



EMPLOY MILWAUKEE POLICY 25-02

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POLICY: 25.02

SUBJECT: SUPPORTIVE SERVICES

ISSUANCE DATE: 11/20/25

EFFECTIVE DATE 11/20/25

REVIEWED DATE: 11/20/25

REFERENCES:

- 20 CFR 680
- 29 USC 3101, Workforce Innovation and Opportunity Act (WIOA), § 3(59), 129(c), and 134(d)
- 2 CFR Part 200, Uniform Administrative Guidance
- United States Department of Labor Training and Employment Guidance Letter (TEGL) WIOA 19-16
- Wisconsin WIOA Titles I-A and I-B Policy and Procedure Manual, Section 8.6
- Supportive Services – Examples and Resource Guide (WIOA)

POLICY SCOPE

- ☒ EMPLOY MILWAUKEE AGENCY
- ☐ WIOA WDA 2 SYSTEM
- ☒ WIOA TITLE I-B PROGRAM(S)
 - ☒ ADULT PROGRAM
 - ☒ DISLOCATED WORKER PROGRAM
 - ☒ YOUTH PROGRAM
- ☒ NON-WIOA PROGRAMS
- ☒ RE ENTRY PROGRAMS

I. BACKGROUND

Funders such as WIOA and DOL require that local Workforce Development Boards (WDBs) develop policies and procedures for the provision of supportive services. These policies and procedures must ensure coordination with other entities to ensure non-duplication of resources and services, establish limits on the amount and duration of such services, and comply with state guidance on supportive services.

II. PURPOSE

To describe the process through which the WDB ensures coordination of resources and services and establishes local limits and procedures for the provision of adult supportive services in Workforce Development Area (WDA) 2.

III. POLICY

The provision of accurate information about the availability of supportive services in the local areas and referral to such activities is a career service that must be provided through EMI program staff or the local One-Stop Delivery System. American Job Center partners in WDA 2 are required through the WDA's Memorandums of Understanding to share information about available services "to support effective delivery of services to workers, job seekers, and employers," WIOA § 101(d)(3)(F). Staff must make fair, consistent, and equitable supportive service determinations and ensure that similarly situated participants have similar supportive services made available to them. Non-WIOA and Re-entry programs share the availability of Supportive Services to grant participants.

A. Eligibility Requirements

1. WIOA Adult – See section B. Required Predecessors.
2. WIOA Adult Needs-Related Payment - in addition to the requirements outlined in Wisconsin's WIOA Titles I-A and I-B Policy and Procedures Manual, Section 8.6.5.1, participants must, at minimum, be:
 - a. unemployed; AND
 - b. not receiving unemployment insurance (UI) benefits or Trade Readjustment Allowances (TRA)

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- because the individual does not qualify or is an exhaustee; AND
- c. enrolled in a training program that has already begun or will begin within 30 calendar days.
- 3. WIOA Dislocated Worker – See section B. Required Predecessors.
- 4. WIOA Dislocated Worker Needs-Related Payment - participants must meet the criteria above and must also:
 - a. be enrolled in a training program by the later of:
 - i. the end of the 13th week after the most recent layoff that qualified them as a dislocated worker; OR
 - ii. the end of the 8th week after they were informed by their employer that a short-term layoff would last longer than 6 months.
- 5. WIOA Youth – See section B. Required Predecessors.
- 6. WIOA Youth Needs-Related Payment – in addition to the requirements outlined in Wisconsin’s WIOA Titles I-A and I-B Policy and Procedures Manual, Section 8.6.5.1, participants must, at minimum, be:
 - a. unemployed; AND
 - b. not receiving unemployment insurance (UI) benefits or Trade Readjustment Allowances (TRA) because the individual does not qualify or is an exhaustee; AND
 - c. enrolled in a training program that has already begun or will begin within 30 calendar days
- 7. Non-WIOA - there are no additional requirements.
- 8. Re-entry - there are no additional requirements.

B. Required Predecessors

An individual must receive an assessment that evaluates barriers to success in the program and potential resources and support systems available to the participant for barrier alleviation.

- 1. For WIOA programs, the Comprehensive Assessment tool in the funder mandated data system, is used.
- 2. For Non-WIOA and Re-entry programs, the individualized plan specific to that program is used. The plan must identify how barriers would be addressed through supportive services. The plan must have been developed, signed and dated by both the participant and the program staff prior to the provision of supportive services.

EMI may provide program-funded supportive services for WIOA Adult and Dislocated Worker participants who:

- 1. Is or will be engaged in career or training services; AND
- 2. Needs the supportive services to participate in career or training services; AND
- 3. Can demonstrate that they cannot access the supportive services, within the time frame needed, through other WIOA titles, federal or state public assistance programs, or job center partners in the local WDA.

The conditions above do not apply to WIOA Youth participants. For WIOA Youth, supportive services are a required program element that enables participants to engage in WIOA activities.

For all programs with program-funded supportive services, these supportive services may be provided before a career or training service begins, if the participant needs the supportive service in order to start the career or training activity.

A participant may receive supportive services to support career or training services, if the service:

- 1. Cannot be funded by other grants; AND
- 2. Is included in the participant's plan; AND
- 3. Is added to the funder mandated data system as applicable.

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Examples of providing supportive services to support career or training services may include:

1. A participant in a registered apprenticeship may receive supportive services, even if the sponsor is paying the full costs of the apprenticeship, when the following conditions are met:
 - a. The participant meets WIOA's or other grant eligibility requirements for training; and
 - b. The training being supported is eligible for funding. (That is, the classroom training must be on the ETPL for WIOA; the On the Job Training (OJT) employer must be eligible to receive OJT funding).
2. A participant receiving résumé and job search assistance may receive supportive services such as transportation or childcare assistance to help him/her participate in the services

In instances when denial documentation is not available, the program staff may enter a case note into the participant file and/or the funder mandated data system outlining attempts made to locate and acquire assistance from other sources.

Program staff of WIOA Title I-B participants who are participants of other Job Center partner programs, such as TAA or DVR, must confer with the appropriate case manager or program staff of that program to determine what supportive services may be available through that program's funding. This cross-program discussion must be documented in the participant's record, through a minimum of a case note.

C. Allowable Supportive Service Categories

1. Training-Related Items

A participant who is receiving training services may receive supportive services that are necessary to continue those activities. The following may be covered in this category, per 20 CFR §680 and other funded programs:

- a. Payments and fees for training-related applications, tests, and certifications.
- b. Fees for exam retakes will be reimbursed a maximum of two (2) times. The first exam retake will be allowed no sooner than 14 days after first exam and must be preceded by additional academic/remedial instruction by a trainer or instructor;
- c. Assistance with educational testing;
- d. Assistance with uniforms or other appropriate work attire and work-related tools, equipment and technology including but not limited to such items as eyeglasses and protective eye gear, laptops and tablets, hot spots, data plans;
- e. Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and
- f. Reasonable accommodations for individuals with disabilities.

Before requesting supportive services, staff must obtain a letter or documentation from the training provider that confirms the required items and provides an estimate of their cost. When assisting WIOA participants, staff should also consult the Supportive Services – Examples and Resource Guide.

2. Transportation Assistance

Transportation assistance may include parking reimbursements, mileage reimbursements, public or private transportation assistance for costs associated with training or allowable WIOA activities. Assistance may include but is not limited to:

- a. Mileage may be reimbursed for round trips greater than 10 miles and may only include travel to and from the training, service. Mileage is reimbursed at half of the IRS standard mileage rate for business. See www.IRS.gov for current year mileage rate. The participant must provide the program staff with documentation of the participant's valid driver's license, automobile liability insurance, and current

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automobile registration.

- b. Public transportation assistance for participation in training or allowable program activities
- c. Private transportation for participation in training or allowable program activities will be reimbursed when public transportation is not available. Examples of private transportation include but is not limited to a Taxi, Uber, or Lyft service.
- d. License recovery support (Non-WIOA and Re-entry programs only) - Interlock devices, SR-22 insurance, ignition interlock, special reinstatement requirements).
- e. Bicycle – which may include support for the purchase of a bicycle and safety related accessories (e.g.: helmet, lights)
- f. Vehicle registration.

3. Child and Dependent Care Assistance

Child and dependent care assistance may be provided for participants participating in training or allowable program activities who are not eligible for child or dependent care assistance through other sources. Child or dependent care payments will only be made when there is an actual cost to the participant for the care. If a portion of the participant's child or dependent care is subsidized through another program, the uncovered portion may be covered through applicable WIOA, Non-WIOA, and Re-entry funds, provided all other supportive service requirements are met.

Child or dependent care reimbursement will be at a rate that is considered usual, reasonable, and customary within WDA 2, which shall be the Wisconsin Department of Children and Families Child Care Subsidy Maximum Rates.

Employ Milwaukee uses the following definition of dependent for the purposes of determining a dependent whose care may qualify for supportive services. "Dependent youth are unmarried children who are dependent upon a parent or guardian for support (more than 50%) and live with the parent or guardian in a regular parent-child relationship. This includes unmarried dependent children for whom the parent or guardian is the legal guardian and has legal custody of, and/or claims as a dependent for income tax purposes, including stepchildren, legally adopted children, or grandchildren. Dependent adults are either related to the head(s) of the household or live with the head(s) of the household as a member of the household for whom the head(s) of the household provided more than half of the person's total support; or are adults who are claimed as a dependent by the head(s) of the household for income tax purposes."

4. Health-Related Services

Participants who require a referral to health care services, medical examination and/or immunizations for training services may receive assistance for such costs when documentation indicates the training provider and/or employer requires this service.

5. Other Supportive Services

Other supportive services that may be requested by participants include linkages to community services, legal aid services, and one-time emergency assistance with housing and/or utilities.

6. Needs-Related Payments

29 CFR §680.930 states that, "Needs-related payments provide financial assistance to participants for the purpose of enabling them to participate in training and are a supportive service authorized by DOL and WIOA sec. 134(d)(3). Unlike other supportive services, in order to qualify for needs-related payments a participant must be enrolled in training."

In general, needs-related payments are meant to be a temporary measure to ensure an individual completes

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training. Whenever possible, career planners and service providers are to provide other forms of supportive services to offset participant financial obligations before issuing needs-related payments. Needs-related payments can only be provided while an individual is participating in training. This includes breaks within and between semesters.

Needs-related payments are not taxable. Participants should not report them as income, and IRS Form 1099 does not apply.

Career planners and service providers shall document the need for and the provision of needs-related payments in the funder mandated data system. Failure to complete this step and adhere to this policy and any corresponding procedures may result in disallowed costs. Service provider compliance to this policy shall be reviewed during subrecipient monitoring.

Employ Milwaukee allows needs-related payments to participants of its grant programs and WIOA Adult, Dislocated Worker, Non-WIOA, and Re-entry programs to assist in covering non-training expenses while participating in a training program. The payment provided for the identified need of the participant must be for a need not covered by another allowable supportive services category and not available through other non-WIOA/Program resources. The needs-related payment must be practical, uniform, and comply with applicable federal, state laws and regulations.

7. Acceptable Payments

- a. Needs-related payments may be provided to address a participant's identified need only if:
 - i. The need is not covered by another allowable supportive service category; and
 - ii. The need cannot be met through other non-WIOA or program resources.
 - iii. All needs-related payments must be:
 - iv. Practical in nature;
 - v. Consistently applied across participants (i.e., uniform);
 - vi. Compliant with all applicable federal and state laws and regulations.

D. Limitations

1. Non-Allowable Supportive Services. Employ Milwaukee does not pay for:
 - a. business capitalization (e.g. purchasing of tools for a participant who is starting a business)
 - b. Deposits for rentals or leases, vehicle or mortgage payments,
 - c. Preventative maintenance work on vehicles,
 - d. Fines and penalties, such as traffic citations or interest fees.
 - e. Reimbursements for expenses incurred without approval are prohibited, per Wisconsin WIOA Titles I-A and I-B Policy and Procedure Manual, Section 8.6.6.
2. Dollar and Duration Limitations

Category	Limitations			
	WIOA Adult	WIOA Dislocated Worker	Non-WIOA	Re-entry
Training-Related Items	None	None	None	None
Transportation Assistance	\$1000.00 per participant,	\$1000.00 per participant,	\$1000.00 per participant,	\$1000.00 per participant,

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	per program year	per program year	per program year	per program year
Child and Dependent Care Assistance	\$1000.00 per participant, per program year	\$1000.00 per participant, per program year	\$1000.00 per participant, per program year	\$1000.00 per participant, per program year
Health-Related Services	\$1000.00 per participant, per program year	\$1000.00 per participant, per program year	\$1000.00 per participant, per program year	\$1000.00 per participant, per program year
Other Supportive Services	\$1000.00 per participant, per program year	\$1000.00 per participant, per program year	\$1000.00 per participant, per program year	\$1000.00 per participant, per program year
Needs-Related Payments	\$1000.00 per participant, per program year	\$1000.00 per participant, per program year*	\$1000.00 per participant, per program year,	\$1000.00 per participant, per program year

*WIOA Dislocated Worker participants are limited to receiving Needs- Related Payments that do not exceed the greater of the weekly UI benefit rate resulting from the qualifying dislocation or the federal poverty line at the time of the qualifying dislocation, in accordance with Wisconsin WIOA Titles I-A and I-B Policy and Procedure Manual, Section 8.6.5.2.

E. Exceptions

An exception to Employ Milwaukee's supportive services limitations will be considered when provided with a justification statement accompanying the voucher packet. When reviewing requests for exceptions, Employ Milwaukee will consider reasonableness as defined by 2 CFR § 200.404: "A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost."

A request for an exception to an Employ Milwaukee supportive services limitation must be made as outlined in the each program's standard operating procedure. All exception requests are subject to approval by the Chief Executive Officer (CEO).

IV. PROCEDURES

See program specific standard operating procedures

V. ACTION REQUIRED

- WIOA Title I-B, Non-WIOA, and Re-entry Service Providers in WDA 2 must share this policy with program staff and other WIOA staff immediately. All supportive services requests following this policy's effective date must meet the local requirements and follow prescribed procedures described herein. All participants currently receiving supportive services must have their need for the supportive services reevaluated by their program staff at the time of their next plan update.
- Posting of this Policy to the Employ Milwaukee website for open access to all personnel.

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RECISSIONS:

EMPLOY MILWAUKEE WIOA POLICY 17-02: SUPPORTIVE SERVICES, EFF. 04/01/ 2018

EMPLOY MILWAUKEE WIOA POLICY 17-02: SUPPORTIVE SERVICES, Change 1, EFF. 01/01/19

EMPLOY MILWAUKEE WIOA POLICY 17-02: SUPPORTIVE SERVICES, Change 2, EFF. 08/06/21

EMPLOY MILWAUKEE WIOA POLICY 17-02: SUPPORTIVE SERVICES, Change 3, EFF. 08/25/22

EMPLOY MILWAUKEE WIOA POLICY 17-02: SUPPORTIVE SERVICES, Change 4, EFF. 03/31/23

EMPLOY MILWAUKEE WIOA POLICY 17-02: SUPPORTIVE SERVICES, Change 5, EFF. 08/29/24

EMPLOY MILWAUKEE POLICY 20-01: SUPPORTIVE SERVICES YOUTH, Change 2, EFF. 08/29/24

BOARD APPROVAL DATE: 11/20/2025

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