



APPROVAL DATE: 7/14/10
APPROVED BY: Betty Baker, WIB Chair

**COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF SOCIAL SERVICES**

POLICY NO: 20-08
TO: Service Providers
FROM: Department of Social Services
EFFECTIVE: September 14, 2009 (Revised July 11, 2013)
SUBJECT: Financial Assistance (Needs Related Payments & Supportive Services)

REFERENCES:

- Workforce Investment Act, Sections 101(46), 134(d)(2)(H), 134(e)(2)(3)
- Title 20 Code of Federal Regulations (CFR) 663.800 and 663.815

BACKGROUND:

Workforce Investment Act (WIA) regulations allow Workforce Investment Boards to establish limits on the provision of supportive services, including a maximum amount of funding and maximum length of time for supportive services (including needs based payments) to be available to customers.

Additionally, WIA regulations mandate that post-employment follow-up services must be made available for a minimum of 12 months after registered customers are placed into unsubsidized employment. Follow-up services may include supportive services, provided the services are clearly documented in a registered customer's case file. Needs based payments are not allowed as a post-employment follow-up service.

PURPOSE:

This policy provides guidance regarding parameters for granting supportive services and/or financial assistance to WIA participants.

POLICY:

1. Needs-Related and Supportive Services payments will only be provided when deemed necessary and reasonable. All other funding sources for services must first be exhausted and services may not be duplicated when available from other sources.

2. Payments will only be provided to participants who are currently registered in intensive or training activities.
3. Payments to clients will be based on results of the ongoing Comprehensive Assessment and documented in the Individual Employment Plan (IEP).
4. To the extent possible, similarly situated clients will receive similar payments.
5. When payments to participants cannot be made by the primary WIA Title 1 service provider but are necessary for the participant to partake in the program, the WIA Title 1 provider will explore other methods to assist participants in securing such assistance.
6. For Needs-Related payments, the Comprehensive Assessment and IEP will provide for a periodic re-assessment of need to accommodate any change in an individual financial status. Needs related payments may be paid for items or services not mandated by the training program or employer, but are necessary for the client to begin, or continue in their intensive or training activity.
7. Supportive Service payments are for items or services not mandated by the training program or employer, but are necessary for the client to begin, or continue in, their intensive or training activity. These items are to be provided to, or reimbursed to, the client when there is an immediate financial need and when without the financial assistance, the client would not be able to begin or continue the employment or training. Supportive Services may also cover post termination services and expenses mandated by the training program or employer as a prerequisite to the course of study or employment.
8. Unallowable costs include interest on borrowing, costs of financing and refinancing, deposits (including housing deposits), fines, penalties and bad debt expenses. Receipts or invoices must be detailed sufficiently to ascertain that charges do not include unallowable items. Tuition for Dislocated Worker and Adult funding sources cannot be paid via Supportive Service payment.
9. Maximum allowable expenses per participant will not exceed \$10,000 including training (maximum ITA is \$8,000) and supportive services for Youth, Adult, and Dislocated Workers. There is a \$2,000 lifetime maximum on supportive services and/or needs related payments per participant.

Eligibility

Needs-Related Payment

Needs-Related Payments provide financial assistance to participants for the purpose of enabling individuals to participate in training and are one of the supportive services authorized by WIA.

Adults must:

- 1) Be unemployed; and
- 2) Not qualify for, or have ceased to qualify for, unemployment compensation; and
- 3) Be registered in training services (basically Individual Training Account (ITA)).

Youth must:

- 1) Be unemployed; and
- 2) Not qualify for, or have ceased to qualify for, unemployment compensation; and
- 3) Be registered in occupational skills training.

Dislocated Worker's must:

- 1) Be unemployed; and
- 2) Not qualify for, or have ceased to qualify for, unemployment compensation or trade readjustment assistance under TAA or NAFTA-TAA; and
- 3) Be registered in training services (basically ITA) under WIA 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 8th week after the worker is informed that a short-term layoff will exceed 6 months.

Supportive Service Payments

Supportive Services payments can include transportation assistance, rental assistance, clothing expenses, and childcare assistance for clients not receiving Needs-Related Payments.

Youth Incentive Program

Youth participants, under WIA, may be eligible. The goal which the incentive will be paid for must be documented in the youth's ISS. The four primary incentive categories are Secondary Education Completion, Earned Certificate, Retention in Job or School and Completion of Primary Goals.

Supportive Service Categories

- A. Transportation: To be used in cases where assistance is required in order for a customer to commute to and from work, training or other training or work related WIA activities. The participant's eligibility and need must be documented and continue to be evaluated and noted in the case notes at least every 60 days.

Copies of current driver's license, insurance and registration must be on file for any mileage or auto repair assistance.

- Mileage is reimbursed according to IRS mileage reimbursement rates (maximum) or public transportation when appropriate, whichever is less and is negotiable per individual participant. Attendance must be verified for all days in which mileage is claimed.
- Automobile Repair is allowable for participants who are currently employed or in a WIA approved training and require assistance to start or retain employment and/or approved training. Case manager must verify that the vehicle is currently registered and insured under the participant's name. Repairs may only be

performed on one vehicle per participant for the duration of the participant's lifetime in San Luis Obispo County funded WIA programs. Auto repair is limited to one vehicle and such repairs can only be for minor repairs, such as tires, brakes, water pump, etc.

- B. Child Care: May be provided when it has been determined that the lack of childcare is a barrier to WIA activities.
- C. Health Care: Health care shall only be provided in cases where such assistance is essential for an individual to participate in or complete training. Health care supportive services include, but are not limited to:
 - 1. Physical exam
 - 2. Eye exam and/or eyeglasses
 - 3. Safety equipment (work related only)
 - 4. Immunization
- D. Books: Book assistance should only be provided when it has been determined that the customer has a definite need for such assistance in order to participate in training. The books shall coincide with the classes being taken for training.
- E. Meals: Meals should only be provided when it has been determined that the customer has a definite need for such assistance in order to participate in training. Meals can only be provided for those who are receiving training out of their local area. They are reimbursed at a maximum rate equivalent to DSS policy on per diem.
- F. Temporary Lodging: Temporary lodging is only to be used when it has been determined that the customer has a definite need for such assistance in order to participate in training, testing, or out of area interviewing. Costs for temporary lodging (i.e. hotel, motel) will be determined on a case-by-case basis. These services should only be provided after other resources such as family, friends and other agencies have been exhausted.
- G. Financial Counseling: Financial counseling, for the most part, should involve in-kind assistance, although referral to credit counseling should be considered in extreme cases.
- H. Tools: Tools may be provided only when they are a requirement for the customer's successful completion of training or when the customer has:
 - 1. A bona fide job offer; and
 - 2. The new hourly rate is not less than the average wage at placement; and
 - 3. It has been documented that the employer does not supply the tools.
 - 4. Such tools will not be used to capitalize a business.
- I. Clothing: Participants may receive limited funds towards clothing expenses required for training, employment or interviewing. Justification for clothing purchase must be

documented in case notes. Costs for clothing will be determined on a case-by-case basis. These services should only be provided after other resources such as family, friends and other agencies have been exhausted. If a specialty store is required, it must be documented and verified.

- J. Union Dues: Only initial start up fees can be paid towards union dues, ongoing monthly dues are the responsibility of the participant to pay.
- K. Utility Bills: Assistance with utility bills (electric, gas, etc...) is allowable when all other resources have been exhausted. Non-essential utility costs, such as cable or satellite TV, are not allowable for payment assistance. Funds are for emergency purposes only, requiring a notice of cancellation. Justification for utility bill assistance must be documented in case notes.
- L. Rental assistance: An allowable expense to help prevent eviction and homelessness. A copy of the rental agreement must be in the file and justification for rental assistance must be documented in case notes. Participants may only receive funds towards a one-time emergency payment which requires a notice of cancellation. WIA funds cannot be used to assist with rental deposits or "last month's rent".
- M. Computers may be leased for clients under the following parameters:
 - 1. Clients attending a training program requiring computer labs where it is unfeasible for the client to access the lab.
 - 2. Clients who have completed training and require a computer as part of an entrepreneurship.

Case managers must exhaust all other sources before reimbursing a participant for a computer lease:

- Check with the training provider to see if they have computers to lend or to lease to the client.
- Check to see if the training provider has a computer lab available for the client to use.
- Check other social service agencies to see if assistance is available.

Note: The computer will be the property of the participant and therefore maintenance of the computer will be the participant's responsibility. Computers leases will not be allowed for participants who are enrolled into a "computer repair" program.

- N. Counseling Services: Allowable but the case manager must insure that the participant does not have Medi-Cal, private insurance or any other resource available to pay for this service. Justification for counseling need must be documented in case notes.

- O. Cell Phones: Prepaid phone cards (for participants with a phone, but no income to purchase minutes) or a prepaid phone with a limited amount of minutes (for those that do not have a phone) are allowable for WIA Youth participants as necessary to support the goals of their ISS and until the youth obtains employment. Providers are encouraged to reissue prepaid phones returned by participants. Justification and need must be documented in case notes and the participant's ISS.
- P. Any and all requests for Supportive Services that do not specifically fall into the above mentioned categories will be decided on an individual basis and will require a supervisory approval.

Limitations

1. Other types of supportive services not included in the recognized categories addressed above may be provided to WIA customers as long as they meet the definition of a supportive service as stated in the Act. Accordingly, these supportive services must also be determined to be reasonable and necessary for an individual to complete training or obtain or retain permanent employment.
2. Neither eligibility for, nor participation in a WIA program, creates an entitlement to services, and nothing in the Act shall be construed to establish a private right of action for a customer to obtain services described in their objective assessment.

Documentation

Supportive services may be provided either in-kind or through cash assistance. In order to obtain payment for any supportive service, the participant or the service-providing vendor must provide appropriate documentation. Documentation will include at a minimum a justification for the need of supportive service (which may include training attendance records, documentation of miles traveled, receipts, etc.) and a description of the supportive service provided and why the supportive service could not be obtained through other programs.

1. Payment records will be maintained, completed and readily available for monitoring or audit reviews.
2. Client records and financial records will meet the standards for financial management and client data systems.
3. Records will be maintained in accordance with records retention requirements.
4. Original receipts that are dated, itemized, reflect amount paid and type of payment made, with the vendor's printed name, address and phone number are required for reimbursement payment.

5. Original invoices that are dated, itemize services or goods, reflect amount billed, with the vendor's printed name, address and phone number are required for payment to vendors.

Youth Incentive Program

Case managers will secure documentation for the payment of incentives when earned. All incentives paid must remain within Supportive Service cap limits.

The four incentive categories for Year-Round Youth Program are:

- Secondary Education Completion
 - Earned Certificate
 - Retention in Job or School
 - Completion of Primary Goals (Primary Skills Attainment)
1. Secondary Education Completion: Completion of Secondary Education
 - A. Amount
 - Up to \$150
 - B. Documentation Required
 - Copy of Diploma
 - GED
 - CHSPE (CA High School Proficiency Exam)
 2. Earned Certificate: Attainment of an Occupational Skills certificate or credential, as outlined in ISS and defined by WIA.
 - A. Amount
 - Up to \$150
 - B. Documentation Required
 - Copy of Certificate or Credential
 3. Retention in Unsubsidized Job or School (For those exiting the program employed or in school)

First Quarter Retention: Retention for 6 of the first 12 weeks after exit (at a minimum of 15 hrs/wk) in unsubsidized employment, post-secondary education, advanced training, military, or apprenticeship program.

 - A. Amount
 - Up to \$150
 - B. Documentation Required

- Confirmation (Employer verification, pay stubs; report cards, school records, etc.)

Second Quarter Retention: Retention for 13 of the first 26 weeks after exit (at a minimum of 15 hrs/wk) in unsubsidized employment, post-secondary education, advanced training, military, or apprenticeship program.

- A. Amount
 - Up to \$150
- B. Documentation Required
 - Confirmation (Employer verification, pay stubs; report cards, school records, etc.)

Third Quarter Retention: Retention for 19 of the first 38 weeks after exit (at a minimum of 15 hrs/wk) in unsubsidized employment, post-secondary education, advanced training, military, or apprenticeship program.

- A. Amount
 - Up to \$150
- B. Documentation Required
 - Confirmation (Employer verification, pay stubs; report cards, school records, etc.)

4. Completion of Goals: Completion of primary basic skills, occupational skills or work readiness skills goals.

- A. Amount
 - Up to \$150 per primary goal
- B. Limitations
 - Three primary goals/ \$450 maximum per enrollment year, one year from enrollment date.
- C. Documentation Required
 - Goals Form showing completion.

ACTION:

The Administrative Entity for the WIB and its service providers shall follow this policy. This policy will remain in effect from the date of issuance until such time that a revision is required.

INQUIRIES:

Inquiries should be addressed to WIB Admin at wibadmin@co.slo.ca.us.

REVISION HISTORY:

<i>DATE</i>	<i>DETAILS</i>
07/11/2013	1-Under policy section 9 the maximum allowable expenses were updated to reflect current amounts. 2-Youth Incentive Program allowable amounts updated. 3-Inquiry contact details updated.