

SECTION 6 – SUPPORTIVE SERVICES, NEEDS RELATED PAYMENTS, AND INCENTIVES

6.1 Purpose

This section establishes uniform standards governing the approval, documentation, and oversight of supportive services, needs related payments, and participant incentives across all workforce programs administered or overseen by the New River/Mount Rogers Workforce Development Board.

The purpose of this section is to:

- Ensure services are necessary and reasonable
- Ensure costs are allowable under 2 CFR Part 200
- Ensure payments are supported by documentation
- Prevent duplication of benefits
- Protect against fraud, waste, and abuse
- Align programmatic authorization with fiscal controls

All payments and disbursements are governed by the Financial Management and Procedures Manual. Nothing in this section authorizes payment inconsistent with that Manual.

6.2 General Standards for Participant Financial Assistance

Participant financial assistance may only be provided when:

- The individual is officially enrolled in the applicable program
- The need is documented in the Individual Service Strategy or case notes
- The service is necessary to enable participation
- The cost is reasonable and allowable
- Funds are available within the program budget
- The service is approved prior to obligation

Participant assistance is not an entitlement and may be limited based on funding availability.

Only staff authorized by the Workforce Development Board may approve supportive services, incentives, or needs-related payments. Authorization levels and approval procedures must comply with the Financial Management and Procedures Manual.

6.3 Supportive Services

Supportive services are services necessary to enable participation in education, training, or employment activities.

Supportive services funded with WIOA resources shall be considered last payer of resort and may only be provided when other public or community resources are unavailable or insufficient to meet the participant's documented need.

Supportive services may include, but are not limited to:

- Transportation assistance
- Childcare
- Required tools or uniforms
- Testing and licensing fees
- Required books and training materials
- Housing-related emergency assistance
- Other services determined necessary for participation

Supportive services must:

- Be directly linked to participation
- Be documented prior to payment
- Not duplicate services available through other resources

Where alternative resources are available, referral should be considered prior to expenditure of program funds.

6.4 Documentation Requirements for Supportive Services

Staff must document reasonable efforts to determine whether the participant is receiving similar assistance from another federal, state, or community program to prevent duplication of benefits.

Each supportive service must include:

- Documented statement of need or case note justification
- Description of service provided
- Cost documentation (invoice, bill, quote, etc.)
- Approval by authorized staff

- Proof of payment
- Confirmation of receipt when applicable

Vendor payments should be made directly whenever possible.

Cash payments to participants should be avoided unless expressly permitted and documented.

All documentation must be retained in the participant file and fiscal records.

6.5 Needs Related Payments (Where Applicable)

Needs Related Payments (NRPs) may be provided in programs where authorized by statute or regulation.

Needs Related Payments must:

- Be allowable under the governing funding source
- Be tied to active participation in training
- Be calculated using documented eligibility standards
- Be supported by attendance verification

Eligibility for Needs Related Payments must be documented prior to issuance.

Payment calculations must be retained in the participant file.

6.5.1 Needs-Related Payment Eligibility

Needs Related Payments may be provided to eligible participants who:

- Are enrolled in WIOA Title I Adult or Dislocated Worker programs, where authorized
- Are actively participating in approved training services
- Demonstrate financial need through documented income verification
- Are not receiving unemployment compensation or other wage replacement income sufficient to meet basic needs

Eligibility and continued participation must be verified through training attendance documentation and case management review.

Needs Related Payments may only be provided while the participant is actively engaged in approved training activities.

6.5.2 Needs-Related Payment Calculation

Needs Related Payments shall be calculated on a weekly basis based on verified training participation and documented financial need.

Payments must be prorated based on verified participation and attendance in training activities.

Adult Participants

Weekly payment shall not exceed the equivalent of the participant's weekly unemployment compensation amount if eligible, or \$300 per week, whichever is lower.

Dislocated Worker Participants

Weekly payment shall not exceed the participant's most recent unemployment compensation weekly benefit amount.

Where unemployment compensation data is unavailable, the weekly payment shall not exceed \$400 per week.

All calculations must be documented using a Needs-Related Payment Calculation Worksheet and retained in the participant file.

6.5.3 Needs-Related Payment Limits

To ensure fiscal sustainability and equitable distribution of resources, the Workforce Development Board establishes the following limits:

Maximum weekly payment:

Adult Participants: \$300 per week

Dislocated Worker Participants: \$400 per week

Maximum cumulative NRP during a single training enrollment: \$5,000

Payments must be prorated based on verified training attendance.

Requests exceeding established limits require written justification and Executive Director approval.

6.6 Incentives

Incentives may be provided to participants when permitted by the funding source and when tied to documented achievements that support progress toward education, training, or employment goals.

Incentives must:

- Be tied to achievement of specific milestones
- Be aligned with program performance goals
- Not be tied to entitlement or guaranteed participation
- Be applied consistently across participants
- Be documented and approved prior to issuance
- Comply with federal and Virginia Works guidance

Examples may include recognition for:

- Credential attainment
- Attendance benchmarks
- Academic achievement
- Completion of training milestones
- Completion of work readiness training
- Successful employment placement

Standard Incentive Amounts

Achievement	Incentive Amount
Attendance milestone	\$25
Completion of work readiness training	\$50
Academic achievement or measurable skill gain	\$75
Completion of occupational training	\$100
Industry-recognized credential	\$100
Employment placement	\$150

Maximum cumulative incentive amount per participant: \$1,500

Exceptions require Executive Director approval.

6.6.1 Prohibited Incentives

Incentives must directly support engagement in education, training, or employment activities.

The following are not allowable incentives:

- Movie theater tickets
- Concert or sporting event tickets

- Entertainment venue gift cards
- Alcohol or tobacco items
- Lottery-related items
- Cash payments

Gift cards may only be used when tied to allowable purposes such as food, fuel, clothing, or work-related supplies.

6.6.2 Gift Card Internal Controls

When gift cards are used, the following internal controls must be followed.

A Gift Card Distribution Log must include:

- Date of purchase
- Vendor name
- Gift card number or identifier
- Dollar amount
- Participant name and participant ID
- Program milestone associated with the incentive
- Date issued
- Participant signature acknowledging receipt

Gift cards must be stored in a secure locked location with limited access.

Program managers must periodically reconcile gift card inventory.

Fiscal staff must reconcile purchases with distribution logs.

Missing or unused cards must be reported according to internal financial control procedures.

6.7 Out-of-Area Assistance

Out-of-Area Assistance may be provided when necessary to support participant access to employment, training, or services not reasonably available within the local workforce development area.

Assistance may include transportation, lodging, or other reasonable costs necessary to participate in approved activities outside the local area.

All assistance must be documented and approved prior to authorization.

6.7.1 Eligibility Criteria

Participants may qualify when:

- Required training or employment opportunities are unavailable locally
- Participation supports documented employment goals
- The participant meets program eligibility requirements
- Financial need is demonstrated

Requests must be approved by the Program Manager.

6.7.2 Allowable Assistance

Allowable costs may include:

- Mileage reimbursement
- Transportation assistance
- Lodging for overnight travel
- Meals during extended travel
- Other reasonable travel-related costs

All costs must comply with federal cost principles.

6.8 Prohibited Uses

Participant financial assistance may not be used for:

- Non-program related expenses
- Entertainment
- Fines or penalties
- Luxury items
- Services unrelated to participation
- Duplicate benefits

Questionable expenditures must be reviewed prior to authorization.

6.9 Approval and Segregation of Duties

Supportive services, needs related payments, and incentives must follow layered approval controls:

1. Case manager documents need
2. Program Manager reviews and approves
3. Fiscal staff verify documentation and budget availability

4. Fiscal Agent processes payment

No individual may authorize, process, and reconcile the same transaction.

6.10 Limits and Caps

The Workforce Development Board may establish limits on:

- Maximum assistance per participant
- Frequency of payments
- Types of allowable services

Limits must be applied consistently and documented in internal procedures.

6.11 Supportive Service Limits

Maximum supportive service amount per participant: \$2,500

Standard limits include:

Transportation assistance

Up to \$75 per week

Childcare assistance

Up to \$150 per week

Work tools or uniforms

Up to \$500

Testing or certification fees

Actual cost up to \$1,000

Emergency housing or utility assistance

Up to \$750 per incident (maximum two incidents)

Requests exceeding limits require Executive Director approval.

6.12 Fraud Prevention

Staff shall:

- Verify authenticity of invoices
- Confirm vendor legitimacy
- Avoid conflicts of interest
- Report suspected fraud immediately

Failure to report suspected fraud may result in disciplinary action.

6.13 Monitoring and Quality Assurance

Supervisory staff shall periodically review:

- Supportive service documentation
- Needs related payment calculations
- Incentive approvals
- Alignment between documentation and payments

Unsupported payments must be corrected promptly.

6.14 Record Retention

All documentation related to participant financial assistance must be retained in accordance with:

- 2 CFR §200.334
- Virginia Works guidance
- Grant-specific requirements

Records must remain available for monitoring and audit.

6.15 Food Assistance and Meal Purchases

Food may be provided as a supportive service when necessary to enable participation in workforce development activities.

Food purchases must comply with 2 CFR §200.403–405 and §200.475.

Food purchases are not allowable for routine daily meals unrelated to program participation.

6.15.1 Participant Food Assistance

Food may be provided when:

- Training extends through normal meal periods
- Participants attend program-sponsored workshops
- Food is necessary to support participation

Allowable assistance may include:

- Meal vouchers
- Meals during training events
- Meals during extended program activities

6.15.2 Documentation Requirements

Food purchases must include:

- Documentation of program activity
- Participant sign-in sheets
- Itemized receipts
- Case notes documenting need
- Approval documentation

6.15.3 Staff Meal Purchases

Meals purchased for staff are allowable only when directly associated with approved program activities or travel.

Routine staff meetings or convenience meals are not allowable.

6.16 Duplication of Benefits Verification

Prior to approving supportive services, staff must take reasonable steps to determine whether the participant is receiving comparable assistance from other federal, state, or local programs.

Staff shall document the verification process through case notes, participant self-attestation, or other available documentation.

Supportive services funded through workforce programs may not duplicate assistance available through other programs including, but not limited to:

- Temporary Assistance for Needy Families (TANF)
- Supplemental Nutrition Assistance Program (SNAP)
- Pell Grants or other financial aid for educational costs
- Vocational Rehabilitation services
- Community action or housing assistance programs
- Other publicly funded assistance programs

When alternative resources are available, program staff should make reasonable efforts to coordinate services and refer the participant to those resources before authorizing supportive service expenditures.

Supportive services may be provided when other resources are unavailable, insufficient, or unable to meet the participant's documented need in a timely manner.

6.17 Participant Financial Assistance Verification

Prior to approving supportive services, needs related payments, or incentives, staff must verify that the participant is actively enrolled and participating in program services.

Verification must include confirmation that:

- The participant is actively engaged in approved program activities
- The requested assistance directly supports participation in training, education, employment services, or job placement activities
- The requested service is consistent with the participant's Individual Service Strategy or Individual Employment Plan

When supportive services are tied to training participation, staff must verify attendance or participation prior to issuing payments when applicable.

6.18 Fiscal Coordination and Budget Oversight

Program staff authorizing supportive services must coordinate with fiscal staff to ensure that expenditures remain within available program funding and comply with budget limitations.

Fiscal staff are responsible for:

- Verifying documentation supporting expenditures
- Confirming that sufficient funds are available prior to payment
- Ensuring expenditures comply with federal cost principles and organizational fiscal procedures

Program managers shall periodically review supportive service expenditures to ensure program funds are used responsibly and remain available to serve eligible participants throughout the program year.