

# **Supportive Services Policy Policy #P-7A-1.22**

Re: Guidance for vendors on Supportive Services

Updated April 8, 2024 Originated: January 15, 2022 Approved: February 10, 2022

Revision Approved: N/A

References: WIOA Section 3(59)

WIOA Sections 134(d)(2) and (3) WIOA Section 139(c)(2)(G) 20 CFR 680.900 - 680.970 20 CFR 681.570 and 681.580

TEGL 19-16 TEGL 21-16

TANF Youth Development Program Manual

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Attachments: Supportive Services Request Form #F-5-1.22

Incentive/Supportive Services Receipt Form #F-6-1.22

Supportive Services Tracking Log

#### I. Purpose:

- A. The purpose of this policy is to establish criteria by which the sub-contractors of the South Central Workforce Development Board (SCPa Works) may provide Supportive Services that are necessary for individuals to participate in Title I activities under the Workforce Innovation and Opportunity Act (WIOA) and aligned regulations. This policy includes services provided to individuals eligible for TANF Youth programming.
- B. SCPa Works, through PA CareerLink® and a network of Title I service providers, ensures appropriate and necessary Supportive Services to assist program participants to achieve goals that lead to secure and retained employment. This policy is in full compliance with the WIOA Adult, Dislocated Worker, and Youth programs, and TANF Youth programming.

# **II.** Affected Parties:

A. This policy applies to contracted service providers who administer Title I WIOA Adult, Dislocated Worker, and Youth services, and TANF Youth services within the SCPa Works eight-county service area. These contracted service providers are responsible for adhering to and implementing this policy to include the Supportive Services procedures and the attached standardized forms.

# III. Background:

- A. Supportive Services are defined as services that are required or necessary for an individual to participate in workforce activities as defined under WIOA Final Rule for eligible Adults and Dislocated Workers in Sections 3(59) and 134(c)(2) and (3), and for WIOA Youth in Section 129(c)(2)(G), the TANF Youth Development Program Manual.
- B. Supportive Services are designed to provide an individual with the resources necessary to enable participation in career and training services. Further guidance on Supportive Services for WIOA Adult and Dislocated Worker participants is provided in 20 CFR 680.900 and TEGL 19-16. Further guidance on Supportive Services for WIOA Youth participants is available in 20 CFR 681.570 and 681.580, and TEGL 21-16, as well as for TANF Youth participants.
- C. SCPa Works service providers authorize the payment of Supportive Services when a WIOA/TANF participant meets the Supportive Services requirements and when funding for the services is not otherwise available from sources outside of Title I grants.
- D. The total lifetime amount allotted for WIOA Adult, Dislocated Workers, Youth, and TANF Youth participants in the SCPa Works service area is \$2000.00.
  - 1. This is a lifetime allocation and is not replenished if re-enrollment occurs.
- E. Training-related expenses that are listed under, and covered by, an Individual Training Account (ITA) do not count against the Supportive Services limit for each WIOA participant. ITA-related expenses may include, but are not limited to, assistance with the purchase of tools required for a specific course, current school admission fees, computer lab fees, and books/supplies directly related to training courses.

# IV. Eligibility:

- A. Eligible WIOA/TANF participants who meet SCPa Works supportive service requirements can be eligible for Supportive Services, as determined by WIOA/TANF service provider(s). The individual requesting Supportive Services must be enrolled in WIOA/TANF and actively engaged in WIOA/TANF career services and/or a WIOA/TANF training program which must be documented in the participant's Individual Employment Plan (IEP), case notes, and/or Individual Service Strategy (ISS), and lends to the achievement of pre-established career goals.
- B. Supportive Services requirements for WIOA Adult and Dislocated Worker participants:
  - 1. The individual requesting Supportive Services must be enrolled in WIOA/TANF and actively engaged in one or more of the following WIOA/TANF-funded activities:
    - a. Basic career and/or individualized services:
    - b. Enrollment or anticipated enrollment in a WIOA/TANF-funded training program or postsecondary enrollment with an eligible training provider;
    - c. Title I funded on-the-job training; and/or
    - d. Title I placement in a paid work experience.
  - 2. The participant's goal and plan of action must be included in the participant's Individual Employment Plan (IEP) which must directly relate to the achievement of pre-established career goals, as defined in WIOA Sections 134(c)(2) and (3), and
  - 3. The participant must demonstrate a financial need; and
  - 4. The participant is unable to obtain Supportive Services through other programs, agencies, or individuals providing such services.
  - 5. NOTE: Adults and Dislocated Workers who have been exited from a WIOA/TANF program, and are currently in the 12-month follow-up period are **not eligible** for paid Supportive Services. Follow-up services do not delay program exit, nor trigger a participant's exit date to change.
    - a. <u>Exception:</u> Participants enrolled in a Registered Apprenticeship Program (RAP), or a Pre-Apprenticeship program that is partnered with a RAP, <u>are</u>

# eligible for Supportive Services for up to 12 months following WIOA/TANF program exit.

- C. Supportive Services for WIOA/TANF Youth Participants:
  - 1. The individual requesting Supportive Services must be enrolled in WIOA/TANF and actively engaged in one or more of the following WIOA/TANF-funded activities:
    - a. Basic or individualized career services to include RAP and pre-apprenticeship;
    - b. Enrollment or anticipated enrollment in a WIOA/TANF-funded training program with an eligible training provider;
    - c. WIOA/TANF-funded on-the-job training; and/or
    - d. WIOA/TANF-funded placement in a paid work experience.
    - e. WIOA/TANF placement in an internship, pre-apprenticeship, RAP, mentorship, or unpaid work experience.
  - 2. The participant's goal and plan of action must be included in the participant's Individual Service Strategy (ISS) or Individual Employment Plan (IEP) which must directly relate to the achievement of documented career goals; and
  - 3. The participant must demonstrate a financial need; and
  - 4. The participant is unable to obtain Supportive Services through other programs, agencies, or individuals providing such services.
  - 5. NOTE: Youth participants who have been exited from WIOA/TANF program, and are currently in the 12-month follow-up period <u>are eligible</u> for paid Supportive Services during the 12-month follow-up period.
    - a. Follow-up services do not delay program exit, nor trigger a participant's exit date to change, and therefore, the Supportive Services can take place after program exit without delaying the exit date.

## V. Additional Supportive Services Request Requirements:

- A. Supportive Services must directly connect to the following WIOA elements in a Title I participant's case record maintained in CWDS and within a Title I participant's physical case record file, when applicable:
  - 1. Individual Employment Plan (IEP)
    - a. The IEP will include participant goals that can be directly related to a need for the requested supportive service.
      - i. The IEP can be edited to reflect new barriers that may indicate a further need for additional Supportive Services.
  - 2. Documented assessments and career counseling
    - a. Case managers will reference specific assessments, training and employment prerequisites included in the physical case record file.
    - b. Case managers will initiate career guidance sessions in which the participant remains focused on attaining the pre-established training and/or employment goal for which the supportive service is requested.
  - 3. Individual Training Account (ITA)
    - a. Case managers will reference the participant's ITA goal in relation to the need for the requested supportive service.
  - 4. Current enrollment in a WIOA/TANF-funded training program and/or current subsidized employment placement
    - a. Case managers will reference the current status of the participant's training and/or employment scenario as a means to define the requested supportive service as necessary in the completion of the current WIOA-funded activity.

# **VI.** Supportive Services Procedure:

- A. The participant and the case manager will identify the need for a supportive service as a part of the initial enrollment or as a part of the on-going assessment, and based on the eligibility requirements included in this policy.
- B. The case manager will work with the participant to identify and source funding from partner agencies, community organizations, private funding entities, or individuals such as a friend or family member of the participant willing and able to cover the cost of the supportive service.
  - 1. In a case note, the case manager will detail the attempt that the participant or case manager initiated to identify a funding source or to provide a referral to a community organization for the requested supportive service. Please include:
    - a. The date of the referral, outreach, or attempt to source the funds;
    - b. The name of the entity, community organization, or individual from which the participant and/or case manager sought funding for Supportive Services or referral to outside agency.
    - c. The program manager will review the case note prior to authorizing the request for a supportive service.
- C. The case manager will document in case notes that supportive service payments are reasonable and necessary, and required for the client to participate in WIOA/TANF-funded services and activities. The need for the supportive service must be described in the case note as it directly relates to the participant's career and/or training goals.
  - 1. The case note must reference the IEP/ISS as a means to identify the targeted goal(s).
  - 2. The case note will illustrate that the supportive service is necessary to ensure the completion of the participant's training and/or the continuation of the participant's employment.
- D. The case manager will collect and maintain required documentation related to the supportive service, if applicable.
- E. The case manager will ensure that the SCPa Works Request for Supportive Services form #F-5-1.22 is completed, signed, and dated.
- F. The case manager will ensure that the SCPa Works Incentive-Supportive Services Receipt form #F-6-1.22 is completed, signed, and dated.
- G. The service provider data performance team will ensure that all service code entry is up to date in the participant's case file in CWDS to indicate WIOA/TANF eligibility, a completed IEP/ISS, a completed ITA/OJT process, and/or indication that the participant is actively engaged in career and/or training services.
- H. The case manager will submit the Supportive Service Request form and the Incentive-Supportive Service Receipt form to the service provider program manager for approval and payment authorization.
- I. Upon approval, the program manager will submit the supportive service request amount to the service provider accounts payable department for payment.
- J. Upon payment, the program manager will return the Supportive Services forms (Attachments A & B) to the case manager for signatures and proof that the cost of the supportive service has been paid.
- K. The case manager will document the of receipt of payment for the supportive service to include a copy of payment in the participant's physical file with a case note detailing the receipt of payment and fulfillment of the supportive service.
- L. The program manager will complete the Supportive Service Tracking log and maintain a current copy of the log in the participant's physical file with the required Supportive Services forms.

# VII. SCPa Works WIOA Title I Allowable Supportive Services:

- A. SCPa Works will allow Supportive Services in alignment with the SCPa Works Supportive Services Policy and procedure under policy #P-7A-1.22.
- B. Under SCPa Works Supportive Service Policy #P-7A-1.22, Supportive Services for eligible WIOA participants enrolled in the Adult, Dislocated Worker, Youth, TANF Youth, and/or EARN programs include:
  - 1. Linkages and referrals to community services.
  - 2. Residential Assistance
    - a. Referrals to local agencies and community organizations for residential assistance will be initiated by the case manager.
    - b. During timeframe specified by SCPa Works, discretionary grants may provide funding for residential assistance.
      - At the time that a special grant funding stream is made available to cover the cost of residential assistance, please reference the special grant budget and guidelines for funding specifications and requirements.
  - 3. Transportation based on an account of the documentation of actual mileage to and from training or employment, and at the established federal rate.
    - a. Documentation of mileage must be indicated on the Supportive Services Tracking log, maintained by the program manager.
    - b. Transportation Supportive Services provided in the SCPa Works service area include:
      - i. Gas cards
      - ii. Bus ticket/pass
      - iii. Parking fees
      - iv. Uber/taxi costs
      - v. Train fare
      - vi. Driver's licensure
      - vii. The purchase of a bicycle
  - 4. Work attire and/or work shoes.
    - a. Clothing must be directly related to work and/or training that has been preestablished in the participant's IEP, ITA, ISS, and/or case notes.
    - b. Work attire can include uniforms, work boots, and additional clothing items that are required by an employer.
  - 5. Work-related tools and supplies that are not included under the participant's Individual Training Account (ITA).
    - a. Materials and supplies should be directly related to WIOA/TANF-subsidized employment in which a participant is enrolled.
    - b. Materials and supplies for unsubsidized employment must be requested and delivered prior to Adult or Dislocated Worker program exit.
      - i. Supportive Services related to unsubsidized employment will not be made available to a Title I Adult or Dislocated Worker after the date of WIOA program exit.
  - 6. School or training-related materials and supplies that are not included in the participant's ITA.
    - a. Materials and supplies must be directly related to WIOA/TANF-funded training or postsecondary school in which a participant is enrolled.

i. The purchase of books, fees, school supplies, and items necessary for students enrolled in postsecondary classes is an allowed supportive service cost.

#### 7. Healthcare/Medical Evaluation Costs

- a. Healthcare costs must directly relate to a participant's documented goals as indicated in the IEP, must be in alignment with a participant's WIOA-funded training and career activities as a required expenditure, and cannot be considered as an eligible service covered under the participant's existing health insurance.
- b. Vision evaluations and the cost of eyeglasses are allowed if they are a necessary service that directly relates to a WIOA-funded training or career service, and cannot be considered as an eligible service covered under the participant's existing health insurance.

# 8. Substance Abuse Counseling

- a. Drug and alcohol abuse counseling co-pays, assessment fees, and additional substance abuse overhead costs that are not covered by the participant's health insurance are considered allowable Supportive Services when:
  - i. An employer has established substance abuse treatment as a prerequisite for a participant to enter employment.
    - (1) This prerequisite must be attained in writing from the employer.
  - ii. A training provider from the PA Eligible Training Provider List (ETPL), provided by the Pennsylvania Department of Labor and Industry, has determined that substance abuse treatment is a prerequisite for a participant to enter a program of training.
    - (1) This request must be attained in writing from the training provider.
- b. The case manager will follow the SCPa Works Supportive Service Procedure to ensure that at least three alternatives are sought to cover the cost of the participant's financial responsibility in fulfilling the prerequisite of completing a course of substance abuse treatment.
- c. The case manager will obtain a statement from the participant's health insurance carrier or a statement from the substance abuse program provider that indicates the co-insurance or co-pay that is owed by the participant.
- d. If the participant is unable to enroll in or begin employment or training due to the time it takes to complete a substance abuse treatment program, the case manager will ensure that the participant remains actively engaged in career and training services offered via local One-Stop career and training activities.

# 9. General Counseling

- a. The case manager will initiate a referral to PA Counseling Services for mental health assessments, treatment, and counseling.
- b. In the event that the participant is in need of services outside of PA Counseling Services, the case manager will adhere to the following requirements:
  - i. The case manager will document in a case note that the participant's health insurance carrier does not cover the cost of said mental health services, and
  - ii. The case manager will acquire a financial statement from the counseling professional indicating the dollar amount of services not covered by the participant's health insurance.

# 10. Technology Assistance

- a. The cost of a laptop and/or tablet to be utilized for a WIOA/TANF-funded training and/or employment is an allowed supportive service cost.
  - The use of the laptop must be directly connected to the participant's goals as documented in the IEP, ITA, OJT, and case notes otherwise.
- b. In alignment with the need for technological resources, WIOA/TANF participants can be eligible for the following items:
  - i. The payment of a cellular phone bill, and
  - ii. Wi-Fi hotspots provided by SCPa Works or prepaid Internet service.
- 11. Background Clearances as performed by the contracted service providers during the intake and enrollment phase of WIOA/TANF participation.
- 12. Identification Documentation to include:
  - a. State-issued photo ID or a PA driver's license;
  - b. Birth certificate replacement; and
  - c. Guidance on obtaining a replacement Social Security card.

#### C. Discretionary Grants

1. See individual grant budget and guidelines for supportive service eligibility requirements and guidance on allowable expenses.

#### D. Disallowed Supportive Services:

- 1. Expenses for family members or others who may be sharing the same resource with the WIOA participant
- 2. Monetary reimbursement for purchases that were made by a participant prior to the participant's WIOA enrollment
- 3. Tax payments
- 4. Child support
- 5. Mortgage payments
- 6. Auto loan payments
- 7. Loan payments, credit card payments, debt payments, or interest payments
- 8. Legal fines, bail, and penalty fees to include traffic violations, or late fees
- 9. Costs related to entertainment including tips, travel, road tolls, and lodging
- 10. Donations or charitable contributions
- 11. Purchases that cannot be directly connected to case notes, the IEP, the ISS, the ITA/OJT and the participant's overall training and career goals
- 12. Refundable deposits of any sort
- 13. Alcohol, tobacco, or marijuana products regardless of a medical need
- 14. Pet food and/or supplies
- 15. Food to include any type of meals and/or groceries
- 16. Items for family members or friends of the participant
- 17. Relocation costs that are paid for by a prospective employer
- 18. Needs-related payments.
  - a. At the time of SCWDB approval, this policy will not include the permission of the LWDB to authorize, nor provide, needs-related payments under the guidance of this Supportive Services policy. Each program year, SCPa Works Supportive Services Policy #P-7A-1.22 will be reviewed to evaluate the demand for additional Supportive Services and to assess the need for this policy to cover further funding options in order for individuals to participate in applicable WIOA activities.

## **VIII. Exceptions:**

- A. Exceptions to this policy may apply under special grants. An individual's eligibility and participation under special grant funding can be identified through case record documentation and authorized by the service provider program manager.
- B. A request for a service that is not included on the allowable service list will be submitted to SCPa Works program director via the service provider program manager. Requests for services listed on the disallowed service list will not be accepted by the SCPa Works, nor authorized by the service provider case manager, program manager, or project director.

#### IX. Definitions:

- A. <u>Basic Career Services:</u> (Wagner-Peyser) TEGL 19-16; Basic career services are universally accessible and must be made available to all individuals seeking employment and training services. These services may be provided by both the Adult and Dislocated Worker program staff, as well as by the One-Stop staff. Generally, these services involve less staff time and involvement, and include services such as:
  - 1. Eligibility determinations
  - 2. Initial skill assessments
  - 3. Labor exchange services
  - 4. Provision of information on programs and services
  - 5. Program referrals
- B. <u>Eligible Adults</u>: Individuals who have been determined eligible for WIOA enrollment under one of the five priorities of service, and who are actively enrolled in a WIOA-funded training program or activity.
- C. <u>Eligible Dislocated Workers</u>: Individuals who have been determined eligible for WIOA enrollment under the dislocated worker provisions, and who are actively enrolled in a WIOA-funded training program or activity.
- D. <u>In-School Youth</u>: An individual who is not younger than the age of 14 and not older than the age of 21, and is actively attending secondary or postsecondary school, is a low-income individual, and who is one or more of the following:
  - 1. Basic skills deficient
  - 2. An English language learner
  - 3. An offender
  - 4. A homeless individual, a homeless child or youth, or a runaway
  - 5. An individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement
  - 6. An individual who is pregnant or parenting
  - 7. An individual with a disability
  - 8. An individual who requires additional assistance to complete an educational program or to secure or hold employment
- E. <u>Out-of-School Youth</u>: An individual is not younger than the age of 16 and not older than the age of 24 at the time of program enrollment and qualifies as one or more of the following:
  - 1. A school drop-out;
  - 2. A student who is enrolled in school, but has not attended school for at least the most recent school year calendar quarter;
  - 3. A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner;
  - 4. An offender:
  - 5. A homeless individual, a homeless child or youth, or a runaway;

- 6. An individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
- 7. An individual who is pregnant or parenting;
- 8. An individual with a disability; and/or
- 9. A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment
- F. <u>Eligibility Determination</u>: A process by which adults and youth are determined eligible for WIOA/TANF services and activities.
  - 1. Participant pre-screening
  - 2. Orientation workshop attendance
  - 3. Initial Intake
  - 4. WIOA application completion in CWDS
  - 5. Eligibility data validation uploads in CWDS
  - 6. Enrollment case note in CWDS
  - 7. Eligibility determination via Secondary Review
  - 8. Accurate service code entry in CWDS to prompt an individual as "Participating" in the system (WCS03, WCS09, WCS10)
- G. <u>Follow-up Services</u>: Case managers will provide follow-up services for Adult, Dislocated Worker, Youth, TANF, and EARN participants who have exited a WIOA/TANF program due to placement in unsubsidized employment, a completion of a WIOA-funded training, or a completion of basic career services.
  - 1. Follow-up services are mandatory for a 12-month period following the participant's exit date.
  - 2. Follow-up services include quarterly contact with the participant prompted by the case manager.
  - 3. Follow-up services do not extend the date of exit in performance reporting; TEGL 10-
- H. <u>Individualized Career Services:</u> (Title I) TEGL 19-16; Individualized career services must be provided to participants after PA CareerLink® staff determine that such services are required to retain or obtain employment, consistent with any applicable statutory priorities. These services involve significant staff time and customization to each individual's needs. Individualized career services include:
  - 1. Specialized assessments;
  - 2. Developing an individual employment plan;
  - 3. Counseling; and
  - 4. Work experiences to include:
    - a. Transitional jobs
    - b. Pre-apprenticeships
    - c. Apprenticeships
    - d. On-the-job training
    - e. Paid work experience
- I. <u>SCPa Works Service Area</u>: The following counties are included in the SCPa Works service area:
  - 1. Adams
  - 2. Cumberland
  - 3. Dauphin
  - 4. Franklin

- 5. Juniata
- 6. Lebanon
- 7. Perry
- 8. York
- J. <u>Subsidized Employment:</u> A type of work-experience that local workforce development boards can offer as an individualized career service under WIOA/TANF. Examples include:
  - 1. On-the-Job Training
  - 2. Paid Work Experience
- **X. Summary of Changes**: This policy is reviewed every 180 days by the SCPa Works Policy Department for necessary changes, edits, updates, and revisions.

Date of Change:	Changed by:	Summary of Change(s):	Effective Date
07/06/2022	Saranne Miller	<ol> <li>Added the element of TANF Youth to all sections relating to Supportive Services eligibility and programmatic eligibility requirements.</li> <li>Added the elements of RAP and Pre-Apprenticeship eligibility to Section IV.</li> </ol>	07/06/2022
04/08/2024	Saranne Miller	Reviewed for edits. No revision necessary. Re-formatted header page.	04/08/2024