

**DATE:** May 1, 2020

**DIRECTIVE NO**: 50-20

**RECISSION:** La Cooperativa Directive No. 25-09

**TO:** All La Cooperativa Subrecipients

**SUBJECT:** Supportive Services

#### REFERENCES:

 Workforce Innovation and Opportunity Act, Sections 101(3)(8)(a), 134(c)(2), 167(c)(2)(D)

 Title 20 Code of Federal Regulations (CFR) 680.900 et al, 685.200, 685.110 and 330, 687.180(a)(2)

#### **PURPOSE:**

This directive provides guidance regarding parameters for granting supportive services to WIOA customers.

### **POLICY:**

Supportive services are designed to provide a participant with the resources necessary to enable their participation in WIOA services. Supportive services may be used for both employed and unemployed individuals to support their participation in career and/or training services. Dislocated Worker participants must be participating in staff assisted basic career services, individualized career services, and/or training services to continue to receive supportive services.

Career and/or training services may include initial assessments, comprehensive skills assessments, career planning, and development of an individual employment plan that outlines the needs and goal of successful employment.

Basic career services must be made available to all job seekers and include services such as labor exchange services, labor market information, job listings, and information on partner programs.

No subrecipient may provide supportive services funded by a WIOA program until other programs that generally provide the supportive service needed by the client have been contacted. If a non-WIOA program is capable of providing the supportive service needed

FINE

by a client, a referral will be made by the WIOA subrecipient. However, if an alternative resource cannot be found, then supportive services will be provided using WIOA funds if it is necessary to enable eligible individuals to participate in career or training services WIOA.

Supportive service funds may only be used to pay for services that are reasonable and necessary for participation in the program and may be provided either in-kind or through cash assistance. Supportive service request documentation must be maintained in the client file and must include the following information:

- A brief description of the expenditure and the need;
- The amount requested;
- Justification for the need of supportive service (which may include training attendance records, documentation of miles traveled, receipts, etc.);
- A description of the supportive service provided and why the supportive service could not be obtained through other programs and;
- An invoice or receipt for payment received (itemized and dated) for the supportive service; and
- The dated signatures of the case manager and the client; an electronic request from the client will be accepted as a signature.

All supportive services must have been requested and approved by the case manager prior to the client receiving or obtaining the goods or services. Backdated expenditures are not allowed.

Subrecipients will not make further supportive service payments when the client fails to participate without good cause, as determined by the case manager.

Supportive services do not have a cap or limit unless otherwise specified in a subaward agreement and subrecipients may use their own discretion in setting cost limitations.

## **ALLOWABLE SUPPORTIVE SERVICES:**

Supportive services may include but are not limited to:

# Linkages to community services

# Assistance with transportation

The most economical public or private transportation is allowable if it will reasonably meet the client's need to participate in program activities. Payments may not exceed the IRS mileage rate; return trip at the completion of the training is allowable at the IRS mileage rate. Clients may not be compensated for travel to and from the training location for weekends or breaks. However, the subrecipient will determine if it is more economical for the individual client to make return trips home from the training rather than pay for lodging during a training break. Mileage will not be paid

for a distance greater than the number of miles in the most direct route from client residence to training location.

Out-of-Area job search and relocation in excess of 50 miles from the client's community is allowable. The client may be assisted with mileage, plane ticket, rental vehicle, per diem, and lodging at the current GSA rate. Prior to case manager approval, the client must be able to provide documentation of at least one interview or verified job offer that fits with the client's employment plan if relocating to a job.

Auto repair, including the purchase of tires, is an allowable cost if the vehicle is needed for participation in career and training activities or for the client to seek, accept or retain employment. A description of repairs needed must be maintained in the client file. Auto repair can only be for minor repairs, such as tires, brakes, water pump, etc.

Auto repair will not exceed the value of the automobile; documentation of the vehicle value must be in the client file. The vehicle must be owned by the client or a family member if the vehicle is the only vehicle available to the client. If the vehicle is owned by a family member, written documentation must be obtained from the owner stating that the client has permission to use and repair the vehicle and that the vehicle is the only means of transportation. Vehicle registration and proof of liability insurance must be obtained and included in client file as documentation.

Automobile liability insurance coverage will be authorized only if the vehicle is needed for the client to accept or retain employment or to participate in employment and training activities. 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.

# Assistance with childcare and dependent care

Child and dependent care costs may be paid at the local documented rate. 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 will make a case note indicating the situation prior to providing payment to the non-licensed or non-registered provider.

#### Assistance with housing

The client must provide documentation of rent receipts for verification of rental costs. Which must be maintained in the client file prior to issuance of payment.

# Assistance with educational testing

Funds may be used for application fees and/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

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, including expungement services, will require working with local bar associations, legal aid, as well as private counsel. Assistance may only be provided in civil, non-criminal legal problems.

# Health-related services:

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 eye glasses
- 3. Safety equipment (work related only)
- 4. Immunization

# Assistance with uniforms or other appropriate work attire and work-related tools and equipment

Clothing includes clothing for interviews and/or clothing required as personal protective equipment not otherwise supplied by the business.

Tools that are required to obtain or continue employment are an allowable cost. The case manager must first determine that the requested tools cannot be provided by any other source such as the prospective employer or client.

# Assistance with books, fees, school supplies and other necessary items for students enrolled in training services

Supplies/tools that are required to begin or continue a training program are an allowable cost. The case manager must first determine that the requested supplies/tools cannot be provided by any other source such as the training provider or client.

Tools become the property of the client upon satisfactory completion of the WIOA training outlined in the client's IEP, ISS or upon employment.

# <u>Payments and fees for employment and training-related applications, tests and certifications;</u>

Allowable costs include union dues or initiation fees (as a condition of employment and

for participation in training); business license fees; bonding and liability insurance for employment; drug testing; background checks;

Other supportive services may be provided as determined by the subrecipient. Such goods and services will be reasonable and necessary for the client to remain in training and/or obtain or retain employment. These services may include but are not limited to:

- Haircuts, personal grooming and hygiene needs
- Financial counseling or assistance. Financial counseling, for the most part, should involve in-kind assistance, although referral to credit counseling should be considered in extreme cases
- Utilities, which may include: power, water, propane or telephone bills

## **UNALLOWABLE SUPPORTIVE SERVICES:**

Payments are not allowed for titled or deeded items or when recovery of the expense is anticipated. Such items include but are not limited to:

- Rent deposits or housing deposits
- Mortgage payments, homeowner's insurance, and property taxes
- Car payments
- Purchase of vehicles
- Fines; and Late fees
- Household items
- Groceries and Onsite meals.

Supportive service payments may not be paid to a Dislocated Worker client while enrolled in follow-up.

Other types of supportive services not included in the recognized categories addressed above may be provided to WIOA 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.

### **PROHIBITIONS:**

The following may not be paid for with WIOA funds:

- Fines or penalties
- Cigarettes or alcoholic beverages
- Legal fees
- Firearms or ammunition
- Bad debts
- Rental deposits
- Union initiation fees

- Purchase of goods or services illegal under any federal state, local, or municipal law or statute
- Payments for participant memberships, dues, or subscriptions

## **ACTION:**

LCCDC and its contractors shall follow this policy. This policy will remain in effect from the date of issue until such time that a revision is required.

# **INQUIRIES:**

Inquiries should be addressed to Marina Tapia at 916-388-2224.

Marco Lizarraga

Interim Executive Director