



# Montana Department of LABOR & INDUSTRY

1  
2 Division: Workforce Services Division  
3 Category: WIOA  
4 Original Effective Date: 08/24/2017  
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6 Policy No.: 08-16

## 7 Supportive Services Policy

8 **Background:** Supportive Services are services that are reasonable and necessary to enable a WIOA  
9 client to participate in WIOA activities when a client is unable to obtain the services through other programs.

10 **Scope:** This policy applies to all service providers operating WIOA Title I programs, WIOA program  
11 managers, WIOA fiscal officers and the WIOA monitoring team. This policy is effective April 1, 2020.

### 12 Policy:

#### 13 Supportive Services:

- 14 • Supportive service funds may only be used to pay for services that are reasonable and necessary for  
15 participation in the program. The clients must be enrolled in the program in order to receive supportive  
16 services. The individual determination of need and the amount of assistance will be based upon the  
17 results of the comprehensive or objective assessments. Supportive service request documentation  
18 must be maintained in the client file and must include the following information:
  - 19 ○ A brief description of the expenditure and the need;
  - 20 ○ The amount requested;
  - 21 ○ Supportive services are unavailable through other programs providing such services;
  - 22 ○ The dated signatures of the case manager and the client; an electronic request from the client  
23 will be accepted as a signature.
- 24 • All supportive services must have been requested and approved by the case manager prior to the client  
25 receiving or obtaining the goods or services. Backdated expenditures are not allowed. Funds may not be  
26 used to pay for charges incurred prior to the client's enrollment.
- 27 • Service providers must record expenditures in MWorks within 7 working days of payment with an  
28 accompanying case note regarding the expenditures.
- 29 • Service providers will not make further supportive service payments when the client fails to participate  
30 without good cause, as determined by the case manager.
- 31 • Supportive services do not have a cap or limit and service providers may use their own discretion in  
32 setting limits.

#### 33 Allowable Supportive Services:

- 34 • Supportive services may include but are not limited to:
  - 35 ○ Linkages to community services;
  - 36 ○ Assistance with transportation;
    - 37 ■ The most economical public or private transportation is allowable if it will reasonably  
38 meet the client's need to participate in program activities. Payments may not exceed the  
39 IRS mileage rate;



- 91                   ▪ Funds may be used for payment of rent. A signed rental or lease agreement or a  
92                   Verification of Rent Form (WIOA.39) must be completed and maintained in the client file  
93                   prior to issuance of payment.  
94                   ▪ The landlord must submit a W-9 form prior to issuance of funds.
- 95 ○ Needs-related payments;
    - 96                   ▪ Needs-related payments provide financial assistance to individuals, enabling them to  
97                   participate in training. See Needs-related section below for details.
  - 98 ○ Assistance with educational testing;
    - 99                   ▪ Funds may be used for application fees and HiSET or State Approved High School  
100                   Equivalency program fees or tests.
    - 101                   ▪ Funds may be used for occupational testing.
  - 102 ○ Reasonable accommodations for individuals with disabilities;
  - 103 ○ Legal aid services;
    - 104                   ▪ Legal aid services may only be provided when the service is not available through other  
105                   agencies or organization and the service is necessary for the individual to participate in  
106                   WIOA activities. Coordinating legal aid service, including expungement services, will  
107                   require working with local bar associations, referral to the State Court Self-Help program,  
108                   the Montana Legal Services Association as well as private counsel. Assistance may only  
109                   be provided in civil, non-criminal legal problems.
  - 110 ○ Health-related services;
    - 111                   ▪ If the client needs health care, the case manager will assist in finding a healthcare  
112                   provider who will accept the client's health insurance. If the client is uninsured, the  
113                   case manager will provide assistance in locating a health provider who will provide  
114                   services on a sliding fee, at low or no cost, or will offer a payment schedule.
    - 115                   ▪ If the client needs health insurance, the case manager will refer the client to a health  
116                   insurance provider. If a client applies for health insurance coverage and is unable to  
117                   obtain coverage through any other source, WIOA funds may be used to pay insurance  
118                   premiums while the client is attending training.
  - 119 ○ Assistance with uniforms or other appropriate work attire and work-related tools and equipment;
    - 120                   ▪ Clothing includes clothing for interviews and/or clothing required as personal protective  
121                   equipment not otherwise supplied by the business.
    - 122                   ▪ Tools that are required to obtain or continue employment are an allowable cost. The  
123                   case manager must first determine that the requested tools cannot be provided by any  
124                   other source such as the prospective employer or client.
    - 125                   ▪ Internet services are considered an allowable expense for clients to obtain employment.  
126                   Payments may only be made on a monthly basis.
  - 127 ○ Assistance with books, fees, school supplies and other necessary items for students enrolled in  
128                   training services;
    - 129                   ▪ Tools that are required to begin or continue a training program are an allowable cost.  
130                   The case manager must first determine that the requested tools cannot be provided by  
131                   any other source such as the training provider or client.
    - 132                   ▪ Tools become the property of the client upon satisfactory completion of the WIOA  
133                   training outlined in the client's IEP, ISS or upon employment.
    - 134                   ▪ Computer purchases, in limited cases, are approved expenses. This is most typically, but  
135                   not exclusively, in distance learning situations. Case managers must complete the  
136                   Computer Purchase Request Questionnaire Form (WIOA.52) with the client and submit  
137                   the form to the supervisor for approval prior to purchase.
    - 138                   ▪ Internet services are considered an allowable expense for clients attending training.
  - 139 ○ Payments and fees for employment and training-related applications, tests and certifications;
    - 140                   ▪ Allowable costs include union dues or initiation fees; business license fees; bonding and  
141                   liability insurance for employment; drug testing; background checks; an Assessment,

- 142 Course, and Treatment (ACT) class, and/or tools and equipment needed for self-  
143 employment.
- 144 ○ Other supportive services may be provided as determined by the service provider. Such goods  
145 and services will be reasonable and necessary for the client to remain in training and/or obtain  
146 or retain employment. These services may include but are not limited to:
    - 147 ■ Haircuts, personal grooming and hygiene needs;
    - 148 ■ Financial counseling or assistance;
    - 149 ■ Utilities, which may include: power, water, propane or telephone bills; and
    - 150 ■ Cell phone purchases and phone cards.

151 **Unallowable Supportive Services:**

- 152 ○ Payments are not allowed for titled or deeded items or when recovery of the expense is  
153 anticipated. Such items include but are not limited to:
  - 154 ■ Rent deposits or housing deposits;
  - 155 ■ Mortgage payments, homeowner's insurance, and property taxes;
  - 156 ■ Car payments;
  - 157 ■ Purchase of vehicles;
  - 158 ■ Fines; and
  - 159 ■ Late fees.
- 160 ○ Other unallowable expenses include:
  - 161 ■ Household items
  - 162 ■ Groceries, and
  - 163 ■ Onsite meals.
- 164 ○ Payments are not allowed for expenses incurred prior to enrollment in a WIOA program.
- 165 ○ Supportive service payments may not be paid to an Adult or Dislocated Worker client while  
166 enrolled in follow-up.
- 167 ○ Business start-up costs that would be considered capitalization or the acquisition of business  
168 assets are not allowed.

169 **Supportive Services Paid Directly to Clients:**

- 170 ○ Supportive services paid directly to clients are only allowable for mileage and per diem which  
171 includes meals and lodging. When payments are made directly to the client, the Direct Client  
172 Payments Form (WIOA.20) must be completed, maintained in the client file, and include all fund  
173 sources paid by the service provider.
- 174 ○ Any single payment paid directly to a client that is more than \$1,000 must have a written  
175 request approved by the service provider supervisor prior to issuing the payment. All payments  
176 paid directly to the client that are less than \$1,000 must be tracked by a running cumulative  
177 total and maintained in the client file. When the cumulative total of multiple payments to the  
178 client will exceed \$1,000, written approval must be obtained from the service provider  
179 supervisor.

180 **Needs-Related Payments:**

181 Needs-related payments provide financial assistance to clients to enable clients to participate in training.

182 **Eligibility:**

- 183 ○ Clients enrolled in the Adult program must meet the following criteria to receive needs-related  
184 payments:
  - 185 ■ Be unemployed;
  - 186 ■ Not qualify for, or have ceased qualifying for, unemployment compensation; and
  - 187 ■ Be enrolled in the Adult training program.
- 188 ○ Client, ages 18 to 24, enrolled in the Youth program must meet the following criteria to receive  
189 needs-related payments:
  - 190 ■ Be unemployed;

- 191                   ▪ Not qualify for, or have ceased qualifying for, unemployment compensation; and
- 192                   ▪ Be enrolled in Youth training program.
- 193           ○ Clients enrolled in the Dislocated Worker program must meet the following criteria to receive
- 194           needs-related payments:
- 195                   ▪ Be unemployed; and
- 196                   ▪ Have ceased qualifying for unemployment compensation or Trade Readjustment
- 197                   Allowance (TRA) under Trade Adjustment Assistance (TAA); and
- 198                   ▪ Be enrolled in Dislocated Worker training services by the end of the 13<sup>th</sup> week after the
- 199                   most recent layoff that resulted in a determination of the worker’s eligibility as a
- 200                   Dislocated Worker, or, if later, by the end of the 8<sup>th</sup> week after the worker is informed
- 201                   that a short-term layoff will exceed 6 months; or
- 202                   ▪ Be unemployed and did not qualify for unemployment compensation or TRA under TAA
- 203                   and be enrolled in Dislocated Worker training services.

204   **Needs-Related Payment Levels:**

- 205           ○ Adult clients must have a financial assessment to determine the level of weekly payment, which
- 206           is then recorded in the IEP.
- 207           ○ Adult clients may not exceed the greater of the following levels for needs-related payments:
- 208                   ▪ The applicable weekly level of the unemployment compensation benefit, for the clients
- 209                   who were eligible as the result of the qualifying separation; or
- 210                   ▪ The poverty level for an equivalent period for clients who did not qualify for
- 211                   unemployment compensation as the result of the qualifying separation. The weekly
- 212                   payment level must be adjusted to reflect changes in total family income.
- 213           ○ Youth clients must have a financial assessment to determine the level of weekly payment, which
- 214           is then recorded in the ISS.
- 215           ○ Youth clients may not exceed the greater of the following levels for needs-related payments:
- 216                   ▪ The applicable weekly level of the unemployment compensation benefit, for the clients
- 217                   who were eligible as the result of the qualifying separation; or
- 218                   ▪ The poverty level for an equivalent period for clients who did not qualify for
- 219                   unemployment compensation as the result of the qualifying separation. The weekly
- 220                   payment level must be adjusted to reflect changes in total family income.
- 221           ○ Dislocated Worker clients may not exceed the greater of the following levels for needs-related
- 222           payments:
- 223                   • The applicable weekly level of the unemployment compensation benefit, for the
- 224                   clients who were eligible as the result of the qualifying separation; or
- 225                   • The poverty level for an equivalent period for clients who did not qualify for
- 226                   unemployment compensation as the result of the qualifying layoff. The weekly
- 227                   payment level must be adjusted to reflect changes in total family income.
- 228           ○ Needs-related payments may be provided if the client has been accepted in a training program
- 229           that will begin within 30 calendar days.

230   **Unallowable Needs-Related Payments:**

- 231           ○ Needs-related payments may not be provided in the following circumstances:
- 232                   ▪ During a period where the client is employed;
- 233                   ▪ If the client is enrolled in on-the-job training;
- 234                   ▪ If the client receives supportive services for an out-of-area job search and/or relocation
- 235                   allowances; or
- 236                   ▪ If the client receives TRA under TAA.
- 237                   ▪ Payments may not be paid to a client during follow-up.

- 238 Supportive Services During Follow-Up:  
239       ○ Limited supportive services may be paid for a Youth client during follow-up as appropriate to  
240       retain or obtain employment.

### 241 Administrative Requirements:

- 242       • The WIOA program manager(s) will provide technical assistance to case managers in providing  
243       supportive services to clients.

### 244 Monitoring and Evaluation:

- 245       • A formal monitoring will be conducted by the entity designated by SWIB.

### 246 References:

- 247       • [20 CFR 680 Part G Supportive Services](#)  
248       • [WIOA Section 3 \(59\) and Section 134 \(d\) 2-3](#)  
249       • [TEGL 19-16 Adult and Dislocated Worker Services](#)  
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