



IMPERIAL COUNTY WORKFORCE DEVELOPMENT BOARD

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POLICY	ORIGINAL DATE	LAST REVISION
ICWED Supportive Services Policy	FISCAL YEAR 2014-2015	December 14, 2022

POLICY OVERVIEW:

The purpose of this policy is to provide guidelines and criteria to be used by the Imperial County Workforce Development Board (ICWDB), Imperial County Workforce and Economic Development (ICWED), America's Job Center of California (AJCC) staff, and Workforce Innovation and Opportunity Act (WIOA) Title I funded service providers in the administration of supportive services for current WIOA eligible adult, dislocated worker and youth participants residing in Imperial County.

REFERENCES:

- WIOA Section 3 (59), Definition of Supportive Services
- WIOA Section 134 (c) (2), Required Local Employment and Training Activities
- WIOA Section 134 (d) (2) and (3), Permissible Local Employment & Training Activities
- WIOA Section 129(a)(c), Use of Funds for Youth Workforce Investment Activities
- Training and Employment Guidance Letter (TEGL) 19-16, Section 14
- Training and Employment Guidance Letter (TEGL) 21-16, Section 7
- 20 CFR: Part 663 Subpart H for Adults and Dislocated Workers
- 20 CFR Part 680 - ADULT AND DISLOCATED WORKER ACTIVITIES UNDER TITLE I OF THE WORKFORCE INNOVATION AND OPPORTUNITY ACT

BACKGROUND:

The WIOA provides program guidelines for supportive services for WIOA eligible adults, dislocated workers and youth participants. The term "Supportive Services" refers to financial or physical accommodations that are reasonably necessary, and/or required, in order for an individual to participate in activities authorized under WIOA Title I. Supportive services are provided to eligible WIOA adults, dislocated workers, and youth in order to remove barriers and help participants reach employment and training goals.

DEFINITIONS:

For the purpose of this policy, the following definitions apply:

Self-Attestation: Self-attestation, also referred to as a participant statement, occurs when a participant states their status for a particular data element, such as identifying as low-income, and then signs and dates a form acknowledging this status.

POLICY:

Supportive services for eligible adults, dislocated workers and youth are defined in WIOA Section 3 (59) and 134 (c) (2) and (3). Supportive services are provided to address a participant's needs or barriers as identified during the initial and on-going individual assessment process, and may include services such as transportation, child care, eldercare, dependent care, housing, and needs-related payments that are necessary to enable an individual to participate in activities authorized under WIOA Title I.

This WIOA Title I financially assisted program or activity is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.

The availability of and referral to supportive services must be made available to adults and dislocated workers through America's Job Centers and is a required Youth Program element to be made available based upon demonstrated need. All efforts to secure supportive services from other sources must be exhausted by the participant and documented in the participant's case file before expending WIOA funds.

WIOA Title I supportive services are only to be provided when they are determined necessary, reasonable, and allowable. The need for supportive services must be based on an objective assessment and described and justified when developing an Individual Employment Plan (IEP) for adults and an Individual Development Plan (IDP) for youth. Therefore, a thorough understanding of the resources and services available from other agencies is essential in providing supportive services with WIOA funds. ***Under no circumstances should a participant be denied supportive services without the documented concurrence of an America's Job Center Site Supervisor.***

ELIGIBILITY FOR SUPPORTIVE SERVICES:

Priority of service status is established at the time of eligibility determination and does not change during the period of participation.

Eligibility to receive supportive services will coincide with the following criteria;

- Participating in programs with activities authorized under WIOA
- The inability to obtain supportive services through other programs providing such services

Non-WIOA funded programs may have different support service guidelines than those listed above. In these instances, funding specific grant guidelines should be followed.

Supportive Services may only be provided when they are necessary to enable individuals to participate in career services or training services. In order to be considered to receive supportive services, a Supportive Services Request Form (see ATTACHMENT 1) must be properly completed by the participant and a service provider Case Manager (CM), or an ICWED Client Service Specialist (CSS).

The general requirements for Supportive Service Payments include the following:

- All requested expenditures must be supported by an itemized invoice for the approved supportive services. All such documentation will be retained both at the service provider level and the ICWED Fiscal Department. Receipts must be submitted within thirty (30) days of purchase
- Determination of needed supportive services on behalf of a participant must include documentation regarding the reasonableness of the specific supportive service and its associated costs determination
- ICWED CSS/CM staff must coordinate with the participant regarding receipt of the approved supportive service and associated reimbursement for the supportive service
- Supportive services payment for mileage will coincide with the current Internal Revenue Service (IRS) authorized per mile rate. This reimbursement rate will be updated as the IRS rate changes
- Supportive services payments made on behalf of, or directly to, a participant must have written approval by CM/CSS supervisory staff. The written approval must denote the specific service to be provided and the amount to be expended

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- Supporting documentation must be retained in each participant's file with assessment of need in case notes and IEP for participants in Adult and Dislocated Worker programs and ISS for participants in Youth Programs
- Service providers must implement a supportive services tracking log to ensure adequate safeguards are in place, prior to the payment of all supportive service, and
- CM/CSS shall ensure that case notes regarding supportive services received are entered in CalJOBS within three (3) working days from the date of service

Self-attestation, as a documentation source, will be an acceptable method of verification only when the preferred options of paper documentation or third party corroboration are not available, or in the event of a local, state or federal emergency declaration. Self-attestation is not to be used as the primary method of gathering documentation to verify data elements.

In the event of a local, state, or federal emergency declaration, necessary documentation can be obtained through self-attestation by verbal verification. If physical documents are not available, a photo or digital document can be accepted, if a form of identification is provided. The participant then must provide a signed copy of the Self Attestation Form to America's Job Center of California staff. Staff members are responsible for documenting the Self-Attestation form and the date of enrollment.

Under emergency situations, a digital signature is considered a valid signature. The client's original/digital signature on their program application will be validated by the site supervisor and all additional documentation. The site supervisor will be required to initial all applicable forms confirming the individual's signature is valid.

INDIVIDUAL SUPPORTIVE SERVICE LIMITS:

Supportive services are contingent upon funding availability and approval of request. Eligible WIOA participants are may qualify to receive a **lifetime maximum limit of \$2,000**. The maximum lifetime limit may be exceeded only on a case by case basis based upon a documented needs assessment and approval by the ICWED Director.

Additionally, participants who are enrolled an Individual Training Account (ITA) training service may qualify to receive an additional **\$500** in supportive services upon completion of their training program. The purpose of these expenses are to be used towards equipment to assist with work readiness and retention. (These funds are also based on available funding for the program year)

ADULT AND DISLOCATED WORKERS:

Supportive services categories for WIOA eligible adults and dislocated workers are outlined in the Allowable Supportive Services List (see ATTACHMENT 1) and include the following:

1. Transportation

Transportation is not subject to supportive services lifetime limits. Expenses may be provided to adults and dislocated workers when transportation assistance is needed for participation in WIOA activities, including employment activities such as OJT and Customized Training. Transportation expenses for eligible WIOA participants, *including round trip expenses to and from a childcare provider*, are authorized but limited to usual and customary public/community transportation, such as bus line, or on a mileage reimbursement basis.

Bus tokens are available to participants in order to engage in career services and Individualized Career Services. It is the responsibility of the America's Job Center of California (AJCC) to determine if a participant is in need of transportation assistance in order to access an America's Job Center or training

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site. This supportive service is made available in order to assist all participants, including youth participating in Youth Programs or services, in accessing the AJCC or training facilities.

Gasoline/mileage assistance is provided to participants who use a vehicle registered to the participant or immediate family (spouse, domestic partner, parent, child, brother, sister, in-laws, uncle, aunt, nephew, niece, first cousin, step-parent, step-child) member. If a privately owned vehicle is used, the participant must provide a valid driver's license, proof of vehicle registration, proof of financial responsibility (insurance). If the participant makes use of another individual's vehicle, written authorization must be provided.

Continued documentation must demonstrate an ongoing need for transportation services. Supportive services for transportation may continue to assist a participant in retaining employment no longer than the point of exit from the program.

2. Housing

Only under extraordinary circumstances may supportive services be used to pay for housing. Extraordinary circumstances may include a WIOA participant who has been confronted with a property owner's/landlord's notice of eviction or by a complaint filed in the appropriate jurisdiction of a local court of law. Funds may only be used to pay monthly rental costs and not for the purpose of being applied toward the purchase of a residence owned by the WIOA participant.

3. Ancillary Expenses

Ancillary expenses shall be costs necessary to attend WIOA activities which include, but are not limited to, books, tools, clothing, background checks, testing fees, application fees, drug tests and other costs necessary to attend and/or participate in an approved training activity that is not otherwise included in the total cost of the program. An ancillary expense may also include those costs directly related to obtaining employment, including expenses related to a condition of employment and/or expenses for the purpose of interviewing for an employment position (i.e. hygiene, clothing, employment related physical or eye exam, tests for communicable diseases, safety or eye glasses, etc.)

4. Child Care Assistance

Child care expenses will **not** be included in the lifetime limits and will be calculated separately. Participants with children 12 years or younger are eligible for child care when it is determined other funding sources, including but not limited to CalWORKS, are not available to pay for such services. Child care for children over the age of 12 years will be considered if the child is physically or mentally incapable of caring for themselves. The need for child care must be verified and documented by AJCC staff. Child care for multiple children is available, as long as the need is present and documented by AJCC staff.

If the participant spouse or significant other is not working, looking for work, or in a training program, child care will not be authorized. This does not include circumstances where the spouse of significant other is incapacitated or has special needs.

Types of allowable child care include: Child Care Centers, Family Child Care Homes, and TrustLined/Relative care. Payments for child care may not exceed the Regional Market Rate Ceilings for subsidized child care (<http://www3.cde.ca.gov/rcsc/index.aspx>). Participants must explore licensed Child Care Centers and Family Child Care Homes before TrustLined/Relatives can be considered. Information regarding licensed child care facilities can be found at <https://www.icoe.org>. If licensed child care is not immediately available, TrustLined/Relatives must be explored as an option. The selection of

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safe and adequate child care providers is the sole responsibility of the parent or guardian of the child in need.

5. Needs-Related Payments

WIOA allows for needs-related payments to provide financial assistance to participants for the purpose of enabling them to participate in training as a supportive service. Unlike other supportive services, to qualify for needs-related payments, a participant must be enrolled in training services.

Adult Eligibility for Needs-Related Payments:

In order for adults to qualify for needs-related payments, the participant must be:

- a. 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 Worker Eligibility for Needs-Related Payments

In order for dislocated workers to qualify for needs-related payments, the participant must be:

- a. Unemployed, and:
 1. Have ceased to qualify for unemployment compensation or trade readjustment allowance under TAA, and
 2. Be enrolled in a training service 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. Unemployed and ineligible for unemployment compensation or trade readjustment assistance under TAA, and be enrolled in a program of [training services](#) under [WIOA](#) sec. 134(c)(3).

The level of needs-related payments shall not exceed:

1. The applicable level of unemployment compensation for dislocated worker, or
2. If the worker did not qualify for unemployment compensation, an amount equal to the poverty line, for an equivalent period, which amount shall be adjusted to reflect changes in total family income

*For needs-related payments, the assessment and IEP will be re-assessed at a minimum of every 60 days to accommodate any changes in an individual's financial status.

6. Supportive Services upon Completion of Training Program

Additional supportive services are available to individuals who have completed an ITA training service. Upon completion of the training program, participants are entitled to up to \$500 in supportive services to assist participants with work readiness. Work readiness equipment includes, but is not limited to, clothing, uniform, shoes, tools, safety equipment, laptop, and/or any work equipment/costs in order to assist an individual with retaining employment.

YOUTH:

Supportive services is one of the fourteen WIOA services elements that must be made available to eligible youth based on each participant's assessment and Individual Development Plan (IDP). The standards to authorize supportive services for youth shall not vary from those for adults and dislocated workers. These supportive services also include, but are not limited to, the following:

- a. Linkages to community services;
- b. Assistance with transportation;

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- c. Assistance with housing;
- d. Referrals to medical services; including eye glasses;
- e. Assistance with uniforms and protective gear;
- f. Child care assistance; and
- g. Other appropriate WIOA activities.

All youth participants must receive follow-up services for a minimum duration of 12 months after program exit. Follow-up services include supportive services, and continued necessary documentation must be maintained and demonstrate an ongoing need for services.

In the event that an eligible youth is co-enrolled in an adult program, supportive services may be provided under the WIOA adult program.

MONITORING:

ICWED is responsible for ensuring oversight of the WIOA Title I funded programs. Monitoring shall take place by means of on-site visits to America's Job Center of California (AJCC) and contracted Service Providers. Site visits shall be performed at a minimum of once a year per each approved training. An annual monitoring visit schedule and monitoring review tool will be used to ensure adherence to WIOA laws, regulations and policies to insure that clients are provided appropriate access to programs or activities.

ACTION:

This policy supersedes WIOA Supportive Service Policy, July 15, 2020. Please bring this policy to the attention of ICWDB, AJCC system staff and appropriate WIOA funded service providers and sub-recipients. This policy is effective immediately. All submitted forms are live documents and subject to change according to local, State, and Federal needs. Once the forms and exhibits pertaining to this policy are approved by the ICWDB, they will not require board approval if other changes occur, unless the change affects protocols. Should you have any questions, please feel free to contact ICWDB staff at (442) 265-4974, (442) 265-4959, (442) 265- 4955 or the Program and Compliance Manager (442) 265-4963.