# WorkSource Atlanta Regional Policies and Procedures Manual

## **Supportive Services Policy**

Board Approved - December 10, 2020 (Pending)

#### **Purpose**

Supportive services for Adults and Dislocated Workers are provided for by the Workforce Innovation and Opportunity Act (WIOA) to enable an individual to participate in activities authorized under WIOA Title I. This memorandum establishes local area policy for WorkSource Atlanta Regional in providing support services as allowed for by WIOA.

#### Reference

WIOA, section 3(59), 20 CFR 680.900

#### **Policy**

Supportive services are services which are reasonable and necessary to enable a WIOAa participant who cannot afford to pay for such services to participate in an individualized careera and/or training services funding under WIOA. Supportive services must be determined on an individual basis. Limited supportive services may be provided to individuals receiving Basic Career Services; however, such individuals must be registered as a WIOA participant and are subject to performance outcomes.

The use of supportive services is encouraged to enable hard-to-serve populations to participate in long-term interventions.

NOTE: Follow-up career services are not a qualifying service for the receipt of supportive services; therefore, an adult/dislocated worker who is only receiving follow-up services may not receive supportive services.

Supportive services may not be used to extend the date of exit for performance accountability purposes.

Supportive Services, like follow-up services, do not make an individual aparticipant or extend participation (TEGL 19-16). Youth follow-up services also may include the following program elements: (1) Supportive Services (WIOA§681.580). (See NexGen Support Policy for Youth)

Note: Follow-up career servcies are not a qualifying service for the receipt of supportive servcies, therefore, an adult/dislocated worker who is only receiving follow up services may not receive supportive services.

Based on individual assessment and availability of funds, supportive services may be awarded to eligible participants. Supportive services must be tied to education, occupational skills training, OJT, or job search activities. Supportive service awards are only provided under the following conditions:

- I. Individuals are Workforce Innovation and Opportunity Act (WIOA) eligible and registered in the Georgia Work Ready Online Participant Portal (GWROPP) and are participating in an individualized-career and/or training services;
  - 4.• Limited supportive services may be provided to eligible applicants before they are enrolled as participants to permit participation in assessment activities.
- To participants unableBe unable to obtain supportive services through other programs that provide such services; and
- 2-3. Participants comply with program regulations and policies during the enrollment period and/or training.
- 4. When it is necessary to enable individuals to participate in WIOA Title I activities; and

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#### Be participating in individualized career servcies and/or training services.

A. I. An Adult, Dislocated Worker, or Youth program participant may receive supportive services when engaged in individualized career or training services funded by WIOA one-stop partners, or other funding sources. If the services are included in the participant's IEP or ISS (WIOA Desk Reference). There is no requirement that WIOA fund the service or activity in order to provide supportive service to an eligible participant. This access to supportive services gives a participant the resources needed to participate in career and/or training services that are not directly funded by the Adult. Dislocated Worker, or Youth program, but that the participant and career planner deem necessary and appropriate for the participant to achieve the employment and training goals identified in their.IEP/ISS (TEGL 19-16, p. 18). Access is permitted if:

B. the individual has been determined eligible for WIOA Title I services;

C. the individual has received, or is receiving, at least one participation-causing service provided by WIOA Title I (NOTE: this requirement is minimally satisfied by the development of an IEP/ISS):

D. the supportive service provided is an allowable supportive service; and

\_E, the need for support is included in the participant's IEP/ISS and documented via a local "Determination of Need" form for Supportive Services (known as Supportive Service Request Form).

NOTE: Services being supported that are not funded by WIOA Title I should be entered in GEO in the Partner Programs section of the Programs page. If the partner program is not listed, the case manager should select "Other."

All supportive services must have been approved and recorded in GWROPP prior to the participant receiving or obtaining the goods or services. Backdated requests for services will not be approved. Advances against future payments are not allowed. The provision of supportive services must be determined on an individual basis. Eligibility and determination of need for supportive services should be conducted by a case manager or appropriate WorkSource Atlanta Regional staff on a case-by-case basis to determine if the participant is eligible for and in need of supportive services. Eligibility for supportive services is contingent upon enrollment and/or participation in a training program or approved activity.

(**Note:** All supportive services are provided at the discretion of the Atlanta Regional Workforce Development Board; supportive services are not to be considered automatic or entitlements and are contingent upon the assessment of a customer's circumstances by WorkSource Atlanta Regional staff and as WIOA funds are available.)

Supportive services may be granted in the following categories with the related stipulations and restrictions:

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**Auto Insurance:** Payment may be issued for auto insurance coverage required by the State of Georgia and can only be justified in a situation where, without the insurance, the participant would not be able to travel to the training site and/or place of employment. Liability insurance coverage will be authorized only if the vehicle is needed for the participant to seek, accept or retain employment, or to participate in employment and training activities. Liability insurance, as required by the state of Georgia covers damage to property and persons after an accident happens. The vehicle must be titled and registered in the participant's name. Payment may not exceed three month's coverage and/or the maximum support limit. Payment will be one-time only for up to three months and not to exceed support services cap.

**Auto Repair:** WIOA funds may pay for repair and replacement of essential parts and safety equipment to an automobile only if it can be verified there is no other reasonable way for the participant to transport himself/herself to a training or work site. The vehicle must be titled and registered in the participant's name, be properly insured and it must be verified by a reputable mechanic that the repairs are needed. Exceptions may be made if the vehicle belongs to another family member and is the only means of transportation available to the participant. **Exceptions must be documented in the participant's file.** Original invoices/receipts are required for car repair payments. Quotes or work orders are not accepted for payment receipts. This is a one-time payment only not to exceed maximum support allowed.

Childcare/After-School Program (ASP) Care: One-time payments may be made for after-school registrations. The childcare cost may be reimbursed at the rate outlined in childcare agreement. This rate should be reviewed on an annual basis. These limits apply on a per child basis not to exceed the maximum support allowed. The childcare provider must be licensed or registered. All participants must apply for Department of Family and Children Services CAPS program and provide proof of application determination.

**Attire:** Clothing, uniforms, and or footwear may be purchased for job interviews or work. This includes, but is not limited to, such items as a uniform, a particular type of footwear required for the job by an employer, or attire for a job interview or first day of work. At least three quotes must be provided.

**Medical/Dental/Optical:** Covered expenses include medical testing/treatment, prescriptions, mental health testing, or counseling. Policy may allow that the maximum can be expended in one (medical, dental, optical) area, or a combination of all three areas. WIOA funds cannot be used for costs incurred by other family members. This service should be limited to the minimum required to permit the person to participate in training, job search, accept employment, or maintain employment.

**Miscellaneous Items:** Payment may be provided to ensure the participant is prepared for a job interview and/or entering employment, including cost for professional licenses, certifications, Individual Training Account (ITA) or intensive service test fees, background checks, identification (Georgia Driver's License, identification card), etc. At least three quotes must be provided.

**Rent Assistance:** WIOA funds may assist with past due rent payments. Clear verification (copy of rental agreement and eviction notice or letter from landlord) of outstanding charges and residency must be provided by the customer. Documentation that the situation would make it impossible for the participant to conduct an efficient job search, maintain employment or participate in training without the rent assistance, and that the participant has a plan for future payments. Mortgage or other payments that contribute to the purchase of real property that the participants own are not allowed (e.g. house, car,

boat). Regulations prohibit the payment of debts incurred prior to enrollment in the program.

**Tools or Equipment:** Supportive service funding may be used to provide tools not included in training costs but as required to complete the training program or obtain employment. If needed for employment, a bona fide, written job offer must be provided prior to the approval of funds for purchase. Otherwise, tools may be purchased for participants if the tools are required to continue a training program or obtain employment. The service provider must determine that the tools are required and that they cannot be provided by any other source such as a community partner resource, the prospective employer, or the participant.

Tools become the property of the participant upon satisfactory completion of the WIOA training as outlined in the participant's Individual Employment Plan (IEP) or upon employment. Tools and equipment can be included in the Individual Training Account (ITA) or as a supportive service. If the participant fails to complete the prescribed WIOA training, the tools remain the property of the ARWDB.

**Computer:** In limited cases, the purchase of a computer may be approved as a required tool. This is most typically, but not exclusively, in distance learning situations. Per guidance from USDOL, case managers <u>must</u> request approval from their program manager prior to a computer purchase to ensure it meets the requirements. Factors that will be taken into consideration prior to computer purchase approval include but are not limited to: a) does the training program include distance learning and to what degree; b) does the participant have reasonable computer access through another source, such as a computer lab on campus or at a public library; and c) does the participant have a lengthy commute to obtain computer access. Providers requesting a computer purchase approval can include justification addressing these factors in an e-mail or submit a request completed by the participant.

WIFI/Broadband Access: Payment assistance for WIFI/broadband access may be available after all other options have been exhausted. Documentation and/or evidence of application for alternative funding sources for assistance will be required. Payment total cannot exceed the maximum support allowed.

**Transportation:** A participant may receive only one type of transportation assistance at any given time: gas card, rideshare, or monthly transit pass. File documentation must clearly itemize transportation assistance.

<u>Transit Pass:</u> Participants may receive a transit pass (e.g. MARTA, Gwinnett County Transit, Connect Douglas, Xpress) issued from a transit provider, which may be renewed monthly. Transit passes range in denominations and WorkSource Atlanta Regional staff will determine the most suitable denomination based on need. Participants are required to be enrolled in training or participating in an approved activity, in good standing, and making satisfactory progress to continue to be eligible to receive transportation assistance.

<u>Gas Cards:</u> Pre-paid gas cards for transportation assistance are available for participants enrolled in training or participating in an approved activity, in good standing, and making satisfactory progress. The amount of the gas card will be calculated using the IRS Standard Mileage Rate. The calculation formula will include miles from home to school roundtrip multiplied by the amount of days attending class. See IRS standard mileage link as follows: <a href="https://www.irs.gov/newsroom/irs-issues-standard-mileage-rates-for-2021">https://www.irs.gov/newsroom/irs-issues-standard-mileage-rates-for-2023</a>— <a href="https://www.irs.gov/newsroom/irs-issues-standard-mileage-rates-for-2023-business-use-increases-3-cents-per-mile">https://www.irs.gov/newsroom/irs-issues-standard-mileage-rates-for-2023-business-use-increases-3-cents-per-mile</a>. Gas cards will be issued once per month; however, a

participant may receive additional funds not to exceed two cards per month with approval of a WorkSource Atlanta Regional program manager.

<u>Ride-Share Cards:</u> Pre-paid ride-share cards for transportation assistance are available for participants enrolled in training or participating in an approved activity, in good standing, and making satisfactory progress. The amount of the card will be calculated using the IRS Standard Mileage Rate. The calculation formula will include miles from home to school roundtrip multiplied by the amount of days attending class multiplied by the IRS Standard Mileage Link. See IRS standard mileage link as follows: <a href="https://www.irs.gov/newsroom/irs-issues-standard-mileage-rates-for-2023-business-use-increases-3-cents-per-mile">https://www.irs.gov/newsroom/irs-issues-standard-mileage-rates-for-2023-business-use-increases-3-cents-per-mile</a> The card(s) will be issued once per month; however, a participant may receive additional funds not to exceed two cards per month with approval of a WorkSource Atlanta Regional program manager.

Other Supportive Services: Other supportive services may be provided as determined by the Atlanta Regional Workforce Development Board. Such goods and services should be reasonable and necessary for the participant to remain in training and/or obtain or retain employment. These services may include, but are not limited to:

- 1. Haircuts, personal grooming and hygiene needs;
- 2. Bonding and liability insurance for employment;
- 3. Work clothing (includes clothing for interviews);
- 4. Financial counseling or assistance;
- 5. Application fees:
- 6. Union dues or initiation fees;
- 7. Auxiliary aides and services for participants with disabilities;
- 8. Business licenses; and/or
- 9. Drug testing as required for employment (includes Work Experience (WEX)

Supportive service funds may  $\underline{\text{not}}$  be used for the following purposes:

- Fines and penalties, such as traffic violations, late finance charges, interest payments, community justice restitution, and supervision\_fees
- b. Entertainment, including tips
- c. Contributions or donations
- d. Vehicle or mortgage payments
- e. Refundable deposits
- f. Food, alcohol, or tobacco products

### WIOA regulations prohibit the payment of debts incurred prior to enrollment in the program.

All supportive service payments must be tied to education, occupational skills training, OJT or job search activities. Supportive services must be reflected in the customer's Individual Career Plan and/or case documentation in GWROPP.

A **Determination of Need Request Form** (Addendum 1) must be fully completed for all supportive service requests needed to mitigate a barrier or barriers to customer's participation in and completion of training or employment activity, but not directly related to program participation and as such considered "standard and customary." Examples of "standard and customary" supportive services for which the **Determination of Need Request Form is not required** include: tools required for program/work participation, uniform/specific clothing required for program participation, license/testing/certification/background check fees required for program participation and or credential attainment. The following questions and issues must be addressed when completing the form:

- Description of the specific circumstances that have created the need for supportive services at this time.
- 2. Description of staff and customer's efforts, and the outcomes of those efforts, in obtaining assistance from other community resources, friends, or family members.
- 3. Description of how this assistance will remedy the specific situation and assist the customer in completing training and/or maintaining employment.
- If the supportive services request reflects a recurring need, explain how this need will be addressed in the future without additional assistance.

All efforts must be made to ascertain that supportive service payments provided to the participant are not available through another resource. Staff must utilize the Determination of Need Request form to clearly document resource referrals made to the participant. Community resources are the primary source for supportive service needs such as food stamps, TANF, Medicaid, and community based social service agencies. WorkSource Atlanta Regional staff should assist participants in exploring resources available from other sources in the community or within their own support system. Document all conversations regarding supportive services, referrals, actions, etc. in the participant's file.

#### Other Considerations

- Supportive service payments are not automatic or guaranteed to customers. Payments must be evaluated on a case-by-case basis to allow a participant to overcome a barrier to training or employment.
- 2. The expenditure should not exceed a prudent person's decision under the circumstances at the time the cost is incurred. It should reflect current market price, and public perception should be taken into consideration.
- 3. Source documentation comprised of original invoices or receipts are required for all payments/reimbursements. No photocopies are allowed. Source documentation should allow tracking of funds to a level of expenditure adequate to establish that funds have not been used in violation of applicable laws and regulations and be in accordance with generally accepted accounting principles. All forms and signatures must be completed in ink.
- 4. All original source documentation related to supportive services must be submitted to the finance department with the completed payment requisition; copies of the source documentation should be maintained in the customer's file.
- 5. Reconciliation of supportive services in the State Participant Portal Tracking System (VOS) will be conducted by the ARC Workforce Finance Administrator. It is the responsibility of the Service Providers to create a supportive services account in VOS with a committed amount for a participant once the individual has been determined to be eligible for supportive services. Total supportive service commitments should not exceed the ARC set cap. Once set

up in the system, the ARC Workforce Finance Administrator will be reconciled one year after the initial set up, or if notified that the participant has exited the program, whichever comes first. If reconciliation determines that there was an excess payment to a participant above the ARC cap with no prior approval, that excess amount will be charged back to the respective Service Provider. Note that reconciliation will be done based on actual submitted receipts and backup documentation sent with monthly invoices.

- 6. Pre-purchased supportive services (i.e., transit passes, pre-paid gas, clothing, personal care services/product cards and certificates, etc.) must be pre-approved by the designated Service Provider manager and must be tracked by usage on a spreadsheet. The pre-purchased cost should be part of the supportive services either set up already in VOS or be the initiating supportive services to set up in VOS if it is the first for the participant.
  - a. All receipts and other proof of payment must be entered into the GWROPP and determined accurate 60-days prior the participant exit.
  - b. All changes to a participant's supportive service situation should be updated in real time in the GWROPP.
- Retention/Follow-up services for participants may be provided on a case-by-case basis for up
  to one year after initial employment date, as permissible by state and federal regulations.
  WorkSource Atlanta Regional reserves the right to deny any request for lack of funding or
  other good cause.

<sup>\*</sup> Annually, the ARWDB Director will establish the maximum amount of supportive services per participant for the current Program Year and will adjust as needed.