



Workforce Innovation and Opportunity Act Program

POLICY/PROCEDURES

Policy Number: WIOA-04-2021-30

 New Policy

 X Policy Revision

Date: April 30, 2021

Subject: WIOA Adult/Dislocated Worker Supportive Services

A handwritten signature in blue ink that reads "Michele Burns".

Michele Burns
Executive Director
CareerSource Okaloosa Walton

Appendix A

Supportive Services Statement of Need and Value



Workforce Innovation and Opportunity Act (WIOA)

WIOA Adults/Dislocated Worker Supportive Services

OF INTEREST TO

CareerSource staff in Okaloosa and Walton counties required to implement programs under Title 1 of the Workforce Innovation and Opportunity Act (WIOA) of 2014.

SUBJECT

WIOA Adult and Dislocated Worker Supportive Services

PURPOSE

These instructions provide guidance for workforce associates to implement the CareerSource Okaloosa Walton's policy on providing supportive services for WIOA Adults and Dislocated Workers.

REFERENCE

- Workforce Innovation and Opportunity Act, Section 134. (d) (2) and (3); Section 3(59).
- USDOL/ETA 20 CFR Part 680, Subpart G, Supportive Services.
- ETA TEGL WIOA 3-15, Operating Guidance for the Workforce Innovation and Opportunity Act.
- ETA TEGL 19-16, Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules.

Supersedes WIOA Adult/Dislocated Worker Supportive Services	Expiration Date 10/14/2020
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BACKGROUND

The Workforce Innovation and Opportunity Act (WIOA) of 2014 authorize supportive services for participants enrolled in WIOA programs. CSOW, in consultation with one-stop partners and other community service providers, must develop a policy on supportive services that ensures

resource and service coordination in the local area. The policy should address procedures for referral to such services, including how the services will be funded when they are not otherwise available from other sources. *The provision of accurate information about the availability of supportive services in the local area, as well as referral to such activities*, is one of the **career services** that must be available to adults and dislocated workers through the one-stop delivery system.

WIOA places great emphasis on education and training activities leading to employment as the desired outcome. Participants enrolled in WIOA programs often find themselves in need of additional assistance to participate or continue participating in WIOA activities. According to WIOA rules and regulations, CareerSource Okaloosa Walton may establish time limits and a maximum amount of supportive services that may be provided to eligible participants.

POLICY GUIDANCE

A. SUPPORTIVE SERVICES

1. Supportive services are services that are necessary to enable an individual to participate in activities authorized under WIOA sec. 134(c)(2) or (3).
2. A key principle in WIOA is to provide local areas with the authority to make policy and administrative decisions; and to allow the flexibility to tailor the workforce system to the needs of the local community. To ensure maximum flexibility with the execution of this policy, the WIOA Career Advisors must:
 - a. Provide the appropriate supportive services that meet the needs of the participants.
 - b. Initiate coordination with other community agencies to ensure the highest quality and most comprehensive service provisions possible; and
 - c. Prevent any duplication of resources and services.
 - d. Develop and maintain a list of agencies in the local area and the type of supportive services they provide.
 - e. Ensure that supportive services are funded by WIOA only when these services are not available through other means; and
 - f. Ensure that supportive services are provided only when necessary, for the individual to participate in career services and/or training activities.

B. WHO MAY RECEIVE SUPPORTIVE SERVICES?

1. Supportive services are authorized for individuals enrolled in Workforce Innovation and Opportunity Act Adult, Dislocated Workers, and Youth programs; and may only be

provided to participants who are unable to obtain supportive services through other programs providing such services.

2. Supportive services are not a standalone WIOA activity. They are intended to provide participants with financial assistance or other supportive needed to allow participation in and successful completion of a WIOA program; and give participants the opportunity to reach the goal of obtaining unsubsidized employment.

C. WHEN IS IT ALLOWABLE TO USE SUPPORTIVE SERVICES?

1. Under WIOA Section 134(d)(2) Supportive services may only be provided to adults and dislocated workers who are participating in career services and/or training services as defined in WIOA Sections 134(c)(2) and (3).
2. Before authorizing supportive services, every effort must be made by the Career Advisor to obtain these services through CSOW partner agencies or other community resources.
3. ***Specifically, the WIOA Career Advisor must make a determination and document in a case note that the participant is in need of, and unable to receive supportive services from other sources that will allow participation in one of the following WIOA activities:***
 - a. **Basic Career Services.**
 - b. **Individualized Career Services.**
 - c. **Training Services.**

D. SUPPORTIVE SERVICES AUTHORIZED UNDER WIOA

1. WIOA supportive services come under two board categories:
 - a. Supportive Services for Adults and Dislocated Workers. And
 - b. Supportive Services for Youth.
2. In practice, supportive services serve two basic purposes for adults and dislocated workers. The first is to enable a participant to participate in WIOA employment related activities or career services; and second, to enable a participant to participate in WIOA training services, as appropriate.
3. Whether or not a participant receives supportive services depends on whether the services are **allowable, reasonable, and necessary**; and whether funds are **available**.

E. SUPPORTIVE SERVICES FOR ADULTS AND DISLOCATED WORKERS

1. The following supportive services are available to WIOA adults and dislocated workers to enable them to participate in career services and/or training services:

- a. Linkages to community services.
- b. Assistance with transportation.
- c. Assistance with childcare and dependent care.
- d. Assistance with housing.
- e. Needs-related payments, as described at § 680.930, 680.940, 680.950, 680.960, and 680.970.
- f. Assistance with educational testing.
- g. Reasonable accommodations for individuals with disabilities.
- h. Legal aid services.
- i. Referrals to health care.
- 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.

F. USDOL/ETA recognized that legal aid can uniquely address certain barriers to employment and included **legal aid services** as a supportive service. This change is also made available to youth under 20 CFR 681.570.

G. Other supportive services that are necessary for a participant to participate in WIOA may be allowed on a case-by-case basis. Prior approval must be requested and approved in writing by the Executive Director or designee.

H. Some examples of the supportive services' Linkages to Community Services may include referrals to:

- a. Drug and alcohol abuse counseling.
- b. Temporary shelter.

- c. Financial counseling. And,
- d. Other reasonable and necessary services required for participation in WIOA.

I. SUPPORTIVE SERVICES COST CATEGORY

1. The supportive services **cost category** for training includes tuition and other supportive services that will enable an individual to participate in training, whether included in the tuition or paid directly by the CSOW. The following supportive services may be included in the **training cost category**, but are not limited to:

- a. Books.
- b. Mandatory fees.
- c. Equipment or tools.
- d. Supplies.
- e. Uniforms and shoes/boots.
- f. Drug tests, physicals, eye exams, and Immunizations.
- g. Background checks.
- h. Training related application, graduation, and GED fees.
- i. Credential, license, or exam fees.
- j. Lodging (when a part of the cost of attending training out-of-area).
- k. Auxiliary aides and services necessary for persons with disabilities to participate in training. etc.
- l. **Note:** This cost category does not include any allocated costs for staff time.

J. LIMITS TO THE AMOUNT AND DURATION OF SUPPORTIVE SERVICES

1. CareerSource Florida (CSF) Administrative Policy #109 and 20 CFR 680.920 states that local Boards may establish limits on the provision of supportive services or provide the one-stop center with the authority to establish limits, including a maximum amount of funding and maximum length of time for supportive services to be available to participants. CSOW will use the flexibility in guidance to establish supportive services limits, including a maximum amount of funding; and maximum length of time a participant may receive supportive services:

a. Participant's Supportive Services Budget

- (1) The amount of the participant's supportive services budget is dependent on the WIOA allocations received from the Department of Economic Opportunity (DEO). Each participant's budget should be set at a maximum amount of \$1000.00 per Program Year (PY), not to exceed \$2000.00 over two years.
- (2) A review of the participants' supportive services budget should be conducted during the 3rd quarter of each Program Year to ensure funding is available to cover any projected needs. Under some circumstances an increase in the individual's supportive services budget may be authorized if requested in advance in writing and approved by the Executive Director or designee. All request for an increase in the supportive services budget must be accompanied by a **Statement of Need and Value**.

b. Participant's Supportive Services Budget Year

- (1) The supportive services budget year should align with the Program Year and run from July 1 through June 30. The participant's supportive services budget in Gazelle will start on the date the Career Advisor signs the **Statement of Need and Value** and end on the last day of the Program Year; or when no longer needed, whichever comes first.
- (2) A participant should not receive more than the allowable \$1000.00 per budget year and \$2000.00 over two budget years, unless pre-approved by the Executive Director or designee.
- (3) The budget amounts should be reviewed annually and may be adjusted if requested in writing and approved by the Executive Director or designee.
- (4) The Career Advisor must review the customer's open and closed supportive accounts in Gazelle prior to requesting a supportive service.

c. Administration of The Supportive Services Budget

- (1) If a participant does not exhaust the supportive services budget during the budget year, any remaining funds in the account will be zeroed out and a new budget, not to exceed the \$1000.00, will be established for the new Program Year.
- (2) If the participant exhausts the supportive services budget during the first budget year and additional funds are needed per a **Statement of Need and Value**, then additional funds may be requested for approval by the Executive Director or designee.

- (3) If the initial **Statement of Need and Value** indicate an amount greater than \$300.00 is needed by the participant, then additional funds may be requested for approval by the Executive Director or designee.
- (4) Supportive services are limited to \$2000.00 over two Program Years without prior approval.
- (5) For the second and subsequent budget years, the participant's supportive services budget will start on first day of the PY and end on the last day of the PY or last date of the participant's services, whichever comes first.

K. STATEMENT OF NEED AND VALUE

1. Staff must first determine that the participant is in financial need of supportive services before they can be provided. Supportive services should be used to address the participant's barriers identified during the initial assessment or objective assessment process.
2. The plan for the provision of supportive services must be documented in the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS) (as appropriate), and case notes. The **Statement of Need and Value** signed by the participant will be the primary method to determine the participant's need for supportive services. The Career Advisor may use additional supporting documentation that demonstrates the participant's financial need, such as a budget or some form of financial analysis.
3. The Career Advisor will use a self-attestation signed by the participant to document that the supportive service was used for its intended purpose. The self-attestation should be signed within 30 days of the issue date. The self-attestation should be documented in the case notes and filed in ATLAS.

L. OVERSIGHT, ACCOUNTABILITY, AND INTERNAL CONTROLS

1. CareerSource Okaloosa Walton will use the highest level of oversight, accountability, and internal controls to ensure supportive services provided to participants are used for its intended purpose. The participants will be required to sign a **Statement of Need and Value** to document the need for supportive services. And will be required to sign a self-attestation to document the supportive services was used for its intended purpose. To enhance internal controls, the following guidelines will be used to add to the accountability of the CSOW WIOA Supportive Services Program:
 - a. **Assistance with Transportation:** *CSOW will use re-loadable debit cards to assist participants with gas expenditures. Instructions for using the reloadable debit cards are in Section M below.*
 - b. **Assistance with childcare and dependent care:** *CSOW will use a voucher/direct payment to the selected vendor.*

- c. **Assistance with housing:** CSOW will use a voucher/direct payment to the selected vendor.
 - d. **Assistance with educational testing:** CSOW will use a voucher/direct payment to the selected vendor.
 - e. **Reasonable accommodations for individuals with disabilities:** CSOW will use a voucher/direct payment to the selected vendor.
 - f. **Legal aid services:** CSOW will use a voucher/direct payment to the selected vendor.
 - g. **Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear:** CSOW will use a voucher/direct payment to the selected vendor.
 - h. **Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary/education classes:** CSOW will use a voucher/direct payment to the selected vendor.
 - i. **Payments and fees for employment and training-related applications, tests, and certifications:** CSOW will use a voucher/direct payment to the selected vendor.
2. Reimbursements to participants are allowable only in situations that do not allow for normal processing. The request must be in writing and approved in advance by the Executive Director or designee. The request must include a Statement of Need and Value and documented in the case notes. Documentation in the file should show:
- a. That the payment was made.
 - b. The purpose for the payment. And
 - c. Proof of follow-up verification by the Career Advisor.
 - d. Other documentation required by this local operating procedure.

M. PAYMENT METHOD FOR SUPPORTIVE SERVICES

1. Reloadable Debit Card Management

The CSOW Debit Card system is an electronic system using debit cards which are reloadable in amounts determined by the Career Advisor, based on documented evidence, for participation in the WIOA program and any other WIOA special projects **where transportation may be provided to participants**. The CSOW debit card system eliminates the need:

- a. To have prepaid cards on hand.
 - b. For inventories of physical cards. And
 - c. Repetitive reordering of cards.
2. The debit card system also provides a means to track total expenditures for individual participants through Gazelle which interfaces with the MIP Accounting System.
3. The Debit Card system works through the Gazelle and MIP systems using an outside vendor as the portal for cards and for downloading dollars to the cards for participants.
4. ***Reloadable debit cards will not to be used for other supportive services such as childcare, uniforms, books, licensing fees, etc. See Paragraph L above.***
5. To ensure an efficient system for managing and distributing reloadable debit cards the following responsibilities are delineated:

a. Finance Department:

- (1) Is responsible for ensuring payments are made to the vendor for the debit cards.
- (2) Will order the debit cards requested via the Gazelle System by the Career Advisor and process the downloading of dollars to each card as requested through Gazelle as per a predetermined schedule provided to the Career Advisors.
- (3) Will provide reports as requested to the Management Team for review of participant expenses.
- (4) Coordinate any corrections to a card as deemed necessary. EFT transfers to the outside vendor conducted by the Finance Department are approved per the EFT policy by the Executive Director to ensure that the dollar amounts transferred reconciles with the requests made by the Career Advisors for the participants.

b. Career Advisors:

- (1) Will determine who in their case load will receive a debit card. The check request form in Gazelle will be used to request the debit card and download dollars.
- (2) Will ensure the participants receive the debit card; and sign an agreement indicating the fee structure before any dollars are downloaded onto the card.
- (3) Will ensure the participants understand the debit card system process and their individual responsibilities.

c. Participant:

- (1) Is responsible for any fees as indicated on the agreement signed by the participant.

N. OTHER PAYMENT METHODS FOR SUPPORTIVE SERVICES

- 1. Support Services are unique goods or services provided to eligible WIOA participants. These types of services can include assistance with childcare and dependent care; assistance with housing; reasonable accommodations for individuals with disabilities; uniforms or other appropriate work attire; and assistance with books, fees, school, and supplies. Career Advisors will utilize the Gazelle Client Services System to generate either Purchase Orders or Check Requests as a means of providing these support services to eligible participants.

a. Purchase Orders

- (1) Purchase Orders will be generated from the Gazelle Client Services System when goods or services can be invoiced to CareerSource after the participant has received the goods or services.
- (2) Purchase Orders must be approved by the Program Manager/Coordinator.
- (3) It is the responsibility of the Program Manager/Coordinator to ensure the transmission of the approved Purchase Order to the Vendor.
- (4) It is the responsibility of the Program Manager/Coordinator to ensure transmission of the approved Purchase Order to the Finance Department for processing, and should include the following in the file:
 - (a) Original Gazelle printout.
 - (b) Copy of the case note.
 - (c) Proof of enrollment in program.
 - (d) Proof that the purchase is recommended or required.
(Examples include letter from employer, itemized list from school, and/or a case note).
 - (e) Verification of cost from the vendor
- (5) The Finance Department will be responsible for reconciliation of the Purchase Order package with the invoice from the vendor and payment processing in accordance with all other payment processing described in the General Policies Manual.

b. Check Requests

- (1) Check Requests will be generated from the Gazelle Client Services System when goods or services must be paid for before the participant receives the goods or services. Check Requests must be approved by the Program Manager/Coordinator.
- (2) It is the responsibility of the Program Manager/Coordinator to ensure transmission of the approved Check Request to the Finance Department for processing, and should include the following:
 - (a) Original Gazelle printout.
 - (b) Copy of the case note.
 - (c) Proof of enrollment in an identified program.
 - (d) Proof that the purchase is recommended or required.
(Examples include letter from employer, itemized list from school, and/or a case note).
 - (e) Verification of cost from the vendor.
- (3) The Finance Department will be responsible for processing the check in accordance with all other payment processing described in the General Policies Manual.
- (4) For emergency requests all efforts for expediting will be accommodated.

O. COORDINATION OF SERVICES

1. USDOL/ETA encourages agencies to work closely together to align programs better and leverage resources. Therefore, it is vital that Career Advisors work closely with partner and community programs to ensure participants receive all the benefits they are entitled to under all aspects of the law. For example, coordinating services with Vocational Rehabilitation to ensure individuals with disabilities receive the supportive services they need will prevent duplication of services.
2. The Career Advisors should coordinate services across WIOA core programs, as well as non-core programs, including required one-stop partners, to help individuals with barriers to employment, including individuals with disabilities, obtain the supportive they need to successfully participate in and complete career services and training services; and ultimately, obtain unsubsidized employment.

P. SUPPORT SERVICE RESTRICTIONS

Supportive services **may not** be used to pay for the purchase of items such as, improvement or maintenance of any asset (e.g., car payments or mortgage payments); to pay taxes; to pay past due fees, penalties, interest, or other such expenses; to pay child supportive payments in arrears or otherwise; to pay for parking or moving violation tickets; to pay for bail

or restitution; to settle an insurance claim; or to pay for consumer debt. Computer hardware and software are considered assets.

Q. EMERGENCY ASSISTANCE

WIOA funding is intended primarily to supportive participants enrolled in WIOA career services and/or training services leading to employment. In the event of an emergency that will prevent a participant from completing training or accepting employment, the WIOA Career Advisor may request a one-time Emergency Supportive Service. Prior to requesting an Emergency Supportive Service, the WIOA Career Advisor must have exhausted all other avenues for assistance from other sources. Determination of eligibility to receive this one-time emergency assistance will be on a case-by-case basis, considering funding availability; and must be approved in advance by the Executive Director or designee. The **Statement of Need and Value** signed by the participant must accompany the request for emergency supportive services.

R. OUT-OF-REGION SUPPORTIVE SERVICES

These support services will be authorized on a case-by-case basis depending on the circumstances, length of training and funding availability. In addition to the support services already mentioned in this Local Operating Procedure, consideration may also be given to lodging costs and additional transportation cost, if appropriate, depending on funding availability.

S. DISASTER RECOVERY DISLOCATED WORKER GRANTS

To be ready to respond to natural disasters or major emergencies, CSOW will include consideration for supportive services that may be unique to potential disaster/emergency situations. For example, there may be a need for insect repellent for individuals conducting cleanup of damaged public property, which CSOW might not otherwise consider allowable under normal circumstances. In the case of a disaster staff should coordinate the need for supportive services not included in this local operating procedure with the Executive Director or Chief Operating officer.

T. FOLLOW-UP SERVICES

A follow-up service is a type of career service but is not a qualifying service for the receipt of supportive services. **Therefore, an individual who is only receiving "follow-up" services should not receive supportive services.** To receive supportive services, the individual must be participating in career services (other than follow-up services), and/or training services. Supportive services should not be used to extend participation for performance accountability purposes. Also, neither supportive services or follow-up services trigger participation or extend participation.

U. CONFIDENTIALITY

All data collected as a result of this policy is for official use only and should only be used in conducting official business.

V. SUGGESTIONS FOR CHANGES OR WAIVERS

Submit request for changes or waivers to this policy to the CareerSource Okaloosa Walton, 109 8th Avenue, Shalimar, Florida 32579, ATTN: Executive Director or Chief Operating Officer. Request may also be e-mailed to: Policy@careersourceow.com.

- a. Request for changes must include the suggested change and an explanation of how the change will improve the process.
- b. Request for **waivers** must include names, effective dates, case notes relating to the waiver, dollar amounts, etc.; and any other documentation to support the request.

W. ACTION REQUIRED

The CSOW staff in Okaloosa and Walton Counties is required to implement this supportive services policy adults and dislocated workers enrolled in a WIOA Program. All support services provided to participants must be administered and documented in accordance with this LOP and State or Federal guidance as appropriate.

R. TRAINING HOURS: 1.5 hours.



Workforce Innovation and Opportunity Act (WIOA)

Supportive Services Statement of Need & Value

Participant Declaration: In order for me to attend and participate in the program activities, I need the following Supportive Services that I have identified below. I certify that I am not receiving these Supportive Services from another source. I certify that, to my knowledge, my support service needs cannot be met by other resources or agencies and that I am not financially able to pay for these services myself.

CareerSource Okaloosa Walton's Career Advisor has fully explained the availability and eligibility for Supportive Services for the program(s) in which I am enrolled. I understand that these services can only be provided in accordance with program guidelines, which are subject to change based on the availability of funds and could end with short notice. I was also briefed the Supportive Services are not an entitlement and have eligibility criteria which I must meet. The eligibility criteria has been explained to me.

Program: ☐ Adult ☐ Dislocated Worker ☐ Other _____

Check the block(s) with the support service(s) you currently need to assist with your participation:

☐ Transportation assistance.	Estimated Cost: _____
☐ Work-related clothing.	Estimated Cost: _____
☐ Tools.	Estimated Cost: _____
☐ Books.	Estimated Cost: _____
☐ Emergency childcare (Limited)	Estimated Cost: _____
☐ Other _____	Estimated Cost: _____

*****Enter Total Estimated Cost: _____ *****Enter Total Approved Cost: _____
(Career Advisor completes cost items)

(Note: Participant should provide and attach verification of cost for each item as applicable)

Self-Attestation: I certify that the above information is true and correct to the best of my knowledge. I understand that any willful misstatement of facts, falsification of information or records, or like activity will result in denial/termination of Supportive Services and may result in legal action being brought against me.

_____/_____
Participant (Print Name) Participant (Signature) Date

CareerSource Okaloosa Walton Career Advisor (Signature) Date

Self-Attestation: I certify that the supportive services I received were used for its intended purpose. I understand that any willful misstatement of facts, falsification of information or records, or like activity may result in denial/termination of supportive services in the future, and may result in legal action being brought against me.

_____/_____
Participant (Print Name) Participant (Signature) Date

4/30/2021