



CITY AND COUNTY OF SAN FRANCISCO
GAVIN NEWSOM, MAYOR

OFFICE OF ECONOMIC
AND
WORKFORCE DEVELOPMENT

DIRECTIVE NO: 32-07

TO: WIA Service Providers

EFFECTIVE: July 1, 2007

SUBJECT: Supportive Services

REFERENCES:

- Workforce Investment Act (WIA) Sections 101(46), 134(d)(2)(H), 134(e)(2)(3)
- Title 20 Code of Federal Regulations (CFR) 663.800 and 663.815

BACKGROUND:

Workforce Investment Act (WIA) regulations allow Workforce Investment Boards to establish limits on the provision of supportive services, including a maximum amount of funding and maximum length of time for supportive services (including needs based payments) to be available to customers.

Additionally, WIA regulations mandate that post-employment follow-up services must be made available for a minimum of 12 months after registered customers are placed into unsubsidized employment. Follow-up services may include supportive services, provided the services are clearly documented in a registered customer's case file. Needs based payments are not allowed as a post-employment follow-up service.

PURPOSE:

This directive provides policy and guidelines for provision of Workforce Investment Act (WIA) supportive services. These guidelines incorporate the requirements of the WIA, Department of Labor (DOL) Regulations, State Employment Development Department (EDD) Directives, and Office of Economic and Workforce Development (OEWD) policies.

POLICY:

Supportive Services may only be provided to WIA customers who are participating in WIA programs and who are unable to obtain supportive services through other

programs. No service provider may provide supportive services funded by a WIA program until other local area programs (that generally provide the supportive service needed by the client) have been contacted. If a non-WIA program is capable of providing the supportive service needed by a client, a referral will be made by the WIA service provider. However, if an alternative resource cannot be found, then supportive services will be provided using WIA funds if it is necessary to enable eligible individuals to participate in intensive services, training, or other program activities under WIA. Supportive service may include such services as:

DEFINITIONS:

Supportive Services — Supportive services are those necessary to enable an individual to participate in activities authorized under Title I of the Workforce Investment Act. Support Services may only be provided to individuals who are:

- Participating in Core B, Intensive or Training Services; and
- Unable to obtain supportive services through other programs providing such services.

Supportive Services are not “entitlements.” This means that although a participant may be eligible for supportive services, participants do not have an unrestricted right to such supportive services. All supportive services should be considered individually as a unique request, based upon individual client need, and as documented in the Individual Service Strategy (ISS). Receipt of supportive services is dependent upon the availability of adequate funding.

Cash Payments — Cash payments, such as incentives and stipends, would be considered allowable if the payments met the conditions of supportive services as described in the WIA and its regulations. If the youth needs the incentive of cash payments in order to succeed in and complete the WIA program, those payments could be allowable under WIA.

SUPPORTIVE SERVICE CATEGORIES:

Transportation: To be used in cases where assistance is required in order for a customer to commute to and from work, training or other training or work related WIA activities.

- Mileage reimbursements will be made at the rate equal to the City and County of San Francisco’s amount per mile or public transportation when appropriate, whichever is less.

Child Care: May be provided when it has been determined that the lack of child care is a barrier to WIA activities. It shall be the policy that the contracted Child Care Service Provider broker all child care services. This contractor is to handle all billing and direct contact with the child care providers.

Books: Book assistance should only be provided when it has been determined that the customer has a definite need for such assistance in order to participate in training. The books shall coincide with the classes being taken for training.

Meals: Meals should only be provided when it has been determined that the customer has a definite need for such assistance in order to participate in training. Meals can only be provided for those who are receiving training out of their local area. They are reimbursed at a rate equivalent to the City and County of San Francisco policy on per diem.

Financial Counseling: Financial counseling, for the most part, should involve in-kind assistance, although referral to credit counseling should be considered in extreme cases.

Tools: Tools may be provided only when they are a requirement for the customer's successful completion of training or when the customer has:

1. A bona fide job offer; and
2. The new hourly rate is not less than the average wage at placement; and
3. It has been documented that the employer does not supply the tools.
4. Such tools will not be used to capitalize a business.

Clothing: Clothing is only to be provided when it has been determined that the customer has a definite need for such assistance in order to secure a job. Costs for clothing will be determined on a case-by-case basis. These services should only be provided after other resources such as family, friends and other agencies have been exhausted.

Needs Based Payments: There will not be any needs based payments.

Limitations

1. Other types of supportive services not included in the recognized categories addressed above may be provided to WIA customers as long as they meet the definition of a supportive service as stated in the Act. 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.
2. Neither eligibility for, nor participation in a WIA program, creates an entitlement to services, and nothing in the Act shall be construed to establish a private right of action for a customer to obtain services described in their objective assessment or IEP.

Supportive services may be provided either in-kind or through cash assistance. 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 the following:

- 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 provided 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.

PROCEDURE:

Considerations For Appropriateness Of Supportive Services

When considering the appropriateness of providing Supportive Services, subcontractors should consider the following criteria:

Participant Status

Only participants actually enrolled in Core B, Intensive or Training services will be eligible for assistance under this policy. All requests for support must be documented, and approved in a participant's Individual Service Strategy (ISS).

Documentation of Need

The supportive service provided must be "necessary" for the participant to effectively begin or continue training, or for the participant to obtain a specific employment or educational goal or objective. Need for supportive services must be clearly addressed during the assessment process, and documented in the participant's ISS plan. Case notes should document effectiveness and /result of supportive service provided. Supportive services needs determined subsequent to ISS development are documented in the client's case notes.

Subcontractors must assure that accounting and tracking systems are in place for the distribution of supportive services made on behalf of WIA participants.

Alternative Sources of Supportive Service

The use of WIA funds for supportive services is allowable only if those services are necessary for the individual to participate in WIA activities, and the individual is unable to obtain those supportive services through other programs.

Effectiveness of Service

Provision of a supportive service should effectively contribute to removing or addressing a specified barrier to employment and/or educational goals as specified in the ISS. Supportive services are not intended to be a temporary solution to a long-

term problem.

Reasonableness of Service

The costs of the supportive service must be commensurate with the benefits of the service. Special consideration must be taken to ensure that costs are not excessive. Additionally, cases may arise where it is appropriate for costs to be shared between the WIA program and the participant. This may be particularly apparent in cases where the request for support services appears to exceed a reasonably “adequate” level of supportive service.

Probability of Benefit

Supportive services should only be provided when there is a reasonable expectation that the participant will fully use and benefit from the service. Such expectations should be based upon the participant’s history of performance and cooperation with WIA subcontractor staff and/or other well-founded criteria obtained during the assessment process.

ACTION:

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.

INQUIRIES:

Inquiries should be addressed to the WIA Program Manager.

Rhonda Simmons
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Office of Economic and Workforce Development