion to provide the supportive services they deem appropriate, subject to WIOA limitations.
- Effective:** August 28, 2018
- Expiration:** Indefinite
- Contact:** Nathan Ramsey, Mountain Area WDB Director at [Nathan@landofsky.org](mailto:Nathan@landofsky.org) or (828)768-3216 or Melissa Wright, Mountain Area WDB Performance and Accountability Specialist at [Melissa@landofsky.org](mailto:Melissa@landofsky.org) or (828)251-6622 ext 140.
- Attachment:** Mountain Area WDB Supportive Services Policy

# Mountain Area Workforce Development Board

## NCWorks Supportive Service Activity Code(s)

### Supportive Service Code Change(s)

Recent Service Code changes in NCWorks Online have combined all Supportive Services into one (1) service/activity code, (CSS). The Adult, Dislocated Worker, *and* Youth programs are to use service code “CSS” when capturing Supportive Service activity with a participant who is still active in Workforce Innovation and Opportunity Act (WIOA) services.

The CSS code **MUST** be recorded in conjunction with an existing open activity and is an actual service being provided and paid for with program funding.

It can be entered once approved with a projected start and end date. Note: the actual start and end date is the date of the invoice for services.

CSS	Supportive Service	<p>Support Service - Assistance provided to eligible individuals to enable them to participate in training or any other employment activities.</p> <p>Per <a href="#">TEGL 19-16</a>: Supportive services may include, but are not limited to: transportation, childcare, linkage to community services, housing, needs-related payments, medical fees, uniforms, work attire, work-related tools, books, school supplies, payments and fees for employment and training-related applications, tests, and certifications, and legal aid services.</p> <p>This is NOT a referral to, but an actual service being provided and paid for with program funding.</p> <p>This activity is to be opened and closed for a single day of duration and the associated Case Note should detail the length and Provider of the supportive service.</p> <p>Staff should record one activity per supportive service occurrence/payment. This activity cannot be recorded without an existing OPEN activity.</p>
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### Adult/DW Follow-Up Supportive Services Codes

F20	Adult Follow Up Services	Adult/DW Follow Up - Provision of follow up services for WIOA Adult or Dislocated Worker participants
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## NextGen (Youth/Young Adult) Follow-Up Supportive Services Codes

F11	Supportive Services***	Youth Follow Up - Supportive Services for Youth
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Service Code F11 combines transportation, purchase of work related uniforms/attire, purchase of work related tools, housing assistance, utilities, and dependent care supportive services formally offered under individual codes.

Supportive services also may not be used to extend the date of exit for performance accountability purposes.

### **Supportive Services Defined**

Supportive services are services that are necessary to enable an individual to participate in activities authorized under WIOA.

These services may include, but are not limited to, the following:

- (a) Linkages to community services;
- (b) Assistance with transportation;
- (c) Assistance with child-care and dependent care;
- (d) Assistance with housing;
- (e) Needs-related payments, *as described at §§ 680.930, 680.940, 680.950, 680.960, and 680.970*;
- (f) Assistance with educational testing;
- (g) Reasonable accommodations for individuals with disabilities;
- (h) Legal aid services;
- (i) Referrals to health care;
- (j) Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear;
- (k) Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and
- (l) Payments and fees for employment and training-related applications, tests, and certifications.

*Pursuant to this Local Area policy any expenses required by an educational and/or training program, long-term or short-term, course of study, with the exception of Finish Line Grants, shall not be considered a supportive service and will be classified as an educational and training expense.*

### **Adult and Dislocated Worker Supportive Services**

#### **A/DW Participants Eligible for Supportive Services**

Supportive service awards are intended to enable an individual to participate in Workforce Innovation and Opportunity Act (WIOA) funded programs and activities to secure and retain

employment. Supportive services may be provided to Adult and/or Dislocated Worker participants following:

- WIOA eligibility determination and validation for the WIOA Adult and/or Dislocated Worker program(s) and participant enrollment as an Adult and/or Dislocated Worker.
- Participants inability to obtain the supportive service through any other resource or program providing such supportive services. *Note: In cases where the need is urgent or may constitute a potentially unsafe situation for the participant, other resources may not need to be considered.*
- Assures that the participant has applicable Community Resource information on the low cost and/or free services available locally and such assurance is documented in the participant file. These services should be utilized prior to program support whenever possible.

### **Adult/DW Supportive Service Guidelines**

Supportive services for participants must be viewed in a manner that underscores collaboration. WIOA resources are limited and must be administered with the knowledge that some supportive service needs may be met through linkages with other NCWorks Career Center and community partners. Every effort must be made on the part of Contractor staff to ensure participants have been provided Community Resource information on low cost and/or free services available locally.

These services should be utilized *prior* to program support whenever possible. Contractor staff must establish internal controls that result in equitable treatment, maximize the allocations, and ensure coordination with, and referral of participants and applicants to other community resources.

The North Carolina [Community Resource Assistance Guide](#) (CRAG) highlights each county's community resources/partners and can be found on NCWorks Online under "Staff Online Resources".

### **Adult/DW Supportive Services During Follow-Up**

Mountain Area WDB does **NOT** offer *supportive services* for Adults and Dislocated workers during follow-up or after exit. Only "*non-monetary*" services are allowed for Adults and Dislocated workers after exit.

WIOA states that local boards must provide follow-up services for Adults and Dislocated Worker participants who are placed in unsubsidized employment, for up to 12 months after the first day of employment.

Although follow-up services are a type of career service, it is not a qualifying service for receiving supportive services. Individuals who receive only follow-up services cannot receive supportive services.

Supportive services, like follow-up services, do not make an individual a participant or extend their participation.

### **Adult/DW Supportive Services Limitations**

The level of supportive services for Adults and Dislocated Workers may not exceed the maximum cap for the relevant supportive service as provided for NCWorks NextGen participants listed in this policy. Supportive services may **NOT** be used to pay for:

- the purchase, improvement, or maintenance of any asset (*e.g. car payments or mortgage payments*);
- taxes;
- past due fees, penalties, interest, or other such expenses;
- child support payments in arrears or otherwise;
- parking or moving violation tickets;
- bail or restitution;
- settlement of an insurance claim or;
- consumer debt

In exceptional circumstances, a request for waiver to the above policies must be made to the Director of Mountain Area Workforce Development Board in writing prior to issuance of the service for which exception is being requested.

### **Needs-Related Payments**

#### **WIOA Requirements Regarding Needs Related Payments**

Needs-related payments provide financial assistance to participants to enable them to participate in training and are a supportive service authorized by WIOA sec. 134(d)(3).

Unlike other supportive services, to qualify for needs-related payments a participant must be enrolled in education and/or training.

#### **Adults must:**

- (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).

#### **Dislocated Workers must:**

- (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) 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 layoff will exceed 6 months; or

(b) 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 WIOA sec. 134(c)(3).

Payments may be provided if the participant has been accepted in a training program that will begin within 30 calendar days.

### **Level of Needs-Related Payments**

#### Adults

The payment level limits and recommendations for Adults will be established by the Mountain Area WDB annually based on budget allotments and/or restrictions.

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 unemployment compensation because of the qualifying dislocation; or
- (2) The poverty level for an equivalent period, for participants who did not qualify for unemployment compensation because of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income.

### **Career Pathway Implementation Funds**

Career Pathway Implementation funds are National Emergency Grant (NEG) or National Dislocated Worker Grant (NDWG) funds.

Supportive Services are **NOT** an allowable cost with NEG or NDWG funds.

If there is a need for Supportive Services, such as transportation or child-care for example, there is the possibility of co-enrolling the participant as a regular WIOA Dislocated Worker (DW).

**Note:** This is a Department of Labor (DOL)/Employment & Training Administration (ETA) policy, not a Department of Workforce Solutions (DWS) policy.

### **NextGen (Youth/Young Adult) Supportive Services**

#### **NextGen Participants Eligible for Supportive Services**

Support services are resources that enable individuals to meet basic and emergent needs while participating in training, education, and employment under the Workforce Innovation and Opportunity Act (WIOA).

Supportive services may be provided to NextGen (Youth and Young Adult) participants following:

- WIOA eligibility determination and validation for the WIOA Youth and Young Adult program and participant enrollment as a Youth/Young Adult.
- Participants inability to obtain the supportive service through any other resource or program providing such supportive services. *Note: In cases where the need is urgent or may constitute a potentially unsafe situation for the participant, other resources may not need to be considered.*
- Assures that the participant has applicable Community Resource information on the low cost and/or free services available locally and such assurance is documented in the participant file. These services should be utilized prior to program support whenever possible.

**Note:** The North Carolina [Community Resource Assistance Guide](#) (CRAG) highlights each county's community resources/partners and can be found on NCWorks Online under "Staff Online Resources".

### **NextGen Supportive Service Guidelines**

Support services are resources that enable individuals to meet basic and emergent needs while participating in training, education, and employment. Supportive services are intended to be one time or time limited services and not on-going assistance.

Supportive services are intended to be one time or time limited services and not on-going assistance. Contractors may provide support services to NextGen program participants when the resource is necessary to attend training, education and/or employment.

All other resources must first be explored before support services are issued, and services must be allowable, reasonable, justifiable and beyond the participant's ability to pay.

All expenditures should meet needs detailed in the Individual Employment Plan (IEP)/Individual Service Strategy (ISS).

### **NextGen (Youth/Young Adult) Supportive Services Limitations**

Supportive services may not be used to pay for:

- the purchase, improvement, or maintenance of any asset (*e.g. car payments or mortgage payments*);
- taxes;
- past due fees, penalties, interest, or other such expenses;
- child support payments in arrears or otherwise;
- parking or moving violation tickets;
- bail or restitution;
- settlement of an insurance claim or;

- consumer debt

*Note:* Computer hardware and software are considered assets unless required by an educational entity as a requirement of the class.

In exceptional circumstances, a request for waiver to the above policies must be made to the Director of the Mountain Area Workforce Development Board in writing prior to issuance of the service for which exception is being requested.

**NextGen (Youth and Young Adult) Supportive Services During Follow-Up**

Supportive Services **may** be provided to NextGen (Youth and Young Adult) customers after exit.

After exit, NextGen Supportive Services may include:

- Assistance with transportation;
- Assistance with child care and dependent care;
- Assistance with housing;
- Assistance with uniforms or other appropriate work attire and
- Assistant with work-related tools, including such items as eye glasses and protective eye gear

Staff will use Service Code F11 to capture supportive services provided after exit.

F11	Supportive Services***	Youth Follow Up - Supportive Services for Youth
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After exit, supportive services for NextGen participants may only be provided if the customer is employed and the intention of the above supportive services is to assist participants in retaining their employment but is limited to one (1) month of providing any of the services listed above after which time the WIOA NextGen Career Development Specialist must assist the participant in obtaining employment with higher wages.

Contractors must use community resources *first* before WIOA funds will pay for these items. If community resources cannot be found, the Contractor must prepare written justification for use of WIOA funds for the above items after the customer has exited from WIOA services and is employed. The written justification must be sent to Mountain Area WDB staff for approval *prior* to services being provided to NextGen participants after exit.

**NextGen (Youth/Young Adult) Supportive Service Procedures**

Policies and procedures also must define the frequency and amounts of support available, and establish internal budgets and maximums to ensure all participants can access support equitably. Participant files must contain all expenditures and required back-up documentation. In addition, attempts to access alternative services must be noted in participant case notes, which is required to utilize program funds.

The following limits and documentation needs exist for Mountain Area WDB contractors:

### **Child/Dependent Care**

To receive child care/dependent supportive services, the NextGen customer must be enrolled full-time in an Occupational Skills training component and/or actively engaging in a Work Experience Activity.

Child/dependent care may be provided to a participant's child or parent while the participant is engaged in training or employment consistent with their Individual Employment Plan (IEP)/Individual Service Strategy (ISS).

- Priority will be given to single heads of household.
- Reimbursement will not be made for such care if the participant has an unemployed spouse at home.
- The participant must be the custodial parent or guardian of the child/dependent for who such services are required.
- Child/dependent care services shall be paid to a licensed vendor unless the vendor is providing services in the participant's home.

Exceptions can be made if it is clearly demonstrated that such care is not readily available due to the child's/parent's age or special needs or in instances when there is no appropriate care available in the area. Such exceptions are intended as a temporary measure to allow the participant to engage in program activities until acceptable care can be found.

Child/dependent care payments may not exceed \$100.00 weekly per child with a \$200.00 weekly maximum.

The payment shall be based upon actual costs while the participant is participating in and traveling to or from approved activities, as documented in attendance records, at rates which are not greater than current Department of Human Services (DHHS) reimbursement rates. In instances where an hourly rate is being paid, the amount paid is not to exceed the maximum daily rate.

WIOA contractors may only pay for child-care at a child care provider licensed by the State of North Carolina. A list of licensed child-care providers is available at [www.ncchildcare.nc.gov](http://www.ncchildcare.nc.gov).

### **Transportation**

Assistance may include bus passes, van pool expenses, Taxi/Uber/Lyft Fares, Parking Fees, Mileage Reimbursement, or other travel assistance determined reasonable and necessary for a given participant to participate in training and/or obtain and retain employment.

In instances where public transportation is not available or not feasible, assistance may be provided in the form of gas vouchers and/or car repairs when a private vehicle is used as the primary source of transportation to **training or work**.

If the repair of an existing vehicle addresses a significant barrier to training and/or employment, and such assistance will alleviate the barrier, then such assistance may be granted.

To provide gas vouchers or pay for repair, the following conditions must be met. Participants must:

- have a current North Carolina Driver's License,
- have valid insurance, *and*
- be the registered owner of the vehicle involved

If the participant is a youth under the age of 18 and not the registered owner of the vehicle, the contractor must obtain documentation identifying the vehicle's registered owner and providing reasonable assurance, in writing, that the vehicle will be available to the participant for the intended purpose, if repaired.

### Transportation Expenditures

To receive transportation supportive services, the NextGen customer must be employed, enrolled full-time in an Occupational Skills training component, and/or actively engaging in a Work Experience Activity.

Total one-time emergency assistance for vehicle related expenses which include repair, registration, or first month's insurance may not exceed \$1,000.00.

Transportation costs may be paid (in accordance with the standard mileage rate established by the Internal Revenue Service) at a rate of \$.54 per mile round trip from the customer's residence to the training facility.

Reimbursement will be limited to a maximum of 150 miles per week, regardless of the number of miles traveled. Only one round-trip per day may be compensated. If the customer is utilizing their vehicle, the participant must complete and turn in the travel log issued by the WIOA Contractor indicating:

- the date of the travel;
- odometer beginning and ending reading and;
- total number of miles traveled to and from the authorized WIOA activity

### **Medical, Dental, and Counseling Expenses**

Finding from Department of Labor (DOL) show that the provision of necessary medical and counseling expenses improves participant outcomes therefore assistance for medical and dental services not covered by other insurance policies or by state labor and industries is allowed.

Professional counseling may also be provided to a participant under comprehensive guidance and counseling which is one of the "14 Required Elements" of the WIOA Title I-B Youth Program. Professional counseling may address legal, financial, and mental health, and other personal needs as well as outpatient treatment for substance abuse. Standard fees charged for medical records and reports are also allowable.

### **Clothing**

Work clothing including uniforms required by employers may be purchased if necessary for a participant to obtain and/or retain employment.

Documentation of placement in employment is required to be included in the file, and with all support requests.

## **Emergency Services**

### Housing

Rental payments may be paid to a participant's landlord for up to \$1,000.00 when such payment is needed to prevent homelessness. Payment may not include late fees.

In the case of shelter for a participant who is homeless, up to two months' rent may be paid, only if required by the landlord to secure housing. \$1,000.00 limit does not apply for an individual who is homeless, in that case the limit is two months' rent.

Such housing assistance is intended as a temporary, one-time measure.

In instances when housing assistance is provided, there must be a reasonable expectation that the assistance will resolve the situation; for example, if rent is paid for one month, there must be a reasonable expectation that the participant will obtain the resources to pay rent for the following months.

If the house is shared by other renters, the rent that supportive services will pay must be proportionate to the number of renters. Back up documentation must include a copy of the lease, the name and contact information of the landlord, phone or official written verification of the name(s) on the lease by the landlord, and the amount of rent and date rent is due.

Other housing emergency services include payments for overdue electric, home heating fuel, and water bills; telecommunication costs; food; and/or payment for temporary shelter.

In instances where an overdue electric, home heating fuel, and/or water bill is being paid, it must be documented that the participant has contacted the local Department of Health and Human Services (DHHS) Low-Income Home Energy Assistance Program (LIHEAP) energy assistance provider and found eligible for services but unable to receive services due to a lack of program funds.

### Telecommunication

If supportive services are used for a cellular telephone, it must be documented in the participant file that this is the participant's ***only means*** of telecommunication. In such instances, ***only base costs may be paid*** (*i.e. the basic ability to make and receive phone calls*).

*No internet/data costs may be paid.*

Overall, each emergency must be evaluated on an individual basis and shall include an evaluation of alternative resources. Attempts to access alternative services must be noted in participant case notes.

In instances when other emergency services are provided, such assistance must be to address a non-reoccurring emergency or there must be a reasonable expectation that the assistance will resolve the situation for the foreseeable future.

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

Union initiation; employment-related fees including but not limited to testing fees, drug screening, background checks; food handlers permits, North Carolina Drivers Licenses and Identification Cards, security clearance, first aid/CPR certification, or finger printing; commercial and business licenses; and/or other fees if required by law and/or not paid for by employer to accept or maintain employment or participate in a WIOA activity.

### **Food**

If all other community resources have been explored a participant may receive supportive services to meet nutritional needs. Attempts to access alternative services must be noted in participant case notes.

### **Safety Gear/Tools/Books/Supplies/Equipment**

Boots, helmets, gloves, safety vests, eye protection, other safety gear required by OSHA standards, and tools required for participation in training or to succeed in employment are allowed.

Participants may receive assistance for the purchase of tools, books, supplies, and equipment related to training or necessary for accepting an employment offer. A given tool or piece of equipment may only be purchased once.

The need for any supportive service must be documented on the participant's Individual Employment Plan (IEP)/Individual Service Strategy (ISS) and in case notes as must *all* efforts to obtain the needed services from a non-WIOA source.

### **Additional Limitations**

The Mountain Area WDB reserves the right to at any time recommend and or/set spending requirements and limits for Adult, Dislocated Worker, and/or Youth Supportive Services due to budget allotments and/or restrictions.

### **Other Exceptions**

In exceptional circumstances, any request for waiver to the above policies must be made to the Mountain Area Workforce Development Board Director in writing prior to issuance of the service for which exception is being requested.