

CWP Policy/Procedure Transmittal

Policy and Procedures Transmittal Number: 23-02

Effective Date: February 1, 2023

To: CWP Staff and Subrecipient Staff

From: Julie Watson, Compliance & Accountability Administrator



Issue Date: January 17, 2023

Subject: WIOA Adult and Dislocated Worker Supportive Services Policy Revision

With this transmittal, CWP is issuing revised WIOA Adult and Dislocated Worker Supportive Services policies. These policy revisions reflect changes in CTDOL's Supportive Services policy issued in October 2022. The most significant changes are the provision of assistance with expenses related to obtaining WIOA eligibility documentation and examples of supportive services by category.

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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Subject: Supportive Services	Effective Date: 02/01/23	

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 Section 36 3.c)

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 Individual Employment Plan (IEP).

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
- k. Payments and fees for employment and training-related applications, tests, and certifications
- l. Assistance with expenses related to obtaining required WIOA eligibility documentation during the enrollment process, see Section B.4 of this policy for criteria and limitations (CTDOL WIOA Policy Manual Section 36 3.g)

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.

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4. Assistance with Obtaining Program Eligibility Documentation (CTDOL WIOA Policy Manual Section 36 4.b)
 - a. Supportive Services can be used to pay for the expenses related to obtaining required WIOA eligibility documentation as long as the participant is otherwise eligible and self-attests to program eligibility pending receipt of documentation. If it is determined that an applicant, who appears to be otherwise eligible, does not have the resources to obtain the required documentation, the applicant may self-attest to the required eligibility factor and be certified based on the self-attestation. Once they are certified, supportive services payments can be used to assist with obtaining the documentation.
 - b. Eligibility elements that require documentation (the use of self-attestation is only temporary until documentation is obtained) include:
 - i. U.S. Citizenship or authorization to work in the United States
 - ii. Social Security Number
 - iii. Age
 - iv. Selective Service Registration
 - v. Other categories as deemed necessary where self-attestation is not acceptable by CT DOL or under federal law
 - a. Participants are provided with a deadline, not to exceed 30 days, to submit the required documentation. Program provider staff assist the participant to obtain the documentation, to the extent possible. Documentation of required eligibility elements must be obtained prior to enrollment in training and/or program exit.
 - b. If eligibility documentation proves the individual is ineligible for WIOA or if the documentation is not acquired before the exit date, CWP is notified immediately.
5. Parameters of Supportive Services Payment Issuance (CTDOL Policy Manual Section 36)
 - a. Supportive services must be provided equitably, i.e., 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.
 - 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, to maintain training participation and/or to obtain required eligibility documentation, if certified eligible based on self-attestation.
 - 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.
 - j. Participant's self-disclosure or declaration of expenses without documentation is not allowable.

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C. Examples of Supportive Services by Category

Examples of supportive services by category may include but are not limited to the following:

1. Linkages to community services
 - a. Referrals to State and Federal public assistance programs
 - b. Food pantries and soup kitchens
 - c. Homeless shelters
 - d. Substance abuse/addiction counseling
 - e. Domestic violence intervention
 - f. Parenting resources
 - g. Clothing assistance
 - h. Free and low-cost medical services
 - i. Legal aid services

2. Assistance with transportation
 - a. Mileage reimbursement
 - b. Parking passes or reimbursements for parking costs
 - c. Car liability insurance
 - d. Vehicle registration fees
 - e. Driver license fees
 - f. Access to public transit (e.g. bus passes)
 - g. Purchase of a bicycle
 - h. Payment towards vehicle repairs

Note: WIOA funds may not be used for foreign travel or for fines or penalties.

3. Assistance with child care and dependent care
 - a. Help with identifying child care options as documented through detailed case notes, a statement from the participant and/or screen-shots from 211 Child Care search tool and/or other evidence from child care providers regarding the lack of available.
 - b. Payments towards the costs of child care with the following conditions:
 - i. No other resources are available to help pay for child care as documented through detailed case notes, a statement from the participant and/or other evidence from child care providers regarding the lack of affordable child care.
 - ii. Child care is provided by a licensed child care provider.
 - iii. Participant continues to attend career services, training or employment-related activities

4. Assistance with housing
 - a. Help identifying emergency housing options
 - b. Financial assistance towards rent or a mortgage
 - c. Financial assistance towards utilities

5. Assistance with educational testing
 - a. Tutoring
 - b. Payment of test-related fees
 - c. Test preparation workbooks and other study aids

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6. Reasonable accommodations for individuals with disabilities
 - a. Assessments for learning disabilities
 - b. Funding of assistive technology/equipment and ASL interpreters
 - c. Funding for foreign-language interpreters to accompany participants to job interviews
 - d. Help securing accommodations from a training provider or employer

7. Legal aid services – referral for and costs associated with but not limited to:
 - a. Reinstatement of an individual’s driver’s license
 - b. Expungement or sealing an individual’s criminal records
 - c. Request for accommodations
 - d. Credit, debt and housing issues
 - e. Civil matters related to domestic violence, sexual abuse, retraining orders and injunctions for at risk individuals
 - f. Civil matters related to child support and child custody

8. Assistance with uniforms or other appropriate work attire and work-related tools
 - a. Eyeglasses
 - b. Protective eye gear, steel toed footwear and other safety equipment
 - c. Uniforms or clothing suitable for work or interviews

9. Assistance with school and training supplies
 - a. Hard copy and electronic text books
 - b. Laptops and other devices and software needed for training
 - c. School fees above and beyond tuition (e.g., application fees, per-credit fees, online course fees, campus parking fees)
 - d. School supplies and other necessary items for students enrolled in postsecondary education classes

Note: These fees are not considered training costs under WIOA so they are charged to supportive services.

10. Payments and fees for related to employment and training
 - a. Employment-related applications, tests and certification exams
 - b. Fees required by employer or training provider for drug testing, medical exams, fingerprinting, vision exams, etc.
 - c. License issuance and license renewal fees

11. Assistance with expenses related to obtaining required WIOA eligibility documentation during the enrollment process, see Section B.4 of this policy for criteria and limitations (CTDOL WIOA Policy Manual Section 36 3.g)

D. 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

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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 in the case notes section of the participant's record. See Policy 3-15 Barriers – Documentation and Recording and section 6 of this policy for more instructions on recording and documenting barriers.

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. See Policy 3-15 Barriers – Documentation and Recording and section 6 of this policy for more instructions on recording and documenting barriers.

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 payments 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 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
- vi. Date payment is required

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

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- 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
 - v. Amount and date of the purchaseA 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. If applicable, the documentation required to determine eligibility
 - iii. Career and/or training activities assigned or the potential employment opportunity
 - iv. Results of the exploration of other available resources
 - v. Description of the barrier that necessitates the supportive service
 - vi. Description of how the supportive service will address the specific need
- 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:
$$[\text{estimated miles to be driven}] \div [\text{miles per gallon}] \times [\text{price per gallon}].$$
- 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

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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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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)

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- a. Certified WIOA eligible, and
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- 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 Section 36 3.c)

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 Individual Employment Plan (IEP).

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
- k. Payments and fees for employment and training-related applications, tests, and certifications
- l. Assistance with expenses related to obtaining required WIOA eligibility documentation during the enrollment process, see Section B.4 of this policy for criteria and limitations (CTDOL WIOA Policy Manual Section 36 3.g)

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.

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4. Assistance with Obtaining Program Eligibility Documentation (CTDOL WIOA Policy Manual Section 36 4.b)
 - a. Supportive Services can be used to pay for the expenses related to obtaining required WIOA eligibility documentation as long as the participant is otherwise eligible and self-attests to program eligibility pending receipt of documentation. If it is determined that an applicant, who appears to be otherwise eligible, does not have the resources to obtain the required documentation, the applicant may self-attest to the required eligibility factor and be certified based on the self-attestation. Once they are certified, supportive services payments can be used to assist with obtaining the documentation.
 - b. Eligibility elements that require documentation (the use of self-attestation is only temporary until documentation is obtained) include:
 - i. U.S. Citizenship or authorization to work in the United States
 - ii. Social Security Number
 - iii. Age
 - iv. Selective Service Registration
 - v. Other categories as deemed necessary where self-attestation is not acceptable by CT DOL or under federal law
 - a. Participants are provided with a deadline, not to exceed 30 days, to submit the required documentation. Program provider staff assist the participant to obtain the documentation, to the extent possible. Documentation of required eligibility elements must be obtained prior to enrollment in training and/or program exit.
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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, to maintain training participation and/or to obtain required eligibility documentation, if certified eligible based on self-attestation.
 - 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.
 - j. Participant's self-disclosure or declaration of expenses without documentation is not allowable.

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C. Examples of Supportive Services by Category

Examples of supportive services by category may include but are not limited to the following:

1. Linkages to community services
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2. Assistance with transportation
 - a. Mileage reimbursement
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Note: WIOA funds may not be used for foreign travel or for fines or penalties.

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 - b. Payments towards the costs of child care with the following conditions:
 - i. No other resources are available to help pay for child care as documented through detailed case notes, a statement from the participant and/or other evidence from child care providers regarding the lack of affordable child care.
 - ii. Child care is provided by a licensed child care provider.
 - iii. Participant continues to attend career services, training or employment-related activities

4. Assistance with housing
 - a. Help identifying emergency housing options
 - b. Financial assistance towards rent or a mortgage
 - c. Financial assistance towards utilities

5. Assistance with educational testing
 - a. Tutoring
 - b. Payment of test-related fees
 - c. Test preparation workbooks and other study aids

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6. Reasonable accommodations for individuals with disabilities
 - a. Assessments for learning disabilities
 - b. Funding of assistive technology/equipment and ASL interpreters
 - c. Funding for foreign-language interpreters to accompany participants to job interviews
 - d. Help securing accommodations from a training provider or employer

7. Legal aid services – referral for and costs associated with but not limited to:
 - a. Reinstatement of an individual’s driver’s license
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8. Assistance with uniforms or other appropriate work attire and work-related tools
 - a. Eyeglasses
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9. Assistance with school and training supplies
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Note: These fees are not considered training costs under WIOA so they are charged to supportive services.

10. Payments and fees for related to employment and training
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 - c. License issuance and license renewal fees

11. Assistance with expenses related to obtaining required WIOA eligibility documentation during the enrollment process, see Section B.4 of this policy for criteria and limitations (CTDOL WIOA Policy Manual Section 36 3.g)

D. Procedures for Supportive Services Issuance

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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 in the case notes section of the participant's record. See Policy 3-15 Barriers – Documentation and Recording and section 6 of this policy for more instructions on recording and documenting barriers.

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. See Policy 3-15 Barriers – Documentation and Recording and section 6 of this policy for more instructions on recording and documenting barriers.

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 payments 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 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
- vi. Date payment is required

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

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- 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
 - v. Amount and date of the purchaseA 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. If applicable, the documentation required to determine eligibility
 - iii. Career and/or training activities assigned or the potential employment opportunity
 - iv. Results of the exploration of other available resources
 - v. Description of the barrier that necessitates the supportive service
 - vi. Description of how the supportive service will address the specific need
- 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:
$$[\text{estimated miles to be driven}] \div [\text{miles per gallon}] \times [\text{price per gallon}].$$
- 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

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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.