

APRIL 18, 2022

TO: All Western Piedmont Workforce Development Area Title I **Service Providers**

SUBJECT: WIOA Title I Adult and Dislocated Worker Support Services Policy

EFFECTIVE DATE: Immediately

EXPIRATION DATE: Indefinite

CONTACT: Workforce Development Administrator

Wendy Johnson

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Workforce Development Director

Serving Alexander, Burke, Caldwell and Catawba Counties

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WIOA TITLE I ADULT AND DISLOCATED WORKER SUPPORT SERVICES POLICY

PURPOSE: To provide guidance to Western Piedmont Workforce Development Area (WPWDA) Title I **Service Providers** (herein referred to as **service providers**) to determine the appropriate use of Workforce Innovation and Opportunity Act (WIOA) Title I funds (herein referred to as WIOA funds) for support services for participants in the Adult and Dislocated Worker programs. *To rescind the WIOA Title I Adult and Dislocated Worker Support Services Policy dated July 1, 2021.*

BACKGROUND: The WIOA defines support services in Section 3(59) as services, such as transportation, childcare and needs related services that are necessary to enable an individual to participate in activities authorized under this Act.

To receive support services, Adult and Dislocated Worker participants (herein referred to as participants) must be receiving staff assisted career services and participating in employment and/or training activities. There must be a direct connection between the support services offered and the WIOA Title I activity in which the participant is participating. The support services provided must be allowable, reasonable, and not otherwise available to the participant.

Support services are not entitlements and must be supported by the demonstration of financial need. WIOA Funds used for support services should be utilized in a manner that avoids duplication of services and must be leveraged with all other resources, including funding from private, community, and faith-based organizations.

PROCEDURE: **Service providers** must be aware of and follow all federal, state, and local requirements for the provision of support services funded by WIOA resources.

Adult Career Advisors (herein referred to as Career Advisors) will use this policy and procedures to determine Adult and Dislocated Worker participant (herein referred to as participant) needs related to support services and to authorize payments and purchases. At no time will a participant receive a reimbursement check for support services. All support services assistance is subject to WIOA Title I (herein referred to as WIOA) funding availability.

1. WIOA funds can only be spent on support services for participants enrolled in one or more allowable/appropriate WIOA Title I activities.
2. Career Advisors are responsible for making a determination of the support services needed for a participant and whether or not the services are available through other resources without using WIOA funds. Staff should give consideration to the participant's own resources and family resources as well as those resources that may be provided by private, community, faith-based organizations.

3. All payments for support services must be approved in writing by an authorized Career Advisor prior to making any payments. A WIOA Title I employment/training activity code must be open along with the Customer Support Service (CSS) code in ncworks.gov for payment to be made. All required documentation is to be uploaded in ncworks.gov as noted in this policy and the WPWDA Occupational Trainings, Individual Training Accounts, and Cost Tracking Process Policy located at <https://www.wpcog.org/policy-statements>. Keep in mind that new forms are to be uploaded in ncworks.gov when support services for a participant changes (for example, if a participant's childcare rate changes a new childcare agreement needs to be completed, signed by the childcare provider and uploaded in ncworks.gov).
4. Payments will be issued directly to the vendor. At no time will a participant receive a reimbursement check for support services.
5. WIOA funds may be used to provide WIOA participants with needed support services only if both of the following conditions apply:
 - a. The individual is unable to obtain support services through other programs/organizations providing such services, and
 - b. Support services are necessary to enable the individual to participate in WIOA Title I activities.
6. All support services may be administered in-person or virtually and must be documented as follows:
 - a. Individual Service Strategy/Individual Employment Plan (ISS/IEP), Objective Assessment, and ncworks.gov case notes – Career Advisors must document the need for support services.
 - b. Customer Support Services (CSS) activity – In addition to completing a CSS activity for the participant, Career Advisors must also document on the required WIOA Title I Need for Childcare Assistance and WIOA Title I Childcare Resource Verification (see WIOA Title I NEXTGEN Support Services Policy located at <https://www.wpcog.org/policy-statements> for these forms) verifying that no other assistance was available and it is to be uploaded into the CSS activity for the respective support service. This code is to be used in addition to a service code for the meeting such as a Career Guidance and Counseling activity or an Individual Counseling activity.
7. When administering support services virtually, **Service providers** must place special emphasis on employing additional strategies to eliminate the possibility of fraud.

ALLOWABLE SUPPORT SERVICES

1. Childcare Assistance – Efforts should be taken to provide childcare support services to eligible participants. This may include paying less than the maximum rate allowable, or limiting the number of children served per family. All participants who receive childcare support services must be notified that the provision of childcare support services is subject to WIOA funding availability.
 - a) The participant demonstrates the need for childcare support services as evidenced by their response on the WIOA Title I Need for Childcare Assistance and the WIOA Title I Childcare Resource Verification (see WIOA Title I NEXTGEN Support Services Policy located at <https://www.wpcog.org/policy-statements> for these forms). The WIOA Title I Childcare Resource Verification form is to be taken by the participant to the Department of Social Services in their county of residence and the Community College they are attending to obtain childcare assistance showing that childcare assistance has been obtained, will be obtained, has been exhausted, or is not available from these sources before receiving WIOA childcare support services. The Career Advisor shall document in the case notes that these options have been explored and both completed forms are to be uploaded in ncworks.gov. If services are available from one of these sources at a later date, the Career Advisor will verify that the participant is on the waiting list for services. The WIOA Title I Childcare Resource Verification is to be completed at the beginning of each new program year showing the need for continued childcare support services and is to be uploaded in ncworks.gov.
 - b) Childcare providers will be paid based on the following rates and assistance from other sources.
 - Full-time student (12+ contact hours for curriculum students, 9+ contact hours for summer curriculum students, 12+ contact hours for continuing education students) 100% of maximum monthly allowed amount (subject to funding availability)
 - Three-fourths time student (9 to 11 contact hours for curriculum students, 7-8 contact hours for summer curriculum students, 9 to 11 contact hours for continuing education students) 75% of maximum monthly allowed amount (subject to funding availability)
 - One-half time student (6 to 8 contact hours for curriculum students, 4-6 contact hours for summer curriculum students, 6-8 contact hours for continuing education students) 50% of maximum monthly allowed amount (subject to funding availability)

- For 1 child, a maximum total of \$350.00 per month will be paid as WIOA support service in accordance with attendance and require documentation policies contained herein (subject to funding availability)
 - For 2 children, a maximum total of \$550.00 per month will be paid as a WIOA support service in accordance with attendance and required documentation policies contained herein (subject to funding availability)
 - For the third child and beyond, no WIOA funds will be paid as a WIOA support service.
 - Childcare registration fees, activity fees and supply fees will not be paid by WIOA funds and are the responsibility of the participant.
 - Wrap-around program fees will not be paid by WIOA funds and are the responsibility of the participant.
 - Weekly charges may not exceed actual cost of care.
- c) The participant may select the licensed childcare provider that most adequately meet their needs for service. Once selected, the Career Advisor will contact the childcare facility to verify that an opening exists and to explain the procedures for payment to the childcare facility. At this point, the following will occur:
- If the participant, Career Advisor and facility agree that this will be the care of choice, then the Career Advisor will arrange an appointment with the Childcare Director and complete the childcare agreement, provide copies of the childcare agreement, invoices, etc. and to insure that the childcare provider understands and agrees to follow WIOA approved procedures. This will be done for new childcare providers and for new Directors for current childcare providers if necessary.
 - The Career Advisor will meet with the participant to go over the Guidelines for Using WIOA Title I Childcare Funds (see WIOA Title I NEXTGEN Support Services Policy located at <https://www.wpcog.org/policy-statements> for form), participant responsibilities, childcare agreement, invoicing, etc. to insure that the participant agrees to follow procedures. The participant will sign the Guidelines for using WIOA Title I Childcare Funds and retain a copy before the child/children begin attending the facility. The signed form is to be uploaded into ncworks.gov.
 - A childcare agreement must be completed for each child for whom the participant is receiving assistance whether they are at the same childcare facility or not. The childcare agreement documents the contractual agreement between the childcare provider, the parent (participant) and the Career Advisor for WIOA funded childcare support services. A new childcare agreement must be signed

anytime the childcare provider makes a change in the weekly rate. Signed childcare agreements are to be uploaded in ncworks.gov.

- The childcare provider is to submit an invoice along with a childcare attendance record and to the Career Advisor for payment. Monthly childcare attendance records are to be uploaded in ncworks.gov with the childcare invoice in the participant's support services activity code.
- d) Career Advisors are responsible for ensuring that childcare support services are generally paid for actual days in school, at work, and/or days of participation in a WIOA Title I training. The use of a childcare invoice and a childcare attendance record are required to document attendance and authorize support service payments and must be verified by the Career Advisor before payment is made.
- e) Some licensed daycare providers may have a policy that requires continued payment of the regular weekly or daily daycare charge during school breaks and holidays. Payment of WIOA support services childcare funds is allowable during scheduled school breaks such as semester breaks and holidays. The amount of payment during the break periods will be the same as regular school days. Career Advisors should discuss this with participants at the time childcare assistance is requested so that all required documentation is in place when the support services are authorized.
- f) Payment is allowable for a full week if the participant is attending GED, classroom training, or work-based learning activities 3 days per week, only if payment is required to retain the childcare position at a daycare center.

EMERGENCY NEEDS RELATED SUPPORT SERVICES

Emergency needs related support services include housing, rent, utilities, car repairs, etc. These support services are available based on WIOA Title I funding availability.

- a) Payment of support services for emergency needs such as emergency housing, utility payments, car repairs, etc. is limited to a maximum of \$750 once per participant enrollment.
- b) WIOA funds for emergency housing assistance should generally not include payments for stays at a hotel. More appropriate housing options should be used if at all possible.
- c) Payment of support services for housing assistance and utilities does not include 'set up' of utilities, rent or rent down payment.

- d) Support services for emergency needs such as for housing, rent, utilities, car repairs etc., may not be paid to a participant who has not actively participated in a WIOA Title I activity within the last 30 days.
- e) Support service payments may be used for late fees or reconnect fees associated with delinquent client utility bills.
- f) Career Advisors are responsible for obtaining written verification of the actual costs for all of the above support services prior to authorizing any WIOA funds to assist with these expenses.
- g. All payments must be approved in writing by the Title I Program Manager or Title I Program Coordinator and must be paid to the vendor. At no time will a participant receive a reimbursement check for support services.

DISALLOWED EMERGENCY NEEDS RELATED SUPPORT SERVICES

The following are not to be paid with WIOA funds:

- Penalties
- Court costs
- Other related criminal fees
- Set up fees for utilities, rent, or rent down payment
- Mortgage or Vehicle payments






WIOA Title I Adult and Dislocated Worker Support Services Policy - Final - 4-18-22

Final Audit Report

2022-04-12

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