

SUPPORTIVE SERVICES

NextGen Program Policy: NGPP 03-04 ARWDB Approved: October 27, 2021

DATE: August 2021 (Revised)

TO: ARC/ARWDB Staff & NextGen Service Providers
FROM: Marsharee O'Connor, NextGen Program Director

SUBJECT: Guidance & Guidelines for Supportive Services Assistance

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2 – PURPOSE

To establish a policy providing guidance and guidelines in the provision of Title 1-B, WIOA sec. 129(c)(2), Youth Program 14 Element, 20 CFR § 681.570, Youth Supportive Services. The policy serves to establish a process for identifying need and providing supportive services assistance to participants receiving WIOA services. As defined in WIOA sec. 3(59), the available supportive services activities enable an individual to continue to have access to employment, education, and training opportunities to succeed in the labor market.

3 - POLICY

Supportive services are one of the 14 program elements options available under WIOA youth services. Supportive services may be made available to participants during enrollment in WIOA Title-I activities and/or after WIOA program exit (during the 12-months follow-up) period. To ensure coordination across programs, non-duplication of resources and services, and to establish limits on the amount and duration of services between Title-I programs, supportive services for the NGP must align with the Adult and Dislocated Workers Programs. The total amount of Supportive Services MAY NOT exceed \$3,000 per participant, per program year unless approved by ARC prior to providing the assistance.

The supportive services cap of \$3,000 also <u>INCLUDES</u> the incentive cap of up to \$500 as outlined in the latest NGP Incentive Policy.

Participants must first obtain supportive services through other programs before relying on WIOA Title-I funding. Career Advisors will assist participants to work with other programs to ensure they receive all the benefits to which they are entitled to under the law.

The ARWDB Director is authorized to adjust the maximum amount of support services funding allowable per person per year (not to exceed \$3,000) to ensure ARWDB programs and services are operated in the most effective manner possible. The ARWDB Director will review relevant data annually to determine if adjustments in the maximum cap should be adjusted. Future adjustments will become effective at the start of the program year unless extenuating circumstances arise to justify a change during the year. If warranted, mid-year adjustments will be recommended by the ARWDB Director and confirmed by the ARWDB Executive Committee

4 – PROVISIONS

Supportive services must be issued in accordance with the requirements contained in the Cost Principles in 2 CFR Part 200 (be reasonable and necessary, both in cost and in items being purchased), and be necessary for participation in career or training activities or the success of the Service Plan (ISS/ISP/IEP). Supportive services will only be provided when the individual is unable to obtain supportive services through another program that provides such services. To prevent duplication of resources and services, services available through other agencies will be researched, explored, and utilized prior to using WIOA funds. The Career Advisor will access services available in the community and make all efforts to access those services at no, or low cost to the participant.

Any assessments, tests and/or supportive services provided to the participant must be documented in the participant's Service Plan. Also, all supportive services must have been approved and recorded in WorkSource Georgia Portal (also known as VOS) prior to the participant receiving or obtaining the goods or services. Backdated requests for services <u>WILL</u> NOT be approved.

The provisions of supportive services related to duration, time, and type outside of what is addressed in this policy will be considered on a case -by-case basis.

5 – TWELVE MONTHS FOLLOW-UP PERIOD

To ensure success after the program, supportive service may be provided to participants who exit the WIOA program and are in the 12- months follow-up period as defined in 20 CFR § 681.580. This is to ensure educational retention for those who are attending advance training (non-WIOA funded) or post-secondary school; and job retention, wage gains, and career progress for those who obtain unsubsidized employment. The approval process is the same as for participants in active status. Support service shall commence no earlier than participant's WIOA enrollment date and shall end upon completion of the 12-months follow-up period.

6 – ELIGIBILITY AND DETERMINATION OF NEED ASSESSMENT

ELIGIBILITY:

To be eligible for any WIOA financial assistance payments, participant must have been determined WIOA eligible and:

- 1. Be participating in career services and/or training services;
 - ❖ EXCEPTION Limited supportive services (such as paying for copies of the social security card or birth certificate, etc.) may be provided to individuals who are not yet enrolled in WIOA. This type of supportive services enables the individuals to successfully participate in assessment activity as well as to complete the eligibility certification requirements for WIOA enrollment. Once enrolled in WIOA, the supportive services amount spent prior to WIOA enrollment will also count towards the \$3,000 cap indicated above.
- 2. Be unable to obtain supportive services through other programs providing such services; and
- 3. Must comply with program regulations and policies during the period of training and/or enrollment to continue to receive supportive services payments.

DETERMINATION OF NEED:

- 1. **Financial/Physical Need** There must be documentation in the participant's physical case file and VOS that demonstrates that the participant is <u>incapable</u> of providing these services for him/herself. Documentation may consist of:
 - a) Low-income status as documented by family/household income determination.
 - b) Receipt of federal or state public assistance.
 - c) Receipt of UI benefits.
 - d) Documentation of skill upgrading that would lead to employment in a local or state in-demand occupation.
 - e) Documentation of lack of employment or underemployment.
 - f) Separation from employment notice.
 - g) Birth certificates of children receiving childcare.
 - h) Transportation distance to attend training.
- 2. Resource Coordination There must be documentation that supportive services or funds for those services are not available from other state or federal grant programs. There must be analysis of all federal/state/local resources available and how they are being coordinated. For example, an ARC/ARWDB analysis of need form will document the total basis of need considering UI, Pell, Hope Grant/Scholarship etc., or other instances of federal/state/local resources available, to determine how resources are being coordinated. Examples of acceptable documentation:

- a) Participant time sheets or attendance record, to demonstrate active participation in WIOA activity/services (signed and dated by the participant and the instructor/supervisor providing training/WEx services).
- b) Income Determination, to demonstrate the participant's is incapable of providing these services for him/herself
- c) UI records, to demonstrate the income as well as if the funding were exhausted.
- d) Application for applicable state and federal funds, to demonstrate that funding through those entities were denied or exhausted.
- e) Supportive Services Request Form, to demonstrate the type of supportive services requested, justification of the requested amount, how the funds will assist the participant, and the time frame the supportive services will be provided (signed and dated by the participant and the Career Advisor).

<u>EXCEPT</u> for WEx related activities, a participant may waive WIOA supportive services assistance payment, if accepting payment would mean the loss of benefits. The following two provisions apply:

- The participant may request the assistance payment to start at a later date, but <u>MAY NOT</u> claim retroactive payments for those assistance.
- Advances against future assistance payments ARE NOT allowed.

7 – DOCUMENTATION OF ELIGIBILITY & DETERMINATION OF NEED

<u>Support Service Request Form</u>: Each participant requesting supportive services must complete a "Supportive Services Request Form". The Career Advisor will determine the basis of need and sign off on the justification for support that is necessary and reasonable to complete WIOA activities. For additional information regarding VOS documentation, see "ELIGIBILITY AND DETERMINATION OF NEED ASSESSMENT" section of this document.

Justification – Must include the WIOA activity for which supportive services is being provided, a projection of the quarterly amounts as well as the total anticipated amount of supportive services requested. Also, the requested form must be collected and included in the participant's physical case file as well as uploaded to VOS.

All documentation of each supportive services payment type and amount must be entered in VOS under the appropriate service activity code to include the type of support service, amount, date of service, etc. Supportive services data and document requirements for VOS are:

- 1. Documents to be uploaded "Support Service Request Form" and any validation of proof of service.
- 2. Service Plan Include goal(s) or objective(s) tied to the Supportive Services need as well as the plan of action to deliver said services.
- 3. Case-notes All attempts to secure other funding as well as issuance of supportive services must be noted under the case-notes section.

- 4. Service Activity Code The appropriate service activity code must be assigned. This section will be used to enter the payment type and amount of supportive services:
 - a) 480 Support Service Child/Dependent Care.
 - b) 481 Support Service Transportation Assistance.
 - c) 482 Support Service Medical.
 - d) 483 Support Service Temporary Shelter.
 - e) 485 Support Service Other.
 - f) 486 Support Service Counseling.

Career Advisors are responsible for tracking payments, to ensure compliance with the \$3,000 limitation. ARC/ARWDB Finance staff will also maintain records to monitor the yearly cap limitations. All supportive services information in VOS must be updated and completed at the end of each fiscal quarter for all participants receiving supportive services in the fiscal quarter. ARC/ARWDB NGP staff will perform a secondary review and reconciliation of participants' information in VOS to ensure the case management system and physical case files reflect an accurate account for the supportive services provided on a quarterly basis.

8 – ALLOWABLE SUPPORTIVE SERVICES

1. Linkages to Community Services

Assistance may be provided for participants needing linkages, referrals, and information about the availability of supportive services assistance not covered by WIOA. These services may include, but are not limited to: SNAP (Food stamps), TANF, veteran's assistance, financial assistance for education, and other public assistance funds.

2. Assistance with Transportation

Assistance (gas for personal vehicle, public transportation, etc.) may be approved for up to \$100.00 per month. Costs for other transportation services such as taxi's, private transportation firms, and company vehicle usage charges will be reimbursed at a maximum amount of \$100.00 per month. Additional expenses may be approved by the ARC/ARWDB NGP Director for extenuating circumstances.

- For the WEx activity, mileage reimbursement may be available for participants who commute to and from a work site or training site for which no other form of transportation is reasonably available. Mileage reimbursement may be allowed up to the first 14 calendar days to support the participant's participation in WEx. Map mileage (calculated using an online map program) may be used as the basis for payment.
 - Supportive services expenditures provided during WEx, according to TEGL 21-16, (except for incentives see NGP Incentive Policy 04-01) <u>CANNOT</u> be counted toward the WEx expenditure requirement even if supportive services assist the participant in participating in the WEx.

3. Assistance with Child Care and Dependent Care

Childcare and dependent care assistance may be provided to participants who are not able to participate in WIOA programs without such assistance. This includes participants who are in danger of dropping out or making less than satisfactory progress due to unsatisfactory or unreliable childcare/dependent care arrangements. Funds from other sources, such as DFCS or TANF, may be combined with WIOA funds with written approval by the ARC/ARWDB NGP Director. In those instances, WIOA funds may only be used for those expenses not covered by the other funding source. For participants receiving TANF benefits, NGSPS must document that the participant is not receiving dependent care benefits from TANF before providing dependent care assistance through WIOA.

- If dependent care is not otherwise available from DFCS, TANF or other funding sources, assistance may be available and NGP may reimburse the cost of:
 - Care for dependent children under age 6 or adult dependents with documented care needs, up to a maximum of \$70 per week per dependent (excluding late fees) while the participant is enrolled in basic career services or an ITA training service during times when the individual is scheduled and/or commuting to training activities.
 - Care for children ages 6 through 14 during times when school is not in session. For each dependent child ages 6 through 14, a maximum of \$45 per week per child may be provided to assist with after school care while a participant attends or commutes to scheduled training activities. A full-time rate of \$70 per week for each dependent child through age 14 may be provided during summer school break.
- Participants are encouraged to use licensed dependent care providers whenever possible. If not licensed, the service must be provided by a dependent care provider who cares for children outside of the participant's home.
- Dependent care costs will be paid directly to the dependent care provider if possible. However, under certain circumstances the cost may be reimbursed to the customer. Payments are based on receipts from the dependent care provider and include verification of a child's attendance record and verification of class attendance by the participant. Payments will be made monthly and will depend on timely receipt of the specified documentation.
- ARC/ARWDB will reimburse up to \$45 per child for a one-time registration fee if this
 fee is customarily charged by the dependent care provider to all clients. No
 reimbursements will be made for late fees incurred by participants.

4. Assistance with Educational Testing

Assistance is authorized for the payment of application fees to educational institutions. These are fees that are paid to determine a participant's eligibility and acceptance at the educational institution which will allow the participant to obtain information on financial aid

awards. Assistance with books, fees, school supplies, and other necessary items for the students enrolled in post-secondary education classes are authorized as well.

 Tuition assistance will be reviewed for approval on a case-by-case basis by ARC/ARWDB NGP Director.

5. Reasonable Accommodations for Individuals with Disabilities

Assistance to enable an individual with a disability to gain access to participate in employment and training services.

It is <u>NOT</u> allowable to use WIOA supportive services funds to make capital improvements to a training facility or worksite for general compliance with the requirements of the Americans with Disabilities Act of 1990.

6. Meals

For each day, a participant attends class for a minimum of 3 hours, \$6 may be provided to assist with meal expenses. Meal assistance is not available if provided by another agency such as DFCS.

7. Emergency Assistance

Defined as payments made on behalf of a WIOA participant to help with problems that would impact his/her continuation in and/or completion of a program. Emergency assistance can be provided for but not limited to, the following:

- Emergency car repairs.
- Emergency healthcare.
- Emergency utilities (power, heating fuel).
- Emergency housing.

<u>Emergency Car Repairs</u> – May be provided if the car is no longer safe, is the only means of transportation to and from training and is owned by the customer. The customer will be required to obtain three (3) written quotes for repairs, not exceeding 25% of the tax value of the vehicle or \$500, whichever is lower.

<u>Emergency Healthcare</u> – Assistance is authorized for healthcare and medical services. This assistance is not intended to cover the costs of major issues such as major surgery or major dental care, and is not intended to encourage visits to healthcare centers or doctors for minor illnesses for which the participant would not normally seek medical attention. Eyeglasses or protective eyewear may be provided if there are no other resources available to provide the eyewear, and the customers vision is impaired. Broken eyeglasses may be replaced if the customer cannot afford to replace them and cannot attend classes. Emergency healthcare must not exceed \$500.

<u>Emergency Utilities</u> – Payment is defined as one month's payment for electricity or heating fuel for a customer. Deposits are not allowable because the amount may be reimbursed to a participant later. Since this is a one-time emergency intervention, a plan must be established

to ensure the participant will be able to meet long term utility needs. Emergency utility payments must not exceed \$500.

Emergency Housing – Assistance may be provided to participants on a case-by-case basis and require prior approval from ARC/ARWDB NGP Director. The assistance may include cost for rent and temporary housing. Past due rent is allowable. Deposits are not allowable because the amount may be reimbursed to a participant at a later date. Since this is a one-time emergency intervention, a plan must be established to ensure the participant will be able to meet long term housing needs. Assistance may not exceed \$1000 for one month or no more than \$1800 to include one month's back rent. Requests for the payment of rent requires the following supporting documentation:

- A rental or lease agreement bearing the participant's name, and
- An original statement signed by the landlord reflecting the amount of rent due and the corresponding dates.
- If a participant does not have a formal lease with a landlord, a notarized letter stating the name of the participant, the address of the property, and the amount of delinquency is required.

8. After Training Assistance

Allowable supportive services provided after training to obtain employment include, but are not limited to:

- Tools, uniforms, other work clothing, and boots/shoes required for employment (also includes eyeglasses and protective eye gear);
- Bonding and liability insurance for employment;
- Drug testing required by employer;
- Financial counseling; and
- Auxiliary aides and services necessary for persons with disabilities.

For participants enrolled in programs such as HVAC, automotive technology, and automotive collision, which require expensive tools for training as well as employment, supportive services may be used to supplement tool purchase costs during training in the event the participant's training ITA funds are exhausted by tuition, books, fees and other training costs.

This determination will be made on a case-by-case basis by the ARC/ARWDB NGP Director.

9. Virtual Learning (Web-based Platform)

For those participants engaged in virtual learning, support may be provided. Support may include:

- Wi-Fi services.
- Computer (laptop or desktop).

 Software (Microsoft Office Suite). This must be a one-time cost and not a recurring cost.

<u>NEEDS-RELATED PAYMENTS</u> – Though needs-related payments as described in 20 CFR § 680.930 through § 680.970 WIOA, sec. 134(d)(3) and § 681.570 WIOA, sec. 129(c)(2) are an allowable supportive service authorized to provide financial support to participants (out-of-school and 18 – 24 years) for the purpose of enabling them to participate in training, ARC/ARWDB does not provide such support.

9 – UNALLOWABLE SUPPORTIVE SERVICES

Payments **ARE NOT** allowed for titled or deeded items or when recovery of the expense is anticipated. Unallowable supportive services include:

- Rent deposits or housing deposits;
- Mortgage payments;
- Car payments;
- Purchase of vehicles;
- Fines;
- Current or past taxes;
- Current or past child support;
- Legal fees (except fees for legal aid) such as bail and restitution; and
- Payment toward goods or services incurred or received prior to the participant's enrollment in WIOA.

10 – CONCURRENT ENROLLMENT

In accordance with 20 CFR § 680.430, NGP participants may concurrently co-enroll in NGP and the Adult Program and can receive supportive services from both programs' funding stream. However, supportive services cannot be duplicated, and the maximum \$3,000 program year limit includes cumulative funds awarded from both the NGP and Adult Program.

11 – DEFINITIONS

- ARC Atlanta Regional Commission
- ARWDB Atlanta Regional Workforce Development Board
- CFR Code of Federal Regulations
- DFCS Department of Family and Children Services
- HVAC Heating, Ventilation and Air Conditioning
- ITA Individual Training Account

- NGP NextGen Program
- NGPP NextGen Program Policy
- NGSP NextGen Service Provider
- OJT On-the-Job Training
- Sec./§ Section
- Service Plan (ISS/ISP/IEP) Individual Service Strategy/ Individual Service Plan/ Individual Employment Plan

- SNAP Supplemental Nutrition Assistance Program
- TANF Temporary Assistance for Needy Families
- TEGL Training and Employment Guidance Letter
- **UI** Unemployment Insurance

- VOS –Virtual OneStop System (WorkSource Georgia Portal)
- **WEx** Work Experience
- WIG PS Workforce Implementation Guidance Programmatic Services
- WIOA Workforce Innovation and Opportunity Act

12 – ATTACHMENTS

The following document is included as an attachment to the Policy:

Supportive Services Request Form

13 – ACTION REQUIRED

ARC/ARWDB NGP shall:

- Take the necessary action(s) to ensure compliance with this Policy.
- Ensure that the NGSPs are informed, trained, and provided a copy of this Policy.

14 – INQUIRES

Inquiries regarding this Policy and its guidance should be directed to an ARC/ARWDB NGP staff.

15 – POLICY EFFECTIVE DATE

This policy shall be effective upon the ARWDB Approval date indicated on the first page of this document, and shall remain in effect until further notice.

16 – REFERENCES

- Federal Register (Final Rules & Regulation) 20 CFR § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580
- NGPP Incentive Policy
- State Workforce (TCSG) Policies and Procedures Manual 02/18/2021
- **TEGL No.** 8-15 and 21-16
- Uniform Guidance 2 CFR Part 200
- WIOA Public Law Sec. 3(59); 129(c)(2); and 134(d)(3)