



WORKFORCE DEVELOPMENT BOARD
OF SOLANO COUNTY

POLICY ISSUANCE

Date: July 17, 2020 Number: 2020-04

SUPPORTIVE SERVICES AND INCENTIVES POLICY

INTRODUCTION

This policy provides guidance to the Workforce Development Board (WDB) of Solano County in providing supportive services that are necessary to enable Workforce Innovation and Opportunity (WIOA) eligible individuals enrolled in the Adult, Dislocated Worker and Youth programs. These services are provided to enrolled participants who cannot afford to pay for such services, in order to participate in authorized WIOA activities to successfully accomplish their training and/or employment goals. WIOA regulations allow Workforce Development Boards to establish limits on the provision of supportive services, including a maximum amount of funding and maximum length of time for such services available to enrolled WIOA participants.

Supportive services may be funded through other revenue sources. Additional supportive services will follow the guidance in this policy, unless otherwise identified by the grant program. Other funding sources may be used to provide supportive services beyond those allowable in this policy guidance if allowable under the specific funding stream.

QUESTIONS

Questions relating to this policy should be directed to Marion Aiken, Workforce Services Manager, at maiken@solanowdb.org or at (707) 863-3594.

ATTACHMENTS

- Attachment A: WIOA Youth 14-Elements

RESCISSIONS

This policy replaces and cancels the 2018-09 Supportive Services and Incentives Policy.

POLICY

Supportive services are provided to eligible WIOA Adults, Dislocated Workers and Youth when the supportive service will assist the participant with reaching his/her employment and training goals. Supportive services are based on need and participants are not automatically entitled to supportive services.

Supportive services may be made available to any Adult, Dislocated Worker, or Youth participating in Title I career services or training activities that is unable to obtain

supportive services through other programs providing such services. Additionally, the supportive services must be necessary to enable the individual to participate in career services or training activities.

Supportive services may not be used to extend the date of exit for performance accountability purposes. Supportive services, like follow-up services, do not make an individual a participant nor extend participation.

SUPPORTIVE SERVICE ELIGIBILITY

All support services are administered through WIOA staff. The use of these funds is based on funding availability. It is the responsibility of staff to ensure allowable, reasonable, and appropriate utilization of supportive service funds and determine if such assistance is available through other community service providers.

Supportive services may be provided to eligible WIOA participants who are enrolled in WIOA career or training services and are unable to obtain the supportive service through any other resource or program providing such services.

WIOA supportive service funding may only be provided to WIOA Youth participants who have exited and need post-program supportive services as follow-up services (for up to 12 months after exit). WIOA Adult and Dislocated Worker participants are not eligible for post-program supportive services.

WIOA supportive services are limited and must be coordinated with other community resources. In every instance of providing supportive services, staff must ensure that no other resource exists, that the resource is not readily available, or that the need is so urgent that referrals to other resources would delay the provision of the support service and create a hardship to the participant.

Supportive services may be utilized to assist in the participation of the following WIOA career services and training activities for Adults and Dislocated Workers:

- Career services:
 - Comprehensive and specialized assessments
 - Development of an Individual Employment Plan (IEP) or Individual Service Strategy (ISS)
 - Group counseling
 - Individual counseling
 - Career planning
 - Short-term prevocational services
 - Internships and work experiences
 - Workforce preparation activities
 - Financial literacy services
 - Out-of-area job search assistance and relocation assistance
 - English language acquisition and integrated education and training programs

- Follow-up services, including counseling regarding the workplace, for participants who are placed in unsubsidized employment (**for WIOA Youth only**)
- Training activities:
 - Occupational skills training
 - On-the-Job Training
 - Incumbent worker training
 - Programs that combine workplace training with related instruction
 - Training programs operated by the private sector
 - Skill upgrading and retraining
 - Entrepreneurial training
 - Transitional jobs
 - Job readiness training or adult education and literacy activities provided in combination with services described above
 - Customized training

PROVISION OF SUPPORTIVE SERVICES

Supportive Services Assessment and Planning

WIOA program staff must determine and document supportive service needs during the initial objective assessment. As part of the assessment and IEP/ISS development, staff should develop a plan with the individual for how barriers will be addressed. The planning process must include exploration with the customer of viable alternative resources or programs available in the community before approval of supportive services funding.

Explanation of a lack of community resources or that the urgency of the needed service is such that referrals to other resources would delay the provision of the support service and create a hardship to the participant must be evident in CalJOBS case notes and in the participant file. Participant files must adequately document that all supportive services are allowable, reasonable, justified, and, when feasible, not otherwise available to the participant. Files must show evidence of referrals to other resources, including, when feasible, outcomes of the referral.

Requesting Supportive Services

Supportive service requests should be initiated as part of the IEP/ISS plan or through a request from the participant. Supportive service requests should be based on the barriers identified within the initial intake and/or IEP/ISS. If a participant requests supportive services beyond barriers originally identified, the participant must provide justification for a change in barriers to the staff. Staff should document this change in a case note.

Staff must maintain a supportive service tracking log located in the participant's file that tracks the date of the service, type of service, amount of the service disbursed to the participant, and a current total of supportive services spent-to-date.

All supportive services are additionally contingent upon the customer's satisfactory performance while participating in and completing WIOA career services or training

activities, as well as upon available funding. To maintain satisfactory performance, a customer who is in training must maintain good attendance and passing grades and follow all other program requirements. For a customer who is participating in career services, they must follow program requirements, including active participation during the period of supportive service delivery.

ALLOWABLE SUPPORTIVE SERVICES

Funds for supportive services are intended to support customers' efforts in training or career services or to assist with job placement needs. These funds are not intended to fully cover all costs associated with certain activities, rather to reduce barriers to such activities. Staff may only approve funds for the types of supportive services and amounts described in this policy. The Executive Director or Division Manager must approve all requests for services or costs that exceed the limits in this policy and may make exceptions to this policy on a case by case basis. Detailed information on supportive service requests and process must be outlined in procedural documents.

The WDB recognizes the following types of allowable supportive services: emergency assistance, employability and training assistance, and needs-related payments.

Emergency Assistance

A participant may receive Emergency Assistance during WIOA participation if the support is determined necessary to facilitate or continue participation in WIOA-funded activities. When emergency assistance is provided, there must be a reasonable expectation that the assistance will resolve the situation and that support is not accessible through other community means. Emergency assistance should only be issued once individuals have applied for applicable government or community benefits, unless the need is so urgent that referrals to other resources would delay the provision of the support service and create a hardship to the participant. If a participant is not deemed eligible for emergency assistance programs, WIOA can provide assistance through supportive service funds. If a participant is deemed eligible for emergency assistance programs, WIOA can provide assistance through supportive service funds until the benefit program begins. Emergency Assistance supportive services are based on funding availability and are not an entitlement.

Assistance may include, but is not limited to:

1. **Food Assistance** – Food assistance can be provided in the form of grocery cards. Food assistance may not exceed \$50 a week for single individuals or \$100 a week for families. Individuals must apply for CalFresh benefits before this emergency assistance is given. (*Note: Food assistance is only allowable for WIOA Youth participants.*)
2. **Health Care and Medical Services** – These services are generally of a one-time nature or for a set period, such as prescription drugs, prescription eyeglasses, immediate dental care, and mental health care, which are needed to enable an individual to effectively participate in activities.

3. **Housing** – Housing assistance includes one-time supportive service payments for rent or mortgage assistance. Participant should have a plan for how they will fund the following month's housing. When supportive service funds are used to pay this expense, documentation must be in the participant's file that verifies the address and rental amount. Housing assistance may not exceed \$2,000. Other types of housing assistance may be available. All housing assistance supportive service requests must be approved by the Executive Director or Division Manager in advance.
4. **Utilities** – One month's payment of utilities is an allowable expense. Other assistance programs must be explored before utilizing WIOA funding for utilities, such as the Low-Income Home Energy Assistance Program (LIHEAP). Participant should have a plan for how they will fund the following month's utilities. Utility assistance may not exceed \$300.

Employability and Training Assistance

A participant may receive Employability and Training Assistance during WIOA participation if the support is determined necessary to: a) facilitate or continue participation or b) maintain or increase employability. When such assistance is provided, there must be a reasonable expectation that the assistance will allow the participant to complete training and/or obtain employment.

Assistance may include, but is not limited to:

1. **Transportation Assistance** – Staff may provide transportation assistance to participants for them to complete WIOA activities, such as job readiness activities, training, or initial employment. In the case of initial employment support, participants may receive transportation through their second paycheck.
 - a. *Public Transportation Assistance* – Program staff may issue a public transportation card, pass or tokens not to exceed \$20 per day with a maximum of \$1,000 per customer per six-month period. Customers may also be issued reimbursement funds for public transportation costs to and from employment and training sites.
 - b. *Private Transportation Assistance* – Customers may be reimbursed for driving expenses in the amount of the federal business mileage rate as set by the US Internal Revenue Service for mileage reimbursements to and from training sites, required employment or training-related appointments, interviews, or employment/work experience sites. Participants may also claim the cost of bridge tolls required to reach their approved destination. Any mileage over 20 miles per day round trip plus tolls are reimbursable up to a maximum of \$1,000 per customer per six-month period. Gas cards may

be distributed in advance for transportation emergencies – the process for approval must be outline in procedural documents.

- c. *Automotive Repairs* – Customers may receive a one-time reimbursement or payment directly to the vendor for automotive repairs. Automotive repairs are approved on a case-by-case basis and require the Division Manager or Executive Director’s approval. The repair of an automobile must be necessary to enable a participant to attend training or employment. When supportive service funds are used to pay this expense, documentation must be in the participant's file that verifies the repair needed and amount. The maximum allowable for automotive repairs of \$1,000.
2. **Child/Dependent Care Assistance** – Child and dependent care assistance is a supportive service provided to participants if it is determined that without it a participant will not be able to participate in services or transition to employment. Childcare assistance may be provided to participants with children age twelve years or younger, or for a child/dependent is mentally and/or physically disabled and requires adult care. Childcare assistance will not be provided when a competent adult (over the age of 18 years) residing at the same address as the participant is available to provide childcare. Full-time childcare is defined as five (5) or more hours per day; while part-time childcare is less than five (5) hours per day.

The WDB uses a direct-referral method with Solano Family & Children Services (SFCS), a private, non-profit Child Care Resource & Referral Agency. SFCS provides services and support to parents, childcare providers, and community members in Solano County. Child/dependent care services shall be paid upon receipt of monthly invoices covering specified periods of care and will be paid up to a maximum of \$36.00 per day per infant or child, not to exceed \$2,500 per customer per six-month period.

Child/dependent care referral agreements shall be authorized for a maximum of ten weeks; they can be renewable if needed (the need must be documented in case notes) and no other support assistance is available. Payment will be based on customer’s attendance; the applicable rate will be paid for each day of participation.

Childcare invoices will be paid only with the submission of documentation that includes verification from SFCS regarding the number of hours of care and that the hours correspond with the hours in the work experience/training activity.

3. **Medical Services** – These services are directly related to employment or training outcomes, and include medical services necessary to successfully complete

training, gain licensure or certification, or obtain employment. Services include a physical examination or drug testing for employment or training purposes.

4. **Tools** – Tools may be purchased for participants if the tools are required to continue a training program or obtain employment. Staff must determine that the tools are required and that they cannot be provided by any other source, such as the prospective employer or training provider. Staff may provide financial assistance up to \$600. Customers must be enrolled in training or have a firm employment offer before this expense can be approved by staff.
5. **Work/Training Costs** – Financial assistance will be limited to an amount not to exceed \$600 per customer for these items. The items must be for a work or training related activity. Examples include, but are not limited to, uniforms, books, educational testing or accommodations, scrubs, stethoscope, protective eye gear, blood pressure cuff, work or training-related licenses and permits, application fees, payments and fees for employment and training-related applications/tests/certifications, union dues or industry membership fees, and interview attire.
6. **Supportive Services Other** – Other supportive services may be provided as needed. Such goods and services should be reasonable and necessary for the participant to remain in training and/or obtain or retain employment. These services may include, but are not limited to:
 - i. Haircuts, personal grooming and hygiene needs;
 - ii. Bonding and liability insurance for employment (for instances where EDD bonding is not available);
 - iii. Internet services for distance learning purposes;
 - iv. Financial counseling or assistance;
 - v. Translation services;
 - vi. Legal aid services;
 - vii. Linkages to community services, such as alcohol/drug/gang intervention counseling, drop-out prevention, pregnancy prevention, money management, tutoring, or other purposes;
 - viii. Auxiliary aides and services for participants with disabilities; and
 - ix. Reasonable accommodations for individuals with disabilities.

NOTE: Training related expenses for WIOA eligible adults or older youth that may be covered by an Individual Training Account do not count against the supportive services limit for each registered participant. ITA related training expenses may include but are not limited to assistance with the purchase of tools required for a specific course; current school admission fees, computer and lab fees; and books and supplies.

Needs-Related Payments

WIOA Sec. 134(d) defines Needs-Related Payments as supportive services for individuals enrolled in training services only. Needs-Related Payments can help individuals meet their non-training expenses and help them to complete training successfully. Funds may be used for Adults and Dislocated Workers who are unemployed and do not qualify for (or who have ceased to qualify for) unemployment compensation for the purposes of enabling individuals to participate in training programs.

Training services eligible for Needs-Related Payments are as follows:

- occupational skills training, including programs that combine workplace training with related instruction, which may include cooperative education programs;
- training programs operated by the private sector;
- entrepreneurial training;
- job readiness training or adult education and literacy activities provided in combination with any of the three training services above;
- Skills upgrading and retraining; and
- Customized training.

A Dislocated Worker who is unemployed and who ceases to qualify for unemployment compensation or Trade Readjustment Assistance, or who did not qualify for unemployment compensation, may receive Needs-Related Payments. To be eligible, the customer must be enrolled in training services:

- By the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility for employment and training activities or
- If later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months.

Needs-Related Payments are a direct stipend to participants to support their living costs during the period of occupational training. Participants must have a documented need and complete the procedures outlined in procedural documents. Needs-Related Payments are provided up to \$100 per week for a participant lifetime maximum of \$1,000. Dislocated Worker payments may not exceed the greater of their applicable level of unemployment compensation or, if the worker did not qualify for unemployment compensation, an amount equal to the poverty line for an equivalent period.

Eligibility for Needs-Related Payments is determined by household income and family size. Households with incomes above the self-sufficiency wage for family size and local area are not eligible for Needs-Related Payments. Needs-related payments cannot be issued before a participant is registered and enrolled in training; however, if enrolled, Needs-Related Payments may be provided to trainees for up to thirty (30) days prior to the start of training.

Needs-Related Payments have been classified as non-taxable income by the IRS. (See IRS Publication 525 – Work-training programs)

LIMITATIONS AND PAYMENTS

The supportive services limit is \$2,500 for the duration of the customer's enrollment. The Division Manager or Executive Director has the authority to increase this limit on a case-by-case basis if additional supportive services allocation would significantly benefit the participant's ability to continue and complete the program. Authorization to increase the supportive service limit above \$2,500 must be documented in case notes and the participant's file.

WIOA supportive service funding may not be utilized to pay for expenses incurred prior to the participant's enrollment into the WIOA program.

The following costs are disallowed WIOA supportive services:

- Fines and penalties such as traffic violations, late finance charges, and interest payments;
- Taxes;
- Child support;
- Bail or restitution;
- Entertainment including tips;
- Contributions or donations;
- Refundable deposits;
- Alcohol or tobacco products;
- Pet food;
- Items for family members or friends; or
- Out-of-state job search and relocation expenses.

Procedures must outline a written fiscal process for the distribution and tracking of supportive service funds.

Supportive service payments should be issued directly to the party providing the service. Any supportive services payments paid directly to the vendor/provider must have a receipt from the vendor/provider that clearly shows the amount that was paid. Supportive service funds may also be reimbursed to the participant, provided prior authorization and proper documentation is received to verify funds were used for their intended purpose. Reimbursement payments will be made only with the submission of original or scanned and legible sales receipts that show itemization of the service and products provided, or in the case of mileage, through the submission of a mileage tracking form.

Supportive services in the form of pre-paid cards may be provided to the participant in advance, if financial or urgent need is demonstrated and documented in the participant's file. Fixed amount pre-paid cards for a specific purpose given in advance do not require provision of receipts from the participant; however, follow up communication of use of pre-paid cards should be case noted in the participant's file.

INCENTIVES FOR YOUTH

Incentives are allowable for WIOA Youth participants only. Incentives are payments that are based on a participant's attendance and/or performance. The milestones allowable for incentive payments must be outlined in procedural documents and must correspond to the 14 Program Elements for Youth Programs (See Attachment A).

For incentive payments, staff must have copies of awards of attainments, such as certificates or diplomas, or other documentation verifying successful completion of the activity. Case notes must document why the incentive was provided, the amount of the incentive, and the date the participant received the incentive.

DISCLAIMER

This policy is based on WDB's interpretation of the statute, along with the Workforce Innovation and Opportunity Act; Final Rule released by the U.S. Department of Labor and federal and state policies relating to WIOA implementation. This policy will be reviewed and updated based on any additional federal or state guidance.

REFERENCES

Law

- Workforce Innovation and Opportunity Act (WIOA) of 2014

Federal Guidance

- Workforce Innovation and Opportunity Act Final Rule: 20 CFR Part 680-900 -910 (Adult & Dislocated Worker) and 20 CFR Part 681-570 (Youth)
- Training and Employment Guidance Letter WIOA (TEGL) 19-16 – [Guidance on Services Provided through the Adult and Dislocated Worker Programs under WIOA](#)
- TEGL 21-16 – [Third WIOA Title I Youth Formula Program Guidance](#)

State Guidance

- Workforce Service Directive (WSD) 17-07 – [WIOA Youth Program Requirements](#)

Approved by

Workforce Development Board of Solano County

ATTACHMENT A: WIOA Youth 14 Program Elements

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalency (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.
2. Alternative secondary school services, or dropout recovery services, as appropriate.
3. Paid and unpaid work experiences that have as a component academic and occupational education may include:
 - a. Summer employment opportunities
 - b. Opportunities available throughout the school year
 - c. Pre-apprenticeship programs
 - d. Internships and job shadows
 - e. On-the-job training opportunities
4. Occupational skills training which includes priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area involved.
5. Education offered concurrently with an in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.
6. Leadership development opportunities, including community service and peer centered activities encouraging responsibility and other positive social and civic behaviors.
7. Support Services are services that enable an individual to participate in WIOA activities.
8. Adult Mentoring
9. Follow-up services for not less than 12 months after the completion of participation.
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referrals to counseling, as appropriate to the needs of the individual youth.
11. Financial literacy education
12. Entrepreneurial skills training
13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services.
14. Activities that help youth prepare for and transition to post-secondary education and training.



WORKFORCE DEVELOPMENT BOARD
OF SOLANO COUNTY

EMPLOYEE ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING FOR:
SUPPORTIVE SERVICES AND INVENTIVES POLICY
(Issued July 17, 2020)

The Workforce Development Board (WDB) of Solano County's Supportive Services and Incentives Policy contains important information pertaining to my employment and duties at the WDB.

A copy of this policy has been given to me to retain for future reference, and I have been provided with the location on the Shared Drive for the policy where I can obtain an electronic copy.

Since the information and policies described in the policy are necessarily subject to change, I acknowledge that revisions to the policy may occur. All such changes will be communicated through official notices. I understand that revised information may supersede, modify, or eliminate existing policies.

I have received the Supportive Services and Incentives Policy and I understand that it is my responsibility to read and comply with the information contained in this policy and any revisions made to it.

I understand that I should consult my supervisor if I have any questions about the information contained in the policy. I understand that failure to comply with the information contained in the policy could lead to disciplinary action or termination.

Employee's Name (printed): _____

Employee's Signature: _____ Date: _____