

SUPPORTIVE SERVICES POLICY AND PROCEDURES

TABLE OF CONTENTS

SUPPORTIVE SERVICES POLICY AND PROCEDURES	1
I. Introduction	2
II. Supportive Services.....	2
III. Funding	3
IV. Subrecipient Responsibilities	3
A. Separation of Duties	3
V. Supportive service documentation (Supportive Service Log)	4
VI. Supportive Service Guidelines	4
A. Approved Supportive Services.....	5
B. Distribution and documentation.....	5
1. Prior to Referral of WIOA Supportive Services	5
2. Distribution of Supportive Service	6
3. Missing Documentation and Receipts	7

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 fully be followed 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 be 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:

Supportive Service Caps	
Tier I: Participants enrolled and active in basic/individualized Services	\$400
Tier II: Participants enrolled in WIOA funded training	\$800

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.

Note: Any supportive services distributed between July 1, 2020 and December 31, 2020 will have been documented in CalJOBS and the subrecipient will need to manually track the expended amounts between CalJOBS and Workforce eFile to ensure the totals do not exceed the allowable amount. This is only applicable for PY20-21.

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.

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 subrecipient 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 SERVICE DOCUMENTATION (SUPPORTIVE SERVICE LOG)

Participant supportive services will be managed electronically through Workforce eFile and CalJOBS. To provide supportive services, subrecipients must complete the supportive service log and upload required documents through the Workforce eFile system. The Workforce eFile system is a secure, web-based document management system that provides a process for subrecipients to provide and track supportive services remotely or in-person. Participants will be able to and sign receipts, as well as upload required documentation from their phone or computer. The Workforce eFile Web Access User Guide is an instruction and guidance manual on how to track supportive services through the Workforce eFile. The user guide is located in the Operations Resources section the SDWP website (<https://workforce.org/operations/>).

VI. SUPPORTIVE SERVICE GUIDELINES

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.

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. **The Workforce eFile Supportive Service 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 SUPPORTIVE SERVICES

Supportive services are services that enable an individual to participate in WIOA activities. These services include, but are not limited to, the following (20 CFR 680.900):

- Linkages to community services;
- Transportation, including bus passes, gas cards, and rideshares;
- Childcare/Dependent Care;
- Housing;
- Needs-related Payments
- Educational Testing;
- Reasonable accommodations for individuals with disabilities;
- Legal Aid Services;
- Referrals to Health Care;
- Work Related Tools/Clothing;
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes;
- Payments and fees for employment and training-related applications, tests, and certifications; and
- *Other needs related to training or employment retention, as determined by the case manager, to ensure the participants can continue to participate in and complete WIOA activities.

**Note: Per, 20 CFR 680.900, food may be provided to eligible participants as a Supportive Service when it will assist or enable the participant to participate in allowable program activities and reach his/her employment and training goals. The following documentation is required specifically for food related purchases, in addition to the requirements in the "Supportive Service Process" below:*

- *Participants must be concurrently enrolled in a training, or employment activity that leads to a placement or attainment goal or have a completed follow up form with a positive placement.*
- *Written confirmation from CalFresh that the participant is not eligible for food stamps/SNAP; and*
- *The phone number and date of contact with a local food bank or other charitable entity to attempt to acquire food for the participant*

B. DISTRIBUTION AND DOCUMENTATION

1. Prior to Referral of WIOA Supportive Services

- a) Subrecipient must assist the participant in identifying non-WIOA resources; if alternative resources are not available, refer the participant for supportive services;
- b) Subrecipient must ensure that the IEP or OAS 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, subrecipient must ensure all receipts have been returned and validated.

2. Distribution of Supportive Service

At the supportive service appointment, the Subrecipient Staff (other than the Case Manager who made the referral) reviews the supportive service referral through the IEP update in CalJOBS and distributes the requested supportive service.

Supportive Service Process

CalJOBS

1. Enter the appropriate activity code for the Supportive Service provided. The date of the Activity Code must match the date of disbursement in Workforce eFile.
 - *At minimum, the attached activity case note must include the following information:*
 - *Description of the supportive service provided, including the related activity(ies) and ISS/IEP goal(s).*
 - *Example: Transportation – Bus Pass for participant to attend ITA Training for the goal of receiving his/her certificate/credential.*

Workforce eFile

2. Complete Supportive Service log entry in Workforce eFile. The date of disbursement to the participant must match the date of the Activity Code in CalJOBS.
3. Subrecipient and/or the participant must upload the following documentation to Workforce eFile:

Bus pass	Gas card	Other checks, gift cards, other “cards”	All others
<ul style="list-style-type: none"> • Copy of both sides of the bus pass with serial number visible <ul style="list-style-type: none"> ▪ Written or eFile DocuBin confirmation of receipt of the bus pass from the participant • Copy of the bus pass purchase receipt with the purchase date and total. If purchased in bulk, the corresponding serial number must be highlighted or circled 	<ul style="list-style-type: none"> • Copy of both sides of the gas card with serial number visible <ul style="list-style-type: none"> ▪ Written or eFile DocuBin confirmation of receipt of the gas card from the participant • Copy of the gas card purchase receipt with the purchase date and total. If purchased in bulk, the corresponding serial number must be highlighted or circled 	<ul style="list-style-type: none"> • Copy of both sides of the check, gift card or other type of card with serial number visible <ul style="list-style-type: none"> ▪ Written or eFile DocuBin confirmation of receipt of the check, gift card, or other type of card • Copy of the itemized receipt with date, purchase detail, and total <ul style="list-style-type: none"> ▪ If direct payment is made to the participant in 	<ul style="list-style-type: none"> • Copy of the itemized receipt with date, purchase detail, and total <ul style="list-style-type: none"> ▪ Written or eFile DocuBin confirmation of receipt of the Supportive Service from the participant

	<ul style="list-style-type: none"> • Copy of the itemized purchase receipt of the gas purchase transaction from the participant. The itemized receipt must show, at minimum, the last 4 digits of the serial number • The start and end addresses for distance determination for each trip to corresponding activity • The odometer reading to calculate total mileage for each trip 	<p>advance of the purchase either through check, gift card or other type of card, the participant must provide an itemized receipt once the purchase is completed</p>	
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3. Missing Documentation and Receipts

IF THE ABOVE DOCUMENTATION/RECEIPTS ARE NOT PROVIDED AND UPLOADED TO WORKFORCE EFILE, NO ADDITIONAL SUPPORTIVE SERVICES MAY BE PROVIDED WITHOUT WRITTEN APPROVAL FROM SDWP. MISSING DOCUMENTATION/RECEIPTS ON SUPPORTIVE SERVICES WILL RESULT IN DISALLOWED COSTS.

Missing Documentation/Receipts Process

The subrecipient must document as an attached case note to the Supportive Service activity code in CalJOBS if a participant fails to return any receipts/documentation for the supportive services provided in full and include an explanation of the following:

- Date of contact with the participant requesting the missing receipts/documentation and explain that no further supportive services will be provided until the missing receipts are received; and
- After notification, if the receipts are not provided within ten (10) business days, send a follow-up letter to the participant requesting the receipts and notifying the customer that no further supportive services will be provided until all receipts are received. A copy of this letter must be kept in Workforce eFile and noted on the attached case note that the letter was sent.
- Requests to provide additional supportive services must come in writing to the Subrecipient’s Program Specialist for approval. If approved, the written approval must be uploaded to Workforce eFile.