



Montana Department of LABOR & INDUSTRY

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2 Division: Workforce Services Division
3 Category: WIOA
4 Effective Date: October 9, 2018
5 Last Revised:
6 Policy No.: 08-16

Supportive Services Policy

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8 **Background:** Supportive Services are services that are reasonable and necessary to enable a WIOA
9 client to participate in activities funded under WIOA Title I. All clients are eligible to receive supportive services
10 provided they meet all the criteria outlined in this policy.

11 **Scope:** This policy applies to all service providers operating WIOA Title I programs, WIOA program
12 managers, WIOA fiscal officers and the WIOA monitoring team. This policy is effective October 9, 2018.

13 Policy:

14 Supportive Services:

- 15 • Supportive Services funds shall only be used to pay for specific necessary services and shall be limited
16 to payments that are necessary for the participation in the program. The individual determination of
17 need and the amount of assistance shall be based upon the results of the comprehensive or objective
18 assessments. Documentation of the assessment(s) completed and the results of the assessment shall
19 be reflected in the Individual Employment Plan (IEP) or Individual Service Strategy (ISS) and shall be
20 maintained in the client file. Supportive service request documentation must be maintained in the client
21 file; the request must contain the following information:
 - 22 ○ A brief description of the expenditure;
 - 23 ○ The amount requested; and
 - 24 ○ The dated signatures of the case manager and the client; an email or fax from the client will be
25 accepted as a signature.
- 26 • All Supportive Services must have been requested and approved by the case manager prior to the client
27 receiving or obtaining the goods or services. Backdated expenditures are not allowed. Funds may not be
28 used to pay for charges incurred prior to the client's enrollment.
- 29 • Service providers must record expenditures within 7 business days in MWorks and provide case notes
30 in MWorks regarding the expenditures.
- 31 • Service providers shall not make further supportive services payments when clients fail to participate
32 without good cause, as determined by the case manager.

33 Eligibility:

- 34 • To be eligible for WIOA Supportive Services funds a client must have met the following criteria:
 - 35 ○ Client must be determined eligible for and enrolled in a WIOA program;
 - 36 ○ The individual must be participating in individualized career services and/or training services or
37 receiving youth services; and

- 38 ○ The individual must be unable to obtain the requested service or the funding for the service
39 through other sources.

40 **Allowable Supportive Services:**

- 41 • Supportive Services for Adult, Dislocated Worker and Youth programs may include but are not limited to:
- 42 ○ Linkages to community services;
- 43 ○ Assistance with transportation;
- 44 ▪ The most economical public or private transportation is allowable if it will reasonably
45 meet the client’s need to attend WIOA activities, an out-of-area job search or relocation.
46 Payments may not exceed the IRS mileage rate;
- 47 ▪ Inter-Community travel from the client’s residence to the training for the beginning of
48 training and for the return trip at the completion of the training is allowable at the IRS
49 mileage rate. Clients may not be compensated for travel to and from the training
50 location for weekends or breaks. However, the service provider shall determine if for the
51 individual situation it is more economical for the client to make return trips home from
52 the training rather than pay for lodging during a break in the training. Mileage shall not
53 be paid for a distance greater than the number of miles accounted for in the most direct
54 route from client residence to training location.
- 55 ▪ Out-of-Area job search and relocation is allowable. The client may be compensated for
56 mileage, plane ticket, rental truck, per diem and lodging at the current GSA rate. Prior to
57 case manager approval, the client must be able to provide documentation of at least
58 one interview that fits with the client’s employment plan or verified job offer that fits with
59 the client’s employment plan if relocating to a job. Out-of-area is an area in excess of 50
60 miles from the client’s community.
- 61 ▪ Out-of-Area assistance is allowable. The client may be compensated for costs incurred
62 for out-of-area training or other activities that are part of the client’s employment plan.
63 Lodging, per diem, mileage and other reasonable costs may be covered. Providers may
64 pay mileage using the current GSA rate or pay actual costs from receipts for mileage.
65 Actual costs cannot exceed the GSA rate. Lodging and per diem rates may be paid
66 based on available budget and other sources of assistance. Out-of-area is an area in
67 excess of 50 miles from the client’s community.
- 68 ▪ Auto repair, including the purchase of tires, is an allowable cost if the vehicle is needed
69 for participation in employment and training activities or for the client to seek, accept or
70 retain employment. A description of repairs needed and provided must be maintained in
71 the client file. Auto repair shall not exceed the value of the automobile; documentation
72 of vehicle value must be in the client file. The vehicle must be owned by the client or
73 family member, if the vehicle is the only vehicle available to the client. Written
74 documentation from the owner must be obtained stating that the client has permission
75 to use and repair vehicle and that the vehicle is the only means of transportation.
76 Vehicle registration and proof of liability insurance must be obtained and retained in
77 client file for documentation.
- 78 ▪ Automobile Insurance: Liability insurance coverage will be authorized only if the vehicle
79 is needed for the client to accept or retain employment or to participate in employment
80 and training activities.
- 81 • Automobile insurance may be covered for a maximum of two quarters of annual
82 liability coverage for a 12-month period. No more than 3 months’ coverage may
83 be paid for at one time.
- 84 • Liability coverage does not include optional coverage such as medical payment
85 coverage, uninsured motor vehicle coverage, underinsured motor vehicle
86 coverage, comprehensive coverage, collision coverage, emergency road service
87 or membership fees to insurance companies.

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- The vehicle being insured must be under the ownership of the client or another family member if the vehicle is the only means of transportation available to the client. This shall be documented by obtaining a copy of the vehicle registration.
 - Insurance documentation must include a detailed description of liability coverage and be maintained in the client file.
 - Assistance with childcare and dependent care;
 - Child and dependent care costs may be reimbursed at the local documented rate. This rate shall be reviewed on an annual basis. The child or dependent care provider must be licensed and/or registered. If no licensed and/or registered provider of care is available or adequate, the case manager shall make a case note indicating the situation prior to providing payment to the non-licensed or non-registered provider. A person in the client's immediate or extended family may perform dependent or child care only after all other sources of care have been exhausted. Payments for care shall be made directly to the provider of the care.
 - Assistance with housing;
 - Funds may be used for payment of rent. A signed rental or lease agreement or a Verification of Rent Form must be completed and maintained in the client file prior to issuance of payment. [Verification of Rent Form-Form number WIOA.39](#)
 - The landlord must submit a W-9 form prior to issuance of funds. The provider shall pay the landlord directly unless a W-9 cannot be obtained.
 - Needs-related payments;
 - Needs-related payments provide financial assistance to clients for the purpose of enabling individuals to participate in training. See Needs-related section below for details.
 - Assistance with educational testing;
 - Funds may be used for application fees and HiSET or State Approved High School Equivalency program fees or tests.
 - Funds may be used for occupational testing.
 - Reasonable accommodations for individuals with disabilities;
 - Legal aid services;
 - Legal aid services may only be provided when the service is not available through other agencies or organization and the service is necessary for the individual to participate in WIOA activities. Coordinating legal aid service, including expungement services, will require working with local bar associations, referral to the State Court Self-Help program, the Montana Legal Services Association as well as private counsel. Assistance may only be provided in civil, non-criminal legal problems.
 - Referrals to health care;
 - A client in need of healthcare shall receive assistance from the case manager to locate the service needed. The case manager shall assist in finding a healthcare provider that accepts the health insurance the client has; or in the case of the client being un-insured, the case manager shall provide assistance in locating a health provider that can provide services on a sliding payment schedule, low cost or no cost.
 - A client in need of health insurance shall receive a referral from the case manager to a health insurance provider. Should a client apply for health insurance coverage and is unable to obtain coverage through any source, WIOA funds may be used to pay insurance premiums while the client is attending training.
 - Assistance with uniforms or other appropriate work attire and work related tools and equipment;
 - Clothing includes clothing for interviews and/or clothing required as personal protective equipment not otherwise supplied by the business.

- 137 ▪ Tools that are required to obtain or continue employment are an allowable cost. The
- 138 case manager must first determine that the requested tools cannot be provided by any
- 139 other source such as the prospective employer or client.
- 140 ▪ Internet services are considered an allowable expense for clients obtain employment.
- 141 Clients who request internet service payment must receive the program manager’s prior
- 142 approval. Internet service payments must be made directly to the internet provider;
- 143 payments may only be made on a monthly basis.
- 144 ○ Assistance with books, fees, school supplies and other necessary items for students enrolled in
- 145 postsecondary education classes;
- 146 ▪ Tools that are required to begin or continue a training program are an allowable cost.
- 147 The case manager must first determine that the requested tools cannot be provided by
- 148 any other source such as the training provider or client.
- 149 ▪ Tools become the property of the client upon satisfactory completion of the WIOA
- 150 training outlined in the client’s IEP, ISS or upon employment. If the client fails to
- 151 complete the WIOA training, the tools remain the property of service provider. The IEP or
- 152 ISS attesting to the above must be signed by the client and maintained in the client file.
- 153 ▪ Technology and computer purchases, in limited cases, are approved expenses. This is
- 154 most typically, but not exclusively, in distance learning situations. Case managers must
- 155 request approval from the program manager prior the purchase. The elements the
- 156 program manager will take into consideration include but are not limited to:
- 157 • Does the training program include distance learning and to what degree;
- 158 • Does the client have reasonable computer access through another source such
- 159 as a computer lab on campus or at a public library; and
- 160 • Does the client have a lengthy commute to obtain computer access?
- 161 ▪ Case managers requesting computer purchase approval must include justification
- 162 addressing these factors.
- 163 ▪ Internet services are considered an allowable expense for clients enrolled in distance
- 164 learning. Clients who request internet service payment and are not enrolled in distance
- 165 learning must receive the program manager’s prior approval. Internet service payments
- 166 must be made directly to the internet provider; payments may only be made on a
- 167 monthly basis.
- 168 ○ Payments and fees for employment and training related applications, tests and certifications;
- 169 ▪ Allowable costs include union dues or initiation fees, business license, bonding and
- 170 liability insurance for employment, drug testing, background checks, and/or tools and
- 171 equipment needed to begin self-employment.
- 172 ▪ All self-employment payments must have program manager prior approval.
- 173 ○ Other supportive services may be provided as determined by the service provider. Such goods
- 174 and services shall be reasonable and necessary for the client to remain in training and/or
- 175 obtain or retain employment. These services may include but are not limited to:
- 176 ▪ Haircuts, personal grooming and hygiene needs;
- 177 ▪ Financial counseling or assistance;
- 178 ▪ Utilities which may include: power, water, propane or telephone bills; and
- 179 ▪ Cell phone purchases and phone cards.
- 180 • Limitations on supportive services payments:
- 181 ○ No limitations are placed upon supportive services payments for the Adult, Dislocated Worker or
- 182 Youth programs.

183 **Unallowable Supportive Services:**

- 184 ○ Payments are not allowed for titled or deeded items or when recovery of the expense is
- 185 anticipated. Such items include but are not limited to:
- 186 ▪ Rent deposits or housing deposits;

- 187 ▪ Mortgage payments, homeowner’s insurance and property taxes;
- 188 ▪ Car payments;
- 189 ▪ Purchase of vehicles;
- 190 ▪ Fines; and
- 191 ▪ Late fees.
- 192 ○ Other unallowable expenses include:
 - 193 ▪ Groceries, and
 - 194 ▪ Onsite meals.
- 195 ○ Payments are not allowed for expenses incurred prior to enrollment in a WIOA program.
- 196 ○ Business start-up costs that would be considered capitalization or the acquisition of business
- 197 assets are not allowed.

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

- 199 ○ Supportive services payments shall only be paid to a client when a vendor is unable to be paid
- 200 or when extenuating circumstances exist. Documentation must be maintained in the client file
- 201 when payments are made to the client. [Direct Client Payments Form-Form number WIOA.20](#)
- 202 ○ Any single payment paid directly to a client that is more than \$1000 must have a written
- 203 explanation sent to the program manager to receive approval. All payments paid directly to the
- 204 client that are less than \$1000 must be tracked with a running cumulative total and maintained
- 205 in the client file. When cumulative totals of multiple payments made to the client exceed \$1000,
- 206 the service provider must also submit a written explanation to the program manager to receive
- 207 approval.

208 **Needs-Related Payments:**

209 Needs-related payments provide financial assistance to clients for the purpose of enabling individuals to

210 participate in training.

211 **Eligibility:**

- 212 ○ Clients enrolled in the adult program must meet the following criteria to receive needs-related
- 213 payments:
 - 214 ▪ Be unemployed;
 - 215 ▪ Not qualify for, or have ceased qualifying for, unemployment compensation; and
 - 216 ▪ Be enrolled in WIOA adult training program.
- 217 ○ Client, ages 18 to 24, enrolled in the youth program must meet the following criteria to receive
- 218 needs-related payments:
 - 219 ▪ Be unemployed;
 - 220 ▪ Not qualify for, or have ceased qualifying for, unemployment compensation; and
 - 221 ▪ Be enrolled in WIOA youth training program.
- 222 ○ Clients enrolled in the dislocated worker program must meet the following criteria to receive
- 223 needs-related payments:
 - 224 ▪ Be unemployed; and
 - 225 ▪ Have ceased qualifying for unemployment compensation or trade readjustment
 - 226 allowance under TAA; and
 - 227 ▪ Be enrolled in WIOA dislocated worker training services by the end of the 13th week after
 - 228 the most recent layoff that resulted in a determination of the worker’s eligibility as a
 - 229 dislocated worker, or, if later, by the end of the 8th week after the worker is informed
 - 230 that a short-term layoff will exceed 6 months; or
 - 231 ▪ Be unemployed and did not qualify for unemployment compensation or trade
 - 232 readjustment assistance under TAA and be enrolled in dislocated worker training
 - 233 services.

234 **Needs-Related Payment Levels:**

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- Adult WIOA clients must have an individual determination of a client’s payment and the amount of such payment shall be based upon the results of the objective assessment and recorded in the IEP.
 - Adult WIOA clients may not exceed the greater of the following levels for needs-related payments:
 - The applicable weekly level of the unemployment compensation benefit, for the clients who were eligible for unemployment compensation as a result of the qualifying dislocation; or
 - The poverty level for an equivalent period for clients who did not qualify for unemployment compensation as a result of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income.
 - Youth clients must have an individual determination of a client’s payment and the amount of such payment shall be based upon the results of the objective assessment and recorded in the ISS.
 - Youth WIOA clients may not exceed the greater of the following levels for needs-related payments:
 - The applicable weekly level of the unemployment compensation benefit, for the clients who were eligible for unemployment compensation as a result of the qualifying dislocation; or
 - The poverty level for an equivalent period for clients who did not qualify for unemployment compensation as a result of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income.
 - Dislocated Worker WIOA clients may not exceed the greater of the following levels for needs-related payments:
 - The applicable weekly level of the unemployment compensation benefit, for the clients who were eligible for unemployment compensation as a result of the qualifying dislocation; or
 - The poverty level for an equivalent period for clients who did not qualify for unemployment compensation as a result of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income.
 - Needs-related payments may be provided if the client has been accepted in a training program that will begin within 30 calendar days.

267 **Unallowable Needs-Related Payments:**

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- Needs-related payments may not be provided in the following circumstances:
 - In a period where the client is employed;
 - The client is enrolled in or receiving on-the-job training;
 - The client is receiving supportive services out-of-area job search allowances and/or relocation allowances; or
 - The client is receiving Trade Readjustment Allowances or Basic Readjustment Services in WIOA.

275 **Supportive Services and Needs-Related Payments During Follow-Up:**

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- Supportive services payments may not be paid to an adult or dislocated worker client during follow-up.
 - Limited supportive services may be paid for a youth client during follow-up as appropriate to retain or regain employment.
 - Needs-related payments may not be paid to a client during follow-up.

281 **Administrative Requirements:**

- 282 • The WIOA program manager(s) shall provide technical assistance to case managers in providing
283 supportive services to clients.

284 **Funding:**

- 285 • Funding for supportive services is provided by the programs in which they are enrolled. The WIOA funds
286 must be allocated to service providers on the basis of the formula prescribed by the Governor that
287 distributes funds in a manner that addresses the WIOA client needs.

288 **Monitoring and Evaluation:**

- 289 • A formal monitoring will be conducted by the entity designated by SWIB. The monitor will evaluate
290 program manager(s) as well as the service provider administering the supportive services and program.

291 **References:**

- 292 • [Verification of Rent Form-Form number WIOA.39](#)
293 • [Direct Participant Payments Form - Form number WIOA.20](#)
294 • [20 CFR 680 Part G Supportive Services](#)
295 • [WIOA Section 3 \(59\) and Section 134 \(d\) 2-3](#)
296 • [TEGL 19-16 Adult and Dislocated Worker Services](#)