

PASSAIC COUNTY WORKFORCE DEVELOPMENT BOARD

Subject: WIOA Title I Supportive Services

Effective Date: 05/08/26

PURPOSE

The primary purpose of WIOA Title I Supportive Services is to provide the necessary assistance to enable individuals to participate in authorized career and training activities. These services address non-academic barriers including but not limited to transportation, childcare, or equipment needs that might otherwise prevent a participant from successfully entering or remaining in the workforce.

POLICY

The policy addresses the use and documentation of Workforce Innovation and Opportunity Act funds for supportive services to eligible participants enrolled in WIOA Adult and Dislocated Worker Individual Training Account (ITA) candidates, as well as those being considered for work-based learning opportunities.

The WDB adopts and implements the following federal and State of New Jersey NJDOL policies and procedures on use of funding for supportive services.

Federal WIOA Framework

Federal regulations under 20 CFR Part 680 Subpart G establish the baseline requirements for supportive services:

- **Eligibility:** Services are only available to individuals actively participating in career or training services who are unable to obtain support through other programs.
- **Necessity:** Support must be deemed essential for the individual to participate in WIOA-funded activities.
- **Allowable Costs:** Includes transportation, childcare, housing assistance, needs-related payments (only for those in training), and work-related tools/attire.
- **Local Authority:** Local Workforce Development Boards have the authority to set their own limits on the amount and duration of these services.

New Jersey State Policies

New Jersey operates under the NJ Workforce Innovation Notice (NJWIN) 10-16(A), which emphasizes flexibility for local boards while maintaining strict documentation standards.

- **Priority of Resources:** If a participant is eligible for supports through other state programs such as Work First New Jersey (WFNJ), TANF, or SNAP then those funds must be used first.
- **Individual Employment Plan (IEP):** All supportive service payments in NJ must be tied directly to a goal identified in the participant's IEP or Individual Service Strategy (ISS).
- **Payment Methods:** Standard disbursement methods in NJ typically include gift cards, direct transportation payments, or checks made directly to vendors; reimbursements are often used only after the service is documented.

WDB Requirements for Supportive Services Implementation

Supportive Services are available for WIOA Title I Adult and Dislocated Worker programs. WIOA supportive services are governed by a "secondary source" policy, meaning federal and New Jersey laws require that the funds only be used when all other community resources have been exhausted.

Supportive services are services that are reasonable and necessary to enable a participant to take part in other services and activities related to their Employment Plan. Supportive services should not duplicate a service a participant could receive from another program in the community. If possible, it may be applicable to cost share with other Subrecipients. Supportive Services are not intended to meet every need of the participant. Rather, they provide temporary assistance. For this reason, staff should assist the participant in developing a plan to cover the supported costs once WIOA Title I funds are no longer appropriate for the individual. This plan must be documented and retained in the participant's file.

Supportive services may only be provided to participants when it is necessary to enable individuals to participate in services and is tied to a specific service. Such needs are typically identified through the objective assessment process and outlined in the Individual Employment Plan (IEP). Supportive services are payments made to or on behalf of eligible participants for one-time or temporary services required to support the IEP. WIOA Title I will only pay for expenses incurred while a participant is enrolled in the program and actively participating in activities authorized under WIOA. Supportive Services are not intended to assist in paying for expenses refundable to the participant.

All Supportive Services must be approved in advance by the Subrecipient's Case Manager. As a part of the objective assessment process and development of the IEP, determination of a participant's need for Support Services and appropriate community resources and referrals.

Funding Requirements and Services

The WDB establishes the funding caps and length of time for support. Award of Supportive Services is determined on an individual participant basis.

Funding Cap and Length of Time for Support

For individuals participating in workforce programs supportive services are governed by local and state Workforce Innovation and Opportunity Act policies. These services are designed to remove financial barriers that prevent participants from completing training or maintaining employment.

State guidance allows local boards flexibility in determining the cap for standard WIOA supportive services therefore the WDB has not established a funding cap.

The duration of supportive services is generally tied to the participant's active involvement in career or training services:

- Duration of Enrollment: Services are available for the entire length of a participant's enrollment in WIOA Title I activities.
- Follow-up Services: Once an individual completes their program and enters employment, they are eligible for 12 months of follow-up services to ensure job retention.
- Waiting Periods: Needs-related payments can be provided while a participant is waiting for training to start, provided the classes begin within 30 calendar days.

Eligibility or enrollment in WIOA does not constitute entitlement to Supportive Services. Supportive Services are based on availability of program funds. A request for additional funds beyond the maximum limit per program year may be submitted by providing the justification and reasoning to the WDB. Approved exceptions must be noted.

Partner Responsibilities

Partners and subrecipients shall accept unconditional fiduciary responsibility for issuing federal funds on behalf of the WDB as specified in this policy, and as written in their current contract. The appropriate checks and balances must be established and utilized to guarantee the integrity of the supportive services funding. Systems must be in place for the

review, approval, and payment of supportive services pursuant to current WIOA and federal and State regulations, directives, policies and procedures. Expenditures shall be tracked in AOSOS and this information shall be kept by means of a hardcopy participant file. All supportive services payments and collection of back-up documentation (i.e. sufficiently detailed receipts, mileage logs, etc.) will be the sole responsibility of the partner or subrecipient.

Separation of Duties

Duties of staff dispersing supportive service payments must be separated so that no one individual has complete authority or control over an entire financial transaction. For example, the person conducting the assessment, the person processing the payment and if a payment is mailed, the person mailing out the check shall not be the same person. Participant records (IEP, case notes, and worksheets) and subrecipient financial records, pertaining to supportive service payments, must be made available for review by monitors, as well as must meet financial management standards.

Supportive Services and Payment Procedures

WIOA funded supportive services will only be issued when all other non-WIOA funded resources have been exhausted or if untimely delivery of other services would create a hardship for the participant. Participants must be referred to other community-based organizations and or resources as the first means of supportive services. Gift cards, transportation payments and checks made out to vendors are the only allowable forms of disbursement. Partners and subrecipients will be reimbursed for gift cards, transportation payments and vendor checks after the supportive services have been distributed to the participant. Detailed original receipts for each individual supportive service and a log must be kept of all inventory of purchased supportive services items. A tracking report what has been distributed to the participant must be kept. The WDB will not reimburse for any unused inventory or receipts not meeting federal and State requirements. All records are subject to monitoring and file review. Failure to comply with this requirement will result in corrective action and/or disallowed costs.

Distribution and Documentation of Supportive Service

When the supportive service is distributed the following documentation is required.

- Enter the appropriate activity code for the Supportive Service provided
- The case note must include the following information: Type of supportive service received; Amount of supportive service received and balance; Type of WIOA Title I Adult/DW Activity for which supportive services was used; Exhausted all free and

low-cost resources to provide supportive services; Funding source (WIOA, non-WIOA, Youth Build, In-Kind, etc.)

The following documentation must be included in the participant's file:

Supportive Services Log and Receipt Form

The Supportive Services Log & Receipt Form is a standard compliance document used to track assistance provided to participants.

Purpose & Usage

- **Documentation of Aid:** It serves as a formal record of supportive services—such as transportation assistance, tools, or uniforms—issued to a participant to enable their continued training or employment.
- **Participant Agreement:** By signing, the participant acknowledges receiving the service and agrees to provide itemized receipts for any purchases made (e.g., via a gas card).
- **Compliance Requirement:** Failure to return required receipts can result in the suspension of additional supportive services.

Components

The form typically requires the following details for each service entry:

- **Service Type:** Specific category of assistance (e.g., "Transportation," "Emergency Housing," or "Work Attire").
- **Amount:** The exact value of the service or voucher provided.
- **Funding Source:** Identification of the program budget used (e.g., WIOA Title I Adult/Dislocated Worker).
- **Signatures:** Acknowledgments from both the participant and the service provider staff

Documentation of Aid

Copy of each gift, gas card (front and back) or other type of card with serial number visible, itemized receipt with date, purchase amount per card, payment detail, serial number and total payment.

Copy of the determination of distance of Mileage/Travel, copy of the determination of distance, such as MapQuest, is kept in the file; for ride share payment the receipt with

date, times, travel details, purchase amount, payment detail and total payment. The client mileage/travel log may be completed by the participant and returned to the Supportive Services provider within 30 days.

If payment is made to the participant in advance of the purchase either through gift card or other type of card, the participant must provide an itemized receipt to the supportive service provider once the purchase is completed, and the itemized receipt must then be included in the participant's file. This includes purchase receipts from the use of gift cards and/or gas cards. If not returned, no additional supportive services may be provided. If the participant fails to return the receipts for the supportive services provided in full, contact the participant requesting the missing receipts and explain that no further supportive services will be provided until the missing receipts are received in full. If the receipts are not provided, send a follow-up letter or email within five (5) business days to the participant requesting the receipts and notifying the participant that no further supportive services will be provided until all receipts are received. A copy of this letter or email must be kept in the participant's file.

Passaic County Supportive Services Procedure for Determining Eligibility

The procedure implements the approved WDB policy and aligns with federal and NJDOL guidance.

1. Passaic County One-Stop Career Center staff will verify and document eligibility for supportive services/transportation payments by:
 - Applicant interviews
 - Review of supportive services payment requests and documentation submitted by customers.
 - List of documents collected for supportive services:
 - Identity and Citizenship
 - Photo ID: A valid state driver's license, state ID, or U.S. passport.
 - Social Security: Your original Social Security card or a Social Security benefit letter.
 - Proof of Birth: A certified U.S. birth certificate or Consular Report of Birth Abroad.
 - Immigration Status: If applicable, a Permanent Resident Card (Green Card) or Employment Authorization Document (Form I-766).

- Income and Financial Need
 - Employment Income: Your most recent consecutive pay stubs (usually covering the last 3 months) or a signed letter from your employer.
 - Public Benefits: Benefit statements for SNAP, TANF, SSI, or SSDI.
 - Tax Records: Your most recent federal, state, or Tribal tax returns and W-2 forms.
 - Banking: Recent statements for all checking and savings accounts.
- Residency and Household Details
 - Proof of Address: A current lease, rental agreement, or a utility bill (gas, electric, or water) in your name.
 - Household Composition: Birth certificates for children, marriage certificates, or court-ordered custody paperwork.
 - Emergency Notices: If applying for eviction prevention, bring your past due rent notice or formal eviction papers.
- Contacting partners and local entities to document that the non-WIOA funded supportive services are not available, and coordinating with other entities to ensure non-duplication of resources and services.
- Referencing LOOPS data to identify Unemployment Insurance recipients.
- Referencing OMEGA data to identify Work First New Jersey recipients

2. Adult, Dislocated Worker and Youth customers will receive:

- A monthly three-zone bus card, if eligible

Customers receiving Unemployment Insurance will not receive travel payments. Welfare recipients will not receive travel.

3. Transportation services will be made to customers in work experience, training and taking training-related certification tests only.

4. Passaic County One-Stop Career Center MIS staff will consult LOOPS to determine if training customers are receiving unemployment benefits. The staff will rely on customer self-attestation to determine receipt of benefits from TANF/GA or other sources.

Customers determined to be receiving benefits from other sources will not receive supportive services/transportation payments.

5. Trainees whose academic progress and attendance are reported as satisfactory by their training institutions will receive supportive services/transportation payments.

6. Passaic County One-Stop MIS staff will review applicant data for WIA/ARRA program eligibility. The Passaic County One-Stop Career Center system counseling supervisor will determine and document customer eligibility for supportive services/ transportation payments. ETS counselors will ascertain customer training attendance and academic progress by review of progress reports from training entities. The Passaic County fiscal department will review payment requests for completeness and accuracy. The customer's Individual Employment Plan and the corresponding America's One-Stop Operating System (AOSOS) record will be updated to reflect the eligibility determination on services received.

Limits on the amount and duration of supportive services and exceptions will be followed as described in the WDB policy.

The Passaic County Workforce Development Board will rely on the process described in the policy to prevent fraud. Suspected fraud will be immediately reported to the Passaic County Prosecutor's Office and the New Jersey Department of Labor and Workforce Development.

Needs Related Payments

Under the Workforce Innovation and Opportunity Act (WIOA), Needs-Related Payments (NRP) are a specialized form of supportive service that provides direct financial assistance to participants so they can afford to participate in training. The federal policy for Needs-Related Payments (NRP) is established under 20 CFR §§ 680.930-680.970, which defines them as financial assistance to enable individuals to participate in training. The New Jersey Department of Labor integrates these federal standards into its state policy, specifically NJWIN 10-16(A), requiring local boards to establish documented internal controls and payment limits. In New Jersey, the financial analysis is governed by NJWIN 10-16(A), the NJ Training Support Analysis Form and the local workforce board policies.

Federal Eligibility Standards

Federal regulations mandate the following basic criteria for all participants:

- **Training Enrollment:** Must be enrolled in a WIOA Title I training program or accepted into one starting within 30 calendar days.
- **Unemployment:** Must be currently unemployed.

- **Benefit Status:** Must not qualify for, or have already exhausted, Unemployment Insurance (UI) or Trade Readjustment Allowances (TRA).

NJDOL State and Local Requirements

NJDOL policy NJWIN 10-16(A) grants the Workforce Development Board the authority to provide NRPs, but they must follow strict procedural guidelines:

- **Last Resort Funding:** WIOA funds can only be used if the participant is unable to obtain similar services through other programs like Work First New Jersey (WFNJ).
- **Local Policy Elements:** Each NJ local area that offers NRPs must explicitly address:
 - Maximum limits per participant.
 - How payment levels are determined.
 - Attendance and academic standards required for payments to continue.
 - The specific number of hours or credits a participant must be registered for.

Eligibility Requirements

Unlike general supportive services, NRPs have strict federal and local eligibility mandates:

- **Training Enrollment:** Recipient must be enrolled in a training program under WIOA Title I or accepted into one starting within 30 calendar days.
- **Unemployment Status:** Recipient must be currently unemployed.
- **Exhausted Benefits:** Recipient must either not qualify for or have completely exhausted Unemployment Insurance (UI).
- **Attendance Tracking:** Recipient must maintain satisfactory progress and submit verified attendance records (e.g., instructor-signed timesheets) to receive payments.

Payment Limits and Determination

The amount awarded determined by the Workforce Development Board based on available funds and documented financial need.

- **Adult Participants:** Payments cannot exceed the federal poverty level for an equivalent period, adjusted for family income.
- **Dislocated Workers:** The weekly payment generally cannot exceed the weekly benefit amount previously received from Unemployment Insurance.

- Local Cap: The limit is set by the WDB and aligns with federal and State requirements.

Eligibility Determination

The following documentation is required:

1. The Financial Analysis (Statement of Need) is a mandatory evaluation used to determine if a participant qualifies for Needs-Related Payments under WIOA. It documents that the individual cannot afford to participate in training without direct financial aid.

Core Components of the Analysis

A valid statement of need must objectively compare resources against obligations:

2. Total Monthly Income: Includes all current and prospective household income, such as TANF, SNAP, Pell Grants, and any remaining UI benefits.
3. Total Monthly Expenses: Costs essential for training participation, such as housing (mortgage/rent), utilities, food, and childcare.
4. Net Income Calculation: The final "bottom line" (Income minus Expenses) determines the specific dollar amount of your financial gap.
5. Pell Grant Coordination: If you receive a Pell Grant, WIOA funds are typically applied to tuition first, while the Financial Analysis justifies using Pell funds for non-tuition costs like transportation.
6. Last Resort Proof: The analysis must prove you have exhausted all other community resources and funding streams before WIOA pays out.
7. Formal Attestation: Applicant must sign a form acknowledging that providing false financial data is grounds for immediate termination and potential repayment.
8. AOSOS Documentation: Case managers must upload this analysis in the AOSOS database to verify eligibility.

POLICY REVISION

The WDB Workforce Innovation and Opportunity Act (WIOA) policies are reviewed and amended annually by the WDB to remain in compliance with all federal mandates and state-level policy changes issued by the New Jersey Department of Labor and Workforce Development. Local partners are notified of all changes to WDB policies.