

## CWP Policy/Procedure Transmittal

**Policy and Procedures Transmittal Number:** 23-04

**Effective Date:** April 3, 2023

**To:** CWP Staff and Subrecipient Staff

**From:** Julie Watson, Compliance & Accountability Administrator 

**Issue Date:** March 27, 2023

**Subject:** General Supportive Services Policy

With this transmittal, CWP is issuing 2-68 General Supportive Services Policy which addresses the provision of supportive service for all CWP programs other than WIOA and JFES-funded programs. WIOA and JFES-funded programs have supportive services policies that are specific to their program.

In addition to being attached to this transmittal, this policy can be found in CWP's online Policy and Procedures Manual, Section 2 CWP's General Policies and Procedures at <https://capitalworkforce.org/policies/>.

Questions regarding CWP's General Supportive Services Policy should be addressed to Sandy Mackie, CWP Chief Program Officer at [smackie@capitalworkforce.org](mailto:smackie@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 employment and training activities provided by non-WIOA and non-JFES funding.

## B. Policy

### 1. Eligibility for Supportive Services

Supportive services are only provided to individuals who are:

- a. Eligible according to the specific program requirements, and
- b. Participating in program activities, and
- c. Are compliant with program policies during the applicable period of enrollment.

### 2. Assessment

The results of an objective assessment are used to determine if supportive services are necessary to enable an individual to participate in program services/activities. The assessment identifies any barriers that the participant might have that interfere with participation in training or with accepting or retaining employment. The assessment establishes whether the participant is eligible for, and able to obtain, supportive services from any other non-CWP source, if required by funding source. The results of the assessment are documented in the participant's program record.

### 3. Type of Supportive Services Allowed

The type of supportive services allowed depends on the policy of the specific program, grant agreement and/or funder.

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

- a. Linkages to community services
- b. Assistance with transportation
- c. Assistance with childcare and dependent care (must be a licensed provider)
- 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 personal grooming essentials to become work-ready such as personal hygiene products, toiletries and haircuts.
- k. Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes
- l. Payments and fees for employment and training-related applications, tests, and certifications

### 4. Parameters of Supportive Services Payment Issuance

- 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 the program supervisor or manager prior

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- 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.
  - d. The participant may request that the payment be issued later but may not claim a retroactive payment **for a service or item purchased prior to program enrollment.**
  - 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 the limit set forth by the specific program policy, grant agreement and/or funder.
  - h. Issuance of supportive services payments is subject to fund availability.
  - i. Participant's self-disclosure or declaration of expenses without documentation is not allowable.

## 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, program staff explore the availability of local resources to resolve the barrier to participation. A description of the barrier and how it prevents participation in career and training activities, or the acceptance of or retention in employment, is documented in the case notes in the participant's record.

### 2. Requesting Supportive Services Payment

If after exploring all available non-CWP resources, the barrier to participation is not resolved, program staff request a supportive service that will resolve the barrier and allow the individual to participate in career or training activities. Program staff request supportive services by completing a supportive service request, signed by both the participant and program staff person, 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 is saved in the participant's record. See section 5 of this policy for more instructions on recording and documenting barriers.

### 3. Review and Approval

After the request is approved by the supervisor, it is reviewed by program management staff to confirm that the participant is eligible for the supportive service, the assessment was documented, the item or service is allowable, and the cost was properly determined. All approved, signed documents are saved in the participant's record.

### 4. Method of Issuance

Once the request is approved by program management staff, supportive services payments are issued by one of the following methods.

- a. Purchase of item or service by program staff (preferred method of issuance)  
The program staff member purchases the item or service directly from a vendor in accordance with that agency's financial policy and procedures. Supportive service items purchased via the internet or phone order are delivered directly to the participant's

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residence. If delivery to the participant's residence is not an option, the item is delivered to the program location. Documentation of the purchase (invoice/receipt) and/or electronic notification of delivery is saved in 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

A written request for check issuance is submitted to the applicable agency's (CWP or program provider) finance department in accordance with that agency's financial policy and 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. Item/service to be purchased
- v. Purpose of the supportive services
- vi. Amount of payment
- vii. 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

A written request for check issuance to the participant is submitted to the applicable agency's (CWP or program provider) finance department in accordance with that agency's financial policy and procedures.

The request to finance must include the following details:

- i. Name of the participant
- ii. Description of the purchased item or service
- iii. Item/service to be purchased
- iv. Purpose of the purchase
- v. Fund source
- vi. 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):

Program-funded gift cards are purchased in accordance with applicable agency's (CWP or program provider) financial policy and procedures. When gift cards are issued to participants, details of the gift card issuance are included on a supportive services log which is signed by the participant. If issuance is an emailed e-gift card, the 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 record. The documentation of need includes a description of the following:

- i. Results of the assessment describing the need

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- 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:
- 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. **Requests for higher amounts must be approved by the program manager and calculated and 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 program management staff signs the supportive services request to document review and approval. The signed request is saved to the record.
- 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
  - v. Date of issuance
- The supportive service log also includes the participant's name, case number and signature as well as the program staff member'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.