



Category	WIOA
Effective Date	TBD
Last Revised	-
Policy No.	08-16

Supportive Services Policy

1 **Background:** Supportive Services are services that are reasonable and necessary to enable a WIOA participant to
 2 participate in activities funded under WIOA Title I. All participants are eligible to receive supportive services
 3 provided they meet all of the criteria outlined in this policy.

4 **Scope:** This policy applies to all service providers operating WIOA Title I programs, WIOA program managers, WIOA
 5 fiscal officers and the WIOA monitoring team. This policy is effective (*insert date upon SWIB approval.*)

6 **Policy:**

7 **Supportive Services:**

- 8 • Supportive Services funds shall only be used to pay for specific necessary services and shall be limited to
 9 payments that are necessary for the participation in the program. The individual determination of need and
 10 the amount of assistance shall be based upon the results of the comprehensive or objective assessments.
 11 Documentation of the assessment(s) completed and the results of the assessment shall be reflected in the
 12 Individual Employment Plan (IEP) or Individual Service Strategy (ISS) and shall be maintained in the
 13 participant file. Supportive service request documentation must be maintained in the participant file; the
 14 request must contain the following information:
 - 15 ○ A brief description of the expenditure;
 - 16 ○ The amount requested; and
 - 17 ○ The dated signatures of the case manager and the participant; an email or fax from the participant
 18 will be accepted as a signature.
- 19 • All Supportive Services must have been requested and approved by the case manager prior to the
 20 participant receiving or obtaining the goods or services. Backdated expenditures are not allowed. Funds
 21 may not be used to pay for charges incurred prior to the participant’s enrollment.
- 22 • Service providers must record expenditures within 7 calendar days in MWorks and provide case notes in
 23 MWorks regarding the expenditures.
- 24 • Service providers shall not make further supportive services payments when participants fail to participate
 25 without good cause, as determined by the case manager.

26 **Eligibility:**

- 27 • To be eligible for WIOA Supportive Services funds a participant must have met the following criteria:
 - 28 ○ Participant must be determined eligible for and enrolled in a WIOA program;
 - 29 ○ The individual must be participating in individualized career services and/or training services or
 30 receiving youth services; and
 - 31 ○ The individual must be unable to obtain the requested service or the funding for the service
 32 through other sources.

33 **Allowable Supportive Services:**

- 34 • Supportive Services may include but are not limited to:
 - 35 ○ Linkages to community services;
 - 36 ○ Assistance with transportation;

- 1 ▪ The most economical public or private transportation is allowable if it will reasonably meet
2 the participant’s need to attend WIOA activities, an out-of-area job search or relocation.
3 Payments may not exceed the IRS mileage rate;
- 4 ▪ Inter-Community travel from the participant’s residence to the training for the beginning of
5 training and for the return trip at the completion of the training is allowable at the IRS
6 mileage rate. Participants may not be compensated for travel to and from the training
7 location for weekends or breaks. However, the service provider shall determine if for the
8 individual situation it is more economical for the participant to make return trips home
9 from the training rather than pay for lodging during a break in the training. Mileage shall
10 not be paid for a distance greater than the number of miles accounted for in the most
11 direct route from participant residence to training location.
- 12 ▪ Out-of-Area job search and relocation is allowable. The participant may be compensated
13 for mileage, plane ticket, rental truck, per diem and lodging at the current GSA rate. Prior to
14 case manager approval, the participant must be able to provide documentation of at least
15 one interview that fits with the participant’s employment plan or verified job offer that fits
16 with the participant’s employment plan if relocating to a job. Out-of-area is an area in
17 excess of 50 miles from the participant’s community.
- 18 ▪ Out-of-Area assistance is allowable. The participant may be compensated for costs incurred
19 for out-of-area training or other activities that are part of the participant’s employment
20 plan. Lodging, per diem, mileage and other reasonable costs may be covered. Providers
21 may reimburse actual costs or use at the current GSA rate to calculate mileage, lodging and
22 per diem rates based on available budget and other sources of assistance. Out-of-area is an
23 area in excess of 50 miles from the participant’s community.
- 24 ▪ Auto repair, including the purchase of tires, is an allowable cost if the vehicle is needed for
25 participation in employment and training activities or for the participant to seek, accept or
26 retain employment. A description of repairs needed and provided must be maintained in
27 the participant file. Auto repair shall not exceed the value of the automobile;
28 documentation of vehicle value must be in the participant file. The vehicle must be owned
29 by the participant or family member, if the vehicle is the only vehicle available to the
30 participant. Written documentation from the owner must be obtained stating that the
31 participant has permission to use and repair vehicle and that the vehicle is the only means
32 of transportation. Vehicle registration and proof of liability insurance must be obtained and
33 retained in participant file for documentation.

	Text of Policy	Info Regarding Option
Option 1	<p>Automobile Insurance: Liability insurance coverage will be authorized only if the vehicle is needed for the participant to accept or retain employment or to participate in employment and training activities.</p> <ul style="list-style-type: none"> Automobile insurance may be covered for a maximum of two quarters of annual liability coverage for a 12-month period. No more than 3 months’ coverage may be paid for at one time. Liability coverage does not include optional coverage such as medical payment coverage, uninsured motor vehicle coverage, underinsured motor vehicle coverage, comprehensive coverage, collision coverage, emergency road service or membership fees to insurance companies. 	<p>20 CFR 680.900 description of supportive services MT has chosen to expand upon the federal language of “assistance with transportation” to include paying for automobile insurance. MT thought that if we are providing funding for repair of a vehicle or for mileage costs for transportation it would also be beneficial to the participant to pay for the</p>

	<ul style="list-style-type: none"> The vehicle being insured must be under the ownership of the participant or another family member if the vehicle is the only means of transportation available to the participant. This shall be documented by obtaining a copy of the vehicle registration. Insurance documentation must include a detailed description of liability coverage and be maintained in the participant file. 	insurance. This is the current policy.
Option 2		Should MT no longer offer the expanded definition of "assistance with transportation" the policy would not identify insurance as an allowable cost. No longer allowing this expense would provide for additional funds to be available for other services.
Staff Recommendation	Option 1. Staff would like to continue to pay for up to 6 months of vehicle insurance to support participant while in training.	

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- Assistance with childcare and dependent care;
 - Child and dependent care costs may be reimbursed at the local documented rate. This rate shall be reviewed on an annual basis. The child or dependent care provider must be licensed and/or registered. If no licensed and/or registered provider of care is available or adequate, the case manager shall make a case note indicating the situation prior to providing payment to the non-licensed or non-registered provider. A person in the participant's immediate or extended family may perform dependent or child care only after all other sources of care have been exhausted. Payments for care shall be made directly to the provider of the care.
- Assistance with housing;
 - Funds may be used for payment of rent. A signed rental or lease agreement or a Verification of Rent Form must be completed and maintained in the participant file prior to issuance of payment. [Verification of Rent Form-Form number WIOA.39](#)
 - The landlord must submit a W-9 form prior to issuance of funds. The provider shall pay the landlord directly unless a W-9 cannot be obtained.
- Needs-related payments;
 - Needs-related payments provide financial assistance to participants for the purpose of enabling individuals to participate in training. See Needs-related section below for details.
- Assistance with educational testing;
 - Funds may be used for application fees and HiSET or State Approved High School Equivalency program fees or tests.
 - Funds may be used for occupational testing.
- Reasonable accommodations for individuals with disabilities;
- Legal aid services;

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	<u>Text of Policy</u>	<u>Info Regarding Option</u>
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Option 1	<ul style="list-style-type: none"> Legal aid is an allowable service. Legal aid services may only be provided when the service is not available through other agencies or organization and the service is necessary for the individual to participate in WIOA activities. Coordinating legal aid service, including expungement services, will require working with local bar associations, referral to the State Court Self-Help program, the Montana Legal Services Association as well as private counsel. Assistance may only be provided in civil, non-criminal legal problems. 	This option would require case managers to make referrals to legal services and assistance in coordinating the legal service that will increase the participants likelihood of securing WIOA training or employment.
Option 2	<ul style="list-style-type: none"> Legal aid is an allowable service and expense. Legal aid services may only be provided when the service is not available through other agencies or organizations and the service is necessary for the individual to participate in WIOA activities. Coordinating legal aid service will require working with local bar associations, referral to the State Court Self-Help program, the Montana Legal Services Association as well as private counsel to find the most economical legal aid provider appropriate for the participants needs. Assistance may only be provided in civil, non-criminal legal problems. Legal services may include but are not limited to access to drivers' licenses, expunging criminal records, and resolving issues with debt, credit, and housing. 	This option would require case managers to make referrals to legal services, assistance in coordinating the legal service, as well as the option to approve payment for the services being retained that will increase the participants likelihood of securing WIOA training or employment.
Staff Recommendation	Option 1. WIA did not list legal aid services as a requirement for services to be offered. As MT begins offering this as a service, we would like to start by making referrals to low or no cost options for the participant to gauge the use of the referrals before we start offering to pay for legal services.	

- 1 ○ Referrals to health care;

	<u>Text of Policy</u>	<u>Info Regarding Option</u>
Option 1	<ul style="list-style-type: none"> Funds may be spent on one time services such as a physical examination, prescription drugs, prescription eyeglasses, immediate dental care and mental health care which are needed to enable an individual to participate in WIOA activities. Health insurance premium payment is an allowable cost for participants while attending WIOA funded training. 	20 CFR 680.900 description of supportive services MT has chosen to expand upon the federal language of “referral to healthcare” to include paying for healthcare, insurance and healthcare related costs. This is the current policy.
Option 2	<ul style="list-style-type: none"> A participant in need of healthcare shall receive assistance from the case manager to locate the service needed. The case manager shall assist in finding a healthcare provider that accepts the health insurance the participant has; or in the case of the participant being un-insured, the case manager shall provide assistance in locating a health provider that can provide services on a sliding payment schedule, low cost or no cost. 	Supportive services shall only be provided when the services or funding for the service is not available from other sources. The ACA provides insurance to those who cannot afford it and provides coverage of healthcare costs. In addition, healthcare can be received at

	<ul style="list-style-type: none"> • A participant in need of health insurance shall receive a referral from the case manager to a health insurance provider. Should a participant apply for health insurance coverage and is unable to obtain coverage through any source, WIOA funds may be used to pay insurance premiums while the participant is attending training. 	<p>community health centers at no to low cost. Should MT no longer offer the expanded definition of “referral to healthcare” the policy would be as reflected here. No longer allowing this expense would provide for additional funds to be available for other services.</p>
<p>Staff Recommendation</p>	<p>Option 2. Expanded Medicaid and the Affordable Care are able to provide the service that we have been paying for. Our paying for the healthcare and insurance premiums is duplicating services in some instances. We would like to keep an exception in policy that will allow funds to be used on insurance premiums if the participant is unable to obtain coverage for some reason.</p>	

- 1 ○ Assistance with uniforms or other appropriate work attire and work related tools and equipment;
- 2 ▪ Clothing includes clothing for interviews and/or clothing required as personal protective
- 3 equipment not otherwise supplied by the employer.
- 4 ▪ Tools that are required to obtain or continue employment are an allowable cost. The case
- 5 manager must first determine that the requested tools cannot be provided by any other
- 6 source such as the prospective employer or participant.
- 7 ▪ Internet services are considered an allowable expense for participants obtain employment.
- 8 Participants who request internet service payment must receive the program manager’s
- 9 prior approval. Internet service payments must be made directly to the internet provider;
- 10 payments may only be made on a monthly basis.
- 11 ○ Assistance with books, fees, school supplies and other necessary items for students enrolled in
- 12 postsecondary education classes;
- 13 ▪ Tools that are required to begin or continue a training program are an allowable cost. The
- 14 case manager must first determine that the requested tools cannot be provided by any
- 15 other source such as the training provider or participant.
- 16 ▪ Tools become the property of the participant upon satisfactory completion of the WIOA
- 17 training outlined in the participant’s IEP, ISS or upon employment. If the participant fails to
- 18 complete the WIOA training, the tools remain the property of service provider. The IEP or
- 19 ISS attesting to the above must be signed by the participant and maintained in the
- 20 participant file.
- 21 ▪ Technology and computer purchases, in limited cases, are approved expenses. This is most
- 22 typically, but not exclusively, in distance learning situations. Case managers must request
- 23 approval from the program manager prior the purchase. The elements the program
- 24 manager will take into consideration include but are not limited to:
- 25 • Does the training program include distance learning and to what degree;
- 26 • Does the participant have reasonable computer access through another source
- 27 such as a computer lab on campus or at a public library; and
- 28 • Does the participant have a lengthy commute to obtain computer access?
- 29 ▪ Case managers requesting computer purchase approval must include justification
- 30 addressing these factors.
- 31 ▪ Internet services are considered an allowable expense for participants enrolled in distance
- 32 learning. Participants who request internet service payment and are not enrolled in
- 33 distance learning must receive the program manager’s prior approval. Internet service

- 1 payments must be made directly to the internet provider; payments may only be made on
 2 a monthly basis.
- 3 ○ Payments and fees for employment and training related applications, tests and certifications;
 - 4 ■ Allowable costs include union dues or initiation fees, business license, bonding and liability
 - 5 insurance for employment, drug testing, background checks, and/or tools and equipment
 - 6 needed to begin self-employment.
 - 7 ■ All self-employment payments must have program manager prior approval.
 - 8 ○ Other supportive services may be provided as determined by the service provider. Such goods and
 - 9 services shall be reasonable and necessary for the participant to remain in training and/or obtain or
 - 10 retain employment. These services may include but are not limited to:
 - 11 ■ Haircuts, personal grooming and hygiene needs;
 - 12 ■ Financial counseling or assistance;
 - 13 ■ Utilities which may include: power, water, propane or telephone bills; and
 - 14 ■ Cell phone purchases and phone cards.
 - 15 ○ Limitations on supportive services payments:

	<u>Text of Policy</u>	<u>Info Regarding Option</u>
Option 1		Currently no limit has been established by the SWIB to indicate the amount or duration of funds allowable for supportive services.
Option 2	A participant may not receive a cumulative total of more than \$2500 in supportive services payments. This cumulative total does not include training or OJT expenditures. The case manager may only allocate supportive services funds during the time a participant is awaiting training to begin, during training and for up to 3 months of job search. This time frame does not include supportive services provided during follow-up.	This option would provide the case manager a limit of funds for supportive services to encourage more efficient use of funds. *suggestions of other dollar limits and time frames are welcome.
Staff Recommendation	Option 1. Putting a cap on supportive services will most likely cause un-intended negative consequences for the participant.	

- 16 ○ Supportive Services payments are allowable for the WIOA Youth program.
- 17 ● **Unallowable Supportive Services:**
 - 18 ○ Payments are not allowed for titled or deeded items or when recovery of the expense is
 - 19 anticipated. Such items include but are not limited to:
 - 20 ■ Rent deposits or housing deposits;
 - 21 ■ Mortgage payments, homeowner's insurance and property taxes;
 - 22 ■ Car payments;
 - 23 ■ Purchase of vehicles;
 - 24 ■ Fines; and
 - 25 ■ Late fees.
 - 26 ○ Other unallowable expenses include:
 - 27 ■ Groceries, and
 - 28 ■ Onsite meals.
 - 29 ○ Payments are not allowed for expenses incurred prior to enrollment in a WIOA program.
 - 30 ○ Business start-up costs that would be considered capitalization or the acquisition of business assets
 - 31 are not allowed.
- 32 ● **Supportive Services Paid Directly to Participants:**

- Supportive services payments shall only be paid to a participant when a vendor is unable to be paid or when extenuating circumstances exist. Documentation must be maintained in the participant file when payments are made to the participant. [Direct Participant Payments Form-Form number WIOA.20](#)

	Text of Policy	Info Regarding Option
Option 1	Any single payment paid directly to a participant that is more than \$500 must have a written explanation sent to the program manager to receive approval. All payments paid directly to the participant that are less than \$500 must be tracked with a running cumulative total and maintained in the participant file. When cumulative totals of multiple payments made to the participant exceed \$500, the service provider must also submit a written explanation to the program manager to receive approval.	This is the current policy language.
Option 2	Any single payment paid directly to a participant that is more than \$1000 must have a written explanation sent to the program manager to receive approval. All payments paid directly to the participant that are less than \$1000 must be tracked with a running cumulative total and maintained in the participant file. When cumulative totals of multiple payments made to the participant exceed \$1000, the service provider must also submit a written explanation to the program manager to receive approval.	This option would provide more flexibility to the case manager and reduced work load of prior program manager approvals by implementing a higher limit. *suggestions of other dollar limits are welcome.
Option 3	The service provider may approve any dollar amount of payments to be made directly to the participant. All payments made to the participant must tracked with a running cumulative total of multiple payments made.	This option would provide even further flexibility to the case manager/service provider to provide the allowable service based on their own professional judgement and budget.
Staff Recommendation	Option 2. Raising the dollar limit of payments paid direct to participants from \$500 to \$1000 will decrease the workload between case managers and program managers. This option will still maintain the accountability and tracking of the cumulative total up to \$1000 prior to needing the program manager approval.	

5 **Needs-Related Payments:**

6 Needs-related payments provide financial assistance to participants for the purpose of enabling individuals to
7 participate in training.

8 • **Eligibility:**

- Participants enrolled in the adult program must meet the following criteria to receive needs-related payments:
 - Be unemployed;
 - Not qualify for, or have ceased qualifying for, unemployment compensation; and
 - Be enrolled in WIOA adult training program.
- Participant, ages 18 to 24, enrolled in the youth program must meet the following criteria to receive needs-related payments:
 - Be unemployed;
 - Not qualify for, or have ceased qualifying for, unemployment compensation; and
 - Be enrolled in WIOA youth training program.

- 1 ○ Participants enrolled in the dislocated worker program must meet the following criteria to receive
 2 needs-related payments:
 3 ▪ Be unemployed; and
 4 ▪ Have ceased qualifying for unemployment compensation or trade readjustment allowance
 5 under TAA; and
 6 ▪ Be enrolled in WIOA dislocated worker training services by the end of the 13th week after
 7 the most recent layoff that resulted in a determination of the worker’s eligibility as a
 8 dislocated worker, or, if later, by the end of the 8th week after the worker is informed that a
 9 short-term layoff will exceed 6 months; or
 10 ▪ Be unemployed and did not qualify for unemployment compensation or trade
 11 readjustment assistance under TAA and be enrolled in dislocated worker training services.
- 12 ● **Needs-Related Payment Levels:**
- 13 ○ Adult WIOA participants must have an individual determination of a participant’s payment and the
 14 amount of such payment shall be based upon the results of the objective assessment and recorded
 15 in the IEP.

	<u>Text of Policy</u>	<u>Info Regarding Option</u>
Option 1	There is not a needs-related payment level in place for the adult program. Service providers shall determine the level of needs-related payments based on budget and the participant’s needs.	This is the current policy. A needs related payment level has not been established for the Adult program. Currently the policy issues no guidance for payment levels. The policy may remain this way should the SWIB want to keep the policy as is.
Option 2	Adult WIOA participants may not exceed the greater of the following levels for needs-related payments: <ul style="list-style-type: none"> • The applicable weekly level of the unemployment compensation benefit, for the participants who were eligible for unemployment compensation as a result of the qualifying dislocation; or • The poverty level for an equivalent period for participants who did not qualify for unemployment compensation as a result of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income. 	This is the same payment level guidance for needs related payments as is used for participants enrolled in Dislocated Worker. Adopting the same guidance for Adult would provide for consistency between the 2 enrollment types and fewer exceptions for case managers to track.
Staff Recommendation	Option 2. Establishing the same payment levels for the adult program as are required for the dislocated worker program will provide consistency across programs. Note: the same recommendation will be made for the payment level for the youth program.	

- 16 ○ Youth participants must have an individual determination of a participant’s payment and the
 17 amount of such payment shall be based upon the results of the objective assessment and recorded
 18 in the ISS.

	<u>Text of Policy</u>	<u>Info Regarding Option</u>
Option 1	There is not a needs-related payment level in place for the youth program. Service providers shall determine the level of needs-related payments based on budget and the participant’s needs.	A needs related payment level has not been established for the Youth program. Currently the policy issues no guidance for payment levels. The policy

		may remain this way should the SWIB want to keep the policy as is.
Option 2	<p>Youth WIOA participants may not exceed the greater of the following levels for needs-related payments:</p> <ul style="list-style-type: none"> • The applicable weekly level of the unemployment compensation benefit, for the participants who were eligible for unemployment compensation as a result of the qualifying dislocation; or • The poverty level for an equivalent period for participants who did not qualify for unemployment compensation as a result of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income. 	This is the same payment level guidance for needs related payments as is used for participants enrolled in Dislocated Worker. Adopting the same guidance for Youth would provide for consistency between the 2 enrollment types and fewer exceptions for case managers to track.
Staff Recommendation	Option 2. Establishing the same payment levels for the youth program as are required for the adult and dislocated worker program will provide consistency across programs.	

- 1 ○ Dislocated Worker WIOA participants may not exceed the greater of the following levels for needs-
- 2 related payments:
- 3 • The applicable weekly level of the unemployment compensation benefit, for the
- 4 participants who were eligible for unemployment compensation as a result of the
- 5 qualifying dislocation; or
- 6 • The poverty level for an equivalent period for participants who did not qualify for
- 7 unemployment compensation as a result of the qualifying layoff. The weekly
- 8 payment level must be adjusted to reflect changes in total family income.

	Text of Policy	Info Regarding Option
Option 1	Needs-related payments may be provided if the participant has been accepted in a training program that will begin within 30 calendar days .	This is currently how the policy reads.
Option 2	Needs-related payments may be provided if the participants application for training has been approved and the training institution has furnished written notice that the individual has been accepted in the approved training program. The participant must be scheduled to begin training at the first available training course or session.	This option does not limit the length of time prior to training beginning to 30 days and would potentially provide assistance to participants who don't have any control over when the training session will begin. The Governor may authorize local areas to extend the 30-day period to address appropriate circumstances
Staff Recommendation	Option 1. Due to the extremely rare occurrence of a needs-related payment being request in the current 30-days prior to the beginning of training the staff does not feel that establishing an extended period is necessary at this time.	

- 9 • **Unallowable Needs-Related Payments:**
- 10 ○ Needs-related payments may not be provided in the following circumstances:
- 11 ▪ In a period where the participant is employed;
- 12 ▪ The participant is enrolled in or receiving on-the-job training;
- 13 ▪ The participant is receiving supportive services out-of-area job search allowances and/or
- 14 relocation allowances; or

- 1 ▪ The participant is receiving Trade Readjustment Allowances or Basic Readjustment Services
2 in WIOA.

3 **Supportive Services and Needs-Related Payments During Follow-Up:**

- 4 ○ Supportive services payments may not be paid to an adult or dislocated worker participant during
5 follow-up.
6 ○ Limited supportive services may be paid for a youth participant during follow-up as appropriate to
7 retain or regain employment.
8 ○ Needs-related payments may not be paid to a participant during follow-up.

9 **Administrative Requirements:**

- 10 • The WIOA program manager(s) shall provide technical assistance to case managers in providing supportive
11 services to participants.

12 **Funding:**

- 13 • Funding for supportive services is provided by the programs in which they are enrolled. The WIOA funds
14 must be allocated to service providers on the basis of the formula prescribed by the Governor that
15 distributes funds in a manner that addresses the WIOA participant needs.

16 **Monitoring and Evaluation:**

- 17 • A formal monitoring will be conducted by the entity designated by SWIB. The monitor will evaluate
18 program manager(s) as well as the service provider administering the supportive services and program.

19 **References:**

- 20 • [Verification of Rent Form-Form number WIOA.39](#)
21 • [Direct Participant Payments Form - Form number WIOA.20](#)
22 • [20 CFR 680 Part G Supportive Services](#)
23 • [WIOA Section 3 \(59\) and Section 134 \(d\) 2-3](#)
24 • [TEGL 19-16 Adult and Dislocated Worker Services](#)