Youth DET Contract Policy 5 – Youth Supportive Services

I. DEFINITION

Supportive services are one of the allowable program services authorized in the Workforce Innovation and Opportunity Act (WIOA). DOL/DET consistently applies the Workforce Innovation and Opportunity (WIOA) definitions for contracts funded with Youth Blue Collar funds. The term Supportive Services may be used interchangeably with the term Direct Benefits but would not be the same as incentives.

- All supportive services given to students must be documented and the student must sign off acknowledging receipt of the supportive services.
- If vouchers are given to multiple students (e.g. bus tickets), a cumulative log with signatures should be kept in addition to the copy of card in the student file.

| The term "supportive services" means services that are necessary to enable a participant, who cannot afford to pay for such services, to participate in activities authorized under WIOA Title 1. |

Supportive services may include transportation, residential support, health care, financial assistance, legal aid services, drug and alcohol abuse counseling and referral, individual and family counseling, special services and materials for participants with disabilities, job coaches, dependent care, meals, temporary shelter, financial counseling, occupational testing and licensing fees and other reasonable expenses required for participation.

To enhance the availability of supportive services to participants, services should be coordinated with community organizations and other agencies. Some community organizations provide services at little or no cost to the participant. These resources should be examined and utilized prior to obligating WIOA/BC funds.

The award of WIOA/BC supportive services to participants is at the discretion of the provider. The provider must ensure each individual supportive service cost:

- Is reasonable – both in cost and the item being purchased
- Is necessary to participate in WIOA/BC, or to obtain or maintain employment
- Is the last resort when utilizing WIOA/BC funds:
  - Participant cannot afford to pay for the expense
  - No other resources are available (family, community, other agencies)
- Is a required item (and not a “nice to have” item) when assisting with payment of tools, books, and supplies, etc.
- The need and rationale for the supportive service must be fully documented in DJL case notes

II. GENERAL SUPPORTIVE SERVICES

A. Dependent Care

Child care or elder care for participant dependents may be necessary for an individual to participate in WIOA/BC activities. Before authorizing supportive service funds for dependent care, provider should explore alternative dependent care programs that may be available in their area. If other programs are not available or appropriate, and supportive service funds are authorized for dependent care services, participants must use only licensed day care centers or licensed babysitters.

In the event of an emergency or when alternative acceptable dependent care arrangements are not available, the use of family members and/or in-home dependent care may be authorized. Justification of the decisions and circumstances must be fully documented in DJL case notes.
B. Transportation
Transportation expenses may be provided for participants to attend training, conduct out-of-area work search or relocate for employment. When transportation costs are authorized, the provider may select from one of the following payment methods: mileage reimbursement, actual fuel cost or public transportation. When making this decision, the provider should choose the most economical means available which reasonably meets the needs of the client.

Provider should submit mileage confirmation from a recognized source such as www.mapquest.com with the first transportation request. A new or updated map is not necessary unless the client moves or changes their training location.

If transportation is contingent upon attendance (classroom training as an example) the client must verify their attendance by submitting signed attendance forms.

Automotive repairs can be an acceptable supportive service regardless of mileage reimbursement negotiated with participant.

Fuel purchases that are necessary for local job seeking activities are an allowable expense. An original receipt or invoice must accompany the reimbursement request.

If available and appropriate, public transportation may be authorized.

C. Medical Assistance
As with all other supportive service costs, providers should explore alternative funding sources before authorizing a supportive service payment to cover minor medical expenses. If other resources are not available, medical services such as eyeglasses or other minor services that are necessary to enable an individual to participate in WIOA/BC activities are allowed.

D. Residential Support for Out-of-Area Training
Residential support, to include lodging and meals, may be provided to participants who attend training outside their normal commuting area. Providers will limit residential support to; 1) short-term training that is not available in the local area, and 2) training for occupations that are in demand.

Participants who attend training outside of their local area may be reimbursed for transportation costs to and from training as well as round-trip travel during school vacation periods and summer/session breaks.

E. Tools, Books, and Supplies
Items included as part of, and are necessary for participation in training, may be purchased with WIOA/BC funds. Such purchases must be a requirement of training; items that are recommended by an instructor but not required for every student are not normally supported with WIOA/BC funds. This is also true for training activities such as on-the-job training, internships, etc. If the training site requires that a trainee have uniforms, tools, etc., and does not provide such items for regular, employees or trainees, WIOA/BC funds may be utilized. Unusual or compelling circumstances may support an exception to this rule.
F. Cash Assistance
Although most supportive service payments are made either to the participant as a reimbursement or directly to a vendor on behalf of a participant (preferred), some circumstances require cash payment be made directly to the client. WIOA/BC funds can only be used for allowable costs. Prior approval is required.

G. Out-of-Area Job Search Assistance
This service is designed to assist youth in seeking employment in areas outside their normal commuting distance. Provider may authorize multiple job searches for a participant, with the following activity and cost limitations applied to each job search activity:

a. Limitations for out-of-area job search: 90% of actual costs, up to a maximum of $600.

b. The participant must have a reasonable expectation of securing employment in the job search area and must provide the provider with verification of employer contacts.

c. The provider must include case notes in DJL that shows evidence that the employment sought by the participant in this occupation is not available and/or will not provide self-sufficient wages in the traditional labor market area.

d. Reimbursable costs in this activity may include round-trip transportation, meals, lodging, and any necessary miscellaneous costs.

e. Transportation will be by the most economical means available which reasonably meets the needs of the client.

f. Meal reimbursement cannot exceed the in-state or out-of-state (as applicable) per diem rates.

g. Lodging reimbursement cannot exceed the actual costs and must be based on single occupancy.

h. The participant must provide the original lodging, gasoline, and miscellaneous purchase receipts to obtain reimbursement. If a per-mile reimbursement for transportation costs is utilized, the provider must attach a mileage map and show the mileage computation in lieu of sending gas receipts.

i. Cash advances of no more than 50% of estimated costs, not to exceed $300, may be provided to the participant; such advances may not be requested more than five (5) working days prior to the commencement of job search activities. Providers must contact contract manager for prior approval for cash advances.

j. Out-of-Area Job Search Assistance may be followed by Relocation Assistance if a job is secured, but these activities may not be provided concurrently.
H. Relocation Assistance

Relocation assistance is designed to enable participants to receive financial assistance toward the cost of relocating themselves and their family to a labor market outside their normal commuting distance. A variety of assistance may be provided in this activity, although the following limitations are in effect:

a. Limitations on relocation assistance: 90% of allowable and actual costs not to exceed $4,000.

b. The actual relocation should be accomplished within a 60 day period, whenever circumstances allow.

c. The relocation destination must be within the United States.

d. Relocation assistance cannot be provided for acceptance of temporary or seasonal employment.

e. The participant cannot have previously received relocation assistance under any WIOA/BC program.

f. A lack of suitable work in the labor market of residence must be documented. In addition, the participant must have received a non-contingent, bona fide job offer or have actually entered employment.

g. Costs in this activity are limited to reasonable and necessary expenses of moving a participant and family to the new labor market.

h. Reimbursable costs may include commercial moving of household goods and personal effects not exceeding a weight limit of 11,000 pounds.

i. Allowable transportation costs in this activity may include the costs of a rental vehicle for moving household goods and effects, costs for the rental of an automobile dolly, trailer, or other similar conveyance, actual gasoline costs for rental vehicles or personal vehicles or reimbursement for gasoline expenses incurred during the relocation.

j. Costs for lodging and meals may be provided to the participant and relocating family members. Lodging reimbursement will be based on the actual rate paid. Meal costs may be reimbursed at rates not to exceed the in-state or out-of-state per diem rates authorized by the State.

k. Reimbursement requests for gasoline, lodging, and rental/commercial moving vehicle costs must be accompanied by receipts. If mileage reimbursement is used, provider must submit proof of mileage instead of gasoline receipts. This may be in the form of a trip calculation for the shortest route from an Internet travel information service such as MapQuest or Expedia.

k. Cash advances of no more than 50% of estimated costs, or $750, whichever is lower, may be provided to the participant; such advances may not be requested more than five (5) working days prior to the commencement of relocation assistance activities. Providers must contact contract manager for prior approval for cash advances.
I. Other Support

Other goods or services necessary for a participant's continuation in WIOA/BC are allowed, unless expressly prohibited by law or otherwise restricted in this technical assistance guide.

General support may include: drug and alcohol abuse counseling and referral, occupational testing and licensing fees, job coaches, meals, clothing, temporary shelter, financial counseling and other reasonable expenses required for participation in the WIOA/BC program.

“Needs based payments,” or cash payments to participants, which are not designated for a specific purpose related to successful program completion, are not authorized. In other words, we don’t supplement participants’ income.

III. INCENTIVES AND BONUSES - YOUTH PROGRAM ONLY

Incentive and bonus payments are payments that are based on a participant's attendance and/or performance. The following are examples of such incentives and bonus payments that may be utilized. These examples of incentives and bonus payments do not limit the provider from offering other incentive/bonus payments. Justifications for all incentive and bonus payments must be recorded in DJL case notes.

All providers shall provide DET with their incentive policy/schedule in order to be reimbursed for these expenditures.

Example 1 - $50 will be offered to a Youth participant as an incentive for each high school (core) credit earned with a minimum grade of a C (2.0 grade point average) as a result of WIOA/BC intervention. Cumulative payment of this incentive (at the end of each semester or school year as appropriate) will be applied towards the participant’s core classes, which are defined as English (including speech), mathematics, science (physical/biological), and social studies. Participants must meet local school district attendance requirements to receive this incentive. A maximum of $300 per program year may be applied toward this incentive per participant.

Example 2 - $50 will be offered to Youth participants as an incentive for each GED section successfully passed while participating in the WIOA/BC Youth program and as a result of WIOA/BC intervention. The participant will participate in training and receive the accumulated incentive once competency is attained. This means payment will be made once all GED exams have been passed. The maximum payment is $200. The High School Equivalency exam is not a part of this incentive.

Example 3 - $20 will be offered as an incentive to out-of-school Youth participants who participate in the initial assessment (pre-test) for the Literacy and Numeracy measure. This payment will be paid upon receipt of the participant’s scores from the pre-test.

Example 4 - $250 will be offered as an incentive to out-of-school, basic skills deficient youth for each area of literacy and numeracy in which they demonstrate an increase of one or more educational functioning levels based on their pre- and post-tests scores. This incentive amount will be paid upon receipt of the participant’s post test scores that notes an increase in educational functioning levels. The incentive payment is limited to one payment per program year for each area of literacy and numeracy ($750 maximum) when WIOA/BC intervention can be demonstrated.

NOTE: The intent is to assist basic skills deficient youth reach basic skills proficiency.
IV. SUPPORTIVE SERVICE PROHIBITIONS

1. Payment toward goods or services incurred or received prior to the participant’s enrollment in WIOA/BC is prohibited.

2. Fines and penalties may not be paid with WIOA/BC funds under any circumstances.

3. WIOA/BC funds cannot be used to cover the cost of certain legal fees. If this type of assistance is contemplated, the Grants Management Unit must be contacted.

4. Bad debts cannot be paid with WIOA/BC funds; debts meet this definition at the point they are turned over to a collection agency for further action.

5. Interest expense cannot be paid with WIOA/BC resources. Revolving credit payments or other periodic loan payments are normally comprised of both interest and principal.

6. Payments for real or personal property that bears title (i.e. - automobiles, homes, etc.) cannot be made with WIOA/BC funds.

7. The purchase of goods or services that are illegal under any federal, state, local, or municipal law or statute cannot be made with WIOA/BC funds.

8. The purchase of cigarettes, alcoholic beverages or firearms is prohibited.

9. WIOA/BC funds cannot be used to pay for union dues or rental deposits.

10. WIOA/BC funds may not be used for foreign travel or training.

11. Entertainment (movie tickets, amusement parks, etc.) with one exception: Costs that would be considered entertainment are allowable only if it is in the Contractor’s written incentive plan tied directly to a program outcome such as credential attainment, job placement/retention, or post-secondary enrollment/retention. All entertainment costs require approval by DET prior to purchase.

12. Food is an allowable expense if approved and only in the Blue Collar budget (Appendix D of your contract). No WIOA funds shall be used to reimburse Contractor for food. Any youth participant, regardless of funding source may benefit from food purchased and reimbursed with Blue Collar funds. Nothing prohibits Contractors from providing gift cards from either funding source to participants to enable them to purchase food (e.g. gift card to supermarket).

13. Payments for participant memberships, dues and subscriptions are not allowed unless it is a specific requirement of a training program, or necessary and reasonable as a condition of employment.
V. SUPPORTIVE SERVICE CAUTIONS
1. If a provider chooses to impose monetary supportive service limitations for any, or all, supportive service categories, the established limits must be applied consistently for all participants.

2. Providers should be very cautious of providing supportive service payments that are associated with standard living expenses, such as insurance premiums, utility payments, or rent payments. Although such payments are not strictly prohibited, providers must fully support such payments as reasonable and necessary for the client to participate and that no other funds or assistance is available to provide these services.

VI. 12 MONTH FOLLOW-UP
Supportive services may be provided to a participant after exiting from the program to assist with obtaining or retaining employment. While a wide variety of services may be offered, these services should be limited to those necessary to obtain employment, ensure job retention, wage gains and career progress. The need for services should be clearly documented in the participant’s case file.