



ANNE ARUNDEL  
WORKFORCE DEVELOPMENT  
CORPORATION

Policy Memorandum 2019-05

**Supportive Services – Effective April 1, 2019**

**INTENDED AUDIENCE:** AAWDC staff who are involved in the management and approval of the supportive services available to participants through AAWDC.

**SUBJECT:** Supportive services to clients for the purposes of providing access to career services, training, and temporary support in employment

**EXPIRATION:** N/A

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**CANCELLATIONS**

This policy supersedes and replaces any local conventions in effect by AAWDC initiatives or administrative offices.


**STANDARD OPERATING PROCEDURES**

Supportive Services Approval Process  
Supportive Services Reporting for non-MWE Initiatives

**FORMS**

Supportive Services Request Form  
Incentives Declaration Form

**Approvals**

 President and CEO, AAWDC

## ***General Information***

Supportive services payments are an important element in the workforce entry and re-employment strategies utilized by the Anne Arundel County Local Workforce Development Board and the Anne Arundel Workforce Development Corporation (AAWDC). These payments are intended to provide participants with assistance beyond career and training services to achieve success. The goal of supportive services is to remove or mitigate barriers that would adversely impact employability and the attainment of self-sufficiency. Supportive services may be used to support career and training services for participants in any AAWDC initiative.

## ***Supportive Services Eligibility***

In accordance with the requirements of the grantor, supportive services may be provided to eligible participants as funding allows. Supportive services are based on financial need and participants are not automatically entitled to supportive services funds. Provision of supportive services is dependent upon funding availability which may change.

Supportive services may be provided to eligible participants who:

1. Are enrolled in an AAWDC initiative and actively engaged in career and/or training services, or
2. Have exited and need post-program supportive services as a follow-up service.

Case management staff will assess individuals for supportive services eligibility. As part of the assessment process, staff will determine a participant's need for supportive services and appropriate resources. The employment plan must document supportive services needed to address barriers to the participant's employment and training goals. Participants must be actively engaged and complying with program regulations and policies during the period supportive services are requested. Per TEG 19-16, supportive services cannot be provided on their own and will not enable participation in or extend exit in any initiative.

Participant files must adequately document that all supportive services are allowable, reasonable, justified, and, when feasible, not otherwise available to the participant.

## ***Limitations***

The maximum cap on supportive services is \$2,000 for the duration of the participant's enrollment. In extraordinary cases, the Initiative Director may decide that circumstances warrant additional spending. In these situations, the Director may authorize additional supportive services. Authorization to increase the supportive services limit above \$1,000 must be documented in case notes and the participant's file.

Supportive services cannot be used to pay participant's fines, penalties, taxes, interest, child support, parking/moving violations, bail, restitution, or for entertainment.

## ***Allowable Types of Supportive Services***

To categorizing and defining participant supportive services limitations, AAWDC recognizes the following types of allowable supportive services:

1. **Emergency Assistance** – A participant may receive Emergency Assistance during the participation period if it is determined that the individual is at risk of losing shelter, facing malnourishment, or having essential utilities disconnected. When emergency assistance is provided, there must be a reasonable expectation that the assistance will resolve the situation; for example, if rent is paid for one month, there must be a reasonable expectation that the individual will obtain the resources to pay rent for the following months. Emergency assistance will only be issued once individuals have applied for all emergency assistance programs for which the participant is eligible. If a participant is not deemed eligible for emergency assistance programs, AAWDC can provide limited assistance through supportive services funds as described below:
  - a. **Food Assistance** – Food assistance is available for participants whose monthly family food budget is greater than 13% of the family's total monthly net income (meaning income after taxes and deductions, also called "take-home pay") and the family's total annual income is not self-sufficient (see current *Self-*

*Sufficiency and Underemployment Policy*). Food assistance will be provided in the form of grocery cards. Participants who live alone are eligible for a \$25 grocery card per week up to 10 weeks. Participants living with their spouse and/or their children (biological, adopted, step, grand) are eligible for a \$50 grocery card per week up to 10 weeks.

- b. **Health Care and Medical Services** – These services are generally of a one-time nature, such as prescription drugs, prescription eyeglasses, immediate dental care, and mental health care which are needed to enable an individual to participate in activities. On-going medical issues may be eligible if approved in advance by the Initiative Director.
- c. **Housing** – Housing assistance includes one-time supportive services payments for rent or mortgage assistance. The participant should have a plan for how they plan to fund the following month's housing. When supportive services funds are used to pay this expense, documentation must be in the participant's file that verifies the address and rental amount. Documentation for new housing may be a signed copy of the rental or lease agreement or when there is no rental or lease agreement between the participant and the landlord, service providers may use a Verification of Rent form signed by the lessor that lists the lessee's rent amount, period of lease, address, and the landlord's federal ID# or social security number. Documentation of current rent or mortgage assistance may be a letter from the lessor identifying delinquency. Documentation must be in the participant's file. AAWDC shall pay the landlord directly after third-party verification.
- d. **Utilities** – Participants should be referred to Community Action Agency for assistance. If after referral, the participant is deemed to be not eligible for utility assistance or utility assistance is insufficient, AAWDC will make a one-time payment for the remaining balance. Documentation must include the current utility bill showing the delinquent amount and detailing all charges. AAWDC will pay the amount due after utility assistance, minus any fees, penalties, and interest. The participant should have a plan for how they plan to fund the following month's utility payment. AAWDC shall pay the utility company directly after third-party verification.

2. **Employability and Training Assistance** – A participant may receive Employability and Training Assistance during participation, provided that the support is determined necessary to: a) facilitate or continue participation, b) maintain or increase employability, and/or c) assist with meeting emergency needs. When such assistance is provided, there must be a reasonable expectation that the assistance will allow the participant to complete training and/or obtain employment within short order. Assistance may include, but is not limited to, clothing, transportation assistance, grooming services, personal vehicle repair/maintenance, required medical and background services, and assistance with job search resources.

- a. **Transportation Assistance** – AAWDC may provide transportation assistance to participants for them to participate in training activities or initial employment. In the case of initial employment support, participants may receive transportation through their first pay check.
  - i. *Direct Transportation Assistance* – Direct assistance may be provided in the form of bus passes, trip tickets, or gas cards. In all cases, AAWDC will utilize the most cost-efficient method to assist the participant as long as the method does not impose a substantial burden on the participant. For example, if bus passes are less expensive than gas cards, AAWDC may choose to issue a bus pass, even though the participant has access to a vehicle.

Public transit user, including those using ride-hailing services (such as Uber), may receive bus passes, trip tickets, tokens, or similar device to enable a participant to travel between the participant's residence and the training or employment location. The device issued to the participant will be based upon the length of training and the principle of cost-efficiency.

For drivers, AAWDC will supply gas cards based upon the mileage traveled. Mileage is based upon the shortest route between the participant's residence and the training or employment location as calculated by Google Maps multiplied by the federal mileage reimbursement rate. Gas cards are purchased in increments of \$25 and participants will be issued a gas card for the nearest increment (rounding down, where necessary).



Regardless of the method used, the maximum allowable payment for direct transportation assistance is \$100 per week.

- ii. *Personal Vehicle Repair*– Personal Vehicle Repair may be provided in circumstances where a participant's personal vehicle is unable to drive to training or employment facilities. AAWDC will only repair vehicles that are titled to the participant and for which the participant can provide proof of insurance. Documentation must be provided with three quotes for service with a maximum allowance of \$1,000 for repair per participant. Vehicle repairs are intended to make the vehicle drivable only and are not intended to pay for the routine costs of vehicle ownership, such as oil changes or routine maintenance.
- b. **Child Care Assistance** – Child care assistance is a supportive service provided to participants if it is determined that without it a participant will not be able to participate in services or transition to employment. Participants in need of child care must first apply for Maryland State Department of Education Child Care Subsidy program. If after referral, the participant is deemed to be not eligible for assistance or assistance is insufficient, child care assistance will be provided at no more than the rate charged by the provider subject to the maximum allowable rate of \$40 per day not to exceed \$200 per week.

Child/dependent care services shall be paid to a licensed vendor. Child care assistance shall be provided to participants with children age twelve years or younger, or a spouse or parent, residing at the same address as the participant, who is physically or mentally incapable of self-care. Assistance will not be provided when a competent adult (over the age of 18 years) residing at the same address as the participant is available to provide childcare. If the need is part-time, then paid assistance will be evaluated on a case-by-case basis if there is a competent minor in the house over age 13. Any in-home child care assistance (i.e. babysitting) must be approved in advance by the Initiative Director.

Child care agreements shall be authorized for a maximum of ten weeks and can be renewed, if needed (the need must be documented in case notes) and no other support assistance is available. Payment will be made to the vendor and based on participant attendance; the applicable rate will be paid for each day of participation. If the participant is absent, child care assistance will not be paid. Requests for child care payments will coincide with the submission of attendance reports. Program staff will review and endorse timesheets to verify the accuracy of the participant's request for child care payments for training and work-based activities. Participants will be encouraged to make child care arrangements that they can afford when supportive services terminate.

- c. **Medical Services** – These services are directly related to employment or training outcomes, and include medical services necessary to successfully complete training, gain licensure or certification, or obtain employment. Services include a physical examination or drug testing for employment purposes.
- d. **Tools** – Tools may be purchased for participants if the tools are required to continue/be successful in a training program or obtain employment. Career Coaches must determine that the tools are required in advance of purchase and that they cannot be provided by any other source, such as the prospective employer or training provider. Tools become the property of the participant upon satisfactory completion of all AAWDC training activities. If the participant fails to complete the prescribed activity, the tools remain the property of AAWDC.
- e. **Computer Purchases** – The purchase of a refurbished computer may be approved as a required tool. Factors that will be taken into consideration prior to computer purchase approval include but are not limited to: whether the training program includes distance learning and to what degree; whether the participant has reasonable computer access through another source such as a computer lab on campus or at a public library; and whether the participant has a lengthy commute to obtain computer access. Participants may not be eligible for computers if they already have a computer in the home. For further guidance, contact the Office of Research, Performance, and Compliance.



- f. **Internet Services** – Payment of internet services is considered an allowable expense for participants who must have internet access for distance learning. There may be other circumstances where internet payments are an allowable expense. In those circumstances, case managers should request approval from their program director prior to making internet payments. Internet payments may be made on behalf of the participant while they are actively participating in distance learning on a month-to-month basis. It is not intended that AAWDC will pay for Internet Service the participant already had just because he or she is participating in distance learning. In this case, it will be considered for payment only in cases of hardship and that the service will be turned off during the distance learning period for nonpayment. Active attendance in training is required for continued internet payments.
- g. **Supportive Services Other** – Other supportive services may be provided as needed. Such goods and services should be reasonable and necessary for the participant to remain in training and/or obtain or retain employment. These services may include, but are not limited to:
- i. Haircuts, personal grooming and hygiene needs;
  - ii. Bonding and liability insurance for employment;
  - iii. Work clothing (includes clothing for interviews);
  - iv. Financial counseling or assistance;
  - v. Application fees;
  - vi. Union dues or industry membership fees;
  - vii. Certification testing fees; and
  - viii. Auxiliary aides and services for participants with disabilities.
3. **Incentive Payments** – Incentive payments are available to certain initiatives. Since incentive payments are defined as participant support costs under 2 CFR 200.75, initiatives must receive prior approval from the grantor. Through this Memorandum, prior approval has been given to the following initiatives:
- Title I Youth (In-school and Out-of-school)
  - Title I Adult
  - Title I Dislocated Workers

Incentive payments are allowable for recognition and achievements directly related to training activities and work experiences. The incentives must be tied to milestones of the specific training program and must be outlined in writing prior to start of the program. Incentives shall not be utilized as motivators to encourage recruitment, submission of eligibility documentation, or initiative participation. Incentive payment must meet the following guidelines:

- a. Payments will be issued in the form of gift cards. Gift cards cannot exceed \$50 in value.
- b. Payments will be issued after verification of milestone achievement.
- c. Incentive payments count against supportive services cap.
- d. If incentive payments are to be used, the requirements must be disclosed to the participant prior to the start of training. A separate declaration form should be used for this purpose.

### ***Performance Accountability***

The Office of Research, Performance and Compliance (RPC Office) at AAWDC has established the following standards for performance accountability:

- 1. Where case notes are required, such notes shall be entered into the Maryland Workforce Exchange (MWE) or other approved reporting system and hard copy placed into the participant's file.
- 2. The maintenance of adequate documentation to ensure accuracy of supportive services eligibility and usage. Such information shall include:
  - a. Request for supportive services form, along with approval of request by Program Director or designee;
  - b. Proof (in the form of case notes) demonstrating that program staff, vendors, and/or contractors have attempted to use other resources before supportive services dollars are requested;

- c. Records of all supportive services payments, including date of check/payment, amount of payment, to whom the payment was issued, and check or voucher number. This item (c) will be recorded by Fiscal into the Individual Cost Spreadsheet by end of the day in which they mail the check to the vendor (or, in rare cases when specifically approved as a reimbursement to the participant, to the participant). Fiscal will keep the only copy of the check.
  - d. Supporting documentation, such as payroll receipts, redeemed checks or vouchers, or travel log;
- 3. Signature and dates of signatures for the applicant must be signed in ink.
  - 4. All data related to supportive services must be entered into the MWE within fourteen (14) days of eligibility verification. Each local area will maintain a master case file for monitoring purposes.

### ***Reporting and Monitoring***

The RPC Office will utilize the reporting capabilities of the MWE to monitor supportive services. At its discretion, the Office of Research, Performance, and Compliance reserves the right to conduct on-site monitoring of participant files and program elements to verify compliance with the conditions of the WIOA initiative and the policies and procedures described herein all will request any needed copies of the check themselves directly from Fiscal.