

DIRECTIVE TITLE:	Support Services Directive
ISSUING DEPARTMENT:	Regional Oversight, Performance and Compliance (ROPC) Department
EFFECTIVE DATE:	April 1, 2010
LAST REVISION DATE:	January 28, 2021

PURPOSE

To establish procedures for issuing support services for all Workforce Innovation and Opportunity Act (WIOA) programs in the CareerSource Capital Region Operating Area.

REFERENCES

20 CFR 680.900-970, WIOA Sec. 3 (59), WIOA Sec. 134(d)(2), Administrative Policy 109– Supportive Services and Needs-Related Payments

BACKGROUND

A key principle in WIOA is to provide local areas with the authority to make policy and administrative decisions and the flexibility to tailor the public workforce system to the needs of the local community. To ensure maximum flexibility, WIOA regulations provide local areas the discretion to provide the supportive services they deem appropriate, subject to the conditions prescribed by WIOA. As such, CSCR staff must ensure coordination with other entities to ensure non-duplication of resources and services, and to establish limits on the amount and duration of such services.

POLICY

Supportive services are services that are necessary to enable an individual to successfully participate in activities authorized under WIOA. CareerSource Capital Region reserves the right to provide all supportive services based on funding availability.

Services may include, but are not limited to:

- a) Linkages to community services;
- b) Assistance with transportation;
- c) Assistance with child care and dependent care;
- d) Assistance with housing;
- e) Needs-related payments;
- f) Assistance with educational testing;
- g) Reasonable accommodations for individuals with disabilities;
- h) Legal aid services;
- i) Referrals to medical services;
- j) Assistance with uniforms or other appropriate work attire and work related tools, including such items as eyeglasses and protective eye gear;
- k) Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and
- l) Payments and fees for employment and training-related applications, tests, and certifications.

Note: CareerSource Capital Region does not pay child care or housing for WIOA participants; furthermore, WIOA needs-related payments are not authorized in the CSCR service area.

The WIOA federal regulations at 20 CFR 680.910 indicate that supportive services may only be provided to individuals who are:

- a) Participating in career or training services; and
- b) Unable to obtain services through other programs providing such services.

Staff must ensure adults and dislocated workers are provided accurate information about the availability of supportive services in the local area, as well as referral to services available from partners or other sources.

Note: Supportive services must not be used as incentive payments. Incentive payments are allowable for youth participants only and, unlike supportive services, are permitted for recognition of achievements directly tied to training activities and work experiences.

LIMITS TO THE AMOUNT OR DURATION OF SUPPORTIVE SERVICES

Supportive services have a maximum of \$1,000 per Program Year in the workforce area, which is inclusive of **all** support type services and is considered part of the overall \$10,000 limit for training services for a maximum two-year period. Supportive services are based on funding availability each Program Year (July 1 – June 30) and career seekers are not automatically entitled to these funds. It is the responsibility of staff to ensure that the career seeker understands the supportive services policy and that a tracking mechanism is in place that ensures the cap of \$1,000 per Program Year is not exceeded. **Note:** Failure on the part of Staff to adequately track the expenditure level is subject to lead to disallowed cost.

DETERMINATION OF NEED

The provision of accurate information pertaining to the availability of supportive services in the local area must be made available to the career seeker as it is one of the core services of the service delivery system. Supportive services should be used to address the career seeker's barriers identified through the initial or objective assessment process. The plan for addressing these barriers, to include the provision of supportive services, must be documented in the career seeker's Individual Employment Plan (IEP) or Individual Service Strategy (ISS), as appropriate. The Act states that supportive services may be provided if not available from any other source; therefore, the case file and appropriate management information system case notes must document the need of the career seeker and the fact that the services are not available from another source.

Example Determination of Need Case Note

Subject: Determination of Need for Training Services

Case Note: After an assessment of the participant's employment and education history and a review of their available resources on the financial analysis form, it has been determined that without assistance, the participant is unlikely (or unable) to obtain or retain employment leading to "self-sufficiency" and additional assistance is needed. Participant does not have a recognized postsecondary credential and is in need of training and/or support services in order to complete the (final 2 terms) of the (Dental Hygiene program at TCC). The services being provided includes assistance with training costs, uniforms and supplies, and the participant has attested to the need for these items and that these resources are not available via any other source.

The WIOA Program Manager and staff are responsible for the maintenance of all records pertaining to the documentation of a career seeker's need and subsequent payments made to the career seeker or on his/her behalf. The Atlas case file and appropriate management information system must always contain updated financial information in order to accurately track supportive services expenditures. All supportive services shall be charged to the training related/supportive services cost category. The appropriate WIOA activity code will be entered in the MIS to identify what type of support service was provided i.e. transportation, incentives or other.

In LWDA 5, support services are provided to:

- Youth
- Adults and Dislocated Workers participating in occupational skills training (ITA or Other) and determined to be in need of such services as a condition of employment*
- Adults and Dislocated Workers participating in the Transitional Employment activity (See the Transitional Employment section of this policy for additional information)

*Supportive Services for Adults and Dislocated Workers not participating in the Transitional Employment activity are limited to certifications, licensure/testing fees, clothing/uniforms, supplies, tools, or other appropriate training-related items. Note: This includes Adults and Dislocated Workers enrolled in training, whether or not they are receiving training assistance from CSCR via ITA or PO, given the career seeker meets WIOA eligibility and has been determined in need with no other resources for assistance.

Under no circumstances shall monetary WIOA Supportive Services be made available beyond the career seeker's employment placement date.

Supportive services may be provided for WIOA participants who have attested to the need for the service in order to actively participate in the WIOA Program; Note: participants who do not fulfill the requirements to receive support services will be denied support service funding. Career seekers may also be denied support services funding if program funding is reduced.

PAYMENT METHODS FOR SUPPORTIVE SERVICES

A variety of payment methods may be used for the provision of supportive services, depending upon the type of supportive service provided. For each supportive service provided, the LWDB must opt to use a payment method that allows the LWDB to exercise the highest level of oversight, accountability and internal controls to ensure the supportive service provided is used for the intended purpose. For example, transportation assistance (i.e. assistance with fuel costs) must be provided in the form of vendor-specific gas cards. Assistance with certifications, licensure/testing fees, clothing/uniforms, supplies, tools, or other appropriate training-related items must be provided via Purchase Order (PO), payable to the selected vendor. See Issuing Individual Training Accounts (ITAs) & Purchase Orders (POs) section of this policy for additional information.

ASSET CARD DISTRIBUTION (RELOADABLE OR PREPAID DEBIT AND GIFT CARDS, GAS CARDS and BUS PASSES)

Staff will ensure a process is in place that provides the following:

- Designated staff members responsible for requesting, receiving, maintaining and delivering the asset cards to Career Navigators.
- A secure system for housing asset cards in an area that prevents loss, theft and exposure to loss and/or theft.
- A logging system that tracks the requests to Board staff for more asset cards, the amount requested, how many received from Board staff, how many are delivered to each designated staff member, and the ending monthly balance.
- A system for designated management staff to perform, reconcile and review a physical Inventory of asset cards no less than quarterly.
- Obtaining supporting documentation that ensures that the asset card was used for its intended purpose (i.e. mileage calculations for gas cards, receipts for payment, etc.).

DOCUMENTATION REQUIREMENTS

Staff are required to maintain documentation sufficient to satisfy the requirements of this policy to ensure that funds are allowable and used for the intended purpose. At a minimum, documentation must include:

- Determination of the career seeker's need for supportive services included in the participant's IEP/ISS. A detailed explanation regarding the career seeker's need for supportive services must be included in the career seeker's case notes in Employ Florida (see example case note above).
- Case notes either confirming that the needed supportive services were not available through other programs providing such services or that the urgency of the needed supportive service was such that referrals to other resources would delay the provision of the supportive service and create a hardship for the career seeker.
- Records of payments to vendors, including date of receipt, the amount of payment, check/voucher number, etc.
- For career seekers enrolled in training, proof/verification of satisfactory progress and attendance in training programs.
- For asset cards, staff must ensure that documentation of mileage calculations are included in the atlas file at the time of distribution. The participant's mileage calculation should include round-trip mileage between his/her home and activity site(s) as determined by mapping tools such as Yahoo, Google and/or MapQuest.

EMPLOY FLORIDA SERVICE CODES

Staff must enter the appropriate service codes in Employ Florida when career seekers are either referred to or provided supportive services. The Wagner-Peyser Services Desk Guide (WPY-DG-0082) outlines the various service code titles and definitions as well as the documentation/case note requirements.

APPENDIX A: DOCUMENT HISTORY

Revised		1/28/2021
	Document was revised to reflect requirements of Administrative Policy 109	
Revised		5/16/2017
	Document was reviewed and rebranded; Updated based on WIOA regulations	
Revised		3/29/2012
Initial Release		4/1/2010