



# EMPLOY MILWAUKEE POLICY

**POLICY:** 20-01, CHANGE 2

**SUBJECT:** YOUTH SUPPORTIVE SERVICES

**ISSUANCE DATE:** 08/29/24

**EFFECTIVE DATE:** 08/29/24

**REVIEWED DATE:** Not applicable

## REFERENCES:

- 20 CFR 681
- 29 USC 3101, Workforce Innovation and Opportunity Act (WIOA), § 3(59), 129(c), and 134(d)
- 2 CFR Part 200, Uniform Administrative Guidance
- United States Department of Labor Training and Employment Guidance Letters (TEGLs) WIOA 21-16 and WIOA 19-16
- Wisconsin WIOA Titles I-A and I-B Policy and Procedure Manual

## POLICY SCOPE

- EMPLOY MILWAUKEE AGENCY
- WIOA WDA 2 SYSTEM
- WIOA TITLE I-B PROGRAM(S)
  - ADULT PROGRAM
  - DISLOCATED WORKER PROGRAM
  - YOUTH PROGRAM
- NON-WIOA PROGRAMS
- RE ENTRY PROGRAMS

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## I. BACKGROUND

Funders such as WIOA and DOL WIOA requires that local Workforce Development Boards (WDBs) develop policies and procedures for the provision of supportive services. to individuals participating in WIOA Title I program elements. These policies and procedures must ensure coordination with other entities to ensure non-duplication of resources and services, establish limits on the amount and duration of such services, and comply with state guidance on supportive services.

For example, supportive services is one of the 14 program elements each local WDB must offer as part of its WIOA Youth Program:

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies;
2. Alternative secondary school services or high school dropout recovery services;
3. Paid and unpaid work experience;
4. Occupational skills training;
5. Education offered concurrently with and in the same context as workforce preparation and training;
6. Leadership development opportunities;
7. Supportive services;
8. Adult mentoring;
9. Comprehensive guidance and counseling;
10. Financial literacy education;
11. Entrepreneurial skills training;
12. Career Awareness, Career Exploration, and Career Counseling;
13. Postsecondary preparation and transition activities; and
14. Follow-up services.

One or more services fall under the umbrella of each program element. Local WDBs are not required to offer/provide one or more services from each program element to every participant, with the exception of follow-up services. Local WDBs must offer follow-up services to each participant. The local program and its service providers determine what specific services a participant receives, based on the participant's objective assessment and individual service strategy (ISS) or individual employment plan (IEP).

## II. PURPOSE

The purpose of Youth supportive services is to enable individuals to participate in WIOA grant activities. Consistent with DOL's requirements for the Adult and Dislocated Worker Programs, DWD- DET /DOL requires local WDBs to have a supportive services policy for their WIOA Youth Programs. Employ Milwaukee WIOA Policy 20-01 Youth Supportive Services describes the process through which the WDB ensures coordination of resources and services and establishes local limits and procedures for the provision of youth supportive services in Workforce Development Area (WDA) 2.

## III. POLICY

The provision of accurate information about the availability of supportive services in the local areas and referral to such activities is a career service that must be provided through the local One-Stop Delivery System. American Job Center partners in WDA 2 are required through the WDA's Memorandums of Understanding to share information about available services "to support effective delivery of services to workers, job seekers, and employers," WIOA § 101(d)(3)(F). Staff must make fair, consistent, and equitable youth supportive service determinations and ensure that similarly situated participants have similar youth supportive services made available to them. Non WIOA programs share the availability of Supportive Services to grant participants.

### A. Required Predecessors

An individual must receive an assessment that evaluates barriers to success in the program and potential resources and support systems available to the participant for barrier alleviation. The Comprehensive Assessment tool in ASSET Manage Assessments is an acceptable assessment for these purposes in WIOA Programs. This assessment must be used in the development of the Individual Service Strategy (ISS) developed between a WIOA Career Planner Program Staff and a participant. The Individual Employment Plan (IEP) is an acceptable tool for other NON WIOA grant program assessment. The assessment tool must identify how barriers would be addressed through supportive services, per Wisconsin WIOA Titles I-And I-B Policy and Procedure Manual. The ISS/IEP that identifies the need for youth supportive services must have been developed, signed and dated by both the participant and program staff prior to the provision of supportive services.

Youth supportive services may only be provided to WIOA Title I-B participants who are participating in WIOA program elements or non-WIOA youth participating in an individualized career service or youth program element, training service or employment. Non WIOA youth can receive supportive services per grant budget and necessary to participate in services. Likewise, supportive services may only be provided to WIOA participants when they are necessary to enable participation in those WIOA activities. The ISS/IEP must list in the comments section which specific service the supportive services are tied to and designed to support.

## **B. Allowable Supportive Service Categories**

### **1. Employment or Training-Related Items**

A participant who is receiving training services or who has entered employment may receive supportive services that are necessary to continue those activities. The following may be covered in this category, per 20 CFR §681:

- i. Payments and fees for employment and training-related applications, tests, and certifications. Fees for exam retakes will be reimbursed a maximum of two (2) times. The first exam retake will be allowed no sooner than 14 days after first exam and must be preceded by additional academic/remedial instruction by a trainer or instructor;
- ii. Assistance with educational testing;
- iii. Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear;
- iv. Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and
- v. Reasonable accommodations for individuals with disabilities.

A letter or documentation from the training provider or employer confirming the items required and their approximate cost must be obtained prior to the request for supportive services. A participant in employment must sign an agreement that s/he may be required to return or repay the cost of employment-related items if s/he leaves the job within the first 30 days of employment.

Non-WIOA grant programs provide employment or training related supportive services based on specific grant requirements.

### **2. Transportation Assistance**

Transportation assistance may include parking reimbursements, mileage reimbursements, public or private transportation assistance for costs associated with training or allowable WIOA activities.

- i. Mileage may be reimbursed for round trips greater than 10 miles and may only include travel to and from the training, service. Mileage is reimbursed at half of the IRS standard mileage rate for business. See [www.IRS.gov](http://www.IRS.gov) for current year mileage rate. The participant must provide the Program Staff with documentation of the participant's valid driver's license, automobile liability insurance, and current automobile registration.
- ii. Public transportation assistance for participation in training or allowable activities may be requested for one week's worth at a time.
- iii. Private transportation for participation in training or allowable activities will be reimbursed when receipt for service is provided. Examples of private transportation include but is not limited to a Taxi, Uber, or Lyft service.

### **3. Child and Dependent Care Assistance**

Child and dependent care assistance may be provided for participants participating in employment, training or allowable activities who are not eligible for child or dependent care assistance through other sources. Child or dependent care payments will only be made when there is an actual cost to the participant for the care. If a portion of the participant's child or dependent care is subsidized through another program, the uncovered portion may be covered through grant funds, provided all other

supportive service requirements are met. Child or dependent care reimbursement will be at a rate that is considered usual, reasonable, and customary within WDA 2, which shall be the Wisconsin Department of Children and Families Child Care Subsidy Maximum Rates<sup>1</sup>.

4. WIOA does not define the term dependent. Employ Milwaukee uses the following definition of dependent purposes of determining a dependent whose care may qualify for supportive services under WIOA/Non WIOA “Dependent youth are unmarried children who are dependent upon a parent or guardian for support (more than 50%) and live with the parent or guardian in a regular parent-child relationship. This includes unmarried dependent children for whom the parent or guardian is the legal guardian and has legal custody of, and/or claims as a dependent for income tax purposes, including stepchildren, legally adopted children, or grandchildren. Dependent adults are either related to the head(s) of the household or live with the head(s) of the household as a member of the household for whom the head(s) of the household provided more than half of the person’s total support; or are adults who are claimed as a dependent by the head(s) of the household for income tax purposes.”

#### 5. Health-Related Services

Participants who require a referral to health care services, medical examination and/or immunizations for training services or employment may receive assistance for such costs when documentation indicates the requirement is provided by the training provider and/or employer.

#### 6. Other Supportive Services

Other supportive services that may be requested by participants include linkages to community services, legal aid services, assistance in obtaining a driver’s license, and one-time emergency assistance with housing.

#### 7. Needs-Related Payments

29 CFR §680.930 states that, “Needs-related payments provide financial assistance to participants for the purpose of enabling them to participate in training and are a supportive service authorized by DOL and WIOA sec. 134(d)(3). Unlike other supportive services, in order to qualify for needs-related payments a participant must be enrolled in training.”

Employ Milwaukee allows needs-related payments to participants of Youth Programs to assist in covering non-training expenses while participating in a training program. Other programs administered by Employ Milwaukee may be permitted to provide needs-related payments with the written authorization of the Chief Financial Officer, Director of Finance, or authorized fiscal designee.

#### 8. Eligibility Requirements

The eligibility requirements for recipients of Needs-Related Payments in WDA 2 are those outlined in Wisconsin’s WIOA Titles I-A and I-B Policy and Procedures Manual, as outlined below.

- i. To receive needs-related payments, participants must, at minimum, be:
  - unemployed; AND
  - not receiving unemployment insurance (UI) benefits or trade readjustment allowances

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1 <https://dcf.wisconsin.gov/wishares/maxrates>

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(TRA) because the individual does not qualify or is an exhaustee; AND

- enrolled in a training program that has already begun or will begin within 30 calendar days.

### 9. Acceptable Payments

The payment provided for the identified need of the participant must be for a need not covered by another allowable supportive services category and not available through other non- WIOA/Program resources. The needs-related payment must tie directly to the cost identified.

## C. Limitations

### 1. Non-Allowable Supportive Services

Employ Milwaukee does not allow business capitalization (e.g. purchasing of tools for a participant who is starting a business), deposits for rentals or leases, vehicle or mortgage payments, preventative maintenance work on vehicles, and fines and penalties, such as traffic citations or interest fees.

Reimbursements for expenses incurred without prior approval are prohibited, per Wisconsin WIOA Titles I-A and I-B Policy and Procedure Manual.

### 2. Dollar and Duration Limitations

There is no dollar limitation to Allowable Supportive Services Category 1: Employment or Training-Related Items unless grant specified. Supportive services in Allowable Supportive Services Categories 2 through 5 are limited to \$1000.00 per participant, per program year, per funding source, per category outlined in this policy or grant budget.

3. Allowable Supportive Services Category 6: Needs-Related Payments has a limit of \$1000.00 per participant, per program year, per funding source for WIOA youth participants and for participants of other Employ Milwaukee-administered programs that have been authorized to provide needs-related payments by the Chief Financial Officer, Director of Finance, or authorized fiscal designee.

### 4. Exceptions

An exception to Employ Milwaukee's supportive services limitations will be considered when provided with a justification statement accompanying the voucher packet. When reviewing requests for exceptions, Employ Milwaukee will consider reasonableness as defined by 2 CFR § 200.404: "A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost."

A request for an exception to an Employ Milwaukee supportive services limitation must be made as outlined in the Procedures section below.

For Non-WIOA programs, grant budgets may supersede the limitations identified in this section.

## IV. PROCEDURES

### A. Program Staff Activities

#### 1. Request Requirements

Prior approval for payment of supportive services is required. Requests for and authorization of supportive services must be made utilizing Employ Milwaukee's vouchering system to ensure proper obligation and tracking of funds.

Program staff must complete and document all required predecessors outlined in this policy prior to submitting a voucher for supportive services to Employ Milwaukee. The voucher packet may include the following:

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- Voucher
- Supportive Service Voucher Documentation Checklist
- Supportive Documentation Relevant to the Request
- Supportive Services Justification Form)

Documentation of the cost for a participant's needs-related payment must be documented in the participant's file.

A voucher packet that includes a request for an exception to an Employ Milwaukee supportive services limitation must be provided to the Employ Milwaukee Program Specialist for preliminary approval. The Employ Milwaukee Program Specialist will consider the reasonableness of the request and will submit to an Employ Milwaukee Exception Approver if it has been preliminarily approved. Once Employ Milwaukee has granted an exception to the supportive services limitation and provided signatory approval, the voucher may be completed and processed as usual.

### 2. Post-Approval Documentation Requirements

Documentation verifying attendance at employment, training, or other allowable WIOA activity that requires supportive services is mandatory and will be tracked by the Career Planner. Career Planners will determine whether the participant has met the program's attendance requirements. Training providers receiving funds must perform time-keeping and participant activity tracking duties.

Participant Expense Reimbursement Request Forms must be completed and submitted to EMI within 10 days after the end of the claim month, along with childcare logs, mileage logs and/or original receipts. Lack of timely submission may result in denial of the claim.

Documentation of the actual transaction of a needs-related payment must be documented in the participant's file.

Program Staff shall periodically review the need for, and the receipt of, supportive services. Individuals receiving supportive services must jointly update their ISS with their Program Staff in accordance with WDA 2 ISS/IEP procedures, at which time changes in supportive service needs must be reflected and documented.

### **B. Payment Method**

Payment of supportive services is generally made directly to the vendor providing the services; however, Career Planners may authorize payments directly to participants on a case-by-case basis with appropriate documentation.

Supportive service providers will be reimbursed for previously approved supportive service payments and invoices upon compliance with the above post-approval documentation requirements.

### **C. Quality Assurance**

Use of supportive services is monitored by Employ Milwaukee during annual monitoring and desk reviews. Proper substantiation of need, other resources sought, how the service ties directly to participation in a grant activity, and documentation of the services must be maintained in the participant's electronic and paper records.

## V. ACTION REQUIRED

- WIOA Title I-B and Non-WIOA Service Providers in WDA 2 must share this policy with Program Staff immediately.

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All supportive services requests following this policy's effective date must meet the local requirements and follow prescribed procedures described herein. All participants currently receiving supportive services must have their need for the supportive services reevaluated by their program staff at the time of their next ISS/IEP update.

- Posting of this Policy to the Employ Milwaukee website for open access to all personnel.

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**RECISSIONS:** [Policy 20-01 Eff. 05/28/20](#)

**BOARD APPROVAL DATE:** [08/29/24](#)

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