



**SANTEE
LYNCHES**

Workforce Development Board

SANTEE-LYNCHES WDA INSTRUCTION NUMBER: WDA 16-01, Change 4

TO: Santee-Lynches WDA Service Providers

SUBJECT: Supportive Services Assistance Policy

ISSUANCE DATE: October 1, 2023

EFFECTIVE DATE: Immediately

The purpose of this instruction is to provide guidance on the Santee-Lynches Local Workforce Development Area's policy on Needs-Related Payments.

POLICY: All supportive services assistance payments issued on behalf of WIOA customers/participants within the Santee-Lynches Workforce Development Area will be issued on the basis of an **established and documented need**, identified as follows:

1. One that was identified during the initial and/or comprehensive assessment and placed on the Individual Employment Plan (IEP) and/or Objective Assessment Summary; **or**
2. One that is identified due to an emergency occurring after the individual becomes a WIOA Customer/participant and is documented in a case note. The IEP must be revised to include the identified need.
3. For Adults and Dislocated Workers, supportive services may only be provided to individuals participating in career or training activities. For Youth, supportive services may be provided during participation in WIOA activities, as well as during the required 12-month follow-up period after exit.

It is important to note that:

Supportive service payments will be limited to the amount necessary to permit the WIOA customer/participant to complete the applicable WIOA activity and such payment must be reasonable and assumable by the individual if/when WIOA ceases to provide such payments. The Grantee must complete and document a cost/price analysis to determine the reasonableness of all supportive service payments. Supportive service payments are not to exceed \$7,500 from the date of participation in a 12-month period, unless authorization is requested from and provided by the Workforce Development Director prior to exceeding the \$7,500 cap. All requests must be submitted in writing and will be considered on a case-by-case basis. In addition, the customer/participant must be making satisfactory progress and attending at least 90% of required training hours.

Supportive Services can be issued during follow-up ONLY for Youth if it is identified and documented as an emergency during the follow-up period that would otherwise keep the individual from continuing to work or remain employed. Supportive Service payments must be directly related to obtaining or retaining employment.

WIOA supportive services are to be offered to a customer/participant after reasonable attempts to procure such services from other agencies have been exhausted and documented:

1. Other resources, including the customer/participant's own personal resources, must be considered prior to approving supportive service payments for a customer/participant.
2. The amounts outlined in the supportive services policy are maximum amounts. The Career Coach should use his/her own judgment about whether the full amount allowed is necessary for each customer/participant on a case-by-case basis.
3. Eligibility for supportive services does not mean a customer/participant must receive a supportive service. A customer/participant is not entitled to supportive service payments because he/she is eligible. Staff should not automatically assume that a person with children needs childcare assistance. Customer/participants cannot assume that they are entitled to supportive service payments due to their classmates receiving such services. Each customer/participant's circumstances must be reviewed individually and a determination made on a case-by-case basis.

Childcare

- (1) The Career Coach must document in the customer/participant's Individual Employment Plan (IEP) and in the Youth's Individual Service Strategy (ISS) the need for the childcare supportive service, the amount, and the length of time the supportive services payment will be provided. "In need" may be defined as follows: An assessment of the customer/participant's situation indicates that lack of childcare while in Individualized and/or training services is a barrier that if not removed will prohibit him/her from actively participating in a WIOA authorized activity. In any case, the amount of cash reimbursement and the length of time the customer/participant may receive childcare depends on the availability of funds allocated for this purpose.
- (2) Childcare support while the customer/participant is actively engaged in Individualized or training services may be reimbursed if the client is attending 90% of his/her required hours. Full-time is to be defined by the Educational Institution/Program and documented in the customer/participant's file. For example: 12 credit hours at a post-secondary school are considered full time. Courses are taught on campus or at a clinical site (not on-line courses). The WIB will allow full reimbursement payment of up to \$100 per week per child for a maximum of three (3) children to a customer/participant whose child attends a licensed day care facility. Therefore, an eligible customer/participant can receive up to \$300.00 a week maximum for 3 children attending. Documentation of the cost of day care must be documented in the customer/participant's file. The amount of payment the Grantee pays to a licensed childcare facility is dependent upon available funds allocated in the budget for this

purpose.

- (3) The **Customer/Participant Time and Attendance Form** will be used to document the customer/participant's attendance in training and must be signed by the instructor and the customer/participant. The hours scheduled and attended must be indicated on the form. Failure to submit timesheets timely may result in customer/participant being responsible for payment to the childcare provider. The childcare provider must provide an invoice for services. The appropriate childcare reimbursement payment will be paid directly to the provider.
- (4) WIOA Youth participants must be attending 90% of the scheduled class time weekly and making satisfactory progress to receive and continue childcare support service payments. WIOA Adult and Dislocated Worker customers must be attending 90% of the scheduled class time bi-weekly and making satisfactory progress to receive and continue childcare support service payments. Satisfactory progress must be documented weekly/bi-weekly/monthly by Progress Reports and collection of current timesheets. A copy of the customer/participant's schedule and grades must be maintained in the customer/participant's file.
- (5) The customer/participant will be responsible for alternate childcare when the training facility is closed for a holiday or other scheduled closings.
- (6) **Childcare is not allowed for a customer/participant who receives TANF and is receiving ABC vouchers for childcare from the Department of Social Services (DSS). The Career Coach must document (via a letter or other written communication) that the customer/participant is not receiving an ABC voucher from DSS. Should this source of childcare be discontinued by DSS and the customer/participant is still in need of this service, then the customer/participant may be considered for such service by the Career Coach. All documentation must be kept in the customer/participant hard case file.**
- (7) Child care referrals and payments are available to WIOA customer/participants with children under thirteen (13) years of age, children incapable of self-care, and/or children under court order who need care while the customer/participant is attending his/her WIOA activity. Verification of "special care" must be provided.
- (8) Customer/participants who are earning a wage while participating in a work-based training component funded in whole or in part through WIOA programs, such as work experience, limited internship, and OJT, may be eligible for childcare assistance. Such assistance shall be limited to the first two weeks of participation in the training component. The Career Coach will make the determination and document accordingly on the IEP/ISS. **Up to two (2) additional weeks of assistance may be considered based on extenuating circumstances of the customer/participant. Approval for the additional weeks must be requested in writing and granted by the Title I Adult/DW Provider/Youth Provider. The Career Coach will make the recommendation to the Title I Adult/DW Provider/Youth Provider and document accordingly on the IEP/ISS.**

- (9) The Career Coach should maintain documentation of all costs paid to the childcare provider, amount of payment, and the length of service to be provided. Documentation of the customer/participant's work or school schedule must be in the file in order to justify this cash assistance.
- (10) The Career Coach shall ensure that efforts are made to avoid duplication of payment and/or the provision of childcare services. The Career Coach shall review the customer/participant's childcare need periodically to determine if there is any change in the need for supportive services.
- (11) The Career Coach shall review this policy with the customer/participant. The customer/participant must be advised that the timesheet is to be submitted weekly/bi-weekly to the Career Coach and that a late submittal of the timesheet may result in denial of the childcare supportive service payment. Habitual tardiness of submission of timesheets or non-compliance with WIOA program requirements may result in discontinuance of childcare supportive service.

Transportation

- (1) The Career Coach must document in the customer/participant's IEP/ISS the need for the transportation supportive service, the amount, and the length of time the supportive service payment will be provided. "In need" may be defined as follows: An assessment of the customer/participant's situation indicates that the lack of transportation assistance while in Individualized and/or training services is a barrier that if not removed will prohibit him/her from actively participating in a WIOA authorized activity. In any case, the amount of cash reimbursement and the length of time the customer/participant may receive transportation assistance depends on the availability of funds allocated for this purpose.
- (2) The reimbursement amount is based on mileage from the client's residence to the WIOA SC Works Center, training facility or work site. Cash assistance will be provided only while the client is actively engaged in Individualized or Training services. Mileage verification must be documented and maintained in the client's file. The Grantee must utilize the option below to reimburse clients requiring cash assistance with transportation:
 - **15 miles or less round trip – no mileage reimbursement**
 - **16 - 30 miles round trip - \$10 per day**
 - **31 miles and above round trip - \$20 per day**

The following information must be on file for each customer/participant in order to process all requests for transportation reimbursement:

- A) Documentation which shows viable contacts with other agencies that may provide transportation.
- B) A copy of the customer/participant's time and attendance sheet for the period in which the reimbursement is intended.

- C) A copy of the customer/participant's most recent training schedule if enrolled in training services.
- (3) Adult and Youth customer/participants may utilize a Transportation Provider for transportation services.
 - (4) The **Customer/Participant Time and Attendance Form** will be used to document the customer/participant's attendance in training and must be signed by the instructor and the customer/participant. The hours scheduled and attended must be indicated on the form. The appropriate transportation reimbursement payment will be paid directly to the customer/participant.
 - (5) WIOA Youth participants must be attending 90% of the scheduled class time weekly and making satisfactory progress to receive and continue transportation support service payments. WIOA Adult and Dislocated Worker customers must be attending 90% of the scheduled class time bi-weekly and making satisfactory progress to receive and continue transportation support service payments. Satisfactory progress must be documented weekly/bi-weekly/monthly by Progress Reports and collection of current timesheets. A copy of the customer/participant's schedule and grades must be maintained in the customer/participant's file.
 - (6) Customer/participants who are earning a wage while participating in a work-based training component funded in whole or in part through WIOA programs, such as work experience, limited internship, and OJT, may be eligible for transportation assistance. Such assistance shall be limited to the first two weeks of participation in the training component. **Up to two (2) additional weeks of assistance may be considered based on extenuating circumstances of the customer/participant. Approval for the additional weeks must be requested in writing and granted by the Title I Adult/DW Provider/Youth Provider. The Career Coach will make the recommendation to the Title I Adult/DW Provider/Youth Provider and document accordingly on the IEP/ISS.**

Legal Services

- (1) WIOA now provides an expanded list of allowable supportive services that includes legal aid services for Title I Participants. Legal aid can uniquely address certain barriers to employment, including access to driver's licenses, expunging criminal records, and resolving issues with credit, and housing.
- (2) Coordinating legal aid services, specifically expungement services, will require working with local solicitors' offices. SC solicitors can only expunge charges filed in South Carolina. There is a solicitor in each of the 16 Judicial Circuits in South Carolina. Information on eligibility, contacts, and process for payment of fees can be found on each Circuit Solicitor's website.

- (3) WIOA funds are used only when services are not available through other agencies or organizations and that the services are necessary for the individual to participate in Title I activities.

Eye/Dental

- (1) The Career Coach must document in the customer/participant's IEP/ISS the need for eye glasses and/or dental work supportive services and the amount of the supportive services. "In need" may be defined as follows: An assessment of the customer/participant's situation indicates that the lack of eye glasses or dental work while in Individualized and/or training services are a barrier that if not removed will prohibit him/her from actively participating in a WIOA authorized activity. In any case, the amount of cash reimbursement for eye glasses and/or dental assistance depends on the availability of funds allocated for this purpose.
- (2) Eye Glass/Dental support while the customer/participant is actively engaged in Individualized or training services may be reimbursed if the client is attending 90% of his/her required hours if applicable. Full-time is to be defined by the Educational Institution/Program and documented in the customer/participant's file. For example: 12 credit hours at a post-secondary school are considered full time.
- (3) The **Customer/Participant Time and Attendance Form** will be used to document the customer/participant's attendance in training and must be signed by the instructor and the customer/participant. The hours scheduled and attended must be indicated on the form.

Miscellaneous Supportive Services

- (1) Miscellaneous supportive services such as fees, physicals, lab tests, uniform requirements, background checks, etc., will not be included in the total cost for training or against the \$9,000 Individual Training Account (ITA) limit.
- (2) Lodging associated with WIOA occupational skills training, at a reasonable cost, is considered an allowable supportive service.
- (3) Miscellaneous supportive services must be documented by official invoices by the vendor providing the service.

Costs that WILL NOT be covered by Supportive Services Assistance Payments are:

- a. **Any form of payments for Food or Food items, except when related to a documented emergency that occurred after WIOA participation;**
- b. **Any form of payments for Automobile Payments, Repairs, Insurance, etc.**
- c. **Any form of Mortgage, Rent, or Utility payments.**
- d. **Any form of payments for Medical expenses, with the exception of physical examinations, immunizations, and drug testing relating to occupational skills training or job placement.**

Needs-Related Payments

Needs-Related Payments are not available currently in the Santee-Lynches Local Workforce Development Area. If funding becomes available for this service, the policy will be reconsidered at that time.

ACTION: Each Grantee/Sub-Grantee is required to review and disseminate the attached policy to all parties involved in the determination and processing of supportive service transactions for customer/participants and ensure that all supportive service transactions adhere to the policy as outlined. Any supportive service needs that are not directly addressed in this Instruction Letter must be approved by the Santee-Lynches Workforce Development Staff. If you have questions, please contact me at (aclark@slcog.org).



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