



<b>WS 17-06 revised</b>
<b>Revised October 30, 2020</b>
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<b>Financial Aid</b>
<b>Expires: Continuing</b>

TO: Workforce Solutions Contractors

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SUBJECT: Managing Financial Aid - Update

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## Purpose

Updates system financial aid policy

This issuance changes and updates guidance in WS 17-06 - Managing Financial Aid released May 25, 2017. **This issuance includes new guidance on providing support services to customers for work-related expenses. Changes are in a red font color.**

## Background

We exist to keep our region the best place to do business, work, and live.

We offer professional advice and individually tailored service to assist our customers in entering the workforce, going back to work, continuing to work, or advancing in a career. Our service includes work search; job matching and placement; career information; assessment; counseling and planning; and financial aid.

Each year, Workforce Solutions spends more than \$125 million to assist over 35,000 customers – making financial aid an important part of what we do.

This issuance provides policy guidance for the system about:

- Who can receive financial aid
- The kinds of financial aid we offer
- How we decide what financial aid to offer
- Basic procedures on eligibility, documentation and limits

## Who Can Receive Financial Aid

We offer financial aid to customers who need help to:

- Continue working;
- Obtain and complete education or training to go to work; and
- Find or take a job or get a promotion.

Customers who receive assistance must be eligible for the dollars that fund Workforce Solutions Financial Aid. Eligibility depends on many factors that may include: family income or support, age, labor force status, proficiency in basic skills, and receipt of public assistance.

Before we provide financial aid, we must determine eligibility for one or more of the fund sources we use. Additionally, we must establish that the customer needs the assistance to attain their employment goals and address the availability of other community resources.

## Kinds of Financial Aid We Offer

1. We offer short-term assistance when we believe it will help a customer go to work quickly or to keep an existing job. Short-term assistance is a one-time, limited-amount payment for a specific reason related to a customer's immediate need to go to work in a job expected to last at least 30 days or to maintain current employment. Short-term financial assistance is associated with an existing job offer or pending entry into a job (confirmed by employer), or an exigent need for continuing in a job (confirmed by employer).

If a customer received any **short-term assistance** in the past **three years**, any subsequent request for financial aid will be considered substantial assistance.

2. We offer substantial assistance for longer-term needs associated with completing a Workforce Solutions employment plan and is *not* a one-time grant of financial support to an individual or family.

Substantial assistance applies when we believe it is necessary to invest more time and dollars over a longer term to help a customer meet their employment goals or maintain employment. Substantial assistance for work search and education is part of an extended relationship between Workforce Solutions and the customer. Workforce Solutions and the customer must be engaged in career planning or extended, intensive work search activities.

Substantial assistance may be more than one time, occur over months or years, and be related to different customer needs. All customers tagged as WIOA youth receive substantial assistance.

## Financial Aid Types and Categories

Our financial aid *types* include:

1. **Work** Support – assistance to help customers accept a job offer or keep a job.
2. **Work Search** Support – assistance to help customers look for work.
3. **Education** Support – assistance to help customers obtain education or training to meet the expectations of employers in our region.

Our financial aid *categories* include:

1. Education related expenses
2. Early education or child care expenses
3. Transportation related expenses
4. Health care or health related expenses
5. Clothing
6. Tools
7. Licenses
8. Documents

## How We Decide What Financial Aid to Offer

**Customer Request.** Often customers ask us for financial aid. We evaluate a customer's request based on our understanding of their need to get a job, keep a job, or get a better job and our guidelines for providing financial aid.

**Staff Suggestion.** Based on our assessment of the customer's, we may suggest financial aid to a customer to support completion of his or her employment plan.

## Action

1. Make sure staff is aware of the [Financial Aid Limits by Type of Assistance Chart](#) for the category and amount of financial aid available to our customers. Managers and supervisors must regularly check the information staff enters to track these limits.
2. Ensure staff enter information into case notes
3. Make sure each staff who works with customers has sufficient knowledge of the system to direct customers to the person/s who can best meet the customer's request.
4. This Issuance is effective immediately.

## Questions

Staff should ask questions first of their supervisors. Direct questions to the Board staff through the electronic [Issuance Q&A](#).

## Appendix

The appendix to this issuance contains additional procedures and guidance that support the purpose of this issuance. Staff must read and understand the material covered in the appendix.

- Eligibility for Financial Aid
- Supporting and Recording Financial Aid Decisions
- Financial Aid Limits
- Paying and Tracking Financial Assistance
- **Transportation Expenses**
- **Using Cash Cards**
- **How to Provide Financial Aid – Work Related Support Services**

# Eligibility for Financial Aid

We have two broad groupings of financial assistance: Short-Term Assistance and Substantial Assistance.

To receive any financial assistance, a customer must meet eligibility criteria for one or more of the available funding streams.

**We use the WIOA Adult Income Exemption when we provide short-term support to customers who have found employment or when we use the self-sufficiency wage for a customer who does not meet the low-income eligibility for substantial assistance.**

**Staff should identify all funding streams for which the customer is eligible.**

## **Short-Term Assistance**

Customers eligible for this level of assistance must complete an Addendum, Orientation to Complaint form, provide documents to satisfy eligible to work status and support other eligibility criteria (including but not limited to: laid off, unlikely to return) in counselor notes based on discussion with the customers. The addendum and instructions can be found at this link: <http://www.wrksolutions.com/staff-resources/issuances/work-addendum-revised>.

Short-term financial assistance is associated with an existing job offer or pending entry into a job (confirmed by employer), or an exigent need for continuing in a job (confirmed by employer). Documentation of “confirmed by employer” includes, but is not limited to:

- Check stub – customer is working
- Letter from the employer – on company letterhead – stating customer is an employee or scheduled to start as of a certain date
- Phone confirmation by the employer that the customer is an employee or is scheduled to start as of a certain date.

**In all instances**, staff must record details in TWIST Counselor Notes and include:

- Name of employer
- Phone number
- Employer contact **(not required if the customer provides a check stub or letter from the employer)**
- Customer employment status or pending hire date
- **Wage information**

If a customer received any **short-term assistance** in the past **three years**, any subsequent request for financial aid will be considered substantial assistance. Determine the three-year period by looking at financial aid provided any time in the three years prior to the date the customer is currently requesting short-term assistance.

## **Substantial Assistance**

- I. Customers who may qualify for this level of assistance include:
  - A. Customers tagged in TWIST as:

TANF Applicant	TANF/Choices
Non-Custodial Parent	SNAP E&T
  - B. Other Customers:
    - 1. Assessed by career office staff as needing substantial assistance which can be provided by Workforce Solutions, and who then
    - 2. Complete and submit a [Financial Aid Application](#), and
      - i. Provide supporting documentation, and
      - ii. Are determined eligible for one or more funds other than those listed in Section 1.A. above (for example-WIOA).

## II. Financial Aid Application Notes – Career Office Staff

- A. Conduct an initial assessment to determine if the customer needs and is suitable for the substantial assistance.
- B. Describe the results of the initial assessment in TWIST Counselor Notes. The Counselor Note should:
  - 1. Include documentation of the customer’s need for financial assistance
  - 2. Support the Career Office staff decision that the customer is seeking financial assistance supported by Workforce Solutions;
  - 3. Is suitable for the financial aid requested; and
  - 4. **Identifies the [WIOA priority criteria](#), if any, the customer meets.**

Note: The Support Center will review TWIST Counselor Notes to establish the Career Office determined the customer is suitable for financial assistance before accepting the Financial Aid Application for eligibility determination.

- C. A customer, who receives substantial assistance through a fund listed (section I.A.) above, could experience an interruption in Financial Aid if they lose eligibility for that fund and/or if funds are not available. Explain to the customer that completing a Financial Aid Application may help protect from an interruption with assistance by identifying additional sources of financial assistance for which they may be eligible.

**Note: Customers tagged as TANF Applicant, TANF Choices, SNAP E&T, and Non-Custodial Parent must complete a Financial Aid Application when requesting assistance for work-related support paid for with WIOA funds.**

If the customer chooses to complete and submit a Financial Aid Application, offer to assist with that process.

- D. Do not comment on the potential eligibility of the customer for Financial Assistance -- only the Support Center can determine eligibility.
- E. Use the [Validating and Entering Qualifications](#) guide to determine acceptable documentation sources for eligibility criteria for funds not included in section I.A. above. In addition, the [Financial Aid Eligibility Glossary](#) provides definitions to clarify reporting and eligibility criteria.

Staff who help customers identify and gather documents that support eligibility and staff who are responsible for determining eligibility for these funds must refer to these documents.

# Supporting and Recording Financial Aid Decisions

Before we provide financial aid, we must determine eligibility for one or more of the fund sources we use. Additionally, we must establish that the customer needs the assistance to attain their employment goals and is unable to obtain assistance from other community resources. Workforce staff must enter counselor notes that support the eligibility determination and the need for the assistance.

We record services in WIT and TWIST to track how Workforce Solutions is helping the customer. If we provide financial assistance, we also record the assistance and the amount of assistance in the Support Services tab in the Service Tracking Menu item in TWIST.

Use Counselor Notes to support the decision that Workforce Solutions is the best option, among community resources, to help the customer meet the need. Consider the availability of other community resources and whether the customer can access those resources in time to meet their need.

## I. Supporting and Recording Short-Term Assistance

### A. Assessment

Customers eligible for this level of assistance must:

1. Complete an Addendum, Orientation to Complaint form, provide documents to satisfy eligible to work status and support eligibility criteria under WIOA Adult and/or Dislocated Worker funds
2. Document the customer's situation, such as prior and current work status, education, self-sufficiency
3. Identify what the customer needs to start or maintain employment

Record a Job Search Map in Counselor Notes or complete an employment plan in TWIST for customers who ask us to help them get a job, keep a job, or get a better job.

**Exception:** A Job Search Map or employment plan is not required if the customer is employed or has a job offer and is not seeking additional assistance from Workforce Solutions to find a job or get a better job

### B. TWIST Counselor Notes must include:

1. A summary of eligibility for Workforce Solutions funds (WIOA Adult and/or WIOA Dislocated Worker) including:
  - a. the eligibility criteria;
  - b. the WIOA priority criteria, if any, the customer meets; and
  - c. any additional information that supports the determination of eligibility
2. Include a summary of the customer's need for financial assistance
3. Documentation and/or verification from the employer that the customer has a job or job offer that is expected to last 30 days or more and the customer needs assistance from Workforce Solutions to accept or keep their job (see documentation requirements on page 5 - Eligibility for Financial Aid); and



4. An explanation as to why the customer is unable to obtain timely assistance from other community resources and determination that Workforce Solutions is the appropriate source for the requested assistance.
- C. Staff must enter in TWIST:
1. Program Detail Information
  2. **Exemption Tab, if the customer doesn't meet one of the WIOA low-income Priority criteria**
    - **Adult Income Exempt**
  3. Objective Assessment
    - Support Services information
  4. Counselor Notes

## II. Supporting and Recording Substantial Assistance (other than childcare financial aid)

- A. Assessment – An assessment is critical to helping the customer identify their employment goals and figure out how to achieve those goals, with or without assistance from Workforce Solutions.

The assessment is used to support the need for the substantial financial, assistance, to develop an employment plan to help the customer achieve their goals, and **identify WIOA priority criteria**. We work with the customer to reassess needs and develop modified employment plans as the need arises. **We use:**

- Service 62 – Initial Assessment to record assessment services provided before eligibility determination
- Service 08 – Objective Assessment to record continued assessment after the eligibility determination

**Note:** The customer has the right to choose the occupation and training provider. We provide information to help the customer make an informed choice. We do not choose the occupation or the training provider for the customer.

If the customer is interested in assistance with education and/or training:

1. Review and discuss Labor Market Information to show demand for persons with skills and expected wages for related occupations.
2. Schedule or arrange tests and assessments as necessary. Discuss their financial aid needs and how financial assistance will help meet their employment goals.
3. Discuss and, if appropriate, provide [FAFSA](#) website for the customer to get information and to submit a free application for federal student aid. Note: There is no requirement to use federal grants before applying Workforce Solutions Financial Aid to support education or training.
4. Help the customer identify other sources of timely assistance in the community, if available.
5. Discuss the customer's ability to meet financial obligations during training.
6. Determine suitability by checking for the customer's:

- understanding their chosen occupation (may include awareness of hours, working conditions, wages, physical demand, character qualifications, etc.),
- readiness to enter and complete the training,
- ability to meet scholastic and financial obligations during training, and identification of barriers that may prevent them from being successful in that field.

B. Employment Planning – organizing Workforce Solutions service and financial aid to help reach employment/career goals

1. Begin developing the employment plan (to the extent you can based on your discussion); include steps both you and the customer will take before your next meeting, such as career exploration, assessment appointments, wage/demand research, gathering documents, creating a budget, finding a part-time job, locating other resources, etc.
2. Ask the customer about their employment goals and discuss specific steps along the customer’s path to achieve those goals. Can the customer obtain or retain employment that leads to self-sufficiency or wages comparable to or higher than wages from previous employment? If not, then discuss how Workforce Solutions can help the customer meet their goals through classroom training and/or work-based training.

C. Completing the Financial Aid Application

When you determine the customer is suitable for financial assistance from Workforce Solutions, note this in TWIST Counselor Notes and **explain to the customer the process for completing the online Financial Aid Application**. Assist them with the collection of required documents as appropriate. Do not advise the customer regarding their eligibility for Workforce Solutions funds.

When the Financial Aid Support Center determines the customer is eligible for financial assistance from Workforce Solutions, continue assessment as appropriate.

D. Choosing an Eligible Training Provider/Adult Education Provider

**Workforce Solutions will provide scholarship support to any occupation on the High-Skill, High-Growth list, provided the vendor is in the Eligible Training Provider List.** Career Office staff must:

1. Review the [High Skill/High Growth](#) occupations list.
2. Review and discuss the approved vendors/schools on the [Eligible Training Provider List](#).
3. Review the training provider report card.
4. Document the selection of the program of study in TWIST Counselor Notes.

Note: Customers eligible for assistance from TAA funds are not restricted to the High Skill/High Growth Occupations and the Eligible Training Providers referenced above.

#### E. Completing TWIST Counselor Note

Use TWIST Counselor Notes to summarize your conversations with customers and to support the service we provide.

TWIST Counselor Notes must include:

1. Initial and ongoing assessments;
2. Summary of eligibility for Workforce Solutions funds **including** [WIOA priority criteria](#);
3. An explanation as to why the customer is unable to obtain timely assistance from other community resources and determination that Workforce Solutions is the appropriate source for the requested assistance;
4. A statement that the customer is suitable for the financial aid requested;
5. A description of the reason the customer is unlikely to return to the previous industry/occupation for dislocated worker status or the reason the customer needs additional assistance for the Board Designated Youth challenge, as appropriate;
6. Enrollment in courses that support the customer's training objective (ascertain start date of training);
7. **Confirmation/documentation of the date the customer started training;**
8. Results of the monthly contacts with the customer (e.g. academic progress, need for additional assistance, etc.);
9. A statement identifying the customer is co-enrolled under multiple funds, if applicable; and
10. **Documentation of verification that a customer receives service and/or purchases items (i.e. proof of checks, vendor payments, vendor receipts or vouchers provided), and/or (i.e. photo of receipt, copy of online or in-store receipt).**

#### F. Data Entering Substantial Assistance in TWIST

TWIST data entry must include:

1. Program Detail
2. Service Tracking
  - Objective Assessment (*service code 8*)
  - Employability Development Plan (*service code 68*)
  - Training Service (Occupational (*service code 01*), OJT (*service code 03*), Work Experience (*service code 50*), etc.)
  - Support Services information, as appropriate. When completing the "Comments: tab, always include a reference to the service related to the support service provided. For example – Refers to 08 service dated 6/10/2017. This may be an objective assessment, an employment plan or a training service such as occupational skills training, OJT, etc.
3. Counselor Notes to support service provided to the customer.

#### G. Following Up on an Employment Plan

1. Update the Employment Plan whenever the customer is requesting a new *type* or *category* of financial assistance. Counselor notes must support the decision to provide requested assistance by justifying the need for the assistance and addressing the availability of community resources to meet the customer's need.
2. Review the employment plan periodically (at least once a quarter) with the customer to determine if the employment plan should be adjusted. Record the results of these reviews in TWIST Counselor Notes and update the plan in TWIST, as appropriate.
3. Monthly contact with the customer is required. Confirm the customer is continuing to meet the goals and actions identified in the employment plan. Document monthly contact in counselor notes.

# Financial Aid Limits

Workforce Solutions limits the dollar amount a customer may receive in financial aid depending on the type of assistance requested and not everyone is eligible for assistance. Discuss alternative sources of assistance with the customer and consider the timely availability of other community resources to help the customer meet goals. Workforce staff must enter counselor notes that address the availability of timely and appropriate assistance from other community resources.

Links to other resources for specific services provided in many of our counties include: [Texas Assistance and Aid Programs](#) and [2-1-1 Texas/United Way Helpline](#).

Refer to the [Financial Aid Limits by Type of Assistance Chart](#) for category limits as appropriate.

## **Notice to Management – When Staff Requests Financial Aid for Themselves**

Staff requesting financial assistance for themselves must notify their managers of their intent to apply for aid. All requests for financial aid from a Workforce Solutions staff member must be submitted to and processed by a member of the office management team.

## **Exceptions to Limits**

Office Managers or designee may allow exceptions to the limitations listed in the chart when there are extraordinary circumstances documented in the customer's employment plan and TWIST Counselor Notes. **Staff may also consider housing costs as an exception in an extraordinary circumstance with Board approval, not to exceed \$1,000.00 in a 12-month period. (i.e. a homeless customer has found a job and needs lodging).**

**Note: There are no exceptions to the restrictions on transportation assistance for SNAP E&T customers.**

## **Fund Alert**

We issue a weekly Fund Alert to communicate important information about the availability of financial aid to the Workforce Solutions system. The alert provides a status of the type of aid available, the status of available funds for financial aid, and the average time to determine eligibility. Workforce Solutions staff use this information to advise customers on the availability of financial aid. **The Fund Alert can be found on [Workforce Solutions SharePoint](#).**

# Transportation Expenses

We provide short-term and substantial assistance to customers for transportation expenses to help them get a job, keep a job, or get a better job. Workforce Solutions supports transportation expenses that are reasonable and necessary. Transportation assistance is available in the following categories:

## **Personal transportation expenses**

- Gas
- Bus fare/passes
- Other personal transportation expense i.e. taxi fare

## **Vehicular transportation expenses**

- Car Repair and Maintenance
- Consumables (i.e. tires, batteries)
- Vehicle Safety Inspection
- Liability Car Insurance
- Vehicle Registration

## Short-Term Assistance

We may provide short-term assistance to a customer requesting personal transportation expenses if the customer has a job or job offer and needs the assistance to work.

## Substantial Assistance

We may provide substantial assistance to a customer requesting personal transportation expenses or vehicular expenses if the customer (a) has a job or job offer and needs the assistance to work or (b) is required to work with us to maintain a benefit such as TANF or SNAP; or (c) is participating in a Workforce Solutions supported training program.

## Transportation Expenses

### 1. Personal Expenses

We use bus passes and gas cards as the primary way to assist customers with personal transportation expenses. **For customers using their personal vehicles, we provide gas cards in \$20 increments based on the number of expected travel miles during the customer's first two weeks of employment.** Use of cash cards (see section below) for personal transportation expenses are the exception and only apply to customers in education/training supported by Workforce Solutions.

We use the Transportation Allowance Chart to determine the number of miles a customer may travel for work daily. Staff must use a mapping tool to determine the number of miles from the customer’s home to work. Once the daily mileage is determined staff will identify the amount of gas allowance a customer may receive from the chart below.

Counselor notes must include the name and location of the employer and the total daily roundtrip mileage. Staff should also indicate the type of card provided and the amount in case notes and in the support service tab in TWIST.

**Transportation Allowance Chart**

<b>Daily Roundtrip Mileage</b>	<b>Allocation for Two weeks</b>
0 - 10 miles	\$20
11 to 20 miles	\$40
21 - 30 miles	\$60
31 - 40 miles	\$80
41 - 50 miles	\$100

- We may provide personal transportation assistance to customers who need help:
  - to continue working;
  - to accept a job or with getting a promotion;
  - completing education or training to go to work; or
  - if the customer is required to cooperate with Workforce Solutions to retain TANF or SNAP benefits *and* is engaged in work search.

***Additional Transportation Guidelines***

- When providing transportation assistance, including parking when appropriate, to support education/training services, Career Office staff may authorize the assistance in advance for anticipated travel. This type of ongoing support may not exceed one month. Career Office staff can authorize an additional period of assistance if the customer provides attendance verification to support the assistance provided in the prior period.
- When a customer requests a need for **personal** transportation assistance beyond the established limits in the [Financial Aid Limits](#) chart, use MapQuest or similar sites to determine mileage. Multiply a mileage rate of .20 cents per mile by the total number of miles traveled from the customer’s home to school for the days the customer is scheduled to attend each week. Approval by the manager or designee is required.
- The office manager or designee may approve payment for other means of personal transportation, such as taxi fare, when there is no other practical way help the

customer meet his or her transportation need.

## 2. Vehicular Expenses

### a. *Minor Car Repairs, Maintenance, Consumables and Safety Inspections*

Workforce Solutions may pay for minor mechanical repairs, maintenance, consumables and safety inspections if the customer:

- Demonstrates clearly and conclusively that they are unable to work, search effectively for work, or attend school without the repairs; and-
- Demonstrates that they own the vehicle or has the approval of the vehicle owner for the proposed service (see Vehicle Permission/Hold Harmless); and
- Co-signs a statement with the vehicle's owner that they use the vehicle to get to employment, work search, or school as called for in his or her employment plan.

Workforce Solutions procured Firestone to provide service to our customer's vehicles needing this type of assistance. When we approve paying for that service:

- ✓ Career office staff gives the customer a special Firestone Voucher from FAMS;
- ✓ Firestone provides the payment office an estimate before beginning work; and
- ✓ Only when we do not find a Firestone location available within 50 miles from the customer's residence, the customer must give us a minimum of two estimates from area automotive repair/supply businesses listed in the local telephone directory and open to the public.

### b. *Car Insurance and registration*

Workforce Solutions may pay for liability car insurance and vehicle registrations if the customer:

- Demonstrates clearly and conclusively that they are unable to get to work, search effectively for work, or attend school without one of the above, and
- Has an estimate, or a bill, from the vendor for the cost, and
- Demonstrates that they own the vehicle or
  - has the approval of the vehicle owner for the proposed service (see Vehicle Permission/Hold Harmless form attached); and
  - Co-signs a statement with the vehicle's owner that they use the vehicle to get to employment, work search, or school as called for in the employment plan.

We will pay the vendor directly for insurance and registration.

Please refer to the [Financial Aid Limits](#) desk-aid for limits to transportation assistance.



Office Managers may approve exceptions to the personal and vehicular expense limitations when there are extraordinary circumstances and/or a clear need for a greater level of assistance is documented in the customer's employment plan and TWIST Counselor Notes.

**SNAP E&T customers cannot receive assistance with vehicular transportation expenses for car insurance, vehicle registration, and safety inspections.**

# Using Cash Cards

The primary methods for providing financial assistance include:

- Bus passes;
- Gas cards;
- Merchant cards;
- Vouchers; and
- Checks or electronic payments to approved vendors.

There are occasions when none of these methods are appropriate. In these cases, we can use a Cash Card to provide the financial assistance. There are two primary instances where we use Cash Cards:

- Customer has a recurring need for financial assistance and it is impractical for the customer to travel to a Workforce Solutions Career Office to support continued assistance;

For example, a customer in training needs transportation for the duration of the training and traveling to a career office to receive another month's support is impractical. In these cases, the customer provides attendance records to support the previous month's travel and requests additional funds for the next month. Career office staff review the attendance records and ensures the customer used the cash card for the authorized purpose. The career office staff authorizes the Support Center to add funds to the customer's Cash Card for the next month.

- Customer needs financial assistance that Workforce Solutions cannot pay with any other method.

For example, a customer in Workforce Solutions supported training needs books or supplies that cannot be obtained through any other method. Career office staff authorize the Support Center to add the funds to a Cash Card and the card is provided to the customer by the career office. **The customer must provide receipts verifying the approved purchases within five working days.**

## Verifying Cash Card Use

Because of the nature of Cash Cards, a customer may use these financial aid funds for items not authorized by Workforce Solutions. For this reason, multiple reviews of Cash Card use are required.

- The Career Office is the key reviewer of Cash Card use when a customer requests additional financial assistance.
- The Support Center also reviews Cash Card use when adding funds to a Cash Card and will consult with the Career Office to verify authorized use of the funds.
- The Financial Aid Payment Office conducts a review of all Cash Cards where there has been no activity on the Cash Card for 45 days or more. The Financial Aid Payment

Office will deduct unused funds from a Cash Card that has no activity for 45 days or more and record this action in TWIST Counselor Notes.

**Inappropriate Use of Cash Cards**

The Desk-Aid, [Cash Card Integrity Review Process](#), provides detailed procedures for assuring proper use of Financial Aid and for recouping funds when customers make inappropriate use of Cash Cards.

All staff are responsible for reporting suspicion of fraud, waste, theft, and/or program abuse to the Financial Aid Payment Office.

# Paying and Tracking Financial Aid

There are multiple roles in the paying and tracking of Financial Aid. The Career Office (including tracking units), the Support Center and the Payment Office must work together to ensure timely and accurate payment and tracking of Financial Aid.

We use multiple data and communication systems to pay and track Financial Aid including TWIST, FACS, DocuWare, and FAMS.

## The Career Office is responsible for:

- Determining the need for and authorizing financial aid dollars to address the need (except for customers requesting only early education child care support);
- Issuing vouchers, checks, and support service cards to customers; and
- Explaining, supporting and documenting financial aid decisions and actions in TWIST Counselor Notes. Always include justification for the reasonableness of the amount of support service dollars awarded to the customer.
  - Staff must ensure they understand the needs of the customer.
  - Sometimes we need more information regarding the items requested. For example: Customer need tools and we need a detailed list of the items requested.

## The Tracking Unit is responsible for:

- Authorizing early education child care support for customers who need assistance with child care expenses because of participation in TANF Applicant, Choices or SNAP E&T; and
- Recording services for customers in TWIST Service Tracking;
  - When recording a support service in TWIST Service Tracking, make sure there is a corresponding service related to the support service. For example, an Objective Assessment service for a work-support support service or an Occupational Skills Training service for a transportation support service. When completing the “Comments: tab, always include a reference to the service related to the support service provided. For example – Refers to 08 service dated 6/10/2017. This may be an objective assessment, an employment plan or a training service such as occupational skills training, OJT, etc.
  - Complete the comments section to reference the service related to the support service provided. This may be an objective assessment, an employment plan or a training service such as occupational skills training, OJT, etc.
  - When you are planning to provide support for a future service, attach the support service to an objective assessment or employment plan service in the comments section of the support service. When the customer begins the service (classroom training, work experience, etc.) attach the support service to the training service in the comments section of the support service.

## The Financial Aid Support Center is responsible for:

- Making and recording an eligibility determination for Workforce Solutions Financial Aid;

- Notating in counselor notes the [priority criteria](#) and income level (low income or self-sufficiency) used to make the eligibility determination;
  - For customers determined eligible using the self-sufficiency level, staff will check the Income Exempt box in the Exemption tab in TWIST.
- Notifying customers of the eligibility determination decision;
- Creating vouchers for training costs authorized by Career Office;
- Adding funds to cash cards as authorized by Career Office;
- Authorizing early education child care support (except for customers receiving assistance with child care expenses because of participation in TANF Applicant, Choices, or SNAP E&T); and
- Conducting financial aid appeals when we deny, reduce, or discontinue financial aid.

The Financial Aid Payment Office is responsible for:

- Approving vouchers for training costs authorized by Career Office;
- Approving amounts of checks/cards for reimbursement to customers for support services;
- Issuing checks to authorized vendors;
- Paying vendors for approved costs; and
- Initiating fact finding and appropriate recoupment procedures when Career Office, Tracking Unit or Support Center staff reports suspicion of fraud, waste, theft, and/or program abuse.

# How to Provide Financial Aid – Work-Related Support Services

Support services provided must be reasonable, necessary, appropriate and allowable under the provisions herein.

Staff must explain to customers the purpose and intended use of the funds being provided.

To provide support services for work-related expenses, we can:

- purchase approved items online to be picked up at a store, locker or delivered to the customer,
- purchase items a customer has on hold at a store or vendor, if we obtain an invoice or receipt through text, email or fax,
- provide a voucher, for an authorized vendor, to the customer to purchase approved items,
- meet a customer at a vendor to pay for previously approved items,
- reimburse customers for previously approved items with a valid receipt or
- As a final resort, we may provide customers with funds to purchase items in advance. The customer **must provide us with receipts** either by text, email or in person. If receipts are not received, the customer will be placed in recoupment and will be responsible to repay the funds.

## **Order Online**

Career office staff may assist customers with selecting items needed and the customer will need to verify all information is correct before the order is placed online. Staff will checkout using the approved process and customers will have the option to pick up or have items delivered. Staff will store a copy of the receipt in DocuWare to confirm the purchase.

## **Pay for Items on Hold**

Customers may choose to go to a vendor and determine the type and size of items needed. In this case and where possible, we will work with the customer and vendor to ensure we can receive an invoice or copy of the receipt. Vendors may email, fax, or text a copy of the receipt. After obtaining a copy of the invoice or receipt, staff can complete the order using the credit card assigned to the office. A copy of the invoice or receipt must be stored in DocuWare.

## **Vouchers**

Career Offices are encouraged to identify vendors who are willing to enter into direct agreements for the provision of support services and provide the name of the vendor to the payment office. This process eliminates the need for customers to use their own funds for purchases and streamlines the support services process to ensure a timely turnaround. To set up a vendor agreement, the vendor procurement process must be followed.

Once procured, a listing of the vendor agreements for the provision of support services must always be maintained and be made available to Board staff upon request. Each listing should identify the:

- vendor,
- vendor location(s),

- vendor contact information,
- type(s) of supportive service to be provided,
- vendor agreement (if available) and payment system utilized (i.e. voucher program, direct vendor payment).

***Note: The payment office staff must ensure, prior to initiating an agreement with a vendor, that a procurement has been conducted.***

### **Accompany Customer to Store**

There may be occasions where an online purchase is not feasible, timely enough to meet the needs of a customer, or the customer does not have funds to purchase items to be reimbursed.

Staff may meet a customer at a prearranged location to purchase the items using the credit card assigned to the office and obtain a receipt.

Staff must upload the receipt received in DocuWare to confirm the purchase.

### **Customer Reimbursement**

Customers may be reimbursed for approved purchases. After a customer meets with a staff and determines the amount of financial aid to be provided, the customer must express intent to purchase the items and staff must record the intent in TWIST Counselor Notes. Once the items are purchased, the customer must provide a copy of the receipt within five business days and career office staff will submit information to the payment office for reimbursement in the form of a check or card with the appropriate amount added. A copy of the receipt and proof of reimbursement must be stored in DocuWare.

### **Exception**

At times, a customer may not have the funds needed to purchase items and have an immediate need. In this situation and by exception, we may choose to give the customer the funds to purchase items. We must make sure we explain to the customer that we will need to receive a copy of the receipt of items purchased. We must discuss with the customer a deadline for returning the receipt (preferably within five business days) and how they will submit the receipts. Lastly, we must explain to the customer that failure to return the receipt may result in the customer being held responsible for repaying the amount provided and risk losing any additional assistance from Workforce Solutions including but not limited to: child care, training assistance, work support until the amount has been repaid. Customers who fail to provide receipts will receive a recoupment letter detailing their next steps to repay Workforce Solutions and to continue receive service. (See Work Related Documentation Recoupment)

### **Reminder:**

Support services must be fully documented in TWIST along with counselor notes that clearly describe the services and costs of services provided.

Counselor Notes shall include:

- an assessment of need for the service,
- justification for support services,
- a statement and documentation indicating other resources have been sought,

- amount of funding,
- verification that services were received/purchased (i.e. proof of checks, vendor payments, vendor receipts or vouchers provided), and/or (i.e. photo of receipt, copy of online or in-store receipt).

Documentation of support services must be entered in TWIST on the Support Services tab, with a comment referencing the open service.

All support documents must be uploaded in DocuWare and documented in TWIST Counselor Notes.