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## I. APPLICABILITY/SCOPE

This policy applies to all Workforce Innovation and Opportunity Act (WIOA) Title I-B subrecipients and sub-awardees delivering workforce development Adult, Dislocated Worker, Youth and Arizona Quality Jobs, Equity, Strategy, and Training Disaster Recovery National Dislocated Worker Grant (QUEST DWG) programs and services.

## II. PURPOSE

This policy addresses the use of Workforce Innovation and Opportunity Act (WIOA) funds for supportive services to eligible individuals enrolled in the WIOA Adult, Dislocated Worker, Youth or QUEST DWG programs.

## III. BACKGROUND

Supportive services, such as transportation, childcare, vision care, work-related clothing, and certifications can be provided to eligible individuals while participating in WIOA Title IB or QUEST DWG career or training services to assist in the removal of obstacles that are hindering their efforts to successfully secure and retain permanent employment. In addition to being necessary to participate, the provision of supportive services must also be allowable and reasonable, per general cost principles, both in cost and in the item/service being purchased; not otherwise available to the participant; and tied to a specific service. Supportive services are based on financial need and not an entitlement.

## IV. DEFINITIONS

AJC Service Dictionary – is a published list of all services and definitions available to WIOA Title IB Adult, Dislocated Workers, Youth and QUEST DWG. The list is categorized as either a business, training, career, or Youth program design element service.


## V. POLICY

### A. Requirements

Supportive services must be made available for participants who may need additional assistance as determined through comprehensive assessments. These assessments, and all supportive services provided, must be documented in the participant’s Individual Employment Plan (IEP) or Individual Service Strategy (ISS), as well as appropriately recorded in the Arizona Job Connection service and training plan and justified in case notes. Supportive services are one of the 14 program elements in the Youth program.

Supportive services must only be provided through WIOA Title IB or QUEST DWG programs when the individual is unable to obtain supportive services through other programs that provide such services. The provision of them must be necessary and reasonable.

1. To be necessary, there must be documentation of the need for the particular supportive service that is tied to a career or training service.
2. To be reasonable, the product or service must be consistent with comparable market prices by a comparison of the product or service from at least two or more vendors. In some instances,

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commonly used supportive services have already been determined reasonable through formal procurement processes with specific vendors identified for us.

**B. Eligibility**

WIOA authorizes the use of Adult, Dislocated Worker, Youth and QUEST DWG funds for the provision of supportive services to eligible individuals who are:

1. Actively participating in career or training services to secure and retain employment;
2. Unable to afford such services;
3. Unable to obtain supportive services through other programs that provide such services; and
4. Complying with program requirements.

Supportive services cannot be the first or the only service provided. They cannot be provided after the date of Exit as a follow-up service in the Adult, Dislocated Worker and QUEST DWG program. However, the Youth program does allow the provision of supportive services as a follow-up service to ensure the youth is successful in employment and/or post-secondary education and training. As noted in Policy #500.502 Supportive Service Categories, there may be additional eligibility criteria based on the specific service.


**C. Allowable Supportive Services**

Supportive services include, but are limited to, the list below. Additional requirements and guidelines can be found in [Policy #500.502, Supportive Service Categories and Cost Guidelines](#).

1. Linkages to community resources;
2. Transportation assistance;
3. Child care and dependent care assistance;
4. Lodging;
5. Needs-related payments;
6. Education testing assistance
7. Reasonable accommodations for individuals with disabilities;
8. Referrals to health-care;
9. Work-related expenses;
10. Training-related assistance;
11. Payments and fees for employment and training-related applications, tests, and certifications;
12. Rental and utility assistance;
13. Reimbursement for cellular or internet service needed to create a wireless connection for distance learning, searching for employment, and job retention;
14. Software needed for career services, training related activities or job placement.

The following list of supportive services, while not commonly used, is allowable:

1. Car insurance for up to one calendar quarter or three months (requires detailed justification and assurances of proper vehicle registration and licensing);

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2. Vehicle registration and licensing (requires detailed justification that the vehicle is the only means of transportation available and that public transportation cannot meet the participant’s needs);
3. Haircuts, personal grooming and hygiene needs; and
4. Membership fees if required to obtain a credential.


D. Supportive Service Prohibitions

1. Payment toward goods or services incurred or received prior to the participant’s enrollments in a WIOA Title IB or QUEST DWG program;
2. Fines and penalties such as traffic/moving violations, parking tickets, fines for late utility payments, other late finance charges, and interest fees;
3. Taxes, except for sales taxes and gasoline taxes, such as income taxes, and business/payroll taxes (for employers);
4. Child support;
5. Entertainment, including tips;
6. Titled or deeded items or when recovery of the expense is anticipated (*Examples include vehicle or mortgage payments; rent or housing deposits; homeowners’ insurance; and property taxes.*)
7. Alcohol, tobacco products or firearms;
8. Legal fees, such as bail and restitution;
9. Debts that have been turned over to a collection agency;
10. Union dues and dues for any organization substantially engaged in lobbying;
11. Business start-up costs; and
12. Other career services and training services, when the actual service provided meets the definition of another career or training service on the AJC Service Dictionary.

E. Reimbursements

Although most payments for supportive services are to be made directly to the vendor through the issuance of a Supportive Services Authorization voucher, there are situations where the Supportive Services Authorization voucher is not accepted by a vendor, can cause a delay or hardship in the service being provided timely, payment can only occur online, or payment must occur in order to access or enroll for the service (such as online exams or testing for certification). In these situations, reimbursement to the participant is appropriate. Guidelines for reimbursements include:

1. Reimbursements can only occur when discussed ahead of the provision of or receipt of the service.
2. Backdated requests are prohibited as are requests for reimbursements for items already purchased.
3. Reimbursement should not exceed \$1,000 and must be supported by documentation indicating that the participant incurred debt as a result or made special arrangements to obtain the funds. One of the criteria as noted in Section B is that the participant cannot afford to pay for such services.

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4. Requests for reimbursement that exceed \$1,000 must have supervisory approval accompanied by detailed case notes as to the justification for doing so. An example would be that the actual cost of the testing for certification exceeds \$1,000.
5. Examples of common requests for reimbursement include: fees for occupational testing for certifications or licenses; internet access; immunizations, drug screens, and physicals; fingerprint and background checks; and specialized uniforms or clothing for training or work.

F. **Needs-Related Payments – QUEST DWG Only**

Needs-related payments provide financial assistance while an individual participates in training services to cover daily expenses associated with attending classes. Unlike other supportive services, a participant must be enrolled in a training service under WIOA sec. 134(d)(3) to qualify and may be provided if the participant has been accepted in a training program that will begin within 30 calendar days.

1. **QUEST DWG – Dislocated Workers must:**
  - a. Be unemployed; and
    - i. Have ceased to qualify for unemployment insurance compensation or trade readjustment allowance under the Trade Adjustment Assistance (TAA); and
    - ii. Be enrolled in a training service or have been accepted into a training service that will begin within 30 calendar days by the end of the 13<sup>th</sup> 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 8<sup>th</sup> week after the worker is informed that a short-term layoff may exceed six months.
  - b. Be unemployed and did not qualify for unemployment insurance compensation or trade readjustment assistance under TAA and be enrolled in a training service program.


2. **Payment Determination**

The level of a needs-related payment for a QUEST DWG dislocated worker must not exceed the greater of either of the following levels:

- a. For participants who were eligible for unemployment compensation because of a qualifying dislocation, the weekly payment may not exceed the weekly (UI) level of compensation; or
- b. For participants who did not qualify for unemployment compensation because of a qualifying layoff, the weekly payment may not exceed the poverty level for an equivalent period.

3. **Payment Amounts**

The needs-related payments are limited up to \$3,000.00 for a qualifying participant and up to \$4,500.00 for a qualifying participant with a family size of two or more enrolled in a training program.

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Note: Family is defined as two or more individuals related by blood, marriage, or decree of court, who are living in a single residence, and are a parent or guardian and dependent children.

#### 4. Payment Guidelines

- a. An individual determined eligible for unemployment insurance compensation is no longer eligible to receive NRPs as of the date of determination.
- b. NRPs are not impacted during periods a participant has received earned income after the initial determination and while in training.
- c. Class attendance and satisfactory academic progress must be met and documented to continue receiving NRPs.
- d. Maintain at least monthly contact with assigned QUEST DWG Career Advisor.

#### G. Documentation

There are two types of documentation required for supportive services, source documentation and service provision documentation:

1. **Source documentation** – establishes the details that substantiates the action, providing the basic facts such as date, purpose and amount of the service/purchase; includes such things as a cost estimate, utility bill, or for reimbursements, the actual receipt. The Supportive Services Authorization voucher is part of source documentation as it includes the relevant participant information as well as supervisory approvals. Self-disclosure or applicant statements are not source documentation.
2. **Service provision documentation** – evidence that the service has been received, such as a receipt, invoice for payment, signature of receipt for a bus pass, etc. This also includes appropriate data entry into Arizona Job Connection and case note justification.

All documentation that supports the issuance of supportive services, such as receipts, invoices, estimates, and billing statements, must be retained in the electronic participant file or uploaded into the participant’s file in Arizona Job Connection. Other documentation requirements can be found on Policy #500.502, specific to the type of supportive service. In addition:

1. Case notes must indicate why the service(s) is/are necessary and the determination of need; and
2. Case notes must indicate other attempts to secure the services.

### VII. POLICY MANAGEMENT REQUIREMENTS

Administrative revisions to the policy may be made by the Phoenix Business and Workforce Development (PBWD) Board Executive Director, with notice to the PBWD Board’s Executive Leadership Committee. All other substantive revisions will go to the PBWD Board’s Executive Leadership Committee for review and recommendation to the PBWD Board for approval.

### VIII. ADDITIONAL OR MISCELLANEOUS INFORMATION

[DES/WIOA Supportive Services Policy, Section 400](#)