

CAMDEN COUNTY WORKFORCE DEVELOPMENT BOARD
WIOA TITLE I (ADULT, DISLOCATED WORKER, AND YOUTH)
SUPPORTIVE SERVICE POLICY

SEPTEMBER 29, 2018

BACKGROUND:

The purpose of this memo is to outline a draft of policy pursuant to WIOA §134 for Supportive Services and Needs Based Payments for Adults, Dislocated Workers, and Youth.

The goal of this program is to properly document supportive services provided for all participants. A previous policy of the local area was to add approximately \$2500 above each tuition cap for purchases of needed items or services not covered by the provider's training and other itemized costs. The Workforce Development Board adopted this policy for the local area on September 29, 2018.

For WIOA Title I Youth participants, supportive services are one of the fourteen (14) required program elements and must be available to all registered Youth participants. Additional guidance may be forthcoming from USDOL and NJLWD regarding additional criteria for Youth beyond existing law and/or state or federal guidance, and therefore, this policy may be amended or supplemented with additional requirements concerning supportive services and needs-related payments for Youth.

WIOA DEFINITION OF SUPPORTIVE SERVICES

Supportive Services are "services such as transportation, child care, dependent care, housing and needs-related payments, that are necessary to enable an individual to participate in activities authorized by the Act." See §3(59), Workforce Innovation and Opportunity Act of 2014. In furtherance of one purpose of both WIOA and the CCWDB Local Plan (2016-2020), supportive services are to be in addition to, not in replacement of, other linkable services or funding available through other agencies.

New Jersey Workforce Innovation Notice 10-16(A) and 20 CFR 680.900 further define these services and including, but not limited to:

- Linkages to community services
- Assistance with transportation
- Assistance with child care and dependent care
- Assistance with housing
- Needs-Related Payments (disallowed per local area)
- Assistance with educational testing
- Reasonable accommodations for individuals with disabilities
- Legal aid services
- Referrals to health care
- Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
- Assistance with books, fees, school supplies and other necessary items for students enrolled in post-secondary education classes

- Payments and fees for employment and training-related applications, tests and certifications

If the support is required to participate in training, it is not considered a “supportive service” it is considered part of the training cost. If it is not required for training, but necessary to continue training or gain employment it is considered a “supportive service”. If the support is a course requirement it must be written on the course syllabus or part of the registration paperwork for the training and a copy of the requirement documentation must be kept in the participant file as part of the supportive service records.

Supportive services are not entitlements and shall be provided on the bases of a documented financial assessment and/or individual circumstances, the absence of other resources, and the availability of program funds. Reimbursement shall be for actual costs. Supportive services may be provided to a participant who meets the following requirements according to the WIOA final rules:

1. The participant is registered in a WIOA or other local area workforce program that allows supportive services. The participant can also be receiving follow-up services and support is needed to obtain or retain employment or continue education; and
2. The participant is receiving career or training services as defined in WIOA secs. 134(c)(2) and (3); and
3. Supportive services are necessary to enable continued participation in career or training services; and
4. The participant is unable to obtain similar services from another source (non-WIOA). Research was done to show all other resources were exhausted; and
5. The participant has a documented financial assessment supported by the youth’s Individual Service Strategy (ISS) or adult’s Individual Employment Plan (IEP).

Service providers must establish internal controls that result in equitable treatment, maximize allocations, and ensure coordination with, and referral of participants and applicants to, other community resources.

As a part of the assessment, program staff will determine a participant’s need for supportive services and appropriate resources. The Individual Service Strategy (ISS for WIOA Youth) and Individual Employment Plan (IEP for WIOA Adult or Dislocated Worker) must document the supportive services needed to address barriers to a participant’s employment goals and how they will be addressed.

Alternatives to WIOA-funded supportive services must be sought prior to providing supportive services with WIOA funds. The CCOSCC will ensure that supportive services are available as defined in this policy to all eligible participants. Prior to WIOA providing a supportive service, counselors must ascertain if community referrals were made and all other resources were exhausted. This determination must be documented in AOSOS and either supplemented by documentation to file or upload to AOSOS. In addition, it may also be documented on the hard copy supportive service form.

REQUIREMENTS FOR ALL WIOA-FUNDED SUPPORTIVE SERVICES

The cap on all supportive services will be \$2,500. Only exceptions advocated by a counselor on behalf of an individual to their manager will be considered for “exception” approval by the CCOSCC. Managers who agree an exception should be made to the capped amount must communicate the request to either the Director of the Resource Center or the CCOSCC Director. Only a Director in agreement may request the exception of the CCWDB. Only in instances of a director being unavailable shall a manager be permitted to go directly to the WDB for exception approval.

All supportive services, while reviewed on a case by case basis must reasonably relate to the assessment by adult, dislocated or youth counselors in the Individual Employment Plan (IEP for Adult/Dislocated) and/or Individual Service Strategy (ISS for Youth).

Prior to consideration of payment of any supportive services, individuals must work with the CCOSCC counselors to determine if supports are available through any other agencies and/or One Stop partners. The exhaustion of said available services/benefits must be demonstrated prior to the utilization of WIOA funding.

All counselors recommending a supportive service will be required to show that all documentation for same is complete in AOSOS, and further, that they understand the importance of proper follow up contact to be in compliance with performance measures for credential attainment, Employment 2nd Quarter after exit, Employment 4th Quarter after exit, and Median Wage.

ADDITIONAL DEFINITIONS

Exhausted All Resources means the process by which a Participant and case manager/counselor will research and document all other possibilities for receiving the requested support(s). Documentation must be written in AOSOS case notes and a hardcopy supportive service form should include that all resources were exhausted prior to utilizing WIOA or other federal funding.

Financial Assessment means an assessment at the time of enrollment or shortly after an eligibility appointment of the Participant’s budget used to determine self-sufficiency and needs for possible support.

ELIGIBILITY DETERMINATIONS FOR SUPPORTIVE SERVICES

Adult/Dislocated/Youth Program Participants

- A. Supportive services may only be provided to individuals who are:
 - (1) Participating in career or training services as defined in WIOA secs. 134(c)(2) and (3); **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 career service or training activities. Training and career services include:
 - a. occupational skills training, including training for nontraditional employment;
 - b. on-the-job training;
 - c. incumbent worker training in accordance with subsection (d)(4);

- d. programs that combine workplace training with related instruction, which may include cooperative education programs;
- e. training programs operated by the private sector;
- f. skill upgrading and retraining;
- g. entrepreneurial training;
- h. transitional jobs in accordance with subsection (d)(5);
- i. job readiness training provided in combination with services described in any of clauses a – h;
- j. adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with services described in any of clauses (a) through (g); and
- k. customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training

Documentation for Adult/Dislocated/Youth Program Participants

NOTE: ALL SUPPORTIVE SERVICES REQUIRE SCHEDULED APPOINTMENTS WITH THE CCOSCC. TO THE EXTENT THAT REFERRAL POLICIES/PROCEDURES ARE IN PLACE PRIOR TO THE APPROVAL OF THIS POLICY, THESE MUST BE REVISED TO ENSURE COMPLIANCE WITH THIS POLICY AND WIOA.

The following are acceptable documentation that can be used to verify eligibility for supportive services:

- **Participating in career or training services** - AOSOS record of career service(s) provided and or funded training service
- **Unable to obtain supportive services through other programs** - Case notes entered into AOSOS documenting that attempts were made to exhaust other resources before WIOA supportive services dollars are authorized.
- **Services are necessary to enable individual to participate in career or training activities** - Case notes entered into AOSOS documenting the determination that the participant requires the provision of supportive services to participate in career or training services.
- **Financial Assessment** – Case notes documenting the Participant’s budget, whether the individual requires supports to remain self-sufficient during length of enrollment

Participants who are considered underemployed or low-income as defined herein may be provided supportive services.

Underemployed Individuals – The following are underemployed individuals:

- Individuals employed less than full-time who are seeking full-time employment;
- Individuals who are employed in a position that is inadequate with respect to their skills and training;
- Individuals who are employed who meet the definition of a low-income individual (see below);
- Individuals who are employed but whose current employment earnings are 80% or less than their previous position.

Low-income Individual(s)

1. Individuals who receive, or, in the past six months received, or are a member of a family that is receiving or in the past six months has received, assistance through one or more of the following:
 - a. Supplemental Nutrition Assistance Program (SNAP);
 - b. Temporary Assistance for Needy Families;
 - c. Supplemental Security Income;
 - d. State or local income-based public assistance
2. Is in a family with total family income that does not exceed the higher of—
 - a. The poverty line; or
 - b. 70 percent of the lower living standard income level;
3. Is a homeless individual as defined in the Violence against Women Act of 1994, or a homeless child or youth (as defined in the McKinney-Vento Homeless Assistance Act)
4. Receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act;
5. Is a foster child on behalf of whom State or local government payments are made; or
6. Is an individual with a disability whose own income meets the income requirement of clause (2), but who is a member of a family whose income does not meet this requirement.

NEEDS-RELATED PAYMENTS (NRPs)

Training and Employment Guidance Letter (TEGL) 3-15 explains that needs-related payments (NRPs) are designed to provide a participant with resources for the purpose of enabling them to participate in training services. ETA recognizes that many individuals in need of training services may not have the resources available to participate in the training. Needs-related payments can help individuals meet their non-training expenses and help them to complete training successfully. According to §134(d)(3)(B) of WIOA, a participant must be enrolled in a WIOA training program in order to receive needs-related payments.

Per NJWIN 10-16, needs-related payments provide financial assistance to participants (adults, dislocated workers, out-of-school youth (OSY) aged 18-24) for the purpose of enabling them to participate in training and are a supportive service authorized by WIOA sec. 134(d)(3). Unlike other supportive services, in order to qualify for needs related payments, a participant **must** be enrolled in training, or may qualify if enrolled in a training scheduled to begin within thirty (30) days, or in any extended period of time so long as same is approved by the Governor for the local area. See 20 C.F.R. 680.930 – 680.960.

In accordance with TEGL 3-15, wherein it states that a “key principle is to provide local areas with the authority to make policy and administrative decisions and the flexibility to tailor the workforce system to the needs of the local community,” the Camden County Workforce Development Board does not support NRPs, and therefore, they are deemed inappropriate and therefore, **not allowable**.

WORK SUPPORT ACTIVITIES

WIOA Sec. 134(d)(1)(B) allows local areas to provide work support activities to low-wage workers. Low-wage workers are those individuals who are employed and eligible SNAP benefits. Work support activities

are supportive services that enhance a worker's ability to participate in training, such as services provided during nontraditional hours or the provision of onsite child care.

YOUTH INCENTIVES (ENROLLED YOUTH PARTICIPANTS ONLY)

WIOA permits local workforce development areas to utilize incentives for enrolled Youth Participants who attain certain milestones which are tied to training activities, work experiences and employment. 20 C.F.R. 681.640 instructs that "incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. The local program must have written policies and procedures in place governing the award of incentives and must ensure that such incentive payments are tied to the goals of the specific program; outlined in writing before the commencement of the program that may provide incentive payments; align with the local program's organizational policies; and are in accordance with the requirements contained in 2 CFR 200." See also TEGL 19-13, NJWIN 10-16(A).

[NOTE: United States Department of Labor (USDOL) makes the reference to the Uniform Guidance at 2 C.F.R. 200 to emphasize that while incentive payments are allowable under WIOA, the incentives must be in compliance with the Cost Principles in 2 C.F.R. 200. For example, Federal funds must not be spent on entertainment costs. Therefore, incentives must not include entertainment, such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment. Additionally, there are requirements related to internal controls to safeguard cash, which also apply to safeguarding of gift cards, which are essentially cash.]

Youth Participants will only be considered for receipt of a gift card when that incentive:

- Is tied to the goals of the specific program;
- Is documented in the Individual Service Strategy (ISS) and AOSOS before the commencement of the program that may be providing the incentive payment;
- Is aligned with the local program's organizational policies (below); and
- Is in accord with the requirements contained in 2 C.F.R. 200, and the participant or the parent or guardian of same signs a form delineating said prohibited purchases or uses.

The CCWDB supports the use of bank gift cards for those allowable and appropriate incentives. The CCWDB will purchase gift cards for the CCOSCC (Youth One Stop) subject to reimbursement by the CCOSCC Fiscal office.

Gift cards shall in no instance exceed \$25.00. In accordance with WIOA and associated guidelines, the following is an exclusive list of milestones/achievements for which gift cards may be considered:

- A Youth Participant passing the HiSet high school equivalency;
- A Youth Participant earning a nationally and industry recognized credential;
- A Youth Participant completing his/her first quarter of post-secondary education;
- A Youth Participant obtaining unsubsidized employment and retaining same for six months;
- A Youth Participant obtaining unsubsidized employment and retaining same for twelve months; and
- A Youth Participant demonstrating perfect attendance in a work experience opportunity.

In accordance with the County of Camden Requests for Proposals “Gift Card” policy, the CCOSCC will be held to the same stringent standard required of its competitively procured Youth providers. As such, the following must be strictly enforced:

- Purchase gift cards as needed (CCWDB, for ease of procurement, will purchase in advance, and will be reimbursed).
- Maintain a log which includes date purchased, type of gift card (bank/visa), amount, bar code ID number, issued to, issued by.
- Receipt of gift card signature form which will include – Participant’s name, reason for giving gift card, date received, type of gift card, amount, the bar code number, signature and print of received by and issued by.
- Copy front/back of gift card.
- Attach copy of the gift card to the receipt.
- In addition to notation in AOSOS and retention of these records in a Participant’s master file (or by attachment to AOSOS) copies of the gift card paperwork described above must be placed in the Participant’s file maintained in the Fiscal office of the CCOSCC.

Originals should be maintained and copies sent with reimbursement request; gift card activation charges are not allowable.

POST-EXIT ASSISTANCE

Post-exit supportive services may be provided for up to one year following exit for youth participants only. Post-exit supportive services must be related to obtaining or maintaining employment or post-secondary education. Service Providers cannot provide assistance related to any training activities including but not limited to work experience, on-the-job training, internship or occupational skills training as paid training is disallowed as a follow up service. Any other allowable supportive service listed above is allowable in follow up and must be documented in case notes as why the support will help maintain or secure employment or post-secondary education. Supportive services provided during follow up must follow the same procedures as a current participant with the exception of the case manager must enter the service in AOSOS as a “post program supportive service”.

Post-Exit Procedures and Documentation

The following procedures are provided to assist in administering supportive services:

- Service Providers are authorized to provide supportive services payments up to \$2,500 (including follow-up) enrollment maximum per participant. For participants who are co-enrolled (Adult and Youth), the maximum amount is \$2,500. Service Providers must work together to develop a supportive service plan on those co-enrolled. All individual supportive services caps still exist and must be included in the overall cap.

If a participant is exited from **all** programs and later returns months or years later to re-enroll in services, the enrollment period starts over and therefore the maximum amount starts over as well. The maximum amount is for the enrollment period in WIOA.

- An amount above the maximum for the participant must submit an exception request to the CCWDB in accordance with exceptions procedures herein.
- Participant files must adequately document that all supportive services are allowable, reasonable, justified, and not otherwise available to the participant and show evidence of collaboration. The file must contain the following:
 - a. An assessment of the participant’s need for supportive services and must be documented in the IEP/ISS; and
 - b. Documentation of participant’s personal budget ensuring youth does not currently have the financial resources to obtain the service; and
 - c. A determination must be made and documented whether other community resources are available to cover necessary expenses and show evidence of referrals to other resources, including, when feasible, outcome of the referral. Must be documented in case notes; and
 - d. Justification of purchase must be documented on the signed supportive service form or agency form. Form must include: participant’s name, seeker id, date of service, vendor’s name, justification for the service, and must include signatures from both the participant and case manager; and
 - e. Evidence that other non-WIOA sources were explored and documented in case notes or on the supportive service form; and
 - f. A service must be added to the electronic file on the date the service was provided. Must include what was purchased and the amount expended; and
 - g. A case note must be entered giving a summary of all above, including but not limited to, the need/justification for why the item was purchased or given, describe other resources exhausted, and amount expended; and
 - h. Service provider must make available a supportive service tracking log or print out from accounting system that lists each supportive service, the date of service, type of service, amount of the service, and a current total of supportive services spent to date.

Supportive services cannot be expended before a participant is enrolled in program. In addition, support may be provided as a follow-up service for up to 12 months after exit for youth programs only. Service Providers must follow the Post-Exit Assistance section above.

DISALLOWED SUPPORTIVE SERVICES

Funding for Supportive Services (including youth incentives) **cannot** be used to pay for the following items for a participant that is either currently enrolled or in follow up of any CCWDB funded program:

- Support for expenses incurred prior to participant’s enrollment in program. Participant must be enrolled before support can be provided. For example, service provider cannot pay for transportation assistance prior to date of enrollment;
- Fines and penalties such as traffic violations or other criminal related charges;
- Late finance charges, taxes and interest payments;
- Child support payments;
- Bail or restitution;
- Entertainment - including but not limited to:

- Tips;
 - theater tickets;
 - restaurant gift cards,
 - sporting events, or
 - other venue where entertainment is the sole purpose.
- Pet food;
 - Alcohol, marijuana, or tobacco products;
 - Refundable deposits;
 - Contributions or donations, federal funds cannot be used to donate or contribute to an organization on behalf of the participant;
 - Items for family members or friends, federal funds cannot be used to purchase items for anyone other than the enrolled participant;
 - Groceries;
 - On site meals during a training or education program;
 - Vehicle payment; or
 - Out of state job search and relocation expenses that are paid for by the prospective employer.

In addition to the above limitations, Youth incentives must also be documented by a signed form that the Youth Participant (ages 18-24) understands these prohibited services/items, **or** the parent or guardian (ages 16-17) signs same on behalf of the minor Participant.

CCOSCC FISCAL OFFICE RESPONSIBILITIES

In instances of Supportive Services (other than Youth incentives, discussed again briefly below) being recommended and documented in AOSOS by the LWD certified career counselor, the counselor shall coordinate with CCOSCC Fiscal Office to complete the following procedures:

- Email the Fiscal Office to the attention of Aaron Cream (aaron.cream@camdencounty.com) the following:
 - The service/item being recommended for purchase for the participant and confirmation that it has been reviewed and preliminarily approved by the counseling manager;
 - The approximate amount of the service/item, for Fiscal to determine the purchasing method required, i.e. quote, direct voucher;
 - Quotes or vouchers and any other required documentation which will result in purchase shall be completed by the Fiscal Office.
- Copies of all purchasing records pertinent to a particular participant's supportive service must be maintained in the participant's file in the Fiscal Office in addition to the documentation the counselor inserts into AOSOS. Counselor shall reference in notes that the supportive service was approved/provided, or denied and the reasoning thereto.
- The information required for Fiscal shall be emailed with the Participant's NJID# and all pertinent information completed, signed by manager and counselor.

In addition to the above rules and procedures, the CCOSCC and/or the CCWDB shall continue to leverage relationships with local businesses/service providers that may work to reduce the costs of services and items that may become repeatedly requested and justified by the participants and counselors. Any such agreements entered into on behalf of the CCOSCC or the CCWDB shall require support and approval of

the Camden County Board of Chosen Freeholders since all payments for services will be paid for by the CCOSCC Fiscal Office.

Gift Cards

In accordance with the County of Camden Requests for Proposals "Gift Card" policy, the CCOSCC will be held to the same stringent standard required of its competitively procured Youth providers. As such, the following must be strictly enforced:

- Purchase gift cards as needed (CCWDB, for ease of procurement, will purchase in advance, and will be reimbursed).
- Maintain a log which includes date purchased, type of gift card (bank/visa), amount, bar code ID number, issued to, issued by.
- Receipt of gift card signature form which will include – Participants name, reason for giving gift card, date received, type of gift card, amount, the bar code number, signature and print of received by and issued by.
- Copy front/back of gift card.
- Attach copy of the gift card to the receipt.
- In addition to notation in AOSOS and retention of these records in a Participant's master file (or by attachment to AOSOS) copies of the gift card paperwork described above must be placed in the Participant's file maintained in the Fiscal office of the CCOSCC.

Originals should be maintained and copies sent with reimbursement request; gift card activation charges are not allowable.

Gift cards are to be maintained in Fiscal until the day of Youth Participant's appointment wherein it is expected the card to be issued.