

Supportive Services Policy

Purpose

It is the purpose of these policies and procedures to define the scope of supportive services that will be available to participants enrolled in programs funded by the Workforce Innovation and Opportunity Act (WIOA) and other grants and programs as administered by AJCC. These policies and procedures are intended to:

- Assist customers with important supportive services needs to enable them to fully participate in AJCC services;
- Allow a streamlined process of approval and reimbursement;
- Enable accurate and timely tracking of expenditures;
- Be relevant across all funding sources; and
- Provide guidelines for staff in working with customers.

While the guiding legislation for these policies is WIOA Title I Law, they are not intended to divert or change allowable activities under other grants. Any grant regulations or policies from other funding sources will supersede inconsistent items written in this document, as appropriate.

Policy

It is the policy of AJCC to provide supportive services to participants in accordance with the law and regulations, as summarized by the following:

As defined by WIOA Section 3(59), WIOA Sections 134 (d)(2) and (3) – Adults and Dislocated Workers, and WIOA Section 129(c)(2)(G) – Youth, “supportive services include services such as transportation, child care, dependent care, housing, and needs-related payments that are necessary to enable an individual to participate in activities under WIOA Title I.”

AJCC will follow the standard framework of procedures outlined in this policy, derived from guidelines of the WIOA. These guidelines will be followed to the extent possible and applicable across all AJCC administered grants and programs. AJCC / AJCC subrecipient staff is expected to be familiar with and to follow these policies.

Staff will inform customers of available supportive services in the local area, and make referrals as appropriate, beginning at the Career Services level. Information regarding support services availability will be disseminated to customers similar to efforts informing customers about available one-stop services and other employment and training services.

With few exceptions, AJCC-funded support services will only be available to participants registered in a WIOA activity and those who are enrolled in other AJCC programs, who are unable to obtain supportive services through other programs offering similar services.

Exceptions to the outlined policy can be approved based on one of the following:

1. That denial of a supportive service award may jeopardize or significantly alter the person’s ability to participate in AJCC activities toward their employment and training goals.
2. That participants enrolled in other AJCC grants or programs outside of WIOA, be allowed flexibility on funding source requirements, beyond the limitations contained in these policies.

3. Exceptions must be documented in the participant's case notes and/or plan, and must be approved by a program supervisor or program manager.

The General Policy for Supportive Service Payments includes the following requirements:

- Supportive service payments will be made directly to either the vendor or reimbursement to the customer. Reimbursement payments will be made only with the submission of original sales receipts that show itemization of the service or products provided or, in the case of mileage, through the submission of a mileage tracking form at a rate of 20 cents per mile. Payment to a vendor must be supported by an itemized invoice for the approved supportive services. All such documentation will be retained at the service provider level;
- Determination of needed supportive services on behalf of a customer must include documentation regarding how reasonableness of the specific supportive service and its associated cost was determined;
- Case management staff must coordinate with the customer regarding receipt of the approved supportive service and associated reimbursement for the supportive service;
- Case management staff must assure that no customer exceeds the WDB approved supportive service limit of \$500 for all WIOA Title I eligible adult, dislocated worker and youth enrolled participants;
- Supportive service payment for mileage will not exceed the current Internal Revenue Service authorized per mile rate;
- Supportive service payments made on behalf of or directly to a customer must have written approval by supervisory or management staff. The written approval must denote the specific service to be provided and the amount to be expended;
- Supporting documentation must be retained in each customer's file;
- Service providers must implement a supportive services tracking log to ensure adequate safeguards are in place, prior to the payment of all supportive services; and
- Case management systems must be updated with the appropriate supportive services activity codes.

Following the "General Policy for Supportive Service Payments" noted above, all America's Job Center of California, in San Benito County Service Providers and WDB subcontractors policies/procedures should include:

- The process and documentation required for the determination of need for specific supportive services;
- The type of documentation required for the provision of specific supportive services for customers;
- Who the responsible party is for approval of the supportive service to be provided to a specific customer;
- The basis and standard for determination of reasonableness for the provision of a supportive service;
- How the \$500 per customer supportive service limitation is controlled and administered;
- Who the responsible party is that assures the \$500 per customer supportive service limitation is not exceeded;

- The process for establishing relationship(s) with specific vendor(s) who provide the pre-approved supportive service(s) for specific customer(s);
- The specific documentation required from the vendor or customer verifying the supportive service provided and its associated cost;
- Who the responsible party is for retention of supportive service documentation and related expenditures; and
- Who the responsible party is for approval of the invoice for payment of the supportive service received by a specific customer.

Requirements & Eligibility

As outlined in the WIOA NPRM 680.910:

- (a) Supportive services may only be provided to individuals who are:
 - 1) Participating in career or training services, and
 - 2) Unable to obtain supportive services through other programs providing such services (WIOA sec. 134(d)(2) (B))
- (b) Supportive services may only be provided when they are necessary to enable individuals to participate in career services or training activities. (WIOA sec. 134(d)(2)(A) and WIOA sec 3(59)).

Registration/Enrollment in a WIOA Activity

The primary criterion for an AJCC customer's eligibility to receive supportive service funds is registration in a WIOA activity. The scope of services will be limited by the availability of funds and specific cost and time limitations established in this policy. For participants with an Individual Employment Plan (IEP)/Individual Services Strategy (ISS), supportive services must be consistent with the participant's plan.

Documentation of Need

Supportive services shall be provided based on an evaluation of a customer's level of need as outlined in case notes and/or plan. Each supportive service provided shall be recorded in the participant's case notes and/or plan, and shall be consistent with the Individual Employment Plan/Individual Services Strategy where applicable. Appropriate documentation for supportive services provided will be maintained in AJCC's Fiscal Unit.

ACTION: Service Providers authorized by the WDB to use WIOA Title I funds for supportive services must develop a written policy with procedures addressing the requirements in this policy. The written policy, the documentation of need, the provision of supportive services, and expenditure of WIOA Title I supportive service funds will be subject to routine monitoring by the WDB.