



**NINETEEN TRIBAL NATIONS
WORKFORCE DEVELOPMENT BOARD**

**ADULT & DISLOCATED WORKER
SUPPORTIVE SERVICES POLICY**

**Approved by NTNWDB
05/12/21**

Nineteen Tribal Nations Workforce Development Board

Adult & Dislocated Worker Supportive Services Policy

Purpose

This policy for the Nineteen Tribal Nations Local Workforce Development Area (LDWA) provides guidance on Supportive Services for Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated Worker programs. The policy is to ensure all program managers, staff, and service providers understand the requirements for providing supportive services. Supportive services are provided on the basis of need as determined by the LWDA. WIOA requires the LWDA to provide accurate information about the availability of supportive services, as well as referrals to such activities as one of the career services. LWDA's may fund supportive services for participants, who cannot afford to pay for such services and to participate in WIOA authorized activities.

References

Workforce Innovation and Opportunity Act (WIOA) of 2014: (P.L. 113-128), 20 CFR: 680.900, 680.910, 680.920, 680.930, 680.940, 680.950, 680.960, 680.970; 2 CFR: 220, WIOA Policy Manual: Chapter 2-Section 300, TEGL: 3-15, TEGL 19-16.

Policy

The Nineteen Tribal Nations Board has established this policy to ensure the highest quality, most comprehensive service provision that prevents duplication of resources and services in the area. Each Administrative Entity will authorize a funding cap for Supportive Services per participant. This will include Needs Based Payments and Transportation Monies as part of the funding cap amount. This policy will be reviewed every year; the amounts for supportive service may be change based on availability of funds. Supportive services must only be provided based on need, and when an individual is unable to obtain supportive services through another program that provides such services. Supportive Services **cannot** be the first or the only service provided, nor can they be provided after the completion of participation as a follow-up service. Supportive Services should not exceed \$5,000.00 per participant, per program year, but will be determined on a case by case basis.

Supportive Service Requirements

1. Supportive services must be made available for participants who may need additional assistance, as determined through comprehensive assessments.
2. Assessments, tests and/or supportive services provided to the participant (including services provided by partner agency) must be documented in the participant's Individual Service Strategy (ISS) and case noted accordingly. This information must also be entered appropriately into AJC. All attempts other than WIOA funding must be case noted in AJC.

The provisions of supportive services assistance is intended to enable an individual to participate in career or training services or success of the training plan to secure and retain employment. Supportive services must be necessary and reasonable, per general cost principals, both in cost and in the item/service being purchased, per 2 CFR Par 215 and 220.

Types of Supportive Services

1. Linkages to community services;
2. Transportation assistance;
3. Child care and dependent care assistance;
4. Housing and utility bill assistance;
5. Lodging;
6. Needs-related payments;
7. Education testing assistance;
8. Reasonable accommodations for individual with disability'
9. Referrals to healthcare;
10. Work related expenses;
11. Training-related assistance;
12. Payment and fees for employment and training-related application, test, and certifications;
13. Reimbursement for cellular or internet services;
14. Software as needed for career services, training related activities or job placement.

General Requirements for Supportive Service Assistance

Supportive services, as described in 20 CFR 680.900. Supportive services are not allowable to Adults and Dislocated workers in follow-up.

1. All participants must be active and enrolled in the program to receive supportive services.
2. The participant should not exceed the NTN set limits of assistance without the directors' approval on a case by case basis.
3. The justification for providing the need of supportive service must be documented on the ISS, case noted, and appropriate service entered in AJC activity record.

4. When using “Support Service-Other” code, the type of supportive service/activity being provided must be noted in the note section of AJC activity record.
5. The request for support form must be completed for all requests and submitted to the Director for approval.
6. Any additional support documentation will be collected, verified, submitted and case noted in AJC. Invoice or and/or timesheet will be completed as required for verification of classroom or training attendance verification.
7. Reimbursement of payment for supportive services must be made directly to the vendor and not the participant.

Supportive Services

A. Child Care Assistance

1. Child care assistance may be provided on a limited basis to ensure successful training outcomes and should not exceed the AE’s allowable support service cap.
2. Participant must maintain appropriate attendance while enrolled in training activity.

B. Lodging

A participant may receive lodging as a supportive service when he or she is attending a short-term training (one month or less) or traveling to take a training related examination when the training location/testing site is more than 50 miles from the participant’s place of residence.

1. The nightly rate must be less than the limitation set by the General Services Administration for the nightly lodging rate by City and State, <https://www.gsa.gov/travel/plan-book/per-diem-rates>.
2. The cost of nightly lodging rate must be reasonable, and comparable to other nightly lodging rates within comparable, reasonable distance from the training location or testing site.
3. Depending on the length of the training, alternative accommodations must be considered, including lodging options that offer weekly rates, or more permanent housing solutions, such as housing options that are rented on a month-to-month basis.

C. Training Related Expenses

1. A participant may receive electronic devices such as computers, laptops, and tablets if needed to complete training for needed for work related job placement. Only available if there are no other resources and if permitted by the LWDB Supportive Services policy.
 - a) When electronic devices are provided as a supportive service, the policy will include Cost Limits for the electronic device which is consistent with market prices for comparable goods
 - b) Disposition of the electronic device upon completion of training, specifying if the participant keeps the device;
 - c) Procedures to determine whether an individual already owns or has access to the required electronic device prior to purchasing a new one.
2. For monitoring purposes, case notes must show the electronic device is necessary for successful participation in training program.
 - a) If required by training provider on ETPL, a description must be in file or uploaded to the AJC system.
3. The LWDB must adhere to the following requirements:
 - a. Follow their procurement standards for the purchase of any electronic device under this provision.
 - b. Devices may be purchased in bulk, with written justification to document how the purchase in bulk is more cost efficient.
 - c. Maintain an inventory to track each device provided to a participant.
 - d. The maximum cost of each device must not exceed the average fair market price for the device. Guidance on how to determine the average fair market price is found at 2 CFR § 200.404(c).
 - e. Pre-approval from DES is required for all capital equipment if the purchase is over \$5,000.
 - f. The LWDB must establish and maintain security standards for any equipment for which the LWDB or fiscal agent retains ownership. LWDBs must also follow their established policies and procedures to ensure sensitive or personal identifiable information is not retained on equipment.
4. Licenses, certification and testing fees may be paid when the license, certification or the successful completion of the test is required to work in the occupation is required by a specific employer for the individual to obtain employment or will result in a recognized credential
5. Eyeglasses, including protective wear
6. Vision exams

7. Clothing/uniforms and/or boots, helmet, gloves
8. Tools
9. Occupational licensing fees
10. Certification, background and fingerprinting, drug testing, health screening and other work related testing; and
11. Transportation assistance may be provided at the inception of WEX, Internship, or On-the Job Training (OJT) to ensure the mobility between home and the location of career and/or training services. This would include providing a bus card to aid in job search activities and gasoline (as approved).

Needs Related Payments

Needs-related payments provide financial assistance to adults and dislocated workers for the purpose of enabling individuals to participate in training activities, per 20 CFR 680.950. Needs-related payments may be provided to eligible participants accepted into training programs. To receive needs-related payments the following applies:

1. Adult Program participants must:
 - (a) Be unemployed;
 - (b) Not qualify for, or have ceased qualifying for, unemployment compensation; and
 - (c) Be enrolled in training services
2. Dislocated Workers must:
 - (a) Be unemployed; and
 - (b) Have ceased to qualify for unemployment insurance compensation or Trade Readjustment Allowance (TRA) under the Trade Adjustment Assistance (TAA); and
 - (c) Be enrolled in a training service by the end of the 13th week after the most recent layoff that resulted in a 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
 - (d) Be unemployed and not qualify for unemployment insurance compensation or TRA under TAA and be enrolled in training services.
3. For eligible dislocated workers, established levels of needs-related payments must not exceed the greater of either the following levels:
 - (a) For participants who were eligible for unemployment compensation as a result of the qualifying dislocation, the payment may not exceed the applicable weekly level of the unemployment insurance compensation

- (b) benefit; or
- (c) For participants who did not qualify for unemployment insurance compensation as a result of the qualifying layoff, the weekly payment may not exceed the poverty level for an equivalent period. Unemployment Insurance is notified of the weekly payment.

Emergency Expenses

Emergency services are allowable on a case-by-case basis and may include, but not limited to payments for:

1. Utility assistance for overdue bills water, gas, electric and/or heating.
2. Rental payments when the participant is at risk of eviction.
3. Temporary shelter in the event of an emergency
4. Emergency assistance for medical, vision or dental services may be provided if it is considered a barrier to the successful completion of WIOA funded activities or may impact continued employment; and has been determined that the individual has no other resource in which to pay for this service.

Note: Utilities and Rental assistance requires the following:

- a. Check availability of service with local community resources
- b. Obtain documentation to show pending shut-off or overdue bills;
- c. Obtain documentation to show pending eviction;
- d. Cannot pay late fees or refundable deposits.

Auto Expenses

1. Assistance may be provided for automobile repairs/maintenance for vehicles used as the primary source of transportation to training or work.
2. The vehicle must be noted as the participants' sole medium for transportation to and from training or work.

Supportive Service Prohibitions

Supportive services, must not be provided after the Adult or Dislocated Worker program participant exits the program. If the individual is in need of supportive services, the individual must be re-enrolled into the WIOA program.

Per 2 CFR 220, unallowable costs do not meet the conditions of supportive services include, but are not limited to:

1. Payment toward goods or services incurred or received prior to the participants' enrollment in a WIOA Title I-B program;
2. Fines and penalties, such as parking tickets or moving violations, and fines for late utility payments;
3. Taxes, except for sales taxes and gasoline taxes, such as income taxes, and business/payroll taxes (for employers);
4. Child Support;
5. Legal fees, except for fees to access a drivers' license;
6. Debts that have been turned over to collection agency;
7. The purchase of goods or services that is illegal under any federal, state, local, or municipal law or statute;
8. The purchase of cigarettes, alcoholic beverages or firearms; and Union dues;
9. Other career and training services as described in the AJC Service Dictionary for Adult, Dislocated Worker and Youth services.

Follow-Up Services

Adult and Dislocated Worker Programs Title I-B Adult and Dislocated Worker Programs do not allow the provision of support services after completion of participation as supportive services are provided to enable adults and dislocated workers to participate in career and training services.

For information on Follow-up Services that may be provided to Adults and Dislocated Workers, see the WIOA Title I-B Adult and Dislocated Worker Programs Policy Section 108.