



Supportive Services

Department: Office of Economic & Workforce Development

Effective Date: January 1, 2020

Directive # 21-32

Supersedes: 32-12

PURPOSE

This directive is to address the use of Workforce Innovation and Opportunity Act (WIOA) funds for supportive services to eligible participants enrolled in WIOA Title I Adult, Dislocated Worker and Youth programs. This directive provides guidance regarding parameters for granting Supportive Services to OEWD funded providers' customers based on individual assessment and availability of funds as stipulated in OEWD's program services contracts. Procedures include documentation requirements to show that the supportive service is allowable, reasonable and allocable and to the benefit of the program.

REFERENCES

- Workforce Innovation and Opportunity Act (WIOA), Sections 3(59), 129(c)(2)(G), 134(d)(2) and (3)
- WIOA Final Rules 20 CFR Part 680.330, 680-900, 680.910, 680.920, 681.570, 681.580
- Training and Employment Guidance Letters (TEGL) 19-16, Section 14 & TEGL 21-16, Section 7
- City and County of San Francisco (CCSF), Office of the Controller Accounting Policies and Procedures

BACKGROUND

For purposes of OEWD's various funded programs and these supportive services guidelines, the term "Supportive Services" shall mean services which are allowable and necessary to enable an individual to participate in workforce-funded programs and activities to secure and retain employment authorized under OEWD funded programs, and consistent with the provisions of this Directive. As stipulated in OEWD contracts, supportive services may only be provided to OEWD funded provider's customers participating in OEWD programs and who are unable to obtain supportive services through other programs.

DEFINITIONS AND LIMITS OF SUPPORT SERVICES

Supportive services are services including (but not limited to): transportation, child care, or dependent care, textbooks, uniforms or materials related to an occupation or other services necessary to enable an individual to participate in workforce-funded programs and activities authorized under this Directive. Support services may only be provided to individuals who are:

- Eligible enrolled individuals participating in workforce-funded programs and activities to secure and retain employment; and are
- Unable to obtain supportive services through other programs providing such services.

SUPPORT SERVICES PAYMENTS AND FUNDING

Supportive services shall be provided individually for specific needs. OEWD's workforce-funded programs are not entitlements; supportive services payments may be made on a case-by-case basis only when determined necessary and reasonable.

Due to funding limitations, OEWD customers are allowed minimal supportive services. All supportive services will be based on the individual need of the customer and the availability of funding.

OEWD service providers may provide WIOA funded Supportive Services until other local area programs (that generally provide the Supportive Service needed by the client) have been contacted to provide these services. If a non-WIOA program is capable of providing the Supportive Service needed by a client, a referral will be made by the WIOA service provider. However, if an alternative resource cannot be found, only then may WIOA funded Supportive Services be provided if necessary to enable eligible individuals to participate in WIOA funded workforce programs and activities.

WIOA Supportive Services funding is to be used as the last resort and all other sources of funding must be sought first. All attempts to find other Supportive Services funding and the reasons WIOA funding is needed must be documented in the participant's case file, as required by the service provider's contract with OEWD and in compliance with the Fiscal and Program Reporting procedures.

GENERAL SUPPORTIVE SERVICE PROVISIONS

WIOA allows WISF to establish limits on the provision of Supportive Services, including a maximum amount of funding and maximum length of time for Supportive Services to be available to customers. OEWD is also providing these guidelines for other non-WIOA funded Supportive Services. The amount of Supportive Services per eligible participant is capped at \$1,000.00 annually and is subject to the availability of OEWD's service provider grant funding. Annually is defined as 365 days from when the Supportive Services request was approved.

OEWD service providers shall develop policies and procedures for Supportive Services that embody the following elements:

- Service provider staff are knowledgeable of other support resource entities that are accessible within the local area.
- Supportive Services provided are allowable, necessary, and reasonable for the individual to participate in OEWD workforce-funded programs and activities.
- Coordination and referral processes with other service providing entities are in place to prevent duplication of services.
- Supportive Services cannot be provided as stand-alone services, and can only be provided in support of OEWD funded workforce programs and activities.
- Supportive Services must be documented using the OEWD Supportive Services Payments Determination/Certification Record form, maintained with the IEP/ISS in each participant's file, or case notes.
- Participants may be eligible for Supportive Services only while enrolled and actively engaged in OEWD workforce-funded programs and activities.
- Sufficient financial internal control processes to minimize and prevent errors.

ALLOWABLE SUPPORTIVE SERVICE CATEGORIES

Authorized Supportive Services may include, but are not limited to:

- Linkages to community services;
- Assistance with transportation;
- Assistance with child care and dependent care;
- Assistance with housing;
- Assistance with educational testing;
- Reasonable accommodations for individuals with disabilities;
- Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear;
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes; and
- Payments and fees for employment and training-related applications, tests and certifications.

Other types of Supportive Services not included in the recognized categories addressed above may be provided to OEWD customers as long as they meet the definition of a Supportive Service as stated in the Directive's references. Accordingly, these Supportive Services must also be determined to be reasonable and necessary for an individual to complete training or obtain or retain permanent employment. Supportive Services may not be provided after exit or during Follow-Up for WIOA Adult and/or Dislocated Worker programs. WIOA Youth participants may receive Supportive Services after exit providing the delivery of such services is documented in the ISS with sufficient documentation of need.

If exceptions arise participant eligibility for exception guidelines will be considered on a case by case basis.

Neither eligibility for, nor participation in an OEWD workforce-funded program, creates an entitlement to services, and nothing in this Directive shall be construed to establish a private right of action for a customer to obtain services described in their objective assessment, case notes or ISS/IEP.

In order to obtain payment for any Supportive Service, the customer or the service-providing vendor must provide appropriate documentation. Such documentation will include at a minimum:

- Eligibility form with justification for the need of Supportive Service (which may include training attendance records, documentation of miles traveled, receipts, etc.);
- A description of the Supportive Service and why the Supportive Service could not be obtained through other programs and;
- An invoice or receipt for payment received (itemized and dated) for the Supportive Service.

Unallowable WIOA costs include, but are not limited to the following:

- Interest on borrowing;
- Deposits (including housing deposits),
- Fines, penalties and bad debt expenses,
- Payment for goods/services incurred or received prior to participant enrollment in WIOA
- Certain legal fees
- Payments for real or personal property that bears title

Receipts or invoices must be detailed sufficiently to ascertain that charges do not include unallowable items.

INQUIRIES

Inquiries should be addressed to workforce.development@sfgov.org.

The Office of Economic and Workforce Development (OEWD) and its service providers shall follow this policy. This policy will remain in effect from the date of issue until such time that a revision is required.