Shenandoah Valley Workforce Development Board, Inc.



Policy and Procedure

Title:	Supportive Services	Number:	OP-12-08 Revised	
Effective Date:	July 1, 2012	Revisions:	February 24, 2022	

Purpose

To establish guidelines for providing supportive services using Workforce Innovation and Opportunity Act (WIOA) funds.

Reference

WIOA Sections 134(c)(2) and (3)(Adult and Dislocated Workers), 129(c)(2)(youth), and defined in 3(59). 20 Code of Federal Register (CFR) 680.900-970 and 681-570.

Background:

The WIOA defines supportive services as necessary services to enable an individual to participate in activities authorized under the Act. Supportive services are not entitlements and must be supported by the demonstration of financial need, are limited, and must be leveraged with other local resources, including co-enrollment with core partner programs.

The following Supportive Services may be provided to Adult and Dislocated Workers in WIOA Individualized Career and Training Services. Youth Supportive Services should enable an individual to participate in WIOA activities.

Services may include, but are not limited to the following:

- Linkages to community services;
- Assistance with transportation;
- Assistance with child care and dependent care;
- Assistance with housing;
- Needs-related Payments, as described below;
- Assistance with educational testing;
- Reasonable accommodations for individuals with disabilities;
- Legal aid services;
- Referrals to health care;
- Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses, protective eye gear, and other essential safety equipment;
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes; and
- Payments and fees for employment and training-related applications, tests, and certifications.

Policy

Supportive services may be provided to WIOA Title I Adult and Dislocated Worker participants as necessary to enable an individual to participate in Individualized Career Services and Training Services. Supportive services can be provided to WIOA Title I Youth during program participation and during Follow-up services. WIOA Title I funded supportive services shall only be provided in the absence of other available resources within the Shenandoah Valley Region, including supportive service resources from other one-stop and community partners.

Instructions:

Title I staff should ensure that supportive services only be provided when the services are not available elsewhere since WIOA is considered the funding of last resort. When participants need supportive services, staff will follow the procedures below:

- 1. The participant's need for the provided service must be determined in the initial and ongoing assessment and must be documented in the case file; participants enrolled in Individualized Career or Training Services must demonstrate need in the Individual Employment Plan (IEP) or Individual Service Strategy (ISS).
- 2. The cost of supportive services must be reasonable and competitive in the process. When multiple options are available for receiving supportive services, documentation must show a reasonable effort was made to determine and choose the lowest, most competitive price available.
- 3. The cost of Supportive Services must be necessary to participate and an allowable cost under Federal guidelines.
- 4. Supportive Services may not be provided before an individual's registration date in WIOA activities.
- 5. The need for Supportive Services will be determined on an individual basis, in coordination with PELL and other federal and local funds, including core partner programs and the availability of local formula funds.
- 6. Supportive Services are meant to be short-term measures and may be limited both in duration and amount.
- 7. Supportive Services may only be provided to active Adult and Dislocated Worker participants before exiting from the program; however, follow-up services for youth may include supportive services.
- 8. Participants will only be reimbursed for training-related expenses when requested and approved before the expense occurs.
- 9. If the cost of the Supportive Service exceeds the approved amount, a modification/waiver request may be submitted with verification/justification of the increased amount.
- 10. Supportive services may be provided either in kind or through monetary assistance.
- 11. To obtain payment for any supportive service, the participant or the service-providing vendor must provide appropriate documentation on the SVWDB Supportive Services Needs Determination Form.
- 12. Such documentation includes the following:
 - Justification for the need for supportive services;
 - A description of the supportive service provided;
 - List organizations contacted to inquire about the availability of supportive services and include why services were unavailable to the participant.
 - An invoice or receipt for payment made (itemized and dated) for the supportive service (must include training attendance records, documentation of miles traveled, receipts, etc.);

Supportive services are intended as temporary assistance and should not be considered or providedas long-term support. Provision of supportive services is not guaranteed and is contingent on funding availability. Payments will be made directly to the vendor or can be issued to the participant as reimbursement for payments they have made.

The following are rules established by the Shenandoah Valley Workforce Development Board to govern the provision of supportive services:

1) Needs Related Payments:

Individuals in need of training services may not have the resources to participate. Needs-related payments are designed to provide a participant with financial assistance to meet the needs of their non-training expenses to enable them to engage in training services (**WIOA Sec. 134(d)(3))** that lead to in-demand occupations. Unlike other supportive services, a

participant must be enrolled in training to qualify for needs-related payments. Needs-related payments are stipends paid directly to the eligible participant, up to the completion date of training or the last day of attendance. Need-related payments are not wages and therefore are not reportable as taxable income.

To Receive Needs-related Payments:

Adults and Out-of-School Youth (ages 18-24) must:

- Be unemployed;
- Not qualify for, or have ceased qualifying for, unemployment compensation; and
- Be enrolled in a program of training services under WIOA Section 134(d)(4)

Dislocated Workers must:

- Be unemployed, and (20 CFR 680.950):
- Have ceased to qualify for unemployment insurance or trade readjustment allowance under TAA; and
- Be enrolled in a program of training services under WIOA Section 134(d)(4) 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
 six months; or
- Be unemployed and unable to qualify for unemployment insurance or trade readjustment assistance under TAA and be enrolled in a program of training services under **WIOA Section 134(c)(3)**.

The Level of Needs-related Payment made:

- To an Adult or Out-of-School Youth ages 18-24, shall not exceed the poverty level for a family of one for an equivalent period. The weekly payment level will be calculated by dividing the poverty level by 52 weeks. (Example: Poverty level for family of one \$12,060 / 52 weeks = \$231.92 weekly, \$463.84 bi-weekly)
- To a Dislocated Worker shall not exceed the greater of (20 CFR 680.970)
 - The applicable weekly level of unemployment insurance compensation for participants who were eligible for unemployment insurance compensation as a result of a qualifying dislocation; or
 - The poverty level for an equivalent period, for participants who did not qualify for unemployment compensation as a result of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income provided in the most current LLSIL Guidelines.

Needs-related payments may be provided if the participant has been accepted in a training program that will begin <u>within 30 calendar days</u>. Payments will be terminated for participants upon completion of training, or at the point they are no longer attending. The Governor may authorize local areas to extend the 30-day period to address appropriate circumstances (20 CFR 680.960).

Documentation Requirements:

Title I staff must maintain sufficient documentation to ensure that funds are allowable and used for the intended purpose.

At a minimum, documentation must include:

Determination of the participant's need for Needs-related Payments must be
Policy and Procedure Manual [3] Shenandoah Vally Workforce Development Board, Inc.

documented through the Supportive Service Determination of Need Form with the Needs-related

Payment worksheet, which is utilized to determine the participant's need and payment level. In addition, the provision of this service is documented in the participant's Career Plan and in case notes.

- Eligible participants must provide a written statement of need and any requested supporting documentation for supportive services to be paid directly to the participant. All documentation requirements must be kept in the electronic case file.
- Title I staff will work with each participant to complete a Financial Plan Profile in the Virginia Workforce Connection (VaWC) to document that income from all other sources is insufficient to support participants in WIOA funded training.
- Documentation to support the WIOA funded training activity will be provided by the program participant and included in the participant's WIOA electronic file.

2) Travel Cost:

Participant Travel Costs is an allowed expense where reimbursements are made to the participant for fuel and other travel-related costs necessary for program participation. Travel cost reimbursement is allowed for career and training activities (including work experience and internships), travel to and from work during the first two weeks of employment, and for job interviews 61 miles or more from the participant's residence to the employer interview location. In all instances, there must be documentation of a demonstrated need and all other travel cost reimbursement documentation in the participant file.

Travel cost reimbursement is not allowed for job search nor is it allowed for job interviews with a driving distance of 60 miles, or less, one way.

Payment will be reimbursed at a rate of no more than $32\frac{1}{2}$ cents (\$0.325) per mile for actual mileage traveled only. The operator may establish a lower rate. (Rate is based on the 2012 IRS established rate of 55 $\frac{1}{2}$ cents per mile minus reduction allowance of 23 cents; subject to adjustment by the Board CEO in response to IRS changes). The maximum per-week travel allowance shall not exceed **\$100**.

Title I staff who have participants who are required to travel unusually long distances may request a waiver to increase the maximum weekly allowable amount for those specific participants. The written request must document the need to increase the travel allowance.

Travel allowances will only be paid for actual days of participation. Travel to training must be documented by an attendance record, which is signed by the appropriate activity representative at the facility and by the participant. Actual round-trip miles per day must be reported accurately by the participant. The participant will be required to sign a receipt documenting payment received for the applicable period. Travel allowances may be paid in the form of a gas voucher or check provided to the participant.

A detailed description of the process for determining the needs for travel reimbursement andthe billing process are delineated in the Travel Cost Reimbursement Processing Steps Addendum that is incorporated into this policy.

3) Child Care:

To receive childcare payments, participants must show evidence of need, and such paymentscan be made only when participants cannot afford to pay the child care themselves. The maximum amount of child care that can be paid is the amount charged by the childcare provider or the rate shown in the chart below, or any co-payment, whichever is lowest. The operator may establish lower rates, if they wish. Payment will only be made for those days the participant attends training or participates in other WIOA program activity. It is understood; however, that child care providers may charge for the entire week or day, even when the child only attends part of that week or day. Payment is allowed in such cases.

Payments to non-regulated childcare providers are <u>not allowed</u>. All providers must be licensedby the Virginia Department of Social Services or be "Voluntarily Registered" with that agency. Proof of licensing/registration must be obtained and maintained by the operator.

To document the actual cost of child care that has been provided, the contractor must maintain documentation from the childcare provider that the services were provided and thecost of the child care provided. As stated above, attendance documentation must be kept, and in no instance will payment be made in advance. Documentation will be retained in the participant's file.

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Maximum Per-Child Care Payment Amounts	Day Care			
Age	Daily	Weekly		
Age	Rate	Rate		
Infant/Toddler (0-2)	\$ 30	\$ 135		
Pre-School (2-5)	\$ 23	\$ 100		
School Age (6-12)	\$ 20	\$ 90		
Before School		\$ 35		
After School		\$ 40		
Before & After		\$65		

4) Assistance with Training Uniforms, Work Attire, Books, and Related Tools:

To receive assistance with training uniforms or appropriate work attire and training/work-related tools or books, the participant must show evidence of need and the inability to pay forthe items themselves. The amount of assistance that can be paid is set at a maximum of \$200 for training uniforms and/or appropriate work attire, \$750 for books, and \$750 for training/work-related tools. Documentation shall address the support service's need,its non-availability from other agencies, and an invoice (itemized and dated) for the items purchased. A waiver to the above maximum specifications may be requested on a case-by-case basis. The need for additional assistance must be sufficiently justified in order for a waiver to be considered.

5) **Other**:

Other supportive services which are required to allow an individual to remain in training or be able to successfully complete program participation, and which the trainee cannot afford, maybe provided on a case-by-case basis. Each situation will be evaluated as the need arises, and the determination of whether support is needed is at the discretion of the SVWDB Executive Director or Deputy Executive Director. Proper documentation and verification are required.

Limitations:

- The Title I staff shall document the individual circumstances of each participant and documenttheir level of need. The amount of supportive services available to each participant will vary based on individual circumstances but is limited as follows:
- Travel allowance is limited to no more than **\$2,500** per participant within a fiscal year(July 1 to June 30), except as approved by the SVWDB CEO or Operations Officer.
- Child care payments are limited to no more than **\$2,000** per participant within a fiscalyear, except as approved by the SVWDB CEO or Operations Officer.
- Other supportive services (including books, uniforms, and work-related tools) are limited to **\$2,750** per participant per fiscal year. No single transaction may be more than **\$500**. Auto repairs can total no more than **\$500** per participant(lifetime maximum).
- Funding of training and supportive services may not exceed a total of **\$14,750** per fiscal year (July 1 to June 30). (See Policy for Individual Training Accounts).

All WIOA participants will be made aware and sign a statement acknowledging any excess cost of training not covered by the program and for which they will be responsible. Title I staff is expected to work closely with participants to determine the individual's ability to contribute to the cost of training and negotiate a funding plan that will adequately meet the participant's needs while using WIOA Policy and Procedure Manual

[5] Shenandoah Vally Workforce Development Board, Inc.

funding in the most efficient manner possible.

A waiver to the above maximum specifications or the supportive services normally prohibited may be requested from the SVWDB CEO or Operations Officer on a case-by-case basis. The necessity for waiver must be sufficiently justified and documented in order for a waiver to be approved.

Unallowable Support Services:

Support services may not be used to pay for expenses incurred prior to the participant's enrollment into the WIOA program. Advances against future payments are not allowed. Examples of unallowable services include, but are not limited to:

- Fines and penalties such as traffic violations, late finance charges, and interest payments
- Entertainment, including tips
- Contributions and donations
- Vehicle or mortgage payments
- Refund deposits
- Alcohol or tobacco products
- Pet food
- Items to be purchased for family or friends
- Out-of-state job search and relocation expenses that will be paid by the prospective employer

Authorized By: Docusigned by: Sharon Johnson Document Doc	3/4/2022
SVWDB CEO and Executive Director	Date
Approved By:	
SVWDB Chair	Date

Equal Opportunity Employer/Program Auxiliary aids and services are available upon request to individuals with disabilities TDD: VA Relay Center: 711 or 800.828.1120

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This workforce product was created using 100% of federal U. S. Department of Labor Employment and Training Administration Workforce Innovation and Opportunity Act (WIOA) award of \$1,460,148 (#AA-33260-19-55-A-51) made to Page County on behalf of the Shenandoah Valley Workforce Development Area by the pass-through entity, the Virginia Community College System. No costs of this product were financed by nongovernmental sources. The information contained herein does not necessarily reflect the official position of the U.S. Dept. of Labor.

Travel Cost Reimbursement Processing Steps Addendum

In order for the contractor to bill the SVWDB for participant travel, SVWDB documentation and billingforms must be used. The following steps shall be followed:

- 1) Meet with the participant to determine any specific training-related need for travel cost reimbursement. If the need is valid, complete documentation of support need using the Supportive Services Needs Determination Form and retain documentation in the participant file.
- 2) Prepare documentation to confirm mileage costs to be reimbursed. Mileage confirmation maybe through Mapquest, Google maps or another nationally recognized source to document number of miles traveled. Retain mileage documentation in the participant file, with number of miles approved for reimbursement. Notify the participant the amount of the mileage that will be reimbursed.
- 3) Provide participant with Supportive Services Travel Activities Attendance Form so participant can obtain signatures from the training activity representative each day participant participates in an activity or from an employer representative at a job interview. This will provide documentation that participant attended the activity each day that travel cost reimbursement is requested. A signature is required for each day of cost reimbursement.
- 4) Participant will submit Supportive Services Travel Activities Attendance Form to Title I stafffor payment. Each Title I staff shall determine the date the participants shall submit activity attendance forms to allow adequate time for Title I staffreview and approval. Supportive Services Travel Activities Attendance Form(s) will be kept in the participant file.
- 5) Title I staff will issue a check for travel cost reimbursement to each participant. Upon receiptof the check, a Supportive Services Payment Check Receipt Form will be completed and signed by the participant and a Title I staff representative. This serves as verification of the check number and check amount as well as the check's receipt by the participant. The Receipt Form will be maintained in the participant file along with all other required travel cost reimbursement documentation.
- 6) Participant Travel Cost Reimbursement shall be no more than \$0.325 per mile (but amount per mile may be set less by the services provider) The log shall document the Supportive Services needs assessment, approved mileage amounts, and the participant's payment Check Receipt Forms for each participant. To be processed for payment, the log must have an authorizing signature which will verify the completion of all travel cost reimbursement documentation and that the documentation is in the participant file. In addition, the Supportive Service Payment Check Receipt Form must be completed and signed by the participant and Title I staff and placed in the participant folder. Log information includes participant name, program (Adult, Dislocated Worker, In School Youth, and Out-of-School Youth), needs determination, mileage documentation and approval, attendance document signed, check number, dollar amount of check, and participant check receipt form signed by participant and Title I staff representative. Fields for "Need Determination/Documentation," "Mileage Approved and Documented in File," "Attendance Form Signed and in File," and Participant Check Receipt Signed and in File" shall be initialed by case manager or other Title I staff to verify the proper preparation and maintenance of documentation.
- 7) There may be situations in which a participant has a documented need and cannot pay for travel costs to work until the first paycheck is received from a newly obtained job. If this is the case, the Title I staff may pay for gas and submit the receipt from the gas station as part of their normal invoice supporting documentation. Documentation of approved mileageis required, and the travel cost reimbursement total must be the lesser of the approved milesto and from their job for each day x .325 mileage reimbursement rate or the amount of the fuel receipt. This cost is allowed for each day of employment until the first paycheck is received or for the first 14 calendar days, whichever is shorter. This documentation is submitted as a separate Support Services item attached to the Title I staff's invoice. It is not included in the PARTICIPANT TRAVEL REIMBURSEMENT LOG.

SHENANDOAH VALLEY WORKFORCE DEVELOPMENT BOARD

PARTICIPANT TRAVEL COST REIMBURSEMENT LOG

SERVICE PROVIDER Location Billing Period:			- - -				
CLIENT NAME	PROGRAM (A/DW/In Sch-Y/ O.O.Sch-Y)	Need determined and documented in file (staff initials)	Mileage approved and docmented in file (staff initials)	Attendance form signed and in file (staff initials)	Check Number	Check Amount	Client "Check Receipt" form signed and in file (staff initials)
					T . (1)		
By signing below, I verify that all required fuel cost re	eimbursement docum	nentation has been	completed and	placed in the	Total this page client file.		
		Authorizing Servi	ce Provider Sig	nature:			
Printed Name		Signature				-	Date