



Bay Consortium Workforce Development Board

Policy Number: 21-01

Effective Date: September 12, 2021

End Date: September 13, 2023

Title: National Dislocated Worker Grant-Comprehensive and Accessible Reemployment Through Equitable Employment Recovery (NDWG CAREER) Supportive Service Policy

PURPOSE

The purpose of this policy is to provide the Bay Consortium Workforce Development Area (BCWDA) with both general and specific guidance pertaining to Supportive Services under the Comprehensive and Accessible Reemployment through Equitable Employment Recovery (CAREER) National Dislocated Worker Grant (DWG) in partnership with the Hampton Roads Workforce Council (HRWC).

REFERENCES

- Workforce Innovation Opportunity Act (WIOA); Final Rules, U.S. Department of Labor (DOL) Employment and Training Administration (ETA), (20 CFR 681.570 and 688.120, 20 CFR 680.900-20 CFR 680.970)
- Training and Employment Guidance Letter (TEGL) #12-19, Dated November 20, 2020
- Training and Employment Guidance Letter (TEGL) #19-16, Dated March 1, 2017
- Training and Employment Guidance Letter (TEGL) #25-20, Dated June 28, 2021

BACKGROUND

Supportive services are necessary to enable an individual to participate in certain activities authorized under WIOA. Supportive services may include, but are not limited to, the following:

1. Linkages to community services;
2. Assistance with transportation;
3. Assistance with childcare and dependent care;
4. Assistance with housing;
5. Needs-related payments; (Not Applicable under the CAREER Grant local policy)
6. Assistance with educational testing;
7. Reasonable accommodations for individuals with disabilities;

8. Referrals to health care;
9. Assistance with uniforms or other appropriate work attire and work-related tools, including items as eyeglasses and protective eye gear;
10. Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes;
11. Payments and fees for employment and training-related application, tests, and certifications.

When may supportive services be provided to participants?

- a) Supportive services may only be provided to participants who are:
 1. Currently enrolled in Individualized Basic Career and/or Training services; and
 2. Unable to obtain supportive services through other programs providing such services.
- b) Supportive services may only be provided when they are necessary to enable individuals to participate in allowable Title I activities.

Also, WIOA funded and/or CAREER Grant supportive services can only be authorized when these same needed services are not reasonably available to the participant through any other personal and/or other community program arrangements. Any assigned staff making the request on behalf of a participant is responsible for reviewing and documenting the unavailability of any other suitable arrangements before any WIOA funds are utilized.

Supportive Services are available to participants only during the active enrollment period. (Meaning they are enrolled in an approved individualized career service or training service as documented in VAWC.) This includes essential supportive services necessary for allowing employed participants or students enrolled in WIOA credited advanced training programs, to continue in (or avoid dropping out of) those programs.

The assigned Case Manager must thoroughly assess the participant's needs for supportive services, document the results of the assessment, and document the provision of such services through vendor receipts, invoices, voucher, etc. Additionally, the participant and Case Manager must discuss how the participant will support the expense for supportive service issues once the initial and/or temporary assistance under this project has been provided to the participant.

The Case Manager must document the efforts to contact and coordinate with the available partners and, if applicable, the inability of such partners to provide the needed supportive services.

As a general rule, no supportive services authorized in support of any single participant should exceed \$2,000 (cumulative, in total) without first submitting a separate written request to exceed



this limit to the HRWC office for prior approval on behalf of the subject participant. The HRWC will evaluate the requests on a case-by-case basis and either approve or disapprove the exception request within seven (7) working days. The provision of supportive services will not count against any participant's ITA Training cap but must be processed for proper internal handling and fiscal tracking.

POLICY

- Supportive services may only be provided to participants who are participating in career or training services and are unable to obtain the services through other programs who provide such services.
- Supportive services may only be provided after it has been determined such services are necessary to enable the participant to participate in Workforce Innovation and Opportunity Act (WIOA) activities.
- Supportive services may only be provided after it has been determined the participant is unable to obtain support services through other programs providing such services.

The service provider must thoroughly assess the participant's need for supportive services, document the results of the assessment, and document the provision of such services through vendor receipts, invoices, voucher, etc. Additionally, the participant and service provider must develop a plan on how the participant will support a part or all of the expense for supportive service issues once the initial assistance has been given to the participant.

The service provider must document the efforts made to contact and coordinate with the available partners and, if applicable, the inability of such partners to provide the needed supportive service.

The One Stop Operator, WIOA Service Providers, and One Stop partners shall identify in the Memorandum of Understanding (MOU) the process utilized to ensure resource and service coordination regarding supportive services including how supportive services will be funded when they are not available from other sources. In addition, the MOU must describe how accurate information will be provided on the availability of such services in the local area.

PROCEDURES FOR SUPPORTIVE SERVICES

Determination of Need

Supportive services are not automatic or guaranteed; they are based on participant need and necessity to enable the participant to participate in approved programs and only when similar services are unavailable within the community. The participant's need and necessity of the supportive service must be documented in the case file; and for participants enrolled in



individualized career or training services, must be included in the Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

Cost Limitations

Cost limitations are listed in Attachment 1. The cost of reimbursement or direct payment to participants or, by subsequent category, vendor for supportive services shall be the actual cost incurred up to an average of \$2,000 per participant. Costs for Supportive Services must be reasonable and when applicable, competitively priced. An effort must be made by the Case Manager to make this determination. The cost limitation includes all supportive services provided during the participant's enrollment and those supportive services provided to the client as part of follow up after exit.

When multiple vendor options are available for delivering supportive services, documentation must show a reasonable effort was made to determine and choose the most appropriate option based on the customer's needs, ability to access and competitively priced service available.

Exceptions to exceed cost limitation or provide a service not listed:

In some instances, there may be a need to exceed the limitations specified by this policy, or to provide a supportive service not defined that otherwise meets the intent of this policy. In cases of exceeding cost limitations, the costs must be approved by HRWC. All requests for providing services not listed in the policy must be pre-approved by HRWC.

All requests for any exceptions must include the following:

- Customer name and State ID#;
- Identification of the additional supportive services needed and approximate cost, and;
- Justification for the request, including documentation of need and the activity it supports, and;
- Current customer activity status, and
- Documentation of previous funds expended.

HRWC will evaluate the request on a case-by-case basis and either approve or disapprove the exception request within seven (7) working days.

ALLOWABLE SUPPORTIVE SERVICES

Assistance with Uniforms or other Work-related Items

Supportive services assistance is authorized for protective clothing, tools, and equipment required for participants to enroll and participate in training programs or other employment under WIOA. These items may include eyewear, steel-toed shoes, work related or training related tools and equipment, uniforms, testing fees required for licensure or certification exam, etc.



Items not included in a training program curriculum are still supportive services if they are provided to the participant. These items include interpreter, or signer, interviewing clothing, laundry and/or dry-cleaning services, additional tools and materials needed for employment after training is completed.

Basic Car Repair

Supportive service cost for emergency car repair is authorized, such as tire and battery replacement, minor car repairs not covered by insurance or warranty, and oil changes. Maintenance repair can be covered up to the amount listed on Attachment 1. Such expenses must be documented by the Case Manager or repair facility.

Child Care and Dependent Care

Childcare assistance may be provided by a licensed and insured child/adult care provider and/or a family day home provider to participants who are not able to participate in WIOA programs without such assistance. "Family day home" means a child day program offered in the residence of the provider or the home of any of the children in care for one through twelve children under the age of 13, exclusive of the provider's own children and any children who reside in the home, when at least one child receives care for compensation.

This includes participants who are in danger of dropping out or making less than satisfactory progress due to unsatisfactory or unreliable childcare arrangements. Case Managers must obtain proof of type of childcare facility being utilized by participant.

Eligible dependent care expenses include:

- Childcare for your children under age 13;
- Day care for your spouse or your children (of any age) who are physically or mentally incapable of self-care who you claim on your Federal Income Tax return as a qualified dependent, and
- Elder care for adults who you claim on your Federal Income Tax return as a qualified dependent.

Expenses cannot be advanced before the care has been provided for your dependent, even if your provider requires payment in advance.

Education, Employment Certification and Associated Membership Fees

Supportive service assistance is authorized for the payment of tutoring services, application, and testing fees to educational institutions. These are fees that are paid to determine a participant's eligibility and acceptance at the educational institution, and which will allow the client to obtain information on financial aid awards. Exam fees and membership fees are allowed if it assists the customer in obtaining employment and networking within the certification field.



Emergency Housing

Emergency housing assistance may be provided to participants on a limited basis. The assistance may include the cost of rent or mortgage payment to stop an eviction and relocation expenses; temporary housing in a motel/hotel, or utility payments. This provision is for emergency housing only and need documentation of possible eviction, homelessness, missed payment, etc. Since this is a limited-time emergency intervention, a plan must be established to ensure the client will be able to meet long term housing needs.

Submitting Reimbursement Invoices

As part of this guidance, sub awardees will use the attached forms for submitting requests for reimbursements. All sub awardees are individually responsible for maintaining all necessary supporting documentation for verification purposes. All financial reimbursements are subject to monitoring and auditing.



ATTACHMENT 1
SUPPORTIVE SERVICES LIMITS
CHART

Notes:

1. Limits for individual items listed below may be modified to provide the total costs for a supportive service, as long as it does not exceed the total cap of per participant as identified by the grant.
2. Any request for increased limit for individuals will be evaluated by the Hampton Roads Workforce Council on a case-by-case basis and either approve or disapprove the exception request within seven (7) working days.

Type of Service	Dislocated Worker Category Limit
Total Supportive Services limits allowable per individual served under this grant. (See above Note 2. for exceptions.)	\$2000
Cost Limitation Per Category	
Assistance with Uniforms or Other Work-Related Items	\$1000
Educational Testing, Employment Certification and Associated Testing/Application Fees	\$1000
Emergency Housing¹	\$1200
Child and Dependent Care ² Licensed Care Facility	\$1440
Child and Dependent Care ³ Family Day Home Care	\$1170
Legal Aid Services	\$500
Medical/Health Services	\$750
Basic Car Repair⁴	\$1000
Car Liability Insurance⁴	\$600
Transportation Assistance	\$750
Mileage Reimbursement	\$0.20/mile up to \$750

¹ Estimated based on the FY 2022 GSA per diem rate for the average of DC and Richmond area for 6 weeks

² Estimated based on VA State average cost of licensed care for 1 child for 6 weeks

³ Estimated based on VA State average cost of Family Day Home Care for 1 child for 6 weeks

⁴ Estimated on average car cost on AAA website