

EASTERN WASHINGTON PARTNERSHIP

WORKFORCE DEVELOPMENT COUNCIL

956 S. Main • Colville, WA 99114 • (509) 684-8421 • Fax (509) 685-6094

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SUBJECT Needs-Related Payments (NRP)

PURPOSE

NRPs provide financial assistance to Workforce Innovation and Opportunity Act (WIOA) eligible adults, dislocated workers, and out-of-school youth (age 18-24) who are enrolled in training, for the purpose of enabling such individuals to participate in a training program. NRPs may also be provided if the participant has been accepted in a training program that will begin within 30 calendar days. The State may authorize local areas to extend the 30-day period to address appropriate circumstances.

BACKGROUND

NRPs are not entitlements and must be necessary to the success of the participant's training plan and beyond the ability of the participant to pay. NRPs shall be provided to participants on the basis of a documented financial assessment, individual circumstances, the absence of other resources and funding limits.

NRPs do not necessarily provide enough money to meet all needs of a participant enrolled in training. NRPs would provide income support beyond what would otherwise be available through other sources [e.g., Unemployment Insurance (UI) compensation, Washington State Training Benefits, Trade Readjustment Allowances (TRA)].

The WDC is establishing this policy within the limitations of the law that describes adults, dislocated worker, and youth eligibility for NRPs. [Reference: WIOA Sections 134 (d) (3), 20 CFR 680.940, 680.950, and 681.570]

POLICY

To be eligible for NRPs, a dislocated worker must:

- be unemployed; **and**
- be ineligible for Unemployment Insurance (UI) benefits or additional benefits (such as state funded training benefits) or Trade Readjustment Assistance (TRA) under the Trade

Adjustment Assistance Act (TAA) or the North American Free Trade Agreement Act (NAFTA-TAA); **or** has ceased to qualify for such benefits; **and**

- be enrolled in WIOA training services by the end of the 13th week after the most recent qualifying layoff that resulted in the determination of the worker's eligibility as a dislocated worker; **or**, if later, be enrolled in training by the end of the 8th week if they are informed that short-term layoff will, in fact, exceed 6 months; **or** be unemployed and not eligible for unemployment compensation or trade readjustment assistance under TAA or NAFTA-TAA, **or** be enrolled in training within 6 weeks of a National Emergency Grant (NEG) approval; **and**
- require NRPs in order to participate in approved full-time training based on the participant's "Training Support Analysis" document at a weekly payment level determined by the local Council; **and**
- meet the academic and attendance standards for the school.

To be eligible for NRPs an adult must:

- be unemployed, and
- not qualify for, or have ceased to qualify for unemployment insurance.
- be enrolled in a program of training services under WIOA section 134(d)(3).

To be eligible for NRPs an out-of-school youth must:

- Not be attending school, as defined by state law, and
- Be unemployed, and
- not qualify for, or have ceased to qualify for unemployment insurance, and
- be enrolled in a program of training services under WIOA Section 129(c)(2), and
- demonstrate a financial need

The term "enrolled in training" means that the participant's application for training has been approved and the training institution has furnished written notice that the participant has been accepted in the approved training program beginning within thirty (30) calendar days. The WDC may extend the 50-day period to address appropriate circumstances.

The WDC has determined a weekly payment level of NRPs that ensures equitable treatment for all eligible participants based on funds available.

- For dislocated workers who cease to qualify for UI compensation as a result of the qualifying layoff, the weekly NRP payment level may be lower than but cannot exceed the "higher" of the applicable weekly level of the UI compensation or \$175.00 per week, whichever is **lower**; **or**
- For dislocated workers and adults who do not qualify for UI compensation as a result of the qualifying layoff, the weekly NRP payment level may be lower than but cannot be greater than 100% of the OMB poverty guidelines based upon family size for an equivalent period of time. In no instance shall the weekly benefit amount exceed \$175.00 per week. NRPs will not exceed thirteen weeks under any circumstances. The weekly payment level must be adjusted to reflect changes in total family income as determined by a monthly review by contractor staff.

Note: Dislocated workers enrolled in approved training who are unemployed but who receive payments as a member of a reserve component of the U.S. Armed Services, or as a member of the Washington National Guard, for periods of duty of 72 consecutive hours or less, shall be considered unemployed for purposes of qualifying for NRPs.

Unless requested by a waiver in a National Emergency Grant (NEG) application and authorized by the U.S. Department of Labor (DOL), NEG funds cannot be used to support NRPs:

- where the WDC has not demonstrated that sufficient resources are not available at the local level.
- that exceed the weekly NRP level determined by the local Council for their formula funded program.

Unless specifically authorized by the WDC, individual contractor's NRPs may not exceed 10% of their total budget.

PROCEDURES

- To be awarded an NRP, an eligible participant must complete a WIOA Title I NRP "Training Support Analysis Form" (TSAF).

Eligibility Determination

1. The Counselor determines family size by identifying the number of persons residing in the same residence who are related by blood, marriage, or adoption.
2. Family income is determined for the previous full calendar month. The Counselor will ensure that the participant is not eligible for unemployment insurance payments.

Income needed to pay specifically for training expenses should not be included when computing resources available to support the participant. Such expenses may include the cost of childcare, transportation to the training site, books, tuition, equipment and required uniforms or clothing. Based upon these determinations, the Counselor determines if the participant is eligible for NRPs, and if so, the weekly NRP amount is calculated. The participant must disclose any supportive services they will be receiving from any other program/partner in order to coordinate and calculate the participant's entire need. If the Counselor determines that the last month's income does not accurately reflect the participant's needs due to exceptional family circumstances, a justification can be documented and brought to the attention of the office Administrator who can make a determination if NRPs should be approved.

The Counselor will then verify that the participant is:

- enrolled in an approved full-time training; and
- following enrollment, the participant must be making satisfactory progress in an approved training program. Satisfactory certification may be a document signed by the registrar or an equivalent person designated by an educational institution where the participant is attending school. A participant must provide documentation on a monthly basis that they

have been regularly attending the classes. This may be documented by a program instructor or another authorized official at the institution who can provide verification.

The TSAF must be signed by the participant. It must be updated on a monthly basis and signed and dated to certify the continued need.

Procedures for Payment

1. The weekly NRP will not exceed the applicable level of unemployment compensation, poverty level income, or \$175, whichever is lower, for the applicable time period.
2. The NRP will be authorized for no more than thirteen weeks.
3. The NRPs will continue during regularly scheduled holidays and breaks as established in a published calendar of the participant's training institution. This does not include summer breaks.
5. NRPs will be suspended during periods when a participant is earning equal to or more than the weekly NRP amount. Available earned income will be calculated as described in #3 of the Eligibility Determination section of this procedure.
4. NRPs will be reduced for unexcused absences at a prorated amount.
5. Records of academic achievement or grades and registration documents will be part of the file to verify participation and authorize payment.
6. In the event of fraud, all WIOA funds obtained from the date of the fraud will be subject to collection from the appropriate sources. Such fraudulent activity will be reported immediately to the OIG as provided in 20 CFR 683.620.
7. Authority to approve NRPs will follow the same procedures as those used by a service provider to authorize support services.

Required documentation shall include:

- a) a copy of the UI entitlement decision or confirmation of UI benefits being exhausted, if applicable.
- b) Evidence of participation in training such as a copy of an ITA or attendance records for each period of training (quarter, semester, classes, etc.)
- c) A signature by the participant attesting to his/her understanding of needs-related payments requirements and instruction.
- d) All eligibility determinations

ATTACHMENTS – Training Support Analysis Form

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NEEDS-RELATED PAYMENT ASSESSMENT FORM

Name: _____ SSN: _____

1. Are you out of school and at least 18 years old?

Yes No

2. Are you unemployed?

Yes No

3. Do you currently qualify (receive) UI benefits?

Yes No

4. Do you currently qualify for additional state or extended UI benefits (e.g., Training Benefits)?

Yes No

5. Do you currently qualify for Trade Readjustment Allowances (TRA)?

Yes No

6. Are you receiving any other federal or state income support? *Examples: TANF, Training Completion Aid?*

Yes No

7. Have you considered all other resources available that will help you successfully participate in your full-time training program? *Examples of other resources include, but are not limited to, Pell grants, severance pay, other family income (e.g. spouse's income).*

Yes No

8. Do you need income support beyond these other resources in order to participate in training full-time?

Yes No

NRPs are not intended to provide the entire amount of income support you need to complete your training. If you are awarded an NRP, it will be based on this support analysis and the weekly NRP level. These payments are made to help you while making satisfactory progress while attending school. NRPs are subject to your eligibility for the program and total funds available.

All answers and statements are true and complete to the best of my knowledge. I understand that providing untruthful or misleading answers are cause for denial of NRPs. Any overpayments or fraud based on my false or misleading answers could result in my repayment of any NRPs provided.

Signature: _____

Date: _____

[Type text]