



Operational Communication

Number: 04.00.01.77000.02

New Revision

Date: November 1, 2006

Topic: Support Service Payments

Affected Programs: Adult, Dislocated Worker, NEG, RRAA

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Purpose

To provide WIA contractors with guidelines in establishing Support Service Payment policy and procedures in compliance with WIA and in line with LWIB goals.

Related Policy

Support Service Payments, 4.0.0.77000.0, dated 2-12-04.

General Guidelines

Based on individual assessment and availability of funds, support services may be awarded to eligible participants. Support Service awards are only provided:

- ◆ To individuals who have been enrolled in WIA services and are participating in intensive or training activities.
- ◆ When the participant requires limited support services during the follow-up period after exit as determined by the service provider to secure or retain employment.
- ◆ To participants unable to obtain support services through other programs that provide such services.
- ◆ When they are necessary to enable individuals to participate in WIA Title I activities.

Support Service funds may not be used for the following purposes:

- Fines and penalties, such as traffic violations, late finance charges, interest payments, community justice restitution and supervision fees
- Entertainment, including tips
- Drug-use testing
- Contributions or donations
- Vehicle or mortgage payments
- Refundable deposits
- Alcohol or tobacco products
- Pet food
- Excessive or costly food purchases beyond normal dietary needs
- Out-of-state job search and relocation expenses that are paid for by the prospective employer or by the employer who has laid off the individual

All support service payments must be tied to education, training, job search activities or maintaining employment. Region 2's priority is to provide payments that enable an individual to participate in intensive or training activities and/or allow participants to accept or retain a job and upgrade skills.

Support Service spending caps must be established as a component of a program's Support Service Policy on both an individual participant and per component basis. Caps should be set and reviewed based on available funding sources and budget restraints. Program spending caps must: include timelines (i.e., annual, lifetime, program-year, etc.); include a waiver policy available on a case-by-case basis; be reviewed and updated at least annually; and be provided to the WSI contract liaison.

Program Requirements

Each One Stop site/program must establish a written Support Services Policy in compliance with the following guidelines.

- ◆ All support service payments must be tied to education, training, job search activities or maintaining employment. Region 2's priority is to provide payments that enable an individual to participate in intensive or training activities and/or allow participants to accept or retain a job and upgrade skills.
- ◆ An Individual Employment Plan and Budget must be completed by all enrolled participants requesting support services. There are no exceptions to this requirement.
- ◆ The role of the One Stop staff is to assist participants to obtain the job or skills to enter or re-enter the workforce. Support Services should be discussed and negotiated with program participants at the time of the budget review and development of the Individual Employment Plan.
- ◆ All efforts must be made to ascertain that support service payments provided to participants are not available through another resource. One Stop staff must provide case notes in participant's file of potential resource referrals made to participant. Community resources are the primary source for support service needs such as food stamps and community based social service and housing agencies. One Stop staff should assist participants in exploring resources available from other sources in the community or within their own support system. Document all conversations regarding support services, referrals, actions, etc. in the participant's file.
- ◆ Payments must be calculated on a case-by-case basis to allow a participant to overcome a barrier to training or employment.
- ◆ Documentation must be written in the participant's file by the One Stop staff stating what, when and why a product or service is required/provided. Staff must ensure the reasonableness, allowability and allocability of the costs according to WIA Regulations. The purpose of the support must be clearly identified on all documentation. The expenditure should not exceed a prudent persons' decision under the circumstances at the time the cost is incurred. It should reflect current market price, and public perception should be taken into consideration. All documentation related to support services must be maintained on site and be made available to WSI staff during Compliance, Quality and Fiscal Reviews, annual audits, and State and DOL monitoring audits.
- ◆ Customers must be made aware that support services are being provided on their behalf. An acknowledgement signed by the participant must be in the file when support service payments are made to, or on the behalf of, the participant.
- ◆ Each One Stop site must establish a procedure for tracking support service payments, including logging the expense approved, payment description, date, amount, and date paid.
- ◆ Each One Stop site must establish a procedure for reconciling pre-purchased support services (i.e., bus passes, pre-paid gas, clothing, personal care services/products cards and certificates, etc.). This

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reconciliation must occur at least monthly, with the documentation maintained at the site and made available during Compliance, Quality and Fiscal Reviews.

- ◆ Support Service spending caps must be established within the One Stop site/program policy on both an individual participant and per component basis. The policy must include exception rules and procedures.
- ◆ Source documentation should allow tracking of funds to a level of expenditure adequate to establish that funds have not been used in violation of applicable laws and regulations, and be in accordance with generally accepted accounting principles.
- ◆ Original invoice or receipts are required for all payments/reimbursements. No photocopies.
- ◆ All forms and signatures must be completed in ink. No pencil.
- ◆ Support service payments/reimbursement must be paid from funds in the program year they were incurred.
- ◆ Retention services for participants may be provided on a case-by-case basis for up to one year after initial employment date.
- ◆ A signature by the designated One Stop site authority on Support Service documentation and request forms verifies that policies and procedures have been followed and documentation is complete and accurate.

Support Service Component Definitions and Restrictions

Each One Stop site/program's Support Service policy must comply with these definitions and restrictions. Agencies may choose to establish policies that are more restrictive than these, but not less.

Auto Insurance: Policy should be established that support service payment is for auto insurance coverage required by the State of Oregon or Washington and can only be justified in a situation where, without the insurance, the participant would not be able to travel to the training site and/or place of employment. The vehicle must be titled and registered in the participant's name.

Auto Repair: WIA funds may pay for repair and replacement of essential parts and safety equipment to an automobile, only if it can be verified there is no other reasonable way for the participant to transport himself/herself to a training or work site. The vehicle must be titled and registered in the participant's name, be properly insured and it must be verified by a reputable mechanic that the repairs are needed. Original invoices/receipts are required for car repair payments. Quotes or work orders are not accepted for payment receipts.

Child Care: One Stop site/program policy should require that child care costs be reimbursed only to the participant and can be paid only for child care that is required to allow the participant to job search or participate in a training activity. Due to the high cost of child care, this service should only be considered on a case-by-case basis. Staff should discuss other potential resources and give the participant referrals. Help the participant strategize how they might supplement their child care costs by exchanging child care and/or other services with classmates, friends, or family.

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Region 2 policy prohibits paying spouse, sibling, or other family members residing within the same household to provide childcare for the participant's children. WIA funds can pay for a child over the age of 11 only if they have a disability and cannot be left alone. Proof of disability is to be submitted prior to approval and included in participant file documentation. An hourly cap should be established as well as a per year/program cap.

Each site/program should use a Child Care Log Form and require same for reimbursement. Child Care Log Forms are completed by the participant, signed by the care provider, and approved by the One Stop site/program signing authority.

Clothing: Clothing and/or footwear may be purchased for interview or work, such as a uniform or a particular type of work boot required for the job by an employer.

Hardship: Policy may provide for a case-by-case decision to assist participants experiencing financial hardships. For example a reimbursement could be made to the participant for child care in advance. Requests should be documented and approved by the site signing authority.

Medical/Dental/Optical: Policy may allow that the maximum can be expended in one (medical, dental, optical) area, or a combination of all three areas. Covered expenses include medical testing/treatment (but not drug-use testing), prescriptions, mental health testing, counseling. WIA funds cannot be used for costs of family members.

This service should be limited to the minimum required to permit the person to participate in training, job search, accept employment, or maintain employment. Have the participant research lower cost providers, such as Oregon Health Plan, County Health Dept., etc. All participants without health care coverage should apply for the Oregon Health Plan.

Miscellaneous: Items that ensure participant is prepared for a job interview and/or entering employment, including cost for professional licenses, certifications, test fees, background checks, identification (Oregon Drivers License, identification card), etc.

Out of Town Transportation: When a participant informs staff that she/he needs assistance to attend training or interview out of town (must be over 150 miles from One Stop service area), WIA funds may be used to reimburse the participant for travel/lodging. The One Stop site/program policy must identify when and how that decision will be made, i.e., identifying local training sites or distance learning opportunities, written justification, other resources, etc.

Parking: Parking fees are allowed to enable the participant to attend training, intensive workshops, on-site computer classes or Career Exploration class.

Personal Care: Where it is apparent that a participant could maximize their potential for employment by obtaining grooming needs, e.g., haircut, shaving, personal hygiene and/or lack of clean or appropriate clothes, support services maybe used ensure preparedness for job interview and/or entering employment and/or maintaining employment.

Relocation: When a participant accepts a job offer at a location out of the One Stop service area (i.e. more than 50 miles), WIA funds may be used to share in the cost of moving to that location (i.e. U-Haul costs). A written, bona fide job offer must be documented to qualify for relocation support services.

Rent Assistance: WIA funds may be utilized to assist with rent payments. WIA funds may not be used to pay interest charges or late fees associated with past due rent expense. Clear verification (copy of rental agreement or letter from landlord) of charges due and residency should be required. Policy should also require clear file documentation that the situation would impede the participant's ability to conduct an efficient job search, maintain employment or participate in training without the rent assistance, and that the participant has a plan for future payments. Mortgage or other payments that contribute to the purchase of real property that the participant owns are not allowed (e.g. house, car, boat). Policy should require payments be made to vendors as opposed to reimbursing the participant.

Test Fees: It is preferable that Policy require test fees be tied to Intensive or ITA training if justification can be provided (i.e. ABE/GED testing for Intensive, Project Management testing for ITA).

Tools: Policy should not cover tools or equipment that would normally be supplied by the employer, i.e., computers, industrial equipment, stationary machinery, safety equipment, etc. Policy should require that a bona fide, written job offer be provided prior to the approval of funds for purchase.

Transportation: Policy should be clear that a participant may receive only one type of transportation assistance at any given time: mileage assistance, gas card or monthly bus pass. File documentation forms should provide a place to clearly itemize transportation assistance.

Bus Pass: Policy may provide for participants to receive a bus pass and may renew monthly as needed. Policy should provide a means and procedure for reconciliation on at least a monthly basis.

Gas Card: Policy may provide pre-paid gas cards for transportation assistance for travel for a job interview, school, or employment. Participant must sign a receipt indicating he/she has received a gas card and social security number must be included on the receipt. Policy must also provide a means and procedure for reconciliation on at least a monthly basis.

Mileage: When a participant needs transportation assistance for travel for a job interview, school, or employment, staff may approve mileage/transportation reimbursement for the participant. The reimbursement must be for actual miles from home to training. Program staff should work with the participant and log mileage between home address and training site/school and document this in the case notes. Policy should provide some form of audit of mileage records using on-line mapping sites. One Stop site/program staff should check the mileage logs closely for accuracy. Mileage should be provided at the prevailing IRS reimbursement rate.

Utilities: Policy should require that utility assistance may be provided to assist the participant in stabilizing their living situation in order to conduct an efficient job search, maintain employment or participate in training. The policy should require an original bill be provided before payment can be approved, with verification that the utilities are for the participant's personal residence. WIA funds may not be used to pay interest charges or late fees associated with past due utility expense. Payments should be made to the vendor as opposed to reimbursing the participant.

Participant Spending Caps for FY 06-07, July 2006 through June 2007

GRANT	PER PARTICIPANT SPENDING CAP	OTHER SPENDING CAP(S) SET
WIA Adult	\$	
WIA Dislocated Worker	\$	

WIA program participants: The year starts from the date of the participant's enrollment (example: participant enrolls on 3/15/05, their year would end 3/14/06).

Per Component Regional Spending Guidelines for Support Services

SERVICE	WIA ADULT	WIA DISLOCATED WORKER
Auto Insurance	\$xxx	\$ xxx
Auto Repair	\$ xxx	\$ xxx
Child Care	\$ xxx	\$ xxx
Clothing	\$ xxx	\$ xxx
Hardship	\$ xxx	\$ xxx
Medical/Dental/Optical	\$ xxx	\$ xxx
Miscellaneous	\$ xxx	\$ xxx
Out of town transportation	\$ xxx	\$ xxx
Parking	\$ xxx	\$ xxx
Personal Care	\$ xxx	\$ xxx
Relocation	\$ xxx	\$ xxx
Rent Assistance	\$ xxx	\$ xxx
Test Fees	\$ xxx	\$ xxx
Tools	\$ xxx	\$ xxx
Transportation/Bus Pass	\$ xxx	\$ xxx
Transportation/Gas Card	\$ xxx	\$ xxx
Transportation/Mileage	\$ xxx	\$ xxx
Utilities	\$ xxx	\$ xxx

Exception Rules

GRANT	EXCEPTION RULES
WIA Adult	
WIA Dislocated Worker	