



## Policy

<b>SECTION: PROGRAMS</b>	<b>POLICY#018-C0012</b>	<b>PAGE: 1 of 5</b>
<b>TITLE: Supportive Service and Incentive Policy</b>		<b>EFFECTIVE DATE: 8.6.18</b>
<b>REPLACES: Supportive Service Issuance Programs Desk Guide</b>		<b>DATED: 8.6.18; Revision 2.21.19, 3<sup>rd</sup> Revision 11.21.19, Rev. 5.21.20</b>

### **DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF**

**PURPOSE:** To provide guidance on the various support services and incentive options allowed under the requirements of Workforce Innovation and Opportunity Act (WIOA) Adult, Dislocated Worker, Youth and Temporary Assistance to Needy Families (TANF) / Welfare Transition programs.

**BACKGROUND:** The Workforce Innovation and Opportunity Act (WIOA) and Temporary Assistance to Needy Families (TANF) legislation and guidance provide for the provision of supportive services to participants enrolled in WIOA and TANF funded programs. The WIOA provides guidance on the provision of incentives for WIOA Youth programs.

WIOA defines the term supportive service to mean services such as transportation, child care, dependent care, housing, and needs-related payments that are necessary to enable an individual to participate in activities authorized under this Act.

Supportive services are for eligible individuals, particularly eligible individuals with barriers to employment. Section 133(b) defines funds allocated to the local area for dislocated workers under section 133(b)(2)(B), may be used to provide supportive services to adults and dislocated workers, respectively who are (a) (A) who are participating in programs with activities authorized in paragraph (2) or (3) of subsection (c); and (B) who are unable to obtain such supportive services through other programs providing such services. Section 134(d)(2)(A) of WIOA requires that adults and dislocated workers must be participants to receive supportive services.

Section 129 defines youth services (vii) supportive services and provision of need-based stipends necessary to enable individuals to participate in the program and to assist individuals, for a period not to exceed 12 months after the completion of training, in obtaining or retaining employment, or applying for and transitioning to postsecondary education or training; and follow-up services for not less than 12 months after the completion of participation, as appropriate.

20 CFR § 681.640 states that “incentive payments to WIOA youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. The local program must have written policies and procedures in place governing the award of incentives and must ensure that such incentive payments are tied to the goals of the specific program; outlined in

writing before the commencement of the program that may provide incentive payments; align with the local program's organizational policies; and are in accordance with the requirements contained in 2 CFR part 200." CSTB will authorize incentives to WIOA Youth customers only.

Chapter 414, F.S., sets forth provisions for receipt of Temporary Cash Assistance (TCA) and requires all individuals who do not meet TCA exemptions to participate in work or alternative plan activities. Chapter 445, F.S., consolidates the state workforce policy direction, oversight, and welfare support functions under one board, CareerSource Florida, Inc., (CSF) and designates the Department of Economic Opportunity (DEO) as the administrative, fiscal, and implementing agency for TCA work activities and supportive services, the Welfare Transition (WT) program.

The Department of Health and Human Services has provided final approval of the Temporary Assistance for Needy Families (TANF) State Plan which authorizes support services assistance. These benefits are designed to deal with a specific crisis situation or episode of need and other service such as child care and transportation, transitional services, job retention, job advancement, and other employment-related services.

#### **PROCEDURE:**

Based on individual assessment and availability of funds, supportive services (includes incentives for WIOA Youth only) may be awarded to eligible program participants. Supportive services awards are intended to enable an individual to participate in workforce funded programs and activities and to secure and retain employment. Supportive services are provided on the basis of need as determined by the CSTB Career Coach working with the participant and may include:

- Transportation including support services cards, gas cards or bus passes
- Clothing including general interview clothing
- Uniforms
- Certification fees
- Tools for occupational skills training or work-related
- Assistance with education-related testing
- Needs-related payments necessary for a career seeker to participate in assigned activities
- WIOA Youth Only: Incentives based on defined milestone achievements
- WIOA Youth programs can provide supportive services during post exit follow-up services for up to 12 months after completion of program services.

CSTB program staff must ensure that the participant is in need and eligible for all requested supportive services and that the supportive service is necessary for ongoing participation in the program.

#### **Documentation:**

Supportive services are outlined in the customer's programmatic career plan. Customers must be in good standing with the program, in compliance and document that their requested need cannot be met or provided through any other organization or entity. The rationale for providing supportive services must be well documented in the participant's plan, supporting documentation and case notes.

Supportive services are outlined in the customer's programmatic career plan. Customers must be in good standing with the program, in compliance and document that their requested need cannot be met or provided through any other organization or entity. Our investment in supportive services will position the customer for optimal success in the program leading to increased training completion, credential attainment and employment rates by removing barriers that customers face.

Opportunities for WIOA Youth to earn incentives will be outlined in writing and reviewed with the customer to ensure a thorough understanding of program requirements. Supporting documentation of the activities completed or milestones achieved will be documented in the participant's file. Incentives may be issued in the form of visa gift cards.

Incentive payments may be issued to WIOA Youth participants for recognition and achievement directly tied to training activities, work-based learning programs (On-the-Job training, Paid Work Experience), or performance related outcomes specified in the customer's individual development plan and are issued in compliance with requirements of 2 CFR Part 200.

### **Eligibility:**

Eligibility for supportive services will be established based on an assessment of need and documented in the participant's individual development plan. To qualify for receipt of supportive services, staff in consultation with the program participant must:

- Qualify and enroll in one or more workforce funded programs operated by CSTB.
- Demonstrate and document a need that will prevent him or her from participating in the program, accepting employment, or retaining employment
- Document that the customer is unable to afford the cost associated with addressing the need;
- Be unable to secure the needed service from another community resource;
- Complete a Statement of Need and eligibility which documents the requested service, need/eligibility along with the prescribed amount

### **Supportive Service Limitations:**

1. CSTB will not provide supportive services retroactively or reimburse for any services previously rendered.
2. Tuition, books and fees for approved training programs are not included as supportive services. These costs are included under the Individual Training account.
3. Supportive Services cap is established as a maximum of \$700 per Program Year (PY) per participant. CSTB Career Coaches will track supportive service amounts per PY to ensure that established caps are not exceeded.
4. The Chief Operations Officer or designee will review supportive services funding levels on a monthly basis to ensure resources are used with the intent of this policy.
5. The Chief Executive Officer may waive the \$700, up to a maximum of \$1,500 limit if circumstances warrant. If excess of \$1,500 is needed, request must be approved by chairman of the board CSTB. Authorization to increase the limit above \$700 must be documented in case notes.

### **Issuance Process:**

Supportive service cards cannot be mailed out to program participants. The CSTB supportive service issuance process consists of two responsible parties: the supportive service **requestor** and the supportive service **issuer**. Staff members are prohibited from acting as both requestor and issuer when dealing with a single program participant. Staff members are prohibited from issuing services to program participants on their caseload. Under no circumstances can a CSTB Career Coach who is requesting services for a program participant also act as the Career Coach who issues services to

that program participant.

**Safeguarding Cards and Internal Controls:**

Security protocols for safeguarding CSTB supportive service cards are of paramount concern for our organization. Each of our CSTB offices also has a safe onsite in the manager’s office or dedicated safe room where the supportive service cards are housed overnight and when there are no scheduled appointments. The supportive service cards are further stored in lockboxes within each safe. Supportive service gatekeepers are the only individuals with authorization to access the safe. The gatekeeper is a CSTB staff member that is not on the programs team to ensure appropriate firewalls are in place. The lockbox is issued daily by the gatekeeper to the issuers with the allotted support service cards needed for the scheduled appointments. Supportive service cards are signed in and out daily by the gatekeeper and issuer to ensure accuracy and track the responsible party for the cards.

Supportive service cards signed out to the supportive service issuer must remain in the lockbox until the time of issuance. When not in use, the lockbox should remain in a safe or a locked drawer or locked overhead compartment. At no point are staff authorized to leave supportive service cards outside of the lockbox (i.e., placed in desk drawer, left out on desk, etc.). The Gatekeeper and a second staff member will perform an inventory count bi-monthly on the (15<sup>th</sup> and the last day of the month). The inventory count sheets are provided to the Finance Department (Program Coordinator – Finance). Program Coordinator – Finance reconciles the inventory count sheets to the inventory per Card Tracker System (defined below). No new cards issuances can occur until the inventory reconciliation process is completed AND appropriated staff are notified by the Program – Coordinator Finance.

Internal monitoring is conducted over the issuance and on hand inventory of supportive service cards. The internal monitoring is conducted to ensure issuance of supportive service cards are to eligible participants, properly documented, within established limits, and on hand inventory is appropriately controlled and agrees to card tracker and financial records.

Periodically throughout the Program Year, CSTB may change the issuers to ensure another layer of internal control.

**Card Tracker System:**

CSTB utilizes a Card Tracker System to record all issuance of supportive services and/or WIOA Youth-incentives issued to program participants. The system records the customer’s signature and documents the transaction, detailed reports are generated out of this system.

**Cancellation of Support Services:**

This policy and some or all of its categories of support services may be cancelled or changed, in whole or in part, by CSTB at any time without notice, effective immediately, or at any time CSTB determines necessary. Exceptions may be made to this policy by CSTB if it is in the best interest of CSTB or its participants.

**Policy Exceptions:**

Any exceptions to the above stated policy or any part thereof, must be documented and approved by the CareerSource Tampa Bay CEO or his/her designee for consideration.

CSTB may receive federal, state and local grant awards that may not be subject to the requirements outlined above. Those awards will be governed by the rules and guidelines set forth as defined in the grant document(s). Desk guide(s) or other internal documents will be established to outline the processes specific to the award(s).

**Inquiries:** Any questions about this policy should be directed to the Chief Operating Officer and/or her designee.