SUPPORTIVE SERVICES POLICY AND PROCEDURES

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I. Introduction

These policies and procedures are intended to:

- Provide guidelines and requirements when administering supportive services to participants;
- Provide a streamlined process for approval;
- Ensure accurate and timely tracking of expenditures; and
- Ensure that similarly situated participants receive comparable supportive services.

It is the policy of the San Diego Workforce Partnership (SDWP) to provide supportive services to participants in accordance with the law and regulations. Subrecipients will ensure, to the extent possible, supportive services are appropriately matched to the participant’s needs.

Subrecipients shall follow the standard framework of procedures outlined in this policy. These guidelines shall be followed to the fullest extent possible and are applicable across all WIOA grants and programs. Note: SDWP’s non-WIOA funded special grant programs may have their own supportive services policies and procedures.

II. Supportive Services

Supportive Services are available for WIOA Title I Adult and Dislocated Worker programs. Supportive services may only be provided to participants when it is necessary to enable individuals to participate in services and is tied to a specific service. Such needs are typically identified through the objective assessment process and outlined in the Individual Employment Plan (IEP). Supportive services are payments made to or on behalf of eligible participants for one-time or temporary services required to support the IEP. WIOA Title I will only pay for expenses incurred while a participant is enrolled in the program and actively participating in activities authorized under WIOA.

Supportive Services are not intended to assist in paying for expenses refundable to the participant. All Supportive Services must be approved in advance by the Subrecipient’s Case Manager. As a part of the objective assessment process and development of the IEP, determine a participant’s need for Support Services and appropriate community resources and referrals.

Supportive services are services that are reasonable and necessary to enable a participant to take part in other services and activities related to their Employment Plan. Supportive services should not duplicate a service a participant could receive from another program in the community. If possible, it may be applicable to cost share with other Subrecipients. Supportive Services are not intended to meet every need of the participant. Rather, they provide
temporary assistance. For this reason, staff should assist the participant in developing a plan to cover the supported costs once WIOA Title I funds are no longer appropriate for the individual. This plan must be documented in a CalJOBS case notes.

III. Funding

The utilization of Supportive Services is determined on an individual basis. Fund distribution is determined at the Subrecipient office with guidance from the Case Manager as needed. Eligibility or enrollment in WIOA does not constitute entitlement to Supportive Services. Supportive Service dollars are not guaranteed as they are based on availability of program funds.

A request for additional funds beyond the maximum limit per program year may submitted by providing the justification and reasoning to SDWP’s Program Analyst. Approved exceptions must be noted in the participant’s case notes in CalJOBS.

The Subrecipient shall ensure that the total supportive services expenditures for each participant do not exceed the maximum allowable caps as detailed in table below:

<table>
<thead>
<tr>
<th>Supportive Service Caps</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Participants enrolled and active in basic/individualized</td>
<td>$300</td>
</tr>
<tr>
<td>Participants enrolled in WIOA funded training</td>
<td>$700</td>
</tr>
<tr>
<td>Participants enrolled in *non-WIOA funded training</td>
<td>$1000</td>
</tr>
</tbody>
</table>

*Adult or DW enrolled Participants who are enrolled in training that is not funded with WIOA Title I funds.

Note: Subrecipients may receive different grant funds that may outline different caps per participant. The cap will be stated in the scope of work attached to the Subrecipient’s contract.

IV. Subrecipient Responsibilities

Subrecipients shall accept unconditional fiduciary responsibility for issuing federal funds on behalf of SDWP as specified in this policy, and as written in their current contract. Subrecipients shall establish and utilize appropriate checks and balances necessary to guarantee the integrity of the supportive services funding. Subrecipients shall ensure systems are in place for the review, approval, and payment of supportive services pursuant to current WIOA and Employment Development Department (EDD) regulations, directives, and SDWP's policies and procedures.
Expenditures shall be tracked in the CalJOBS system and this information shall be kept by means of a hardcopy participant file. All supportive services payments and collection of back-up documentation (i.e. receipts, mileage logs, etc.) will be the sole responsibility of the Subrecipient.

A. Separation of Duties
Duties of staff dispersing supportive service payments must be separated so that no one individual has complete authority or control over an entire financial transaction. For example, the person conducting the assessment, the person processing the payment and if a payment is mailed, the person mailing out the check shall not be the same person.

Participant records (IEP, case notes, and worksheets) and contractor financial records, pertaining to supportive service payments, must be made available for review by local, State and Federal monitors, as well as must meet the financial management standards specified in the SDWP Operations Manual Chapter VI, Financial Management, including enough information to provide:

- A comparison of actual expenditures with the budgeted amounts of each contract;
- Support for accounting records and to ensure proper charging of costs and cost allocation; and
- The ability to track funds to a level of expenditure adequate to establish that funds have not been used in violation of the applicable restrictions on the use of the funds.

Strict adherence by Subrecipients to the required supportive service tracking and documentation procedures will help to ensure that supportive services are appropriately provided to participants, as well as prevent the probability of disallowed and/or questioned costs.

V. Supportive Services and Payment Procedures
WIOA funded supportive services will only be issued when all other non-WIOA funded resources have been exhausted or if untimely delivery of other services would create a hardship for the participant. Subrecipient shall identify and refer participants to other community-based organizations and or resources as the first means of supportive services.

Documentation of referrals must be maintained in the participant’s hard file and recorded in a CalJOBS case note.

Gift cards, transportation payments and checks made out to vendors are the only allowable forms of disbursement. Subrecipients will be reimbursed for gift cards, transportation
payments and vendor checks after the supportive services have been distributed to the participant.

Subrecipients must log all inventory of purchased supportive services items and track what has been distributed to the participant. SDWP will not reimburse Subrecipients for any unused inventory. These logs are subject to monitoring and file review. Failure to comply with this requirement will result in corrective action and/or disallowed costs.

A. Approved Support Services

1. Transportation Assistance
   When selecting the type of transportation method such as a bus pass, gas card or ride share the Subrecipient must determine the first and most reasonable means of getting to and from the WIOA activity or non-WIOA funded training. In addition, due to the nature of the service, participants may receive on-going supportive services. However, it will be the responsibility of the Subrecipient to ensure participant continues to be eligible for the supportive services and that such service is a continued barrier to employment.

2. Career Wardrobe, Tools, and Equipment
   Supportive services assistance will only be used in situations where a participant is in need of specific clothing items, tools, or equipment required by employers, training providers, or required for job interviews.

3. Food
   The supportive services provider will be responsible for maintaining food cards, food vouchers and a food pantry or partnership with food pantries for participants requiring assistance with food. Supportive Services may not be used for the purchase of alcohol or tobacco. Participants in violation of this policy must be suspended from AJCC services.

4. License/Certification Fees
   License/Certification fees are allowable only when the expense directly relates to a condition of employment, training and/or for the purpose of interviewing for an employment position.
5. **Text Books**

Supportive services assistance for text books will only be used when the participant is enrolled in an approved training activity and are in need of a specific text book required to successfully complete the training activity.

**B. Supportive Service Process**

1. **Prior to Referral of Supportive Services (Subrecipients shall)**
   a) Assist the participant in identifying non-WIOA resources; if alternative resources are not available, refer the participant for supportive services. This activity must be documented in a CalJOBS case note and a copy of referrals kept in the participant’s file;
   b) Ensure that the IEP demonstrates the need for supportive services request as a barrier to employment; and
   c) If the participant has previously received supportive services and is returning for additional services, ensure all receipts have been returned and validated.

2. **Referral for Supportive Service**

The participant is referred for support services by their case manager. Appropriate activity code for the Supportive Service requested is entered in CalJOBS along with a case note. At minimum, the activity case note must include the following information:
   - Type of supportive service
   - Amount of supportive service and how it was calculated
   - Type of WIOA Title I Adult/DW Activity for which supportive services will be used
   - Exhausted all free and low-cost resources to provide supportive services
   - Funding source (WIOA, non-WIOA, In-Kind, etc.)

3. **Distribution of Supportive Service**

At the supportive service appointment, the Subrecipient Staff (other than the Case Manager who made the referral) reviews the activity code, completes **EXHIBIT-SUPPORTIVE SERVICES LOG & RECEIPT FORM** and provides the participant with the supportive service. Once the supportive service is received the activity code is closed and the attached case note is updated to include the amount provided and the balance remaining.
4. Documentation and Receipt Requirement

Provide the following documentation for the participant’s file:

a. **EXHIBIT - SUPPORTIVE SERVICES LOG & RECEIPT FORM**

b. Copy of check, gift card or other type of card with serial number visible, if applicable

c. Itemized receipt with date, purchase detail, and total

ii. For mileage/travel

1. A copy of the determination of distance, such as MapQuest, is kept in the file; and
2. If gas card or ride share payment is provided, the client mileage/travel log is completed by the participant and returned to the Supportive Services provider within 30 days after supportive services are provided and/or before receiving additional supportive services.

iii. The participant must provide itemized receipt(s) totaling the amount provided within 30 days after supportive services are provided and/or before receiving additional supportive services, and the itemized receipt(s) must then be included in the participant’s file. This includes purchase receipts from the use of gift cards and/or gas cards. If not returned, no additional supportive services may be provided. The Subrecipient must perform and record in CalJOBS if a participant fails to return the receipts for the supportive services provided in full:

1. Contact the participant requesting the missing receipts and explain that no further supportive services will be provided until the missing receipts are received in full; and
2. If the receipts are not provided, send a follow-up letter within five (5) business days to the participant requesting the receipts and notifying the participant that no further supportive services will be provided until all receipts are received. A copy of this letter must be kept in the participant’s file.

VI. Exhibits

**SUPPORTIVE SERVICES LOG & RECEIPT FORM**