



**POLICY  
NUMBER  
109**

## **Administrative Policy**

<b>Title:</b>	Supportive Services and Needs-Related Payments		
<b>Program:</b>	Workforce Innovation and Opportunity Act		
<b>Effective:</b>	12/03/2020	<b>Revised:</b>	02/23/2021

### **I. PURPOSE AND SCOPE**

The purpose of this policy is to provide Local Workforce Development Boards (LWDBs) with requirements for ensuring supportive services and needs-related payments are provided to eligible Workforce Innovation and Opportunity Act (WIOA) participants. Additionally, this policy defines requirements for establishing local operating procedures (LOPs) that govern supportive services and needs-related payments.

### **II. BACKGROUND**

A key principle in WIOA is to provide local areas with the authority to make policy and administrative decisions and the flexibility to tailor the public workforce system to the needs of the local community. To ensure maximum flexibility, WIOA regulations provide local areas the discretion to provide the supportive services they deem appropriate, subject to the conditions prescribed by WIOA. LWDBs must develop policies and procedures to ensure coordination with other entities to ensure non-duplication of resources and services, and to establish limits on the amount and duration of such services.

### **III. AUTHORITY**

Workforce Innovation and Opportunity Act, Public Law (WIOA) Sections [3\(59\)](#); [106\(c\)\(1\)\(F\)](#); [133\(b\)\(2\)\(B\)](#); [133\(b\)\(3\)](#); [134\(c\)\(3\)](#); [134\(d\)\(3\)](#); [134\(d\)\(4\)](#); [134\(c\)\(1\)\(A\)\(ii\)](#); [134\(c\)\(1\)\(A\)\(iii\)](#)

[20 Code of Federal Regulations \(CFR\) Subpart G](#); [680.970](#); [681.570](#); [681.640](#)

Training and Employment Guidance Letter (TEGL) [19-16](#) and [21-16](#)

## **IV. POLICIES AND PROCEDURES**

### **A. Supportive Services for Adults, Dislocated Workers and Youth**

Supportive services are services that are necessary to enable an individual to successfully participate in activities authorized under WIOA. Services may include, but are not limited to:

- 1) Linkages to community services;
- 2) Assistance with transportation;
- 3) Assistance with childcare and dependent care;
- 4) Assistance with housing;
- 5) Needs-related payments, as described in **Section IV.B.** of this policy;
- 6) Assistance with educational testing;
- 7) Reasonable accommodations for individuals with disabilities;
- 8) Legal aid services;
- 9) Referrals to health care;
- 10) Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear;
- 11) Assistance with books, fees, school supplies and other necessary items for students enrolled in postsecondary education classes; and
- 12) Payments and fees for employment and training-related applications, tests, and certifications.

Supportive services may only be provided to adults, dislocated workers or youth who are participating in career or training services authorized under WIOA secs. 129(c)(2) or 134(c)(2)-(3) and who are unable to obtain supportive services through other programs providing such services.

LWDBs must ensure adults and dislocated workers are provided accurate information about the availability of supportive services in the local area, as well as referral to such activities.

Note: Supportive services must not be used as incentive payments. Incentive payments are allowable for youth participants only and, unlike supportive services, are permitted for recognition of achievements directly tied to training activities and work experiences.

#### **1. Limits to the Amount or Duration of Supportive Services**

Limits may be established on the provision of supportive services. LWDBs may establish limits on the provision of supportive services or provide the one-stop operator 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. If one-stop operators are allowed to grant exceptions to these limits, LWDBs must include procedures for such in their LOPs, along with other

requirements outlined in **Section IV.E. Local Operating Procedures** of this policy.

## **2. Determination of Need**

As supportive services are not an entitlement, staff must first determine a participant to be in financial need of supportive services before they are provided. Supportive services should be used to address the participant's barriers identified through the initial or objective assessment process. The plan for addressing these barriers, to include the LWDB's provision of supportive services, must be documented in the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS), as appropriate. LWDBs are encouraged to develop and use additional supporting documentation that demonstrates the participant's financial need, such as a budget/financial analysis form and/or a Statement of Need signed by the participant.

## **B. Needs-Related Payments**

Needs-related payments are a supportive service that provides financial assistance to participants to enable their participation in training. Unlike other supportive services, LWDBs may only provide needs-related payments to eligible WIOA participants who are enrolled in training or accepted in a training program that will begin within 30 calendar days.

### **1. Eligibility for Adults, Dislocated Workers and Out-of-School Youth (OSY)**

To receive needs-related payments, adults and OSY (ages 18-24) must:

- a) Be unemployed;
- b) Not qualify for, or have ceased qualifying for, Reemployment Assistance (RA) benefits; and
- c) Be enrolled in training services authorized under WIOA sec. 134(c)(3).

To receive needs-related payments, dislocated workers must be unemployed, and:

- a) Have ceased to qualify for RA benefits or Trade Readjustment Allowance (TRA) under the Trade Adjustment Assistance (TAA) program; and
- b) Be enrolled in training services authorized under WIOA sec. 134(c)(3) by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or, if later, by the end of the eighth week after the worker is informed that a short-term layoff will exceed six months; or
- c) Be unemployed, deemed ineligible for RA benefits or TRA under the TAA program, and be enrolled in training services authorized under WIOA sec. 134(c)(3).

## 2. Payment Levels

- a) For adults and OSY, LWDBs must establish the payment level of needs-related payments in their LOPs, along with other requirements outlined in **Section IV.E. Local Operating Procedures** of this policy. For statewide projects, the payment level must be established by the State Workforce Development Board.
- b) For dislocated workers, the payment level of needs-related payments must not exceed the greater of:
  - i. The applicable weekly level of RA benefits for participants who were eligible for RA benefits; or
  - ii. The poverty level for an equivalent period, for participants who did not qualify for unemployment compensation because of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income, as determined by LWDB policies.

## C. Payment Methods for Supportive Services

LWDBs may use a variety of payment methods for the provision of supportive services, depending upon the type of supportive service provided. For each supportive service provided, the LWDB must opt to use a payment method that allows the LWDB to exercise the highest level of oversight, accountability and internal controls to ensure the supportive service provided is used for the intended purpose. As examples, assistance with transportation (e.g., assisting a participant with fuel costs) should be provided in the form of vendor-specific gas cards. Assistance with uniforms should be provided in the form of a voucher/direct payment to the selected vendor (in alignment with a quote or other form of cost estimate documentation).

Supportive services may be paid to participants in the form of reimbursements.

### 1. Reloadable or Prepaid Debit or Gift Cards

The use of reloadable or prepaid debit or gift cards (e.g., Visa, vendor-specific or gas cards), or bus passes may be used for payment of support services when the LWDB:

- a) Has written LOPs pertaining to separation of duties and internal controls for the secure storage, distribution and use of such cards.
- b) Ensures a physical inventory is performed, reconciled and reviewed timely by management (to include establishing a designated frequency for such reviews to occur no less than quarterly); and
- c) Obtains supporting documentation before or after the use of such cards to ensure the card was used for the documented need and intended purpose.

Such documentation could include, but is not limited to, receipts for actual goods/services purchased or mileage calculations (if the assistance is transportation related).

#### **D. Documentation Requirements**

As supportive services are paid directly to or on behalf of eligible participants, LWDBs are required to maintain documentation sufficient to satisfy the requirements of this policy to ensure that funds are allowable and used for the intended purpose. At a minimum, documentation must include:

- 1) Determination of the participant's need for supportive services included in the participant's IEP/ISS. LWDBs are also encouraged to include a budget/financial analysis form and/or Statement of Need signed by the participant reflecting the participant's financial situation. An explanation regarding the participant's need for supportive services must be included in the participant's case notes in Employ Florida.
- 2) Case notes either confirming that the needed supportive services were not available through other programs providing such services or that the urgency of the needed supportive service was such that referrals to other resources would delay the provision of the supportive service and create a hardship for the participant.
- 3) Records of payments to vendors, including date of receipt, the amount of payment, check/voucher number, etc.
- 4) For participants enrolled in training, proof/verification of attendance in training programs.
- 5) For participants receiving assistance with childcare or dependent care, documentation of other resources explored.
- 6) If the LWDB provides supportive services in the form of reimbursements, documentation showing the specific need that was reimbursed and proof of payment by the participant.
- 7) For participants receiving needs-related payments, documents used to determine the participant's eligibility for such payments and payment level.

##### **1. Employ Florida Service Codes**

The LWDB must enter the appropriate service codes in Employ Florida when participants are either referred to or provided supportive services. The [Employ Florida Service Code Guide](#) outlines the various service code titles and definitions as well as the documentation/case note requirements.

## **E. Local Operating Procedures (LOPs)**

LOPs help local areas further define and clarify how programs will be operated locally and are unique to each LWDB. Further, 20 CFR 680.900, requires LWDBs, in consultation with career center partners and other community service providers, to develop supportive services LOPs. The LOPs must:

- 1) Ensure resource and service coordination in the local area.
- 2) Address procedures for referral to such services, including how such services will be funded when they are not otherwise available from partners or other sources.
- 3) Include limits on the provision of supportive services or provide the one-stop operator with the authority to establish such limits, including a maximum amount of funding and the duration such services will be provided to participants, if such limits are established by the LWDB. If one-stop operators are allowed to grant exceptions to these limits, the LOPs must include procedures for such.
- 4) Ensure supportive services are WIOA-funded only when these services are not available through other agencies and that services are necessary for the individual to participate in WIOA career or training services.
- 5) Include the process for staff to appropriately assess the participant's need for supportive services.
- 6) Establish a methodology for ensuring supportive services are provided in the actual amount of the participant's documented need, as appropriate based upon the supportive service provided.
- 7) Include the processes and/or documentation the LWDB will use to verify supportive services provided to participants are used for the intended purpose.
- 8) Identify and define each type of supportive service that will be provided to eligible participants and the associated documentation requirements.
- 9) Identify processes for accounting for the award of supportive service payments to ensure safeguards are in place for federal funds.
- 10) If the LWDB provides needs-related payments to eligible participants, establish the payment level of such payments, procedures for documenting participants' eligibility for needs-related payments, and the process and frequency for re-assessing participants' continued need for needs-related payments.
- 11) Identify payment methods that will be used by the LWDB to fund eligible supportive services costs.
- 12) If the LWDB provides supportive services in the form of reimbursements, include the provisions under which reimbursements will occur.
- 13) Identify delivery methods of supportive service payments (to include verifying proof of receipt by the intended party).

14) Indicate the LWDB's local procurement practices will be followed when procuring supportive services.

#### **F. State and Local Monitoring**

The Florida Department of Economic Opportunity will perform programmatic and fiscal monitoring, as well as review each LWDB's LOPs, to ensure compliance with federal and state laws, regulations and policies.

At the local level, the LWDB must conduct the necessary oversight and monitoring to ensure supportive services are provided in a manner that aligns with federal and state laws, regulations and policies, as well as its own LOPs.

#### **V. REVISION HISTORY**

<b>Date</b>	<b>Description</b>
02/23/2021	Issued by the Florida Department of Economic Opportunity.
02/18/2021	Revised and approved by CareerSource Florida Board of Directors.
12/29/2020	Issued by the Florida Department of Economic Opportunity.
12/03/2020	Approved by CareerSource Florida Board of Directors.

#### **VI. RESOURCES**

[Workforce GPS – Youth Connections, Community Resources, Supportive Services](#)