

DATE ISSUED: April 28, 2009

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TO: Ramsey County DWP/MFIP Employment Services Providers

FROM: Kate Probert Fagundes – MFIP/DWP Employment Services Division Manager

SUBJECT: Participant Support Services Funds Policy

PURPOSE: To provide guidelines for the discretionary use of available support services funds; to help foster the consistent support services funds use across the Ramsey County DWP/MFIP employment services system. Further, it is to clarify that Workforce Solutions encourages agencies to be proactive and flexible in their approval of support funds for work incentives. Agencies are expected to use 12% or more of their annual MFIP budget (not including in-kind donations) on participant support service funds. It is recognized that an agency’s ability to make expenditures is tied to the amount of support services remaining and available.

BACKGROUND: This memo replaces the Participant Support Funds Policy update on April 28, 2009. Refer also to the current version of the Minnesota Department of Human Services MFIP ES Manual Section 10.9.

- PROCEDURES:**
- A. General Guidelines**
1. When resources other than the MFIP Support Services funds are available, use those other funds first.
 2. The MFIP Support Services line item budget is established to help agencies consider participant support funds requests, as funds availability allow, to participants (0-60 months, approved Extended or DWP).
 3. In keeping with this policy guidance, agencies are strongly encouraged to proactively distribute these funds to participants when applicable to the goals set in their current employment plan and when in compliance (or to get in compliance) with the employment plan.
 4. These funds are equally available to Universal Participation or Family Stabilization Services participants with an active MFIP case, or active DWP case.
 5. At the discretion of the agency manager, and the availability of remaining funds, support service funds can be provided for up to nine months as retention support for employed, post-MFIP exited Ramsey County participants. Dependent on availability, support service can be provided for up to nine months as retention support for employed, post-DWP (not on MFIP) exited Ramsey County participants.
 6. Payments to participants, including payment authorizations, gift cards, bus cards and/or vouchers, work clothing, tools, work-incentive-awards, etc. must be recorded on the Services tab of the participant Workforce One file. Copies of receipts or expenditure back-up documentation must be kept in the participant files.
 7. The rationale for expenditure exceptions made by management should be case-noted.

8. Support service transactions must be case noted (the participant needs identified and expenditure rationale described) in Workforce One.
9. Incentive awards are for the achievement of a significant milestone (attaining new educational level, employment, etc.) on the client's path to employment and self-sufficiency.
10. Support services payments should be issued directly to the business (e.g. car repair shop, school, bookstore, uniform store, etc.). On rare occasions, participants might be reimbursed if the expense was pre-approved and a valid receipt is provided.
11. At the discretion of the agency manager, and the availability of remaining funds, support services can be provided for up to two months for non-employed, post-MFIP exited Ramsey County participants immediately after exhausted 60 month limit if the participant meets the under 200% federal poverty guideline criteria. If case-noting or entering support services are not possible, the agency manager should ensure a paper file of all of these expenditures is available for review.
12. At the discretion of the agency manager, and the availability of remaining funds, the DHS ES Manual Section 10.6 and 10.9. allows support services to be provided to families at "risk of receiving MFIP or DWP...whose income is below 200% of the Federal Poverty Guideline (FPG) for a family of the applicable size are eligible for services using the consolidated fund: families with a minor child; or a pregnant woman; or a non-custodial parent of a minor child receiving assistance." The agency manager has the discretion to determine if these funds are available on a one-time basis or might be available for up to two months. Casenote the rationale for either choice.
13. If the agency manager decides to provide support services as described in item A. 11 and A 12 above, he or she should retain in a paper file evidence of the person having met the below 200% FPG criteria and pertinent casenotes. Items A.2, A.3, A.4, A.6, and A.9 are not relevant in this instance of support services provision.

B. Use of Funds

Generally, support service payments are related to supporting the participant in engagement, attainment of significant milestones, job search, education and training, employment-related expenses, or job retention. In some circumstances, support may be available (as consistent with ES Manual Section 10.9) to assist with the participants adherence to employment plans for social and health-related services. Refreshments (for example, coffee and cookies), however, associated with direct program activities such as support group, job club, parenting classes, etc. are considered customary and acceptable as long as capped at \$3.00 per person attending. Refer to pages 4 through 6 of this document. In extreme situations, and consistent with ES Manual 10.6 and 10.9, support services may be used for County-residents at risk of receiving MFIP or DWP (See Items 12 and 13 above).

C. Unauthorized (Unacceptable) Expenses

- Recognition events such as amusement, diversion, social activities, ceremonial events, and related costs such as meals, lodging/facility costs, rentals, transportation, and gratuities.
- Penalties and fines, parking tickets, traffic fines, restitution, other penalties, defaulted student loans, etc.
- Meals. It is not considered customary or acceptable to serve a meal associated with direct program activities, such as support group, job club, parenting classes, or other similar events.

D. DHS Bulletin #12-32-03 Definitions (Dated 2/2/2012)

Working Clients – include all permanently, temporarily or occasionally employed clients, as well as clients that have a job start pending, during the reporting period.

Emergency Criteria – to qualify as an emergency, all three criteria must be true:

- 1) there is a qualifying emergency episode;
- 2) the emergency is expected to be resolved within 4 months;
- 3) the emergency is NOT expected to recur.

DHS Defines Non-Assistance Expenditures as:

- Client education expenses
- Transportation for a non-working client that meets all three emergency criteria
- Transportation for a working client
- Employment related expenses
- Housing for clients that meet all three of the emergency criteria

DHS Defines Assistance Expenditures as:

- Transportation for non-working clients that do not meet all three of the emergency criteria
- Housing for clients that do not meet all three of the emergency criteria

E. A Closely Related Rule

A policy cannot anticipate all of the specific items that could be included in support services. Providers are encouraged, when using their discretion regarding the expenditure of support service funds on an item not listed here, to:

- a. keep in mind that support service payments are generally related to supporting the participant in engagement, job search, education and training, employment-related expenses, or job retention; and
- b. consider whether the item in question is required for employment and is closely related to an item that is covered or not covered. For example, birth certificates are not listed in this policy as an acceptable expense but since a birth certificate is required (closely related) for the authorization of child care, and child care is instrumental for maintaining employment, paying for a birth certificate is a reasonable, acceptable expense. Another example might be paying the fee to replace a lost Green card in order for a participant to work although we would not pay other application fees or legal fees for immigration matters.

If an agency has a question about whether an item such as the fore-mentioned birth certificate, etc. is more closely related to any of the prohibited expenditures (medical service, fine, parking ticket, restitution or other penalty, or payment on defaulted student loan, cost of amusement, diversion, social activity, ceremonial event or related cost) than to a permitted expense, call the assigned WFS Planner to discuss.

Effective Date: May 1, 2015

WFS Contact: Your Agency's Lead Planner

Note: See attachment which follows.

MFIP-ES PARTICIPANT SUPPORT FUNDS

It is recognized that an agency's ability to make expenditures is tied to the amount of support of support services funds remaining and available.

TRANSPORTATION

Proof of vehicle ownership (or signed affidavit of client use by vehicle owner), current insurance coverage, and participant's valid driver's license **MUST** be in the participant case file if mileage is to be reimbursed.

Up to \$150 per participant (dependent on funds availability) in a month can be made available (may include bus passes for 31-day bus passes for up to \$3 a ride fare, stored value bus cards, stored value gas cards, gas vouchers, or mileage reimbursement, allocated expenses of a van pool or cab fare) to a participant as appropriate to the employment plan and actual engaged activities. In a two-parent case, both parents will receive a monthly allocation for car expenses if they cannot carpool together because they are on different schedules, job searching in different geographic areas, or searching for different types of work not usually in close proximity. Agencies can provide (contingent on the employment plan, activities, and progress) gas cards to participants who do not have a vehicle or license but rely on other drivers for transportation.

Employed:

- As funding allows, the agency can provide transportation allowance to a working but still on MFIP participant for up to nine months when a job begins. A determining factor for the continued provision (up to 9 months) of the support services would be an indication of a positive retention impact. Ramsey County MFIP or DWP participants (who exited employed and are not on MFIP) may be eligible for retention support services for up to nine months post-exit working.
- When available, participants in a Transitional Work Experience (TWE) may receive a transportation allowance while engaged in the program.

Not Employed:

- Participants engaged in Job Search activities may receive a transportation allowance on a weekly basis. At the agency's discretion, the agency may distribute stored value cards (instead of 31-day bus passes) based on the participant's need to complete the activity or the anticipated level of job search hours for as long as the activity is approved in the plan.
- Participants engaged in training, education, unpaid work experience, WEP, community service volunteer activities may receive stored value cards or transportation allowance on a weekly, bi-weekly, or monthly basis, for as long as the activity is approved in the plan.
- Participants engaged in Social Services activities may be eligible for a transportation allowance for the activities included in the approved plan.

CAR REPAIR/MAINTENANCE/LICENSE TABS

Proof of vehicle ownership, insurance coverage, and participant's valid driver's license **MUST** be in the participant case file if auto repair/maintenance, license tabs or insurance is to be reimbursed. An agency manager can determine whether to repair the car for a participant when the car the participant uses is owned by another person but is on-loan to the participant. In this situation, a signed affidavit of client use by vehicle owner is required, as is an affidavit that the participant is the primary user of the vehicle, in addition to proof of insurance and a copy of the participant's current driver's license. Payment for towing of a vehicle to repair shop is allowable.

Up to \$1500 in a calendar year for car repair/maintenance/license tabs/insurance for the participant. Agencies have the option, in a two-parent case, to approve, the repair of the second parent's vehicle provided that proof of vehicle ownership, insurance coverage, and participant's valid driver's license are on file. The limit remains \$1500 per vehicle and the sum of repairs for both vehicles cannot exceed \$3000. The agency Supervisor's approval should be included in the Workforce 1 case notes.

Fees for replacing or reinstating a lost driver's license may be covered by these funds. Funds will not be used to pay any penalties or fine associated with license reinstatement.

Depending on fund availability, the agency has the option to exceed the \$1500 limit in unusual circumstances when the agency determines it likely to have a direct, positive employment or retention impact. The agency Supervisor's approval, and rationale, should be included in the Workforce 1 case notes.

Fees for replacing or reinstating a lost driver's license may be covered by these funds. Funds will not be used to pay any penalties or fine associated with license reinstatement.

Agencies are expected to be selective in the approval of car repairs. The repair must be essential to the participant's ability to obtain and retain employment and must have a reasonable chance of extending the cars functional life. Agencies must be prepared to deny car repairs. Some cars are simply not worth the investment. With limited funds, agencies must place investment where it is likely to make the most positive impact.

A car repair may be approved based on an estimate or invoice. The agency will issue the check to the car repair shop after the work is completed and only when there is an actual bill/receipt provided.

Some car repairs may be paid for by another source, e.g. an insurance company might cover the windshield replacement costs.

EMPLOYMENT RELATED

Employment related includes costs of employment related expenses such as work tools, uniforms, safety shoes, trade licenses, interview clothing, etc.

Pre-paid gift cards (e.g. a Target gift card) may be used for interview/work clothing. The counselor can educate the participant about what items should and should not be purchased with the gift card. Inform the participant that the counselor may ask to see the receipt to confirm that the purchases were for the reason the card was provided. The counselor can use his or her discretion whether to review the receipts or not.

Pre-paid gift cards (e.g. a Target gift card) may be used for interview/work clothing. The counselor can educate the participant about what items should and should not be purchased with the gift card. Inform the participant that the counselor may ask to see the receipt to confirm that the purchases were for the reason the card was provided. The counselor can use his or her discretion whether to review the receipts or not.

Up to \$400 per participant in a year can be authorized. Any authorization over \$100 requires the supervisor's signature. The agency Supervisor's approval, and rationale, should be included in the Workforce 1 case notes. In unusual situations, depending on the availability of funds, and the direct benefit to participant stabilization, employment or job retention, the agency Supervisor can authorize up to an additional \$200 in work related support funds. The agency Supervisor's approval, and rationale, should be included in the Workforce 1 case notes.

Employed:

- Cost of items not provided by an employer including safety equipment, uniforms or other special clothing, tools, etc. can be purchased with support services funds

Not Employed:

- May include expenses necessary to improve interview and job potential such as developing/printing resumes, portfolio development, etc.
- Interview clothing is included but is limited to \$100 in a year.

EDUCATION AND TRAINING

Assistance should only be considered for valid training costs that are not covered by financial aid. This may include a short-term training class not covered by financial aid. Continuing provision of support services funds for education should also take progress into consideration.

"It is recommended that, to the extent possible, WFS and their affiliated ES Providers, use WIA approved education institutions and follow the definition of WIA approved training programs and credentials" (from the Credentials and Certificates Ops Definition).

- The participant must complete an Occupational Preparation Packet that identifies the costs of training and other related expenses.
- The training needs to lead to employment. The agency should help the participant understand how to use the school's placement rates to factor into their decision to make the investment with this particular program.
- The agency should help the participant understand the cost of enrolling in expensive courses that involve student debt. Help the students understand whether the value of that course outweighs the cost of the expense and debt.
- Funds may not be used to purchase equipment such as typewriters, laptops, cameras, tripods, tape recorders, etc.

- The school may bill on a monthly, quarterly or semester basis. The agency should pay the school on a monthly, quarterly or semester basis and should not pay the entire program in advance when possible.
- Costs of GED testing, occupational testing, professional licenses fees, driver’s training may be covered.
- On an exception basis, expenses related to remedial or prep classes required to enter an education or training program (literacy, basic skills, English as a Second Language, etc.) may be covered. The agency Supervisor’s approval, and rationale, should be included in the Workforce 1 case notes.
- Depending on fund availability, and employment plan, agencies can pay for Driver’s Education class and/or up to six hours of required behind the wheel training.

EMERGENCY AND HOUSING/LIVING COSTS

Up to \$1,000 is available for a non-recurring housing emergency, crisis or in the judgment of the participant and counselor, to prevent a housing crisis, including security deposit, rent, mortgage payment, furnishings and utility expenses. Any authorization over \$100 requires the supervisor’s signature. Application fees may be paid only if the participant does not have a UD that would prevent the application from moving forward. The agency Supervisor’s approval, and rationale, should be included in the Workforce 1 case notes.

- Emergency funds should only be provided after other resources are exhausted, and it is clear that short-term help will help the participant stabilize the situation, support obtaining or retaining a job or meet plan requirements.
- The agency must issue payment directly to the landlord, mortgage/utility company, etc.
- Direct the participant to inform the financial worker when funds are used.

WORK INCENTIVE AWARDS

All agency managers are encouraged to exercise, at their discretion, greater flexibility with regard to proactively approving support service funds for work incentive awards. This includes incentive awards for significant milestone achievements resulting in increases in engagement, making significant progress toward or obtaining education, employment, and family and economic stability.

Workforce Solutions encourages its MFIP and DWP ES provider agencies and internal teams to develop and implement a specific plan to award incentives that will recognize and reinforce participant engagement and achievement that leads to family and economic stability through education and employment. Based on available funds and on a discretionary basis, agency managers will establish “reasonable dollar amount” guidelines. Remember, awards don’t have to be monetary, and may include chocolate, diapers, or zoo tickets. Eligibility for incentive awards will be determined on a case-by-case basis, rather than a one-size-fits-all. Greater emphasis will be placed on documentation of rationale for each determination made, whether approved or denied. Participant employment, educational achievement, and engagement outcomes will be enhanced by the consistent application of a flexible and proactive Incentive Awards Policy. Supervisory approval and signature/documentation will be required for work incentive awards in excess of \$100.

Federal law prohibits the use of TANF funds for gifts; however, work incentive awards are allowed if:

- The work incentive award is used to acknowledge benchmarks in the participant’s progress toward self-sufficiency (e.g. when a participant completes a class, obtains a GED, gets a job, or retains a job for a certain length of time).
- Benchmark behaviors and achievements are set and work incentive awards are made available to all MFIP participants within the agency.
- Work incentive awards are not provided to pay for participant’s basic needs such as food, shelter and utilities (e.g. certificates to grocery stores).
- Work incentive awards are not used to replace support dollars for other allowable items such as expenses to find or accept a job, or to resolve a shelter crisis.