



**SAN JOAQUIN COUNTY WORKNET  
 EMPLOYMENT AND ECONOMIC DEVELOPMENT DEPARTMENT  
 POLICIES AND PROCEDURES DIRECTIVE**

DIRECTIVE NO.	EFFECTIVE DATE	APPLICABILITY	PAGE
25-20	February 25, 2026	CMD, FMD, GMD	1 of 7
<b>SUBJECT: WIOA NEEDS-RELATED PAYMENTS</b>			

**I. PURPOSE**

The purpose of this directive is to establish clear policies and procedures for San Joaquin County Employment and Economic Development Department (EEDD) staff regarding the provision of Needs-Related Payments (NRPs) to eligible individuals enrolled in Workforce Innovation and Opportunity Act (WIOA) programs administered by EEDD.

Needs-Related Payments are a form of participant financial assistance authorized under WIOA Title I and are intended to provide temporary income support to eligible participants who are unemployed, enrolled in approved training, and unable to meet basic living expenses during participation. NRPs are not wages, do not establish an employer–employee relationship, and are not compensation for services rendered. Needs-Related Payments are distinct from supportive services and are subject to separate eligibility, duration, and payment limitations under federal regulation.

This directive applies to eligible Adults, Dislocated Workers, and co-enrolled Youth (ages 18–24) participants, and is intended to ensure NRPs are administered in a manner that promotes equity, removes barriers to training completion, and meets all federal, state, and local monitoring requirements.

**II. GENERAL INFORMATION**

Needs-Related Payments may be provided only when necessary to enable participation in WIOA Title I training services and only while the participant remains actively enrolled and meeting training participation requirements.

- Adults and Dislocated Workers: NRPs are not permitted during follow-up after exit.

- Youth ages 18–24 may receive NRPs only when co-enrolled in the Adult or Dislocated Worker program and only under the eligibility, payment, and duration requirements applicable to that co-enrolled program.

All NRPs must be:

- Documented in CalJOBS
- Supported by the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS)
- Issued in compliance with federal eligibility, payment, duration, and documentation requirements

This directive supersedes PPD D-58, dated July 1, 2020.

### References

- [Workforce Innovation and Opportunity Act \(WIOA\) of 2014](#), Sections 134(d)(3), 167
- Title 20 Code of Federal Regulations (CFR), Sections [680.910](#), [680.930-680.970](#), [685](#)
- [TEGL 19-16](#), Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules
- [TEGL 10-16, Change 3](#), Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Core Programs
- [TEGL 9-22](#), Workforce Innovation and Opportunity Act Title I Youth Formula Program Guidance
- [WSD 24-05](#), CalJOBS Activity Codes

### Definitions

**Adult/Dislocated Worker:** A participant enrolled in WIOA Adult or Dislocated Worker programs who is receiving individualized career services and/or training services.

**Needs-Related Payment (NRP):** Temporary financial assistance provided to eligible WIOA participants who are unemployed, enrolled in approved training, and unable to meet basic living expenses during participation.

**Youth:** Participants ages 16–24 enrolled in WIOA Youth Program. NRPs are limited to youth ages 18–24 who are co-enrolled in Adult or Dislocated Worker programs.

### III. POLICY

EEDD will provide Needs-Related Payments to eligible participants in accordance with WIOA §134(d)(3) and 20 CFR §§680.930–680.970 to support successful completion of training and entry into employment.

NRPs:

- Must be reasonable, necessary, and documented
- May not supplant or duplicate unemployment compensation, public assistance, or other income supports
- Are subject to stricter eligibility, duration, and payment limits than other supportive services

The San Joaquin County Workforce Development Board reserves the right to limit or not offer NRPs based on local funding availability, partner resources, and board-approved priorities. Any such limitations shall be applied consistently and in a nondiscriminatory manner in accordance with WIOA Section 188. Any decision to limit or suspend NRPs must be documented in local policy. Participants will be informed of and referred to available community resources when NRPs are not provided.

### IV. PROCEDURE

#### A. Eligibility Requirements

Needs-Related Payments (NRPs) may be provided only when all the following conditions are met:

1. The participant is unemployed.
2. The participant is enrolled in and actively participating in WIOA-approved training.
3. The participant demonstrates documented financial need.
4. Other reasonably available resources have been exhausted or are unavailable. These resources may include, but are not limited to, unemployment compensation, public assistance, scholarships, stipends, or other income supports.
5. The NRP is provided concurrently with training services.
6. Adult priority of service, when applicable, is documented in CalJOBS prior to the issuance of NRPs.

In addition to the general eligibility requirements above, the following program-specific standards apply:

- **Adults** must be unemployed, enrolled in approved training, and either not eligible for or have exhausted unemployment compensation. NRP amounts for Adults may not exceed 100 percent of the Lower Living Standard Income Level (LLSIL), adjusted for family size.
- **Dislocated Workers** must be unemployed, enrolled in approved training within the required timeframe, and have ceased or exhausted unemployment compensation or Trade Adjustment Assistance (TAA), if applicable. NRP amounts for Dislocated Workers may not exceed the greater of the participant's weekly unemployment compensation amount at the time of layoff or the weekly equivalent of the Federal Poverty Level, adjusted for family size.
- **Youth ages 18–24** may receive NRPs only when co-enrolled in the Adult or Dislocated Worker program and meeting all federal NRP eligibility requirements. Payment limits and duration must follow the requirements of the co-enrolled program.

#### B. Financial Need Determination

Participants must demonstrate financial need through a Financial Analysis Budget attached to the IEP or ISS, comparing family income to family expenses following enrollment in training. Family income and expenses shall be calculated based on the participant's household as defined in WIOA eligibility documentation.

NRPs may not duplicate or replace:

- Unemployment compensation
- Public assistance
- Other stipends or income available at enrollment

Any change in financial circumstances requires an updated budget and IEP/ISS modification, with justification and approval prior to continuation of payments.

#### C. Payment Amounts, Duration, and Timing

Payment Limits NRP amounts may not exceed federal limits established under 20 CFR §§680.960–680.970 and are based on the participant's documented financial need.

1. For Adults, the maximum NRP is:

Up to the weekly equivalent of 100% of the Lower Living Standard Income Level (LLSIL), adjusted for family size, as published annually by the U.S. Department of Labor. It is a maximum ceiling, not an automatic payment. The participant may receive less than the maximum if their budget shows partial need.

2. For Dislocated Workers, the maximum NRP is:

The greater of the participant's weekly UC amount at the time of layoff, or the weekly equivalent of the Federal Poverty Level (FPL). Family income must be considered. If the participant was never eligible for UC or exhausted UC, the poverty level comparison still applies.

3. Youth may receive NRPs only if co-enrolled in the Adult or Dislocated Worker program and must follow the same payment limits as the co-enrolled program.

Federal regulations require NRPs to be based on financial need, not simply issued at the maximum allowable amount. This means that staff must complete a Financial Analysis Budget in the IEP/ISS that compares total family income including UC, wages, stipends, and benefits, and total family expenses such as housing, utilities, food, and transportation. The difference between income and expenses determines the authorized NRP amount. Even if the LLSIL allows a higher amount, the NRP may not exceed the documented need.

Needs-Related Payments (NRPs) are time-limited and may be provided only while a participant is actively enrolled in training, making satisfactory progress and attendance, and demonstrating ongoing financial need. Satisfactory progress and attendance shall be determined in accordance with the training provider's published standards and the participant's IEP/ISS. NRPs must cease if the participant becomes employed, exits training, receives sufficient income, or fails to meet participation requirements. Failure to meet training provider standards may result in suspension or termination of NRPs following case manager review and supervisory approval. If a participant's financial situation changes, the IEP/ISS budget must be reviewed and modified, as necessary, to continue, adjust, or terminate NRPs. Case manager must document the modification in the IEP/ISS and provide justification. All modifications require Division Manager approval prior to issuance of payments.

#### **D. Approval and Documentation**

Division Manager approval is required for all NRPs. NRPs may not be issued retroactively for periods prior to approval or documentation of eligibility.

Documentation must include:

- Financial Analysis Budget in IEP (Attachment 1)
- Supportive Needs Section of IEP or ISS
- CalJOBS Enrollment Verification
- Evidence of Exhaustion of Other Resources
- Needs-Related Payment & Financial Assistance Form (Attachment 2)

Once documentation is complete, it is submitted to the supervisor for review and Division Manager for final review and signature approval and forwarded to Fiscal.

NRPs must be entered into CalJOBS accurately and consistently with source documentation within five working days. Entries must support monitoring review and fiscal validation, including:

1. Activity Code: Use the appropriate activity code for the NRP. Activity code 326 will be used when an NRP is made on behalf of an Adult/Dislocated Worker. Activity code 491 will be used when an NRP is made on behalf of a Youth. It may be used only for youth ages 18–24 who are co-enrolled in the Adult or Dislocated Worker program and meet all federal Needs-Related Payment eligibility requirements.
2. Case Note: Include a description of the supportive service provided and any related activities.
3. Activity Code Dates: Reflect the date the supportive service was issued.
4. Corresponding Career Service Code: Ensure the supportive service activity code corresponds with the career service activity code in CalJOBS.
5. Funding Stream Consistency: Both supportive service and corresponding career service codes must be coded to the same funding stream.

## **E. NRPs and Follow-Up Services**

Adult/Dislocated Workers: Follow-up NRPs for Adults and Dislocated Workers are not permitted during follow-up after exit, consistent with [TEGL 19-16](#), [TEGL 10-16](#), and [20 CFR § 680.910](#), which limit supportive services to participants actively engaged in career or training activities.

Youth: While Youth supportive services may be provided up to one year post-exit, consistent with WIOA Youth program requirements. Needs-Related Payments may not be provided after exit and must be limited to periods of active training participation under the Adult or Dislocated Worker program.

**F. Equal Opportunity, Accessibility, and Grievance Rights**

NRPs shall be provided in compliance with WIOA Section 188 and applicable nondiscrimination and equal opportunity requirements. Participants shall have access to NRPs without discrimination based on protected characteristics.

Participants may file a grievance or complaint regarding Needs-Related Payment determinations in accordance with EEDD's grievance procedures.

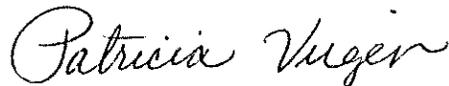
**V. QUESTIONS REGARDING THIS DIRECTIVE**

May be referred to the Executive Director of EEDD via Managers or designee.

**VI. UPDATE RESPONSIBILITY**

The Executive Director of EEDD and/or designee shall be responsible for updating this directive, as appropriate.

**VII. APPROVED**



PATRICIA VIRGEN  
EXECUTIVE DIRECTOR

PV:jl

Attachment 1: Budget Worksheet

Attachment 2: Needs-Related Payment & Financial Assistance Form

**FINANCIAL ANALYSIS:**

CLIENT NAME

DATE


Number of individuals dependant upon your income

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**MONTHLY RESOURCES:**

- 1 Wages (**Self or Spouse**)
- 2 Child/Spousal Support (**Circle income that applies**)
- 3 Workmen's Comp./UI (**Circle income that applies**)
- 4 SSA, Retirement, Pension (**Circle income that applies**)
- 5 TANF
- 6 Food Stamps
- 7 Other


**A. TOTAL MONTHLY RESOURCES**

\$ - **A**

**COST OF LIVING:**

Actual

1	HOUSING:	Rent	<input type="text"/>		
		Mortgage/Insurance/Property Tax	<input type="text"/>		
		Telephone/Cellphone	<input type="text"/>		
		Gas/PG&E	<input type="text"/>		
		Water & Sewage	<input type="text"/>		
		Cable	<input type="text"/>		
		Internet	<input type="text"/>	\$ -	<b>1</b>
2	FOOD:	Groceries	<input type="text"/>		
		Lunch Money	<input type="text"/>	\$ -	<b>2</b>
3	CLOTHING:	Self & Dependants	<input type="text"/>		
		Diapers	<input type="text"/>	\$ -	<b>3</b>
4	PERSONAL EXPENSES:	Toiletries/Haircuts	<input type="text"/>		
		Laundry/Cleaning Products	<input type="text"/>	\$ -	<b>4</b>
5	MEDICAL:	Medi-Cal recipient?	<input type="text"/>		
		Doctor/Dentist Bills	<input type="text"/>		
		Prescription/Medicine	<input type="text"/>	\$ -	<b>5</b>
6	TRANSPORTATION:	Car Payment	<input type="text"/>		
		Car Insurance	<input type="text"/>		
		Gas, Oil, Upkeep	<input type="text"/>		
		License & Reg Fee	<input type="text"/>	\$ -	<b>6</b>
7	EDUCATION & RECREATION:	Entertainment	<input type="text"/>	\$	
		Tuition	<input type="text"/>	\$ -	<b>7</b>
		Books or Tools	<input type="text"/>	\$	
		Uniforms	<input type="text"/>		
8	CHILD CARE:		<input type="text"/>	\$ -	<b>8</b>
9	CREDIT CARDS, OUTSTANDING DEBTS				
		Institution	Balance	Monthly Payments	
		<input type="text"/>	<input type="text"/>	<input type="text"/>	
		<input type="text"/>	<input type="text"/>	<input type="text"/>	
		<input type="text"/>	<input type="text"/>	<input type="text"/>	
				\$ -	<b>9</b>
<b>B</b>	<b>TOTAL COST OF LIVING (Add items 1-9)</b>			\$	<b>B</b>
<b>C</b>	<b>BALANCE (A-B)</b>			\$	<b>C</b>

I hereby certify that the information above is true, and correct. (Signature) \_\_\_\_\_  
 Live with Family and Friends, and no income  
 Budget, and expenses have been revisited, and there are no changes on income as of this date \_\_\_\_\_



## Needs-Related Payment & Financial Assistance Form

CalJOBS Application Number

Participant Name (Last, First)

<input type="checkbox"/> Adult or Youth <input type="checkbox"/> Dislocated Worker <input type="checkbox"/> Non-WIOA Special Grant	Training Start Date	Training End Date	Number in Family
<b>RATIONALE FOR NEEDS-RELATED PAYMENTS</b>			
Needs-Related Payments were requested by _____ because _____ requires financial assistance to participate in an approved training activity. The weekly payment for this participant is _____ Needs-Related Payments funds will be used to pay for this supportive service.			
<b>ELIGIBILITY FOR NEEDS-RELATED PAYMENTS</b>			
1. Is this participant currently unemployed?	Yes	No	
2. Does the participant receive TANF or qualify for UI or TAA?	Yes	No	
3. Has the participant applied for a Pell Grant?	Yes	No	
3a. Eligible?	Yes	No	
4. Is the participant receiving CalWORKS financial assistance? (If yes, include in Monthly Household Income calculation below)	Yes	No	
5. Monthly Household Income			
Amount _____ Source _____			
Amount _____ Source _____			
Amount _____ Source _____			
Total _____			
6. Does monthly income exceed the federal poverty guidelines for the family size?	Yes	No	
7. Monthly household living expenses	Yes	No	
8. Does monthly household income exceed the monthly living expenses?	Yes	No	
9. Has the participant provided (and attached) a W9 form signed within the last six months	Yes	No	
If questions 6 and 8 are both yes, participant is <b>not eligible</b> for needs-related payments. If 6 is yes and 8 is no, participant is <b>eligible</b> . Participant eligible? Yes No Reminder: Needs-related payments to Non-WIOA Special Grant participants may not exceed \$500/week. I certify that the above-named participant is eligible for needs-related payments at the hourly rate of: _____			
Printed Name of Requesting Staff	Signature of Requesting Staff	Date	
My signature below indicates that I have been informed of and understand the information contained on this form. I understand that I am required to return proper receipts and/or documentation that are requested for the purchases and services that I have received. I understand that, if the required receipts and/or documentation in the amount listed above are not returned, no additional supportive services will be provided to me. Additionally, I understand that the above-mentioned supportive services are solely for the use of myself. All supportive services are only to be used for the intended purpose. Failure to comply with these policies will result in termination of assistance.			
Printed Name of Participant	Signature of Participant	Date	
<b>FOR MANAGER/ACCOUNTING USE ONLY</b>			
Is request reasonable, necessary, and allowable based on established local policies? <input type="checkbox"/> Yes <input type="checkbox"/> No	Request Outcome <input type="checkbox"/> Approved <input type="checkbox"/> Denied	Check/Card Number (if applicable)	
Printed Name of Accounting Staff	Signature of Accounting Staff	Date	
Printed Name of Manager	Signature of Manager	Date	
Note: Participant's household income and living expenses must be evaluated monthly. If household income increases, participant may become ineligible for needs-related payments.			
This WIOA, Title I-financially assisted program/activity is an equal opportunity employer/program. Auxiliary aids and services are available upon request to people with disabilities and/or limited English proficiency.			