

Purpose

The purpose of providing Supportive Services for WIOA enrolled clients is to remove as many barriers to securing employment as allowed under the Workforce Innovation and Opportunity Act (WIOA).

Policy

Supportive Services may be provided to WIOA enrolled participants to enable an individual to attend, participate in and complete approved career and training services, including apprenticeship, pre-apprenticeship, adult education and Local Board Determined Training.

Background

The Department of Labor has determined that WIOA is a funding resource of last resort (if other sources of funding are available, they must be used first). Therefore, participants are not automatically entitled to supportive services. The ETC will evaluate and assess that the WIOA eligible Adult and/or Dislocated Workers individual need for services by documenting the following:

- The service or supply is essential for participating in training or securing employment AND
- The Client can't afford the service or supply, AND
- There are no other financial resources available that can pay for the service or supply

Examples of Documentation that verifies that the service or supply is essential

Documentation may include, but is not limited to:

- A course outline from the training provider listing required materials (textbooks, tools, materials, etc.) to participate in training
- A list from employers of items and supplies needed to secure employment
- Invoice or documentation from licensing board showing testing and license fees
- Invoice from Union detailing Initiation fees and mandatory upfront dues
- Detailed case notes documented by the counselor in participant file

Examples of Documentation from participant to establish need

Documentation may include, but is not limited to:

- A basic household budget reflecting income and expenses
- Google Maps showing mileage to training provider for transportation assistance
- Invoice from Union detailing Initiation fees and mandatory upfront dues
- Invoice or documentation from licensing board showing testing and license fees
- Hours of class time including commute time to and from school for child care
- Detailed case notes documented by the counselor in participant file

Establish and document other resources are NOT available to pay for supportive services

WIOA funding is the funding source of last resort. Document and/or case note that resources are not available from any other:

- State educational programs (Perkins, Board of Governors Grant)
- Employment Development Department, Unemployment Insurance
- Federal Grant and Financial Student Aid programs (FAFSA application results)
- Department of Rehabilitation
- Public assistance (TANF, SonomaWORKs, Food Stamps)
- Worker's Compensation
- Detailed case notes documented by the counselor in participant file
- Case notes by counselor in participant file noting call to 211 and outcome of call

Required Documentation to demonstrate eligibility and need, for Needs-Related Payments

- A copy of any Unemployment Insurance entitlement decision letter or confirmation of UI benefits being exhausted.

Clients who are interested in receiving Needs-Related Payments, should be referred to UI Online https://www.edd.ca.gov/Unemployment/UI_Online.htm to secure a copy of a UI entitle decision letter. However, if the client has not worked during the 12 months of their base wage period (talk to on-site EDD partner if you have questions), the on-site EDD representatives may be able to secure the needed documentation.

“Stand Alone” supportive services may be provided for a WIOA enrolled participant who is not participating in WIOA funded training and can include items necessary to secure employment (this includes Job Search only clients).

Supportive Services are defined as services necessary to enable an individual to participate in activities authorized under WIOA. The following provides examples of supportive services and is not intended to be an exhaustive or exclusive list of allowable services:

- Child care
- Books/Supplies
- Exams/Testing Fees
- Union initiation fees (not for monthly dues)
- Uniforms Boots
- License fee
- Tools and equipment
- Transportation expenses

Needs-Related Payments

Needs-Related Payments (NRPs) are a form of supportive services available under WIOA, for participants enrolled in training. NRPs are designed to provide participants who are unable to work while training, with financial assistance to help mitigate their temporary loss of income. The NRPs are meant to help the participants pay for their non-training expenses during the course of their training.

Per WIOA regulations, effective August 2018 the Sonoma County WIB approved the use of NRPs and established their level. The maximum payment is either:

- The equivalent of the monthly Unemployment Benefit the client is eligible for, or
- An amount equivalent to the poverty line.

Eligibility for Supportive Services

Adult or Dislocated Workers who are currently enrolled may be eligible for supportive services. Due to funding limitations, the necessity and dollar amount of supportive services must be determined based on the individual need of the WIOA enrolled participant.

Determining client need will vary with each client's individual situation. The Employment Training Counselor (ETC) should use their discretion based on their professional experience and the counsel of their supervisor/manager to make the final determination. Utilizing documentation of a client's particular need or hardship should be used, when appropriate, to document the counselor's rationale for approving supportive services. To be eligible for supportive services, a participant must have been determined WIOA eligible, enrolled into the program, the services deemed necessary to participate in agreed upon and approved activities that lead to employment and:

- Participating in career or training services; or
- Demonstrate need to secure employment; and
- Are unable to obtain supportive services through other programs providing such services and
- Have complied with program regulations and policies during the period of enrollment.

Eligibility for Needs-Related Payments

In addition to meeting the criteria required to determine eligibility for supportive services as outlined in this policy; (Essential, Inability to Pay, and Verification there are no other financial resources available) the following are also required to ensure the appropriate use of NRPs as an allowable supportive service for WIOA Adults and Dislocated Workers is as follows:

Eligibility Requirements to Receive Needs-Related Payments

- Be unemployed AND
- Not qualify for, or have ceased qualifying for unemployment benefits AND
- Be enrolled in a training services program

Participants in Follow-up career services are **NOT** eligible for supportive services. Individuals identified as needing ongoing supportive services must still be participating in career services (other than follow-up), training activities, or both to continue to receive supportive services. Supportive services may NOT be used to extend the date of exit. Supportive services, like follow-up services do not make an individual a participant or extend participation.

Disallowed Supportive Services

Supportive services may not be utilized to pay for the following items:

- Expenses incurred prior to determination of WIOA eligibility
- Fines and penalties such as traffic violations, finance charges, and interest payments
- Contributions or donations
- Vehicle or mortgage payments
- Alcohol, Tobacco, Vaping or Marijuana
- Items for family members, friends or pets

Payments – Reimbursement Process

Supportive Service payments may occur in one of several ways. The following provides examples and is not intended to be an exhaustive or exclusive list:

- Reimburse client directly with submission of original receipt.
- Approved vendor payment (must have a payee data record on file)
- Voucher for vendors who accept them (i.e. Santa Rosa Shoes)

Needs-Related Payments should be provided when it is determined that ongoing resources and income from all other sources are insufficient to support participants in WIOA-funded training.

The Maximum Needs-Related Payment amount allowed may not exceed the greater of either of the following levels:

- An amount equivalent to 100% of the LLSIL (Based on family size at time of Eligibility), OR
- The applicable weekly UI benefit the client was receiving before their unemployment benefits ended

Request received by ETC:

1. Invoice/reimbursement request received by ETC must be processed within 1 – 2 days.
2. ETC will do the following:
 - a. Review invoice: dates and charges listed should match the attached receipts.
 - i. Missing documents: If any receipts are missing, notify the client or invoicing vendor to request required items.
 - b. Complete the **Reimbursement/Payment Form** (HSD 1110) Note: the “Approved” line is for Supervisor to sign.
 - c. Provide either a W-9 or the Payee Data Record if not already submitted.
 - d. Enters Case note in CalJOBS for **EACH** invoice processed:
Sample case note: “Child Care Invoice processed– received invoice from 4Cs for December child care fees, approved payment for \$1,039 using NDWG 21/22 and \$103 using 4Cs contract.”
 - e. Either print and submit to Supervisor or digitally sign and submit to Supervisor
3. Supervisor who will do the following:
 - a. Perform a final review to ensure:
 - i. Funds are available in TED
 1. If not, then increase to the needed amount
 - ii. Accuracy,
 1. Correct funding source, calculations, etc.

- iii. Not a duplicate, and
 - iv. Allowable.
 - b. Approves the invoice on bottom of form by checking “Approved” box, entering initials and date. (Must be an actual or digital signature, do not type in)
 - c. Returns the approved invoice to the HSA
- 4. HSA will do the following:
 - a. Review for accuracy
 - b. Ensure that all back up documentation is included
 - c. Completes the following in TED:
 - i. Client search, Edit, review past payments to ensure it’s not a duplicate request
 - ii. SB734 Amount = enter amount for invoice
 - iii. Invoice # = leave blank
 - iv. Invoice Date = enter date the employer signed the invoice
 - v. Vendor = select the employer who will get the payment
 - vi. Click Save Payment, click Save Obligation, click Save Client
 - vii. Finalize the invoice by doing the following:
 - 1. Sending invoice to Fiscal by email.
 - a. Process Date = date invoice is sent to Fiscal
 - 2. Saving a copy of invoice to N drive > Job Link > Fiscal Docs > (save to the relevant folder).
 - 3. Scan the invoice into the client’s case file in OnBase.

CalJobs System Payment Entries

The ETC will enter the approved Supportive Service activity in participant’s on-line case file using the Activity Code Breakdown document to determine appropriate code and duration along with a case note for each invoiced processed.

Books/Supplies cost for WIOA funded training will be included in the summary of total cost for the program and entered in the Activity 300.

- **Sample Case Note:** Supportive Services invoice processed for the following: transportation 01/06/2023, approved bus ticket purchased, from 22-23 (name of funding source). Invoice submitted to HSA 1/6/2023.

References:

NPRM 680.150
 NPRM 680.180
 NPRM 680.330
 NPRM 680.900, 910, 920, 930, 940, 950
 NPRM 680.970
 WIOA 134(c)(2)(A)(xii)
 WIOA 3(59)
 WIOA 134(d)(2) & (3)
 TEGL 19-16