



BOARD POLICY

**POLICY
NUMBER
POL 100-5**

Title:	Support Services		
Effective:	December 21, 2023	Revised:	April 17, 2020
Supersedes:	WIOA Adult and Dislocated Worker Support Services Policy	Version:	01

I. OF INTEREST TO

This policy is applicable to South Florida Workforce Investment Board (SFWIB) dba CareerSource South Florida (CSSF) American Job Centers (AJC), Service Providers, Youth Service Providers, and partners.

II. PURPOSE AND SCOPE

The purpose of this policy is to provide guidance to local workforce development area (WDA) 23 regarding the administration, resources and services coordination when providing supportive services and needs-related payments (NRP) to eligible Workforce Innovation and Opportunity Act (WIOA) and Temporary Assistance for Needy Families (TANF) participants. Additionally, this policy establishes the requirements for the use and documentation of WIOA funds for support services and NRP.

III. BACKGROUND

The WIOA provides program guidelines for supportive services and needs related payments to enable eligible adults, dislocated workers, and youth to participate in activities authorized under the law. As such, the SFWIB/CSSF established requirements contained within this policy to ensure maximum flexibility as well as to assist in the elimination or reduction of barriers that may hinder eligible participants from participating in activities authorized under the WIOA and in compliance with TANF work activities. Additionally, this policy helps ensure when coordinating with other entities the services and resources are not duplicated and limits are established for the amount and duration of said services.

IV. STATUTORY AUTHORITIES

- Workforce Innovation and Opportunity Act (WIOA) of 2014, Public Law 113-128 § 3(59); 129(c)(1) and (2); 134(c)(1)(A)(ii)-(iii); 134(c)(2-3); 134(d)(2)-(3)
- Code of Federal Regulations (CFR) § [680.900](#); [680.910](#); [680.920](#); [680.930](#); [680.940](#); [680.950](#); [680.960](#); [680.970](#); [681.460](#); [681.570](#); [681.640](#)
- U.S. Department of Labor Training and Employment Guidance Letter (TEGL) [19-16](#); [21-16](#); [08-15](#), and [09-22](#)
- CareerSource Florida Administrative Policy [109](#), Supportive Services and Needs-Related Payments

Approved By:
Rick Beasley, Executive Director

- Florida Statutes Chapters [414](#); [445.024](#); [445.025](#)

V. DEFINITIONS

- A. Family ([\(20 CFR 675.300\)](#)) – means two or more persons related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:
1. A married couple and dependent children;
 2. A parent or guardian and dependent children; or
 3. A married couple.
- B. Homeless – means individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))).
- C. Individual Employment Plan (IEP) – is an individualized career service, under WIOA sec. 134(c)(2)(A)(xii)(II), that is developed jointly by the participant and career planner when determined appropriate by the one-stop center or one-stop partner.
- D. Individual Responsibility Plan (IRP) – means an individualized career service, under WIOA sec. 134(c)(2)(a)(xii)(II), that is developed jointly by the participant and career planner when determined appropriate by the one-stop operator or one-stop partner. This plan is an ongoing strategy to identify employment goals, achievement objectives, and an appropriate combination of services for the participant to achieve the employment goals.
- E. Individual Service Strategy (ISS) – is a service strategy developed for each youth participant, in accordance with WIOA 129(c)(1)(B), that is directly linked to one or more of the indicators of performance described in WIOA section 116(b)(2)(A)(ii), that shall identify career pathways that include education and employment goals, appropriate achievement objectives, and appropriate services for the youth participant taking into account the assessment. The ISS plan is developed in conjunction with the youth and adopts a customer and strengths-based customized approach that addresses the unique strengths, challenges and needs of each youth participant.
- F. Needs Related Payments – means financial assistance provided to an eligible participant for the purpose of enabling them to participate in training and are a supportive service authorized by WIOA sections 129(c)(2)(G) for youth and 134(d)(3) adult and dislocated workers. Unlike other supportive services, in order to qualify for needs-related payments a participant must be enrolled in training.
- G. One Stop Service Tracking System (OSST) – is a State of Florida system used to track case management activities and to extract data for federal and state level reporting for the Welfare Transition and Food Stamp Employment and Training (FSET) programs.

- H. Support Services – means services such as transportation, child care, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under the WIOA.
- I. Temporary Assistance for Needy Families (TANF) – is a time limited program that helps families when parents or other relatives cannot provide for the family's basic needs.

VI. SUPPORT SERVICES

Support services is not an entitlement and shall be based on the unique financial, employment and training needs of the individual. By providing said services, the SFWIB/CSSF shall not be obligated, nor commits its contracted service providers, to approve and/or provide supportive services of any type.

Support services shall be viewed individually and creatively to enable participants to participate in education, training, and work activities. Decisions regarding appropriate support shall, to the fullest extent possible, be made by the career advisor assigned to the participant. The rationale for those decisions shall be well documented in the participant's Individual Employment Plan (IEP), Individual Responsibility Plan (IRP), or Individual Service Strategy (ISS).

When providing support services, it must be ensured that the service could not be provided by another resource, the resource is not readily accessible, or there is a crucial need where referrals to other resources would delay the delivery of the support service that is creating a hardship for the participant.

Support service payments shall not be made for activities in which the participant did not participate; nor shall they be made prior to enrollment into or after exit from the applicable eligible program.

A. Eligibility

Support services shall only be provided to eligible adults, dislocated workers, youth, and TANF participants who are participating in career or training services authorized under WIOA sections 129(c)(2) or 134(c)(2)-(3) and who are unable to obtain supportive services through other programs providing such services. Assessments and all support services provided must be documented in the participants IEP, IRP, or ISS, and must be appropriately recorded in the Employ Miami Dade/Employ Monroe (EMD/EM).

Two of the required criteria for providing support services are when the participant:

1. Cannot afford the cost associated with addressing the need.
2. Is unable to secure the needed service from other resources.

However, if the participant obtains the service(s) or funds for the needed support service(s) from a source other than SFWIB/CSSF, the eligibility criteria that was initially met to receive the said service(s) shall no longer be valid. Therefore, the participant shall not be entitled to a reimbursement of the support service(s) when the service(s) are obtained through other means. This requirement shall not be applicable to youth participants.

Youth shall be enrolled under WIOA Title I-B in order to be eligible. Youth co-enrolled concurrently in Adult and Youth Programs under WIOA Title I-B shall be determined eligible under the applicable programs' criteria in order to receive the respective programs and services.

B. Assessment/Need Determination

Eligibility for support services shall be established based on an assessment of immediate needs and barriers. The need for support services that would hinder the participant from participating in career services or training activities shall be identified in the completed IEP, IRP, or ISS. Career advisors shall follow up with participants while active in career services or training activities to ensure that all barriers to successful participation are identified and addressed timely; and shall discontinue said services that are no longer required.

C. Required Documentation

The participant shall provide a copy of all required documentation in order to receive support services. Said documentation shall be maintained in the case file with copies of any additional documentation of need that has been provided and signed by the participant.

D. Duration

Supportive services shall only be made available to eligible WIOA participants and shall be limited to the established maximum funding amount and time limitations available to qualified participants, per program year as referenced in the SFWIB Support Services Procedures.

E. Service Codes

The CSSF AJC staff shall use the Employ Florida Service Code Guide to enter the appropriate service codes in Employ Miami Dade/Employ Monroe when participants are either referred to or provided with supportive services. Reference the SFWIB Support Services Procedures, Attachment E–Employ Florida Service Code Guide.

F. Payment Methods

Support service payments shall be paid directly to or on behalf of an eligible participant. The CSSF AJC shall accept unconditional fiduciary responsibility for issuing federally funded payments on behalf of the SFWIB/CSSF, and as detailed in their respective Workforce Services and Youth Services contracts. Sufficient documentation shall be maintained by the AJC and youth service provider as required to show that the funds are allowable and are used for the intended purpose. Dependent upon the type of support service provided, a variety of payment methods shall be used as appropriate. The AJC and youth service provider shall use the payment method that allows staff to exercise the highest level of oversight, accountability, and internal controls to ensure the support service provided is used for the intended purpose. A list of allowable payment methods are detailed in the SFWIB Support Services Procedures.

Support services shall only be paid directly to the participant in the form of reimbursements.

G. Separation of Duties

The AJC and youth service provider shall ensure any staff dispersing support services payments shall be separated in order that no one individual has complete authority or control over an entire financial transaction. All payment records and financial records pertaining to support services payments shall be made available for federal, state, and local monitoring review, and shall meet the financial standards of the SFWIB and all applicable laws, regulations, policies, and procedures.

Strict adherence to this requirement and those of this policy, as well as, the SFWIB Support Services Procedures will ensure checks and balances to mitigate findings and disallowed costs.

H. Vendor Procurement

In order to streamline the authorization process and maximize allowable expenditures, vendors shall be sourced through a competitive procurement process. Where the SFWIB determines there is an insufficient number of vendors, a cost and services availability comparison shall be required and documented. The AJC and youth service provider staff shall submit a documented comparison with a sole source request to the board for approval. This vendor procurement requirement shall not apply to youth services.

I. Expenditure Limitations and Reporting

Support service expenditures shall be based on SFWIB/CSSF funding availability and the availability of other community resources, so as to leverage limited program resources to the greatest extent possible.

Amounts that exceed the maximum amount must be approved by the Executive Director prior to the issuance of services. In the event the support service payment does not fully cover the cost of the service the participant must indicate how the entire cost of the service will be paid. This must be documented in the case notes.

Support services that enables WIOA youth participants to participate in training shall count toward the training, pre-apprenticeship, and work experience expenditure requirements. Where the pre-apprenticeship program includes an occupational skills training component, separate from the work experience, WIOA youth programs shall report pre-apprenticeship under both the work experience program element and occupational skills training program element. Additionally, WIOA youth expenditures related to Registered Apprenticeship programs shall count toward the minimum work experience expenditure requirement.

J. Support Services Provisions

Support services shall be provided to Adults, Dislocated Workers, and Youth, contingent upon the availability of funds, which shall include, but are not be limited to:

1. Linkages to Community Services

2. Transportation Assistance
3. Ancillary Expenses
4. Housing Assistance
5. Child and Dependent Care Assistance
6. Educational Testing Assistance
7. Healthcare Referrals
8. Other Support Services
9. Employment and Training-Related Payments and Fees
10. Reasonable Accommodations for Individuals with Disabilities
11. Legal-Aid Services
12. Needs Related Payments (as detailed in Section VII. of this policy)

The AJC and youth service provider staff shall ensure adults and dislocated workers are provided with accurate information regarding the availability of supportive services WDA 23, as well as, referrals to such activities.

VII. NEEDS RELATED PAYMENTS

Needs related payment shall be provided only to individuals enrolled in training services (consistent with 20 CFR [680.930](#), [680.940](#), [680.950](#), [680.960](#), and [680.970](#)) and shall be made to help WIOA participants cover non-training expenses while participating in a training program.

A. Eligibility

Adults

Eligible WIOA adults must be employed; does not qualify for, or has ceased to qualify for, unemployment compensation; and be enrolled in a program of training services under WIOA section 134(c)(3).

Dislocated Workers

Eligible WIOA dislocated workers shall be unemployed; and

1. Has ceased qualifying for unemployment insurance compensation, or the trade readjustment allowance under the Trade Adjustment Act (TAA); and
2. Be enrolled in a program of training services under WIOA section 134 (c)(3) no later than the end of the 13th week after the most recent layoff that resulted in the 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 six months; or
3. Be employed and did not qualify for unemployment compensation or trade readjustment allowance under the TAA and must be enrolled in a program of training services under WIOA section 134(c)(3).

Out-of-School Youth (OSY)

Eligible youth participants, ages 18-24, must be enrolled in an educational program or training related service in accordance with the WIOA. In order to eliminate

barriers to obtain or retain employment, assistance may be provided to youth participants unable to pay for exams, certifications, or licenses. Other needs related payments may be provided to a youth participant based on an assessment of need in the ISS plan.

Needs related payments shall also be provided to a youth participant while the individual is waiting to begin a training program or during a job search to obtain employment.

B. Payment Levels

WIOA adult and youth payment levels shall be determined pursuant to the federal poverty level (FPL) on a weekly basis in accordance with the documented family size. Reference the SFWIB Support Services Procedures for the specific amounts.

Dislocated workers payment levels shall not exceed the greater of:

1. The weekly level of Reemployment Assistance (RA) benefits for participants who were eligible for RA benefits; or
2. The poverty level for an equivalent period for participants who did not qualify for unemployment compensation due to the qualifying layoff. Weekly payment levels shall be adjusted to reflect the changes in total family income.

VIII. INCENTIVE PAYMENTS

An initial incentive payment shall be provided to an eligible WIOA participant who has retained employment for a minimum of six months. A second incentive payment may be made if the individual remains employed for an additional six months after the initial six months. Incentive payments to a single individual shall not exceed a one year period of time. Incentive payments shall not be included in the support services program year's maximum amount.

Incentive payments to youth shall be permitted for recognition and achievements directly tied to training activities and work experiences. Said payments shall be made in accordance with the all applicable laws, regulations, SFWIB policies, and Support Services Procedures.

IX. LIMITATIONS

Support services shall not be provided using WIOA funding for, but not limited to, the following:

- A. Payment toward goods or services incurred or received prior to determining WIOA eligibility to receive WIOA services.
- B. Fines and penalties, such as for parking tickets and moving violations.
- C. Legal fees, such as bail and restitution.
- D. Debts that have been turned over to a collection agency.
- E. Child support.

- F. The purchase of goods or services that are illegal under any federal, state, local, or municipal law or statute.
- G. The purchase of cigarettes, alcoholic beverages, or firearms.
- H. Union dues.
- I. Other career and training services.

X. EXCEPTIONS

Exceptions to this policy, or any part thereof, must be approved in writing by the SFWIB Executive Director.