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| **WS 17-06**  |
| **May 25, 2017** |
| **Financial Aid** |
| **Expires: Continuing** |

# To: Workforce Solutions Contractors

From: Mike Temple

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Subject: Managing Financial Aid

Purpose

Updates system financial aid policy

This issuance changes and updates guidance in WS 15-08 - Managing Financial Aid. This issuance includes links to a revised Financial Aid Application and a Verification of Eligibility Qualifications guide.

Background

We help customers get a job, keep a job, or get a better job.

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 35,000+ customers – making financial aid an important part of our service.

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 her employment goals and address the availability of other community resources.

The Kinds of Financial Aid We Offer

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 financial aid in the past **three years**, any subsequent request for financial aid will be considered substantial assistance.

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 her 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.

Substantial assistance often includes financial aid from more than one type.

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 her 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 and her needs, 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](http://www.wrksolutions.com/staff-resources/performance-improvement/desk-aids) 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 that staff is aware of the [Transportation Expenses Desk Aid](http://www.wrksolutions.com/staff-resources/performance-improvement/desk-aids).
3. Make sure that 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](http://www.wrksolutions.com/staff-resources/issuances/submit-a-question-issuances-qa).

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

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 funds Workforce Solutions can use for financial 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>.

**Substantial Assistance**

1. Customers who may qualify for this level of assistance include:
2. Customers tagged in TWIST as:
3. TANF Applicant,
4. TANF/Choices
5. Non-Custodial Parent
6. SNAP E&T
7. 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](http://www.wrksolutions.com/Documents/Staff/fin-aid-app-inst/application/Fillable_PDFs/Financial-Aid-Application-E.docx), and
		1. Provide supporting documentation, and
		2. Are determined eligible for one or more funds other than those listed in Section 1.A. above (for example-WIOA).
8. Financial Aid Application Notes – Career Office Staff
9. Conduct an initial assessment to determine if the customer needs and is suitable for the substantial assistance .
10. Describe the results of the initial assessment in TWIST Counselor Notes.  The Counselor Note should support the Career Office staff decision that the customer is seeking financial assistance that is supported by Workforce Solutions and is suitable for the financial aid requested.

Note: the Call 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.

1. A customer, who receives substantial assistance through a fund listed in section I.A. above, could experience an interruption in Financial Aid if she loses eligibility for that fund. Explain to customer that completing a Financial Aid Application may help protect from an interruption with assistance by identifying additional sources of financial assistance for which she may be eligible.

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

1. Do not comment on the potential eligibility of the customer for Financial Assistance -- only the Call Center can determine eligibility.
2. Use the [Validating and Entering Qualifications](http://www.wrksolutions.com/staff-resources/performance-improvement/desk-aids) 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](http://www.wrksolutions.com/Documents/Staff/fin-aid-app-inst/Financial-Aid-Eligibility-Glossary.docx) 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 her 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.

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 her need.

1. **Supporting and Recording Short-Term Assistance**
2. Assessment and Job Search Map/Employment Plan

Customers eligible for this level of assistance must complete an Addendum, Orientation to Complaint form, and provide documents to satisfy eligible to work status. The addendum and instructions can be found at this link: <http://www.wrksolutions.com/staff-resources/issuances/work-addendum-revised>.

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.

1. TWIST Counselor notes must include:
2. A summary of eligibility for Workforce Solutions funds including the eligibility criteria, the documents supporting the eligibility and any additional information that supports the determination of eligibility;
3. Documentation and/or verification from the employer that the customer has a job or job offer and the customer needs assistance from Workforce Solutions to accept or keep her job; 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.
5. TWIST data entry must include
6. Program Detail
7. Objective assessment
	1. Support Services information
8. Counselor Notes
9. **Supporting and Recording Substantial Assistance (other than child care financial aid)**
10. Assessment – An assessment is critical to helping the customer identify her 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 and to develop an employment plan to help the customer achieve her goals. We work with the customer to reassess needs and develop modified employment plans as the need arises. An initial assessment is required for individuals applying for substantial financial assistance

**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 her financial aid needs and how financial assistance will help meet her employment goals.
3. Discuss and, if appropriate, provide [FAFSA](https://fafsa.ed.gov) website for the customer to get information and to submit a free application for federal student aid.
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 her 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 her from being successful in that field

1. Employment Planning – organizing Workforce Solutions service and financial aid to help reach employment/career goals
2. 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.…
3. Ask the customer about her 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 her goals through classroom training and/or work-based training.
4. 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 help the customer complete the financial aid application. Assist her with collection of required documents as appropriate. Do not advise the customer regarding her eligibility for Workforce Solutions funds.

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

1. Choosing an Eligible Training Provider/Adult Education Provider

Customers must select a program of study from the [High Skill/High Growth Occupations Supported with Scholarships](http://www.wrksolutions.com/Documents/Individuals/faj/highskillprofile/High-Skill_High-Growth_Occupations.pdf) list to receive Workforce Solutions’ financial aid for school or training. Career Office staff must:

1. Review the [High Skill/High Growth](http://www.wrksolutions.com/Documents/Individuals/faj/highskillprofile/High-Skill_High-Growth_Occupations.pdfhttp%3A/www.wrksolutions.com/Documents/Individuals/faj/highskillprofile/High-Skill_High-Growth_Occupations.pdf) occupations list.
2. Review and discuss the approved vendors/schools on the [Eligible Training Provider System](https://apps.twc.state.tx.us/PROVIDERCERT/dispatcher?link=HREF&pageid=PUBLIC_SWL_SEARCH).
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.

1. Completing TWIST Counselor Note

Use TWIST counselor notes to summarize your conversations with customers and to support the services we provide. Counselor notes must support the decisions to provide financial assistance and to support the amount of financial assistance we provide.

TWIST Counselor notes must include:

1. Initial and ongoing assessments
2. Summary of eligibility for Workforce Solutions funds;
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. Confirmation the customer is enrolled in courses that support the training objective (ascertain start date of training).
7. Results of the monthly contacts with the customer (e.g. academic progress, need for additional assistance, etc.)
8. Data Entering Substantial Assistance in TWIST

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.

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.
1. Counselor Notes to support services provided to the customer.
2. Following-Up on an Employment Plan
3. Update the Employment Plan whenever the customer is requesting a new *type* or *category* of financial assistance. Counselor notes must support the decision to provided requested assistance by justifying the need for the assistance and addressing the availability of community resources to meet the customer’s need.
4. 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.
5. 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 her 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](http://www.needhelppayingbills.com/html/texas_assistance_programs.html) and [2-1-1 Texas/United Way Helpline](http://referral.unitedwayhouston.org/).

Refer to the [Financial Aid Limits by Type of Assistance Chart](http://www.wrksolutions.com/staff-resources/performance-improvement/desk-aids)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 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. **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.

Paying and Tracking Financial Aid

There are multiple roles in the paying and tracking of Financial Aid. The Career Office (including tracking units), the Call 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
* Explaining, supporting and documenting financial aid decisions and actions in TWIST counselor notes.

**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, TANF Choices or SNAP E&T
* 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.

**The Financial Aid Call Center is responsible for**

* Making and recording an eligibility determination for Workforce Solutions Financial Aid
* 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).
* 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
* Issuing checks to authorized vendors
* Paying vendors for approved costs
* Initiating fact finding and appropriate recoupment procedures when Career Office, Tracking Unit or Call Center staff reports suspicion of fraud, waste, theft, and/or program abuse.

**Using Cash Cards**

The primary methods for providing financial assistance include:

* Bus passes
* Gas cards
* Merchant cards
* Vouchers
* Checks or electronic payments to approved vendors

There are occasions when none of these methods is 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 Call 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 Call Center to add the funds to a Cash Card and the card is provided to the customer by the career office.

**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 Call 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.

**Inappropriate Use of Cash Cards**

The Desk-Aid, [Cash Card Integrity Review Process](http://www.wrksolutions.com/Documents/Staff/deskaids/Cash-Card-Integrity-Review-Process.docx), 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.