

CWP Policy/Procedure Transmittal

Policy and Procedures Transmittal Number: 20-04

Effective Date: December 15, 2020

To: CWP Staff and Subrecipient Staff

From: Julie Watson, Compliance & Accountability Administrator

Issue Date: December 15, 2020

Subject: WIOA Adult and Dislocated Worker Supportive Services Policies

With this transmittal, CWP is issuing revised WIOA Adult and Dislocated Worker Supportive Services policies. These revised supportive services policies include changes and clarifications regarding the assessment of need, procedures for requesting and method of issuance of supportive services.

In addition to being attached to this transmittal, these policies can be found in CWP's online Policy and Procedures Manual, Section 3-60 WIOA Adult Supportive Services and Section 4-60 WIOA Dislocated Worker policy at <https://capitalworkforce.org/policies/>.

Questions regarding CWP's WIOA Adult and Dislocated Worker Supportive Services policies should be addressed to Shelly Henderson, CWP's One-Stop Services Manager, at SHenderson@capitalworkforce.org.

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A. Purpose

To provide policy and procedures for the provision of supportive services that are necessary to enable individuals to participate in activities authorized under WIOA. (WIOA sections 3(59) and 134(d)(2) and (3)).

B. Policy

1. Eligibility for Supportive Services (20 CFR §680.910)

Supportive services are only provided to individuals who are:

- a. Certified WIOA eligible, and
- b. Participating in career or training services as defined by WIOA section 134(c)(2) and (3), and
- c. Unable to obtain supportive services through other programs providing such services, and
- d. Compliant with program policies during the applicable period of enrollment.

2. Assessment (CTDOL WIOA Policy Manual)

The results of an objective assessment are used to determine if supportive services are necessary to enable an individual to participate in career or training services. The assessment identifies any barriers that the participant might have to successfully accessing training or accepting or retaining employment and it establishes whether the participant is eligible for, and able to obtain, supportive services from any other source. The results of the assessment are documented in the participant's record.

3. Type of Supportive Services Allowed (20 CFR §680.900)

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

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

A request to authorize payment for any supportive service not on the list above must be submitted to the CWP One-Stop Services Manager for approval. Note: Needs-related payments or payments for basic needs as defined in 20 CFR §680.930 are not authorized under this policy.

4. Parameters of Supportive Services Payment Issuance (CTDOL Policy Manual)

- a. Supportive services must be provided equitably; e.g. supportive services must be made available to all eligible participants in accordance with this policy and these parameters.
- b. Supportive services issuance must be approved by AJC supervisor or manager prior to issuance.

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- c. Supportive services may be provided either directly to, or on behalf of, participants as necessary to reduce or eradicate barriers to obtaining or retaining employment and/or maintaining training participation.
- d. The participant may request that the payment be issued later but may not claim a retroactive payment.
- e. The amount of a supportive service payment must be determined based on the actual cost of the service or item, or a reasonable estimate based on available information.
- f. No further payments are issued if the participant fails to participate without good cause.
- g. The total amount of supportive services per individual participant shall not exceed \$5,000 per period of WIOA enrollment. (20 CFR §680.920)
- h. Follow-up career services do not qualify for the receipt of supportive services. An individual who is only receiving follow-up services may not receive supportive services. (TEGL 19-16)
- i. Issuance of supportive services payments is subject to fund availability.

C. Procedures for Supportive Services Issuance

1. Assessment of Need and Resources to Address Need

If after conducting an objective assessment and/or during participation in program activities, a barrier to participation in career or training activities becomes apparent, AJC staff explore the availability of local resources to resolve the barrier to participation. Local resources include services available through one-stop partners and community services. A description of the barrier and how it prevents participation in career and training activities, or the acceptance of employment, is documented in the case notes section of the participant's record. The exploration of one-stop and community resources to address the barriers is also documented case notes in the participant's record.

2. Requesting Supportive Services

If after exploring all available resources the barrier to participation is not resolved, AJC staff request a supportive service that will resolve the barrier and allow the individual to participate in career or training activities. AJC staff request supportive services by completing the Supportive Service Request Form (signed by both the participant and AJC staff submitting the request) and submitting it to their supervisor for consideration and approval. The request for supportive services is documented in the case notes section of the participant's record and the Supportive Services Request form is uploaded to the participant's record.

3. Review and Approval

The Supportive Services Request form is reviewed by the Director, Manager or Supervisor for compliance with this policy to confirm that the participant is eligible for the supportive service, the need for the supportive service is documented in the assessment, the item or service is allowable, and that the cost is properly determined. All approved, signed documents are uploaded to the case file.

4. Method of Issuance

Supportive services are issued by one of the following methods

a. Purchase of item or service by AJC staff (Preferred method of issuance):

Once the request is approved, the designated AJC staff purchases the item or service directly

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from a vendor. Supportive service items purchased via the internet or phone order are delivered directly to the participant's residence. If delivery to the participant's residence is not an option, the item is delivered to the AJC. Documentation of the purchase (invoice/receipt) and electronic notification of delivery is uploaded to the participant's record. The purchase is recorded in the case notes section of the participant's record.

b. Check to merchant or service provider

Once the request is approved, the AJC staff submits a written request to AJC provider's finance staff to issue a check to the merchant or service provider following local procedures. The request to finance must include the following details:

- i. Name of the participant,
- ii. Name of the merchant or service provider,
- iii. Fund source,
- iv. Purpose of the supportive services,
- v. Amount of payment, and
- vi. Date payment is required.

A copy of the approved Supportive Services Request is included with the request for check issuance.

c. Reimbursement check to participant

Once the request is approved, the AJC staff submits a written request to AJC provider's finance staff to issue a check to the participant for reimbursement for approved support services according to local procedures. The request to finance must include the following details:

- i. Name of the participant,
- ii. Description of the purchased item or service,
- iii. Purpose of the purchase,
- iv. Fund source, and
- v. Amount and date of the purchase.

A copy of the receipt for the item or service and the approved Supportive Services Request is included with the request for check issuance.

d. Merchant gift card (physical card or e-gift card):

Once the request is approved, the gift-card is issued to a participant and details of the gift card issuance are listed on the supportive services log which is signed by the participant. If issuance is an emailed e-gift card, the AJC staff confirms receipt of the gift card through email with the participant. A copy of the issuing email and the participant's email confirming receipt are saved to the participant's record. *Note: Pre-paid debit card (e.g. American Express or Visa) are not used as a method to pay for supportive services.*

5. Documentation

a. Documentation of Need

The need for the supportive service is documented in the participant's Individual Employment Plan (IEP) and case notes. The documentation of need includes a description of the following:

- i. Results of the assessment describing the need,
- ii. Career and/or training activities assigned or the potential employment opportunity,
- iii. Results of the exploration of other available resources,
- iv. Description of the barrier that necessitates the supportive service,

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- v. Description of how the supportive service will address the specific need, and
- vi. Approved Supportive Services Request form signed by the participant and the AJC staff.
- b. Documentation of Amount

The basis used to determine the amount of the payment is documented using one of the following options and attached to the Supportive Services Request form:

 - i. Actual cost shown on a bill, invoice, order form or product description with price;
 - ii. Estimated cost based on examples of similar services or items from websites or catalogues;
 - iii. For gas cards, the standard amount is \$25 per week. Should a participant request a higher amount, the calculation must be documented as follows:
[estimated miles to be driven] ÷ [miles per gallon] x [price per gallon].
- c. Documentation of Review and Approval

The Director, Manager or Supervisor signs the Supportive Services Request form to document review and approval. The signed form is uploaded to case file.
- d. Documentation of Supportive Services Issuance

A description of the supportive services issuance is documented in case notes and included on the supportive services log. The description in case notes and the supportive services log includes:

 - i. Method of issuance (i.e., online order, gift card, or check),
 - ii. Name of the recipient (merchant, service provider or participant),
 - iii. Amount of the issuance,
 - iv. Order number, check number or gift card id number, and
 - v. Date of issuance.

The supportive service log also includes the participant's name, case number and signature as well as the AJC staff's signature. If issued via online order or an e-gift card and the participant's signature cannot be obtained on the supportive services log, a copy of the notification of delivery and a copy of an email from the participant confirming receipt is attached to the supportive services log.

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- v. Description of how the supportive service will address the specific need, and
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