

DATE:	June 30, 2015
POLICY NUMBER:	2014:06
SUBJECT:	WIN (LWIA 13) SUPPORTIVE SERVICES POLICY
PURPOSE:	To provide uniform policy and guidance for providing supportive services to WIA-eligible participants.
REPLACES:	N/A
REVISION NUMBER:	1 (effective on date indicated above)

I. POLICY

Supportive services are meant to help Workforce Investment Act (WIA)¹ customers participate in WIA/WIOA services that will help them obtain self-sufficient employment². All supportive service payments are provided on an “as needed” basis and must be tied to a participant’s education, training, employment search activities or employment retention. However, participants are not automatically entitled to supportive services. Unless otherwise indicated herein, the total amount for any and all non-classroom related supportive services shall not exceed \$1,000 per participant for the duration of the program³ (“Maximum supportive service amount”). Any requests to exceed the maximum amount of supportive services will be reviewed by the Deputy Director of Operations on a case-by-case basis.

Staff shall also comply with the specific grant provisions for any supportive services authorized under different funding sources/programs (e.g., YouthBuild, Disability Employment Initiative, etc.)

II. DEFINITIONS

Section 101(46) of the Workforce Investment Act⁴ defines supportive service as services such as transportation, child care, dependent care, housing, and needs-related payments⁵, that are necessary to enable an individual to participate in activities authorized under WIA/WIOA Title I.

¹ Effective July 1, 2015, the Workforce Innovation and Opportunity Act (WIOA) takes effect and supersedes WIA. Any reference to WIA includes reference to the applicable WIOA regulation.

² This policy also applies to other programs administered and/or managed by LWIA 13/WIN (e.g., Youth Build, etc.). WIOA Section 171(c)(2)(vii) provides that supportive services and needs-related payments may be provided to assist individuals, for up to 12 months after completion of training, in obtaining or retaining employment or applying for and transitioning to postsecondary education or training.

³ Support services that are related to the participant’s actual training program (e.g., uniforms, supplies, books, tools) are not included in this amount. Such services are deducted from the maximum ITA amount established by LWIA 13.

⁴ See also WIA Section 134(e)(2); WIOA Sections 3(59) and 34(d)(2). 20 CFR 664.440 of the WIA Final Regulations provides an additional elaboration regarding supportive services for youth: “Supportive services for youth may include the following:

- (a) *Linkages* to community services;
- (b) *Assistance* with transportation;
- (c) *Assistance* with child care and dependent care;

III. ELIGIBILITY

Tennessee Department of Labor and Workforce Development WIA Memorandum Number E&T 03-24 provides that supportive services should be readily available for the unemployed who are in need of support services during their participation in core, intensive or training services. WIA/WIOA funds may be used to provide supportive services to WIA/WIOA participants who are:

1. Determined eligible and enrolled in WIA/WIOA with the proper activity code; and
2. Participating in career or training services (including follow-up); and
3. Unable to obtain supportive services through other programs providing such services; and
4. In need of supportive services to enable the individual to participate in WIA/WIOA Title I activities.⁶

A. No Other Availability

Supportive services may be provided with WIA/WIOA Title I funds only when the participant is unable to obtain supportive services through other non-WIA/WIOA resources.

LWIA 13 recognizes that many supportive services are offered through non-WIA/WIOA sources; however, not all of these services may be available to a WIA/WIOA participant at the time of his or her need. The primary criteria for evaluating whether a service is “available” through another program or agency shall be whether the service is “present or ready for immediate use.” (Source: Merriam-Webster Online Dictionary). The participant file (case notes) must contain documentation evidencing that (1) such supportive service(s) could not be accessed through non-WIA/WIOA resources within a reasonable amount of time for participation in the approved activity; and (2) the participant is in need of such service at the time of the request.

B. Necessity

When considering the necessity of providing a supportive service, WIN staff⁷ or service providers shall make a determination of whether the service is reasonably required based on each individual participant’s unique need as identified through the participant’s assessment process and on his/her Individual Employment Plan (IEP) or Individual Service Strategy (ISS). In addition, the case notes should reflect a clear picture of circumstances and services provided to a participant.

When the participant is enrolled in training and is working and earning a wage, the WIN Staff person should carefully evaluate the need for supportive services, as well as

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- (d) *Assistance* with housing;
 - (e) *Referrals* to medical services; and
 - (f) *Assistance* with uniforms or other appropriate work attire and work-related tools, including such items as eye glasses and protective eye gear (WIA Sec. 129 (c)(2)(G). (emphasis added)

⁵ See WIA Section 134(e)(3); WIOA Section 134(d)(3)

⁶ See 20 CFR 663.800 and 663.805. The need for such supportive service must be reflected in the participants’ IEP or ISS.

⁷ Includes Workforce Development Specialists, Youth Specialists and Business Services Analysts.

the length of time for such. Cases should be reviewed monthly to determine if a need for assistance still exists, and reviews should be noted in the IEP or ISS.

IV. TYPES OF SUPPORTIVE SERVICES AVAILABLE

Supportive services available in LWIA 13 include the following:

A. Transportation Assistance

Transportation assistance is provided in the form of bus passes or gas cards to assist with the expenses of commuting to and from WIA/WIOA activities. LWIA 13 may provide participants a one-time, upfront bus pass or gas card as a “good faith” measure” for the participant to attend WIA/WIOA activities. In order for the customer to continue receiving WIA/WIOA transportation assistance, the customer must provide required documentation of his/her regular participation in WIA/WIOA activities, e.g., attendance records from the instructor for the previous week.⁸

B. Training/Work-Related Items

WIA/WIOA funds may be used to provide training/work-related items when such is required for the customer’s participation in training or to succeed in his or her employment. The cost for these supportive services is not included in the maximum supportive service amount and will be deducted from maximum ITA amount established by LWIA 13 pursuant to Policy No. 2014:09.

1. Books and supplies. The WIN Staff person may request a books and supplies allowance not to exceed the cost of the books and supplies required for the customer’s particular training. A list of the required books and supplies must be provided by the customer’s eligible training provider. The allowance for books and supplies does not count toward the maximum supportive service allowance provided in Section I above.
2. Work clothing, such as uniforms, boots and business attire while participating in WIA/WIOA activities. The WIN Staff person may request a clothing allowance for the actual costs of the items needed by the participant, not to exceed \$250 per participant. This is the total amount for the duration of the program and does not have to be used at one time. All clothing purchased must be job appropriate.

This amount does not include clothing required by training programs with an LWIA 13 eligible training provider, such as CNA, LPN, etc. Clothing required for training must be included on the eligible training provider’s list of training requirements on file with LWIA 13/WIN. The WIN Staff person will need to submit the requirements list from the training provider as support documentation for purchasing clothing for training programs.

3. Tools and equipment, such as stethoscopes, blood pressure cuffs, helmet, gloves, protective eyewear, etc. The WIN Staff person may request a tools and equipment allowance not to exceed the actual cost of the tools and equipment required for the customer’s particular training or occupation. A list of the required tools and

⁸ Refer to LWIA 13 Policy Numbers 2012:03 and 2014:05 for detailed guidance regarding transportation assistance.

equipment must be provided by the customer's eligible training provider or specified on the applicable position description.

C. Testing Fees

WIA/WIOA funds may be used to pay for testing fees when such is required for the customer's selected training program and is not included in the tuition costs. The eligible training provider must provide documentation listing the required tests and fees. Such fees shall be provided only after the participant has completed the applicable training program and a voucher has been issued. The cost for these supportive services is not included in the maximum supportive service amount and will be deducted from the maximum ITA amount established by LWIA 13 pursuant to Policy No. 2014:09.

D. Childcare and Dependent Care

Under most circumstances, childcare assistance is available through the Department of Human Services (DHS). In order to qualify for WIA/WIOA-funded childcare, the WIN Staff person must have documentation showing that the participant attempted to receive such services through DHS or other programs, and it was unavailable.

Childcare services shall be from a childcare center that has attained a 3-star report card rating by DHS⁹ and otherwise comply with applicable policy. The weekly rate for childcare services shall not exceed the maximum rate allowed by DHS.

E. Other Supportive Services

Subject to management's discretion and the overall guidance provided in this policy, supportive services that are not expressly identified herein may be provided in LWIA 13. Examples include materials for individuals with disabilities, needs-related payments¹⁰, etc. If other supportive services are required, the WIN staff person shall submit a written request to the Career Center Manager. Such requests will be reviewed on a case-by-case basis and otherwise comply with this Policy.

REMEMBER: Any requested supportive service must not be available from another source.

V. COORDINATION OF AVAILABLE SOURCES OF FUNDS

To ensure non-duplication of resources and services, linkages should be established with programs such as Temporary Assistance for Needy Families (TANF), DHS for childcare assistance, Memphis Housing Authority (MHA), Metropolitan Inter-Faith Association (MIFA), etc. Accordingly, LWIA 13/WIN will establish appropriate linkages with programs and agencies in the LWIA 13 service area, such as public transportation agencies, public housing agencies, TANF, DHS, MHA, MIFA, etc., that may serve as key supports for customers making the transition to self-sufficiency. LWIA 13/WIN will work in collaboration with other agencies to publicize information about community resources that may be available to WIA/WIOA Program participants and applicants.

VI. INFORMATION AND REFERRALS

⁹ WIA/WIOA's childcare allowance cannot be used for childcare services from family or group homes.

¹⁰ See 20 CFR 663.815 et seq.

When appropriate, LWIA 13/WIN will refer participants to other programs and agencies. When making referrals to other providers of services (whether or not they are part of the LWIA 13 Career Center system), the individual being referred for additional services should be provided clear and concise instructions. In particular, the referral process should include, at a minimum:

- Service sought;
- Name of the agency/organization to which the customer is being referred;
- Agency's hours of operation;
- Eligibility requirements, if known; and

VII. PROCEDURES

All requests for supportive service funds must be documented in the participant's file and approved through the process below. Additional policies and/or procedures may be developed for each specific supportive service identified in Section IV above.

1. WIN Staff must document the participant's need for the particular supportive service(s) on the client's IEP or ISS and in the State's electronic management information system (i.e., eCMATS, VOS, etc.)
2. WIN Staff must complete a written supportive services request that includes the participant's name, type of service sought, justification for the need (including the date and evidence that other sources were contacted and other resources were not available).
3. A staff member beyond the WIN Staff, e.g., Career Center Coordinator, Career Center Manager, shall approve such supportive service requests.
4. The Career Center Coordinator must issue a voucher in the MIS for any approved supportive service.
5. WIN Staff must keep a copy of the approved supportive services request in the participant's file, and enter the supportive service information into the State's electronic management information system.
6. WIN Staff shall keep an up-to-date log regarding the supportive service expense requests for each participant, including the type of service, date and amount. Such information must be kept in the participant's file.
7. In addition, the Career Center Coordinator must maintain a master log of supportive services provided to LWIA 13 participants.

VIII. EFFECTIVE DATE.

This policy shall be effective upon the date indicated on the first page of this document, and remain in effect until further notice.

IX. INQUIRIES.

Please contact WIN Career Center Manager regarding any questions or concerns related to this Policy.