

**POLICIES AND PROCEDURES**  
**For Implementation of**  
**WIA TITLE I-B FORMULA FUNDS, RECOVERY ACT FUNDS,**  
**AND OTHER FUNDING SOURCES AS MAY BECOME AVAILABLE**

**KCDEE & River Valley Workforce Investment Board**

**POLICY & PROCEDURES MANUAL RELEASE**

To	All KCDEE Grantee Staff, and Sub-Recipients	SUBJECT AREA	Program Services
From	KCDEE Administration	POLICY NUMBER	CM 03-02, Change
Issue Date	Modification to CM 03-02 6/1/09	EFFECTIVE DATE	Retroactive to February 17, 2009

**SUBJECT: SUPPORTIVE SERVICES**

**PURPOSE:**

To identify availability of supportive services in LWIA #5, and establish fair and equitable procedures for dissemination of WIA Title I-B formula funds, Recovery Act funds, or other funding sources as may become available for supportive services, excluding needs-related payments (to be addressed under separate policy). This includes, but is not limited to the determination of need, setting appropriate financial limits, establishing resource coordination and referral procedures, and creating policies related to the issuance of supportive services. Policy direction is necessary in order to ensure that all Grantee staff and sub-recipient staff make fair, consistent, and equitable determinations for customers, and to establish and implement sound administrative procedures.

**REFERENCES:**

*WIA Regulations 20 CFR Part 663 Subpart H – Supportive Services*  
*WIA Statute 101(46), 134 (e) (2) and (3)*  
*American Reinvestment and Recovery Act of 2009*  
*Department of Labor TEGL 14-08, and 14-08, Change 1 DOL Guidance ARRA Implementation Guidance letter*  
*WIA Policy No. 99-1, and 99-1 Addendum 1- Adult Service Priority System*  
*08-ARRA-01, Change 1 WIA Youth Programs Funded Under the Recovery and Reinvestment Act of 2009.*

**BACKGROUND:**

The DOL ETA encourages the establishment of policies that assure that supportive services described in the above references that may be necessary for an individual's participation in job training, are part of the dislocated worker service strategy. For adults, the Recovery Act specifically emphasizes the authority to use these funds for supportive and needs-related payments to ensure participants have the means to pay living expenses while receiving training. Priority for adult funds shall be for services to recipients of public assistance and other low income individuals as described in WIA section 134 (d)(4)(E) and defined previously by DCEO in the above referenced policy letter on the Adult Service Priority System. LWIA #5 ensures supportive services described in WIA section 129(c)(2)(G) are available to youth funded through WIA, Recovery Act funds, and any other fund source that may become available.

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Recovery Act funds can be used on all activities specified under the WIA Youth, Adult and Dislocated Worker Programs, in accordance with Federal, State, and local policy.

**A. Rules and Regulations**

**1. Definition, Regulations, and General Eligibility / Adults & Dislocated Workers:**

**Supportive services** are services such as transportation, child care, dependent care, housing, and other services that are necessary to enable an individual who is unable to obtain the services from other programs to participate in activities authorized under WIA Title I-B, the Recovery Act programs, and other funding sources as deemed appropriate.

- Supportive services may be provided to participants through non-financial or financial assistance, or by arrangement with another partner or agency when necessary to enable a participant who is eligible for core, intensive, and/or training activities under WIA Title I-B, Recovery Act, or other funding sources to participate in such activities.
- Funds may be used to provide supportive services to adults and dislocated workers respectively – who are participating in programs with activities authorized under Core, Intensive, and/or Training service levels; and who are unable to obtain such supportive services through other programs or community resources providing such services.
- Priority for adult funds (WIA and ARRA) used for supportive services shall be for services to recipients of public assistance and other low income individuals as described in WIA section 134 (d)(4)(E) and defined previously by the DCEO to be either 51% or greater of adult enrollments or adult expenditures on individuals served in the Intensive and Training Service Levels. Therefore, at a minimum, 51% of adult funds spent on supportive services will be for those individuals determined low-income in accordance with DCEO WIA eligibility policy and adult service priority policy, or any such revisions as may be dictated by the State to this priority of service to adults.
- Any adult or dislocated worker determined eligible for WIA Title I-B, Recovery Act, or other funding source as low-income as defined by the State through family size or as an individual participant is automatically deemed eligible to receive financial supportive services, thus waiving financial need assessment procedures stated within this policy. The participant must be registered in the appropriate fund source and enrolled in the appropriate supportive service activity. Adults or Dislocated Workers determined eligible, but not low income as defined will not be automatically eligible for financial supportive services. A determination of need through an assessment must be performed for these participants as outlined herein.

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- No participant will receive supportive service payments to assist him/her in training or other activities if the participant fails to participate in the training or activity without good cause. "Good cause" is defined as "circumstances completely outside the participant's control". Acceptable attendance/participation level has been established and described herein.
- Supportive Service payments shall not be considered as income for the purposes of determining service level eligibility.
- A participant may be eligible for non-financial supportive services at any level of service at which time the need is determined through assessment.
- A participant must provide basic financial/budget information during an assessment with WIA Grantee staff, or sub-recipient staff in order for the determination of need to be established.

**2. Definition, Regulations, and General Eligibility / Youth:**

**Supportive services** for youth, as defined in WIA section 101(46), may include the following:

- (a) Linkages to community services;
- (b) Assistance with transportation;
- (c) Assistance with child care and dependent care;
- (d) Assistance with housing;
- (e) Referrals to medical services; and
- (f) Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear, protective foot wear, and other items required or deemed necessary for participation.

Any youth determined eligible for WIA Title I-B, Recovery Act, or other funding source as economically disadvantaged either through family size or as a participant is automatically deemed eligible to receive financial supportive services, thus waiving financial need assessment procedures stated within this policy. The youth must be registered in the appropriate fund source and enrolled in the appropriate supportive service activity. Youth participating in activities funded through sources using WIA Title I-B eligibility through the 5% window of eligibility, or youth who are disabled or family of one (1) and whose parents or households are not economically disadvantaged will not be automatically eligible for financial supportive services. A determination of need through an assessment must be performed for these youth as outlined herein.

**B. WIA Supportive Services Resource Coordination & Referral Procedures**

Each Illinois workNet Center shall identify and maintain a local listing of available resources along with requirements for accessing those resources. Additionally, One-Stop partners are to provide updates to any State or locally sponsored information and referral resource system. Efforts to link participants with local community resources shall be documented in State's management information system and other areas noted above.

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WIA Title I-B, Recovery Act, and/or sub-recipient staff must have general knowledge of available resources (financial and non-financial) within the LWIA area. Such knowledge is obtained through the local resource listings made available in the Illinois workNet career resource centers, State-sponsored resource and referral services available through the internet, gained from attendance at local community resource network group meetings, resource sharing agreements or arrangements with One-Stop partners, or through other available means. Grantee and sub-recipient staff will align use of WIA adult and dislocated worker funds, Recovery Act funds, and other fund sources identified with Wagner-Peyser, Reemployment Services, Trade Adjustment Assistance, Unemployment Insurance, and other One-Stop Career Center Partner programs.

Once an assessment and needs determination is conducted, WIA Title I-B, Recovery Act, and/or sub-recipient staff should first refer the participant to available resources within the community for which they believe the participant will be eligible. Such referral should be made in written or acceptable electronic forms.

If eligibility for or availability of local resources has been ruled out and documented in the Justification of Need form (attached herein), the appropriate fund source under the purview of this policy letter may be utilized.

**C. Assessment of Need Requirements:**

“Eligible” means that the participant: (1) must have been determined eligible for and (2) enrolled in an appropriate level of WIA or Recovery Act services, verified through the State’s management information system, (3) is determined to be unable to obtain such supportive services through other programs providing such services, and (4) has a demonstrated financial need following analysis of the participant’s financial circumstances.

Supportive Services are limited by the finite availability of funding as identified in each grant budget. Funds may be affected by rescissions, may be diminished near the end of each program year, or may be limited in other ways. In order to conserve the limited funding, the following procedures are to be followed:

Assessment of Need: At any level of service an assessment may be made of the need for supportive services. Such need must be in accordance with the intent of and definitions found in A.1. above, and documented through use of the relative forms attached and appropriate records submitted for entry or entered into the State’s workforce information system. WIA Title I-B, Recovery Act, or other fund source staff and service provider staff should first make reasonable efforts to locate or provide information to the participant about alternative resources and assist them in accessing these resources.

Establishing Need: In the absence of alternative resources, or in times when accessing alternative resources presents an additional barrier to a participant’s participation in WIA Title I-B, Recovery Act, or other fund source services, Grantee staff or service provider is to:

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Step 1: Update participant's budget information for entry into the State's management information system, documenting, verifying and justifying the need;

Step 2: Complete and submit required forms in accordance with procedures found within this policy.

Step 3: register or report participant will be served in each of the supportive service activities, as appropriate;

Step 4: record or report issuance of supportive services in the case notes.

Reassessment of Need: Reassessment of need should occur at the following times:

- a) prior to each new semester of classes or new class start;
- b) at the beginning of a new program year for those participants who received services in the prior year;
- c) upon any request by a participant for new or additional supportive services, or
- d) during regular case management or follow-up contacts,
- e) at such time as the current funding source may be nearing its end (i.e. grant ends or funds exhausted) and supportive service funds through another grant-managed source may be needed, and
- f) at such time as participant obtains full-time employment.

With proper planning, and whenever possible, inter-mingling of fund sources for any one activity should be avoided.

Step 1: Update the participant's needs determination and budget information for reporting or entry in the State's management information system to reflect any changes in the participant's circumstances impacting financial need; update applicable hard-copy forms for file or submission.

Step 2: Document and report changes in participant's case notes.

**D. Allowable Supportive Services for WIA, Recovery Act, and other funded sources as may become available:**

**1. Child Care / Dependent Care**

Grantee staff or service providers will establish the supportive service plan based on the participant's programmatic needs for childcare.

For childcare needs of the participant that will exceed 45 calendar days in duration should complete and mail the Child Care Resource and Referral (CCR&R) form for eligibility determination.

A temporary childcare subsidy can be provided when needed for training or employment. This temporary subsidy shall not exceed 45 calendar training days or employment days. This temporary childcare subsidy is to accommodate the timeframe associated with CCR&R eligibility determination or allowance for timeframe associated with receipt of approximately one-month's income from new employment.

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Priority for child care provision is to be through a legal care arrangement by which all child care providers must be at least 18 years of age and meet the licensure requirements as determined through the Department of Human Services. In instances where access to child care arrangements through a licensed provider are not feasible or present undue burden or additional cost on behalf of the eligible participant, further justification of alternate arrangements must be presented to the Grantee for review and pre-approval of the arrangements and need.

Childcare may be provided for children under age 13 or for children age 13 or older that need the care because of a physical or psychological condition or court-ordered guardianship.

Acceptable hourly or daily rates will be those rates set by the Department of Human Services for those participants qualifying for CCR & R. For participants that do not qualify for CCR & R, but have been determined in need of such services, the acceptable rates shall be those set by the licensed facility, under terms and agreement established with the provider. For participants requiring alternative child care arrangements that are not with a licensed facility or individual, and whose justification has been pre-approved, the hourly or daily rate shall follow the DHS rate schedule.

Payment for childcare must be authorized in the childcare provider's name and mailed to the provider's address. Forms attached herein related to the issuance and approval of child care subsidy must be completed and submitted in accordance with stated procedures.

**2. Transportation**

Transportation is paid at the most reasonable and economical rate. Participants in need of transportation assistance should be encouraged to use public transportation if public transportation is available, less costly than driving, and reasonable (in terms of pick up, drop off, and schedule). When public transportation is used, the amount of the actual fare for each trip is authorized, or the cost of a weekly, monthly, or specialty pass appropriate to cover need, whichever is less. If the participant must use more than one form of transportation, for example, participant uses the bus and the Metra train, allow the most reasonable total cost for the trip. Bus passes or tokens are the preferred means of assistance. Carpooling should be considered as an option when possible.

If a participant has access to a vehicle and is in need of financial assistance for mileage expenses, actual mileage must be documented and shall be reimbursed for travel approved for appropriate activities.

In all instances noted above, acceptable attendance/participation documentation is required, in addition to acceptable documentation supporting the expense and distribution of the supportive service.

With the influx of Recovery Act funds, the rate for mileage reimbursement utilizing the ARRA fund source will be at the full IRS rate in effect at the time of the travel. No deduction of

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miles will be made if the participant is receiving transportation support under the ARRA funding stream. WIA Adults, Dislocated Workers, or Youth may be co-enrolled in ARRA in order to receive the full benefit of transportation supportive services, allowing for the preservation of limited resources in the WIA formula grant.

When establishing the supportive service plan, consideration must be given whenever possible for use of only one funding stream per activity.

Transportation expenses must be authorized in advance of payment to participants for travel necessary to get to and from approved activities. Payment is processed on a cost reimbursement basis, when all appropriate documentation has been provided. Forms attached herein associated with transportation subsidy must be completed for submission in accordance with stated procedures.

The transportation and/or child care supportive services covers activities such as: work-related activities, job clubs, approved education and training, assessment interviews, job retention meetings, counseling and treatment needed to eliminate barriers to employment such as domestic violence, substance abuse treatment, mental health treatment, job interviews for the participant, scheduled appointments, and locating suitable child care and taking children to child care, if appropriate. Verification of attendance during such activities by an authorized individual, along with the recommended signed forms reflecting purpose and amount of expense are required as proof of expense incurred. Documents must be signed by participants and authorized individuals who can validate the attendance and costs claimed.

Employed Participants – Supportive service expenses will be available for full-time employed participants up to 45 days following date of employment. Payment of supportive services for participants that have part-time employment while participating in education and training activities may be allowed with appropriate financial assessment and justification of need.

**3. Expenses with Cash and Time Limits**

Total payments for expenses with time and cash limits for one (1) participant cannot exceed \$1,200 in any 12-month period ***without the approval of the RVWIB's designated committee.*** Some of these expenses also include individual limits.

- Repair of an auto (maximum \$900 in any 12 months). Obtain one (1) estimate for the purchase or repair of items listed in this section. If the estimate is over \$100, obtain a 2<sup>nd</sup> estimate. For items \$100, or less, an informal estimate may be used (TV, newspaper or radio ads). Authorize the least expensive item(s). **Supervisory approval is required. Do not** approve a request for payment of automobile repairs unless:

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- The participant has no other available and suitable form of transportation to and from the job site or work and training activity.
- The participant is unable to report to the job site or the work and training activity unless the auto is repaired.
- The participant has a valid driver's license and provides proof that he/she has or can get insurance.
- The automobile, when repaired, will be suitable for the purpose intended. No other obvious mechanical defect has been observed.
- The title and license of the automobile are in the name of the participant or their spouse who lives in the home.
- Auto license plate fees.
- Auto liability insurance at the least costly rate but not over \$675 in any 12 months.
- Special clothing such as uniforms or outsized clothing needed for the participant to meet a dress code for an activity or employment (\$600 in 12 months).
- Required tools not provided by the employer (\$600 in 12 months).
- Other required items related to the specific job (maximum \$900 in any 12 **months**).  
**Supervisory approval is required.**

**Note:** Supportive Services may not be issued to buy firearms, to pay bail bonds or traffic tickets.

**4. Emergency Services**

All emergency services are for one (1) time temporary assistance only. Emergency services requests are considered on case-by-case basis only as recommended by the Grantee staff or subrecipient staff and approved by the appropriate supervisory personnel or authorized Grantee staff. Local community resources and requirements should be identified. Referrals for financial counseling may also be appropriate.

**Utilities.** Temporary assistance only. Participant to be referred to utility company to work out deferred or budget payment plan. If emergency funds are still needed, they will be used to cover required down payment for one (1) time only.

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**Food.** Temporary assistance only. A participant in immediate need of food will be referred to available local community resources, food pantries, and the Department of Human Services to apply for food stamps.

**Health/Medical.** Temporary assistance only. Participant to be referred to local community resources, and to Department of Human Services to apply for medical card, or to local county health department for *KidCare* program.

**Other Emergency:** Temporary assistance only. Participant to be referred to local community resources, as appropriate.

**NOTE:** Credit Card Payments are not an allowable supportive service expense.

**E. Disqualifying Factors**

- If a participant refuses to follow through on program staff referrals to local resources, the participant will be deemed inappropriate to receive supportive services and perhaps may be disqualified from continuing in the approved activities.
- Department of Human Services participants may not receive supportive services that would be duplicated services they are eligible to receive through DHS.
- Dislocated Workers with estimated household income exceeding their household budget for necessities may be disqualified from consideration for supportive services.
- If a participant's participation level falls below 90% for the period for which supportive service payments are being made, the participant may be docked a pro-rated amount of the supportive service payment. Continued attendance problems may disqualify participant entirely from receiving supportive services. A minimum of 90% attendance in scheduled WIA activities is required. There is no differentiation between excused and unexcused absences. The attendance rate is determined by the following formula: number of hours absent in a period divided by the number of hours scheduled for the period. In the event the attendance problem is a direct result of the need for the supportive services, an exception may be considered.
- If a participant is not complying with program/services agreement.

**F. Approval Process.** Grantee staff or service provider staff may authorize supportive services in accordance with this policy. Participants must sign a Supportive Services Agreement and supply all necessary and accurate information for development of the participant's supportive services plan as a part of the plan approval process.

The appropriate sub-recipient supervisory personnel or authorized Grantee staff must approve all emergency supportive services requests.

**G. Submission and Tracking of Supportive Services Process.**

An Expense Voucher for supportive service dollars must be prepared, signed by the appropriate supervisory personnel or authorized Grantee staff and submitted for payment along with signed timesheet and other verifying documents as applicable. Paid copies must be maintained in the participant's file. Sub-recipient costs will be reimbursed in accordance

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with the Grantee's documentation requirements and reimbursement procedures covered under the sub-contract.

**H. Other Related Concerns.**

WIA Title I-B, Recovery Act, or sub-recipient staff shall inform participants receiving supportive services that they are receiving assistance based on their individual need and circumstances, and that it is inappropriate for them to discuss information about their services with other WIA Title I-B, Recovery Act, or other fund-source participants.

Exceptions to this policy may be considered based on unique, unforeseen participant situations. All requests for exceptions to items in this procedure must be submitted on the Exceptions Request Form by case manager to the appropriate supervisory personnel or authorized sub-recipient personnel for consideration and final approval.

**EXPIRATION**

Ongoing based on the life of grant fund sources referenced herein, or until otherwise modified.

**ATTACHMENTS:**

1. Needs Determination Form & Justification For Exception Form
2. Supportive Service Agreement
3. Participant Travel / Mileage Form
4. Participant Expense Voucher
5. Participant Attendance Sheet
6. Childcare Verification Form