



DWD Issuance 12-2010

Issued: May20, 2011
Effective: May20, 2011

Subject: Statewide Supportive Services Policy

1. Purpose: This Issuance is written to provide guidelines on allowing and paying Supportive Services based on the Workforce Investment Act (WIA).
2. Background: The WIA defines Supportive Services as those services necessary to enable an individual to participate in activities authorized under WIA, Title I. Local Supportive Service policies are developed by the Workforce Investment Board (WIB) and are included within the local plans. These policies must be adhered to for all programs that fall under this Policy. Only one Supportive Service Policy is allowed per region.
3. Substance: The extent of Supportive Services provided will vary based on customer needs and availability of funds and resources. Supportive Services payments are requested individually for specific needs. Supportive Services may include transportation, child care, dependent care, housing, and needs-related payments that are necessary to enable an individual to participate in activities authorized under WIA Title I. The justification for WIA Supportive Service payments must be documented in Toolbox Service Notes.
4. Action: This Policy is effective immediately. Each Region must review the local Supportive Service policy for compliance with this statewide Policy. Any required modifications must be submitted in conjunction with the Planning Budget Summary modification for Program Year 2011/Fiscal Year 2012.
5. Contact: Direct questions or comments regarding this Issuance to the Manager of the Dislocated Worker Programs, Randy Cottrell, at 573.826.8242 or email randy.cottrell@ded.mo.gov.

6. Reference: 20 CFR 663.800 et al.
7. Rescissions: None
8. Attachments: Statewide Supportive Services Policy



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STATEWIDE SUPPORTIVE SERVICES POLICY

Description

The Workforce Investment Act (WIA) defines Supportive Services as those services necessary to enable an individual to participate in activities authorized under WIA, Title I. This Policy provides guidelines for administering Supportive Services based on the WIA. Supportive Services should be made available to assist customers in removing or reducing barriers to participate in WIA activities.

Supportive Services may include transportation, child care, dependent care, needs-related payments, and emergency housing. Assistive technology/equipment may be included in this definition if staff document the customer needs this technology/equipment in order to participate in the WIA activity and are unable to obtain it from other resources. The extent of Supportive Services provided will vary based on the customer's needs and the region's availability of funds and resources.

This Policy applies to:

- Adult and Dislocated Worker programs;
- Youth program;
- National Emergency Grant (NEG); and
- Rapid Response/Additional Assistance.

Supportive Services are only to be provided to customers who:

- Are participating in core, intensive, or training services;
- Are unable to obtain Supportive Services themselves or via their support network;
- Are unable to obtain Supportive Services through other programs including community agencies that provide these services; and
- Demonstrate a need for assistance to enable him/her to participate in Title I activities.

Needs-Based Analysis

Supportive Service payments are requested individually for specific needs. Because WIA programs are not an entitlement, Supportive Service payments are made on a case-by-case basis only when determined necessary and reasonable. Payments should not be made for non-WIA activities or for items that are not necessary for participation in the WIA activity. A statement that a customer “needs” a Supportive Service will not justify the payment of these expenses. (I.e. Customer states he needs brakes. The payment cannot be authorized on this statement alone; but instead, must be related to the WIA activity; based on customer need; and other resources must be sought first.). The service provider’s determination of financial need must be documented at a minimum through Toolbox Service Notes.

The ‘Financial Needs’ tab in Toolbox is a good tool in determining customer need. This tab has a ‘List of Values’ for the types of “Monthly Household Resources” and “Monthly Household Expenditure”. These resources and expenditures are automatically calculated and the “Net Difference” between the two displays. After completion of this information, the form can be printed and given to the customer. (Note: This tab will only help determine customer need, but all other resources must still be considered.)

Due to funding limitations, WIA Supportive Services are the last resort. All other sources of funding must be sought first. All attempts to find other Supportive Service funding and the reasons for needing WIA funding must be documented in Toolbox Service Notes. The availability of community resources will vary by region. The region should keep an up-to-date listing of these resources to make referrals to prior to paying Supportive Services.

Examples of possible community resources:

- Faith-based organizations;
- Non-profit organizations;
- Women’s shelters;
- Clothes closets;
- Pro bono medical, dental, and legal services (may or may not need to be accessed through an organization);
- Government assistance such as: local health departments, WIC, assistive technology reimbursement programs, MO HealthNet, etc.;
- Local transportation programs; and
- Statewide and nationwide organizations such as: United Way, Goodwill, Salvation Army, etc.

Supportive Service Examples:

- Pam states she needs work attire to attend interviews. When reviewing her needs, the staff determined she previously worked in an office setting and has the appropriate attire without paying this through Supportive Services; therefore, it is not appropriate to pay this expense.
- Bill states he needs new tires for his truck to attend class. Staff reviewed his need and determined that Bill's budget allows for him to pay these expenses himself as he is currently employed and has discretionary income; therefore, it is not appropriate to pay this expense.
- Jill states she needs scrubs for her nursing program. Staff reviewed her need and determined there are no other community resources and her budget does not allow for the expenses; therefore, it may be appropriate to pay this expense.
- Tom states he needs mileage reimbursement to attend class. Staff reviewed his need and determined there are other community resources to pay for this expense; therefore, it is not appropriate to pay this expense.
- John states he needs childcare to attend class. Staff reviewed his need and determined a portion of childcare is not paid for through federally funded childcare; therefore, it may be appropriate to pay this expense.
- Mark states he needs mileage reimbursement to attend training. Staff reviewed his need and determined he currently rides with a family member who does not ask for reimbursement; therefore, it is not appropriate to pay this expense.
- Jane states she needs new brakes for school. Staff reviewed her need and determined she only takes online classes, so this expense is not directly related to her training; therefore, it is not appropriate to pay this expense.
- Bob states he needs steel-toed work boots to attend training. Staff reviewed his need and determined his budget does not allow for this and there are no other resources to cover the cost, therefore; it may be appropriate to pay this expense.
- Mary states she needs childcare to attend class. Staff reviewed her need and determined the childcare is completely paid for through federally funded childcare; therefore, it is not appropriate to pay this expense.

Employment Plan (EP)

The EP is an ongoing strategy jointly developed by the customer and staff that identifies the customer's employment goals; the appropriate achievement objective(s); and the appropriate combination of services to achieve the employment goals. The Supportive Service(s) must be necessary for the customer to achieve the goals outlined in the EP. Therefore, it is imperative the goals listed on the EP are consistent with what the customer intends to achieve.

Examples:

- The EP goal is to become a welder. It would not be appropriate to pay for daycare for the customer to attend computer classes.
- The EP goal is to become an RN. It may be appropriate to pay for scrubs if the needs-based analysis is met.

Transportation

The Internal Revenue Service (IRS) mileage reimbursement includes direct and indirect vehicle expenses. Therefore, if the region is paying full IRS mileage reimbursement, no other vehicle expenses and/or mileage can be paid. If the region pays less than full IRS mileage, repairs may be paid if determined by staff to be reasonable and necessary.

Needs-Related Payments

Needs-related payments can be provided to Adults and Dislocated Workers to enable them to participate in training; and may also be provided to a customer who will begin a training program within thirty (30) calendar days. The law does not include needs-related payments in the list of Supportive Services that an eligible Youth can receive. An Older Youth (eighteen (18) years or older) who is enrolled in training and has been determined to be in need of a needs-related payment(s), should be enrolled in the WIA Adult program in order to receive the payments.

Eligibility requirements for Adults:

- Must be unemployed;
- Not qualify for, or ceased qualifying for Unemployment Insurance (UI) compensation; and
- Be enrolled in an eligible WIA training service.

Eligibility requirements for Dislocated Workers:

- Must be unemployed;
- Not qualify for, or ceased qualifying for UI compensation or Trade Readjustment Allowance under Trade Adjustment Assistance; and
- Be enrolled in an eligible WIA training service by:
 - The end of the thirteenth (13th) week after the most recent layoff that resulted in unemployment; or
 - After the thirteenth (13th) week, but by the end of the eighth (8th) week after being informed the short-term layoff will exceed six (6) months.

Needs-related payments cannot exceed the applicable weekly level of UI compensation. If the customer didn't qualify for UI compensation then the payment cannot exceed the poverty line which is adjusted to show changes in total family income. The actual amount of the payments is based on each region's local Supportive Service Plan.

Emergency Aid

Emergency Aid is a one time or rare expense paid to allow a customer to continue participating in WIA activities such as school, work experience, OJT, etc. If the customer is having extreme financial difficulty, staff should be assisting him/her with needed financial information (development of a budget, credit counseling, debt management, etc.). Emergency aid payments must be well documented in Service Notes. If there is confidential information, Service Notes should refer to the "hard" file.

Examples include:

- Payment of utility bills (electric, water, heating, etc.);
- A car insurance payment;
- A rent payment; and
- Vehicle repairs when full IRS mileage was paid **only** in cases where it is absolutely necessary to allow participation in WIA activities.

As with all other WIA funding, all other options should be sought first. For example, heating and cooling assistance could be pursued through resources such as: Low Income Home Energy Assistance Program (LIHEAP), Salvation Army's "Heat Share", local programs (e.g., Ameren UE's "Dollar More," Kansas City Power & Light's "Dollar Aide," etc.), and faith-based organizations. Rent assistance could possibly be obtained through the U.S. Department of Housing and Urban Development (HUD). The resources available for assistance will vary depending on the region.

Trade Act Funding

If a customer is enrolled in Trade Act, this funding source must be utilized prior to WIA funding. If the customer needs resources not covered by Trade Act, local policy should be followed to provide these wrap-around services.

For example:

- The customer is enrolled in Trade Act and WIA. The customer is attending Trade Act approved training. If the customer travels more than 50 miles one-way between their residence and a training facility, Trade Act allows for transportation reimbursement of \$0.50 a mile with a maximum payment of \$57 a day. The customer travels 100 miles and is in Trade Act approved training; therefore, the

transportation reimbursement is \$50 (100 miles @ \$0.50). Local WIA funding is not used since Trade Act already reimbursed the full mileage.

- The customer is enrolled in Trade Act, WIA, and a NEG. The customer travels 35 miles one-way; therefore, Trade Act will not pay this expense. Local WIA policy allows for reimbursement of \$0.25 a mile up to 100 miles. If all of the stipulations of the Policy are met, WIA would then pay \$17.50 (70 miles @ \$0.25).

National Emergency Grant (NEG)

NEGs provide supplemental dislocated worker funds to respond to the needs of dislocated workers and communities affected by major economic dislocation events which cannot be met with formula allotments. Since NEGs serve a specific layoff or group of related layoffs, only one Supportive Service Policy is allowed per NEG. Therefore, if there are multiple regions within the same NEG, the regions must submit only one Supportive Service Policy that is based upon the combined policies of affected local areas to ensure equitable services. This Policy is as an attachment to other planning documents during the “Project Planning Period” of the NEG.

Pell Grant

DWD Issuance 12-1999 addresses the “Coordination of all Workforce Investment Act (WIA) Title I-B programs with programs under Title IV of the Higher Education Act including the Pell Grant Program.” This Issuance should be adhered to when determining funding including Supportive Services.

Highlights of the Issuance include:

- Duplicate payments must be avoided when the customer is eligible for both WIA and other assistance.
- The mix of funds should meet the needs of the customer and be determined based on the availability of funding for either training costs or Supportive Services so that the training can be completed successfully.
- Simply reducing the amount of WIA funds by the amount of Pell Grant funds is not permitted.

Toolbox Service Notes

All Supportive Services must be documented in Toolbox and include at a minimum all of the following:

- The type of Supportive Service paid (e.g., transportation, childcare, etc.);
- The amount of Supportive Service paid;

- The timeframe the Supportive Service was paid for;
- The justification of need for the Supportive Service; and
- Lack of other community resources.

In all cases, staff must review Service Notes prior to making any Supportive Service payments to avoid duplicate payments.

Responsibilities

It is the responsibility of staff to provide accurate information to the customer including:

- If supportive services are requested or determined necessary, if he/she is eligible;
- If he/she has is no longer eligible to receive the supportive service for any reason (i.e. cap met, no longer has a need, etc.); and
- The requirements (e.g., paperwork, attending classes, etc.) to receive the Supportive Services.

Local Plans

Regional Supportive Service policies are developed by the local Workforce Investment Board (WIB) and are included within the local plans. These local policies must be adhered to for all programs that fall under this Policy. Only one Supportive Service Policy is allowed per region.

The region's local plan must include all of the following information:

- Types of Supportive Services available to customers. These services can only be provided after it is proven necessary to enable him/her to participate in WIA funded activities.

Examples:

- Work attire or uniforms;
 - Work-related tools;
 - Testing fees;
 - Transportation;
 - Child care and dependent care;
 - Linkages to community services;
 - Emergency housing; and
 - Referrals to medical services.
- Documentation the customer must submit when requesting Supportive Service(s).

- If the region chooses to cap specific supportive services, the length of time and maximum dollar amount for each Supportive Service must be listed (i.e., Childcare is capped at \$XXX for each calendar year. Transportation is capped at \$XXX for the previous X months.)
- Length of time and maximum dollar amount for all Supportive Services (i.e. The cap for all Supportive Services per customer per calendar year is \$XXX.).
- Procedures on paying supportive services beyond the capped amounts, which must include a statement that written justification from the customer is required prior to making the payment.
- Mileage reimbursement calculation (i.e. \$0.XX a mile up to XX miles). If this reimbursement is the full IRS mileage, a statement must be included that no repairs can be paid.
- Procedures on how the region will pay Supportive Services for individuals who have accessed Supportive Services from another region(s) (i.e., Staff will review the customer's Supportive Service payments in Toolbox. All Supportive Service payments will be calculated prior to authorizing additional funding, regardless of the Region making the payments.).
- Statement that Supportive Services are based upon individual need and all of the individual's resources must be considered prior to making these payment(s).
- Statement on documenting all Supportive Service payments in Toolbox.
- If the region chooses not to pay for all core, intensive, and training services, a listing of WIA Services that are eligible for Supportive Services.
- Information on how the region is utilizing community resources including faith-based organizations prior to using WIA funding.
- Reference to this Policy or incorporate this Policy within the local policy.