



WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) POLICY NOTICE NO. 20 Rev.5

EFFECTIVE DATE: September 14, 2026

SUBJECT: SUPPORTIVE SERVICES AND NEEDS RELATED PAYMENTS

I. PURPOSE

This policy establishes clear, consistent, and compliant standards for providing supportive services, needs-related payments, and youth incentive payments to eligible participants under the Workforce Innovation and Opportunity Act (WIOA). These services are intended to enable participation in authorized WIOA activities and support successful progress toward employment and education outcomes.

II. AUTHORITY

This policy is issued pursuant to the following federal laws, regulations, and guidance:

- Workforce Innovation and Opportunity Act (WIOA) §§ 3(59), Section 116 (Performance Accountability), Section 129 (Youth Program), and Section 134 (Adult and Dislocated Workers Programs)
- 20 CFR Part 680 (Adult and Dislocated Worker Programs)
- 20 CFR §§ 680.900–680.970 (Supportive Services and Needs-Related Payments)
- 20 CFR Part 681 (Youth Program Requirements)
- 20 CFR § 681.640 (Youth Incentive Payments)
- 20 CFR § 681.570 (Supportive Services for Youth)
- 20 CFR Part 677 (Performance Accountability and Measurable Skill Gains)
- 29 CFR Part 38 (Equal Opportunity and Nondiscrimination)
- 2 CFR Part 200 (Uniform Administrative Requirements)
- Applicable guidance issued by the U.S. Department of Labor, including but not limited to Training and Employment Guidance Letters (TEGLs) such as TEGL 19-16 and subsequent guidance, and applicable guidance issued by the New Mexico Department of Workforce Solutions (NMDWS).

III. DEFINITIONS



Supportive Services

Services that are necessary to enable an individual to participate in WIOA-authorized education, training, or employment activities, as defined in 20 CFR § 680.900 and WIOA Section 3(59).

Needs-Related Payments (NRPs)

Financial assistance provided to participants for the purpose of enabling them to participate in training, and a supportive service authorized under WIOA Section 134(d)(3). Unlike other supportive services, to qualify for needs-related payments, a participant must be enrolled in training. See 20 CFR §680.930

Youth Incentive Payments

Monetary payments or items of value provided to youth participants to recognize achievement of program milestones or goals, consistent with the allowable use of incentives under 20 CFR §681.640.

IV. GENERAL REQUIREMENTS

- A.** Supportive services, needs-related payments, and incentives may be provided only when they are:
 - 1.** Necessary to enable participation in WIOA activities.
 - 2.** Based on an individualized assessment. and
 - 3.** Documented in the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS), as applicable.
- B.** Supportive services may not duplicate assistance available from other sources and must be coordinated with partner and community resources whenever possible.

C. SUPPORTIVE SERVICE CATEGORIES

- 1.** Supportive services may be provided to eligible participants when such services are reasonably necessary and directly related to enabling participation in WIOA-authorized education, training, or employment activities, consistent with 20 CFR § 680.900 for Adult and Dislocated Worker participants and 20 CFR § 681.570 for Youth participants. Needs-Related Payments are a specific type of supportive service and are governed separately under 20 CFR 680.930-680.970
- 2.** Supportive services may include, but are not limited to, the following categories:

Transportation and Commuting Assistance:

Includes mileage-based reimbursement, public transportation passes or bus tokens, fuel assistance, flat daily transportation assistance, and other transportation necessary to attend training, work experience,



employment, or required program activities. When NALWDB calculates transportation assistance on a per-mile basis, payment shall be based on the standard business mileage rate published by the Internal Revenue Service and in effect on the date of travel. Contracted service providers may use an alternative transportation assistance methodology, including a flat daily amount, as established in the provider's written procedures and consistent with its contract and approved budget, provided the method is applied consistently to similarly situated participants and the assistance is reasonable, necessary, documented, and subject to available funding. Documentation must support the method used, such as a mileage log for per-mile reimbursement or participation or attendance documentation for a flat daily amount.

Childcare and Dependent Care: Includes childcare assistance and dependent care services necessary to enable participation in WIOA activities for individuals with caregiving responsibilities, such as:

- Licensed childcare providers or daycare centers
- Before- and after-school care programs
- Payment to informal providers (e.g., family member or relative), where allowable and properly documented
- Summer or school break childcare programs
- Care for dependent adults, including elderly parents or disabled household members
- Respite care services to temporarily relieve a primary caregiver
- Specialized care services for dependents with medical, developmental, or behavioral needs
- Registration fees or deposits required to secure childcare services

Housing and Temporary Shelter Assistance includes emergency or short-term housing assistance necessary to prevent interruption of participation in WIOA activities, such as:

- Short-term rental assistance or lodging (e.g., hotel or motel stays)
- Emergency shelter placement or transitional housing
- Utility assistance (e.g., electricity, water, gas) when necessary to maintain housing stability
- Security deposits or application fees required to secure temporary housing
- Payments to prevent eviction or loss of housing on a short-term, emergency basis; temporary relocation assistance when required to participate in training or employment

Medical, Health, and Mental Health Services include medical, health, and mental health services necessary to enable participation in WIOA activities, such as:

- Physical examinations, immunizations, and required medical clearances



- Vision or hearing exams and related services
- Mental health services, counseling, or behavioral health support
- Prescription assistance necessary for participation
- Assistive services or devices (e.g., glasses, hearing aids, or other adaptive equipment) not otherwise available through other programs

Assistive services not otherwise available through other programs such as:

- Adaptive equipment (e.g., ergonomic tools, modified keyboards, or specialized work equipment)
- Vision-related supports (e.g., prescription glasses or lenses required for training or employment)
- Hearing-related supports (e.g., hearing aids or assistive listening devices)
- Interpreter services (e.g., sign language interpreters) or translation services necessary for participation
- Modifications or accommodations necessary to enable participation in training or employment activities

Work-Related Expenses-includes items and costs necessary to enable participation in training or employment, such as:

- Uniforms, work clothing, or required attire
- Tools, equipment, or safety gear required for training or employment
- Licensing, certification, or testing fees (including exam retakes, where appropriate)
- Required background checks, drug screenings, or fingerprinting fees
- Union dues or work-related fees required to begin employment
- Required books, supplies, or instructional materials directly related to training or employment

Technology and Connectivity includes technology and connectivity services necessary to enable participation in WIOA-authorized training or program activities, such as Internet access, data plans, or connectivity services required for remote training or participation

- Limited provision of devices (e.g., laptops, tablets, or hotspots) when necessary for participation and not otherwise available
- Software, applications, or licenses required for training or coursework
- Basic technical support or setup assistance necessary to access training or program services



Other Supportive Services may be provided when documented as necessary to enable participation in WIOA activities and when such services are allowable, reasonable, and approved in accordance with this policy, such as

- Hygiene items or personal care products necessary for participation or employment readiness
- Clothing not otherwise covered under work-related expenses (e.g., interview attire)
- Document-related costs (e.g., birth certificates, identification cards, or work authorization documents)
- Minor incidental expenses directly related to participation in training or employment activities

V. DISTINCTION BETWEEN PAYMENTS

A. Needs-Related Payments

- May be provided to eligible Adults and Dislocated Workers, subject to statutory eligibility requirements.
- Must be tied to participation in training.
- Are not performance-based.
- Needs-related payments for Adult and Dislocated Worker participants may be issued only pursuant to a Needs-Related Payment Schedule approved by NALWDB. The schedule shall establish the applicable payment levels or calculation methodology, eligibility requirements, payment frequency and duration, required documentation, and approval procedures consistent with 20 CFR §§ 680.930–680.970. This policy incorporates the current Board-approved schedule by reference. If no Board-approved schedule is in effect, the Board does not authorize needs-related payments.

B. Youth Incentive Payments

May be provided to youth participants for achievement of defined milestones or outcomes, consistent with 20 CFR 681.640, such as:

- Completion of a Measurable Skill Gain (MSG)
- Attainment of a secondary school diploma or equivalent
- Completion of an occupational skills training program
- Earning an industry-recognized credential or certification
- Successful completion of a work experience or internship
- Achievement of educational milestones identified in the Individual Service Strategy



- Completion of program elements that demonstrate progress toward employment or postsecondary goals.
- Must be tied to achievement (e.g., MSGs, completion, credential attainment).
- May be provided to youth participants for achievement of defined milestones or outcomes and must be tied to documented achievement. Incentive payments may not be provided solely for enrollment, attendance, or participation.

VI. SUPPORTIVE SERVICE GUIDELINES AND EXCEPTIONS

Supportive Services are provided based on participant need and availability of funds. While fixed caps are not established, service amounts must be reasonable, necessary, and consistent with local market rates and service provider budgets to ensure consistency and fiscal stewardship.

Exceptions to typical service levels may be approved when:

1. The need is documented and justified.
2. The service is necessary to enable continued participation or completion. and
3. The exception is approved in accordance with the authority approval outlined in this policy.

VII. APPROVAL AUTHORITY AND PROCESS

A. Request Initiation

The Case Manager is responsible for:

1. Identifying the need for supportive services through an individualized assessment.
2. Documenting the need in the participant's IEP or ISS
3. Completing the Supportive Services Request (TRSS) form with appropriate justification and supporting documentation.

B. Program Review

The completed TRSS request must be reviewed and approved by the Program Manager (Supervisor) to ensure:

1. The request is reasonable, necessary, and allowable.
2. The service aligns with program requirements. and
3. Documentation is complete.

C. Board Approval



After supervisory approval, the request is forwarded to the Northern Area Local Workforce Development Board (NALWDB) for approval by the Executive Director, the authorized approving official.

D. Fiscal Processing

Following Executive Director approval, the request is forwarded to the Finance Specialist for processing, payment, and fiscal documentation in accordance with applicable financial controls and 2 CFR Part 200 requirements.

No supportive service payment may be issued without completion of all approval steps outlined above.

VIII. EQUAL OPPORTUNITY AND NONDISCRIMINATION

All supportive services, needs-related payments, and incentive payments shall be provided in compliance with WIOA Section 188 and 29 CFR Part 38. Discrimination is prohibited based on race, color, religion, sex, national origin, age, disability, political affiliation or belief, or participation in a WIOA Title I– financially assisted program. Reasonable accommodations must be provided for qualified individuals with disabilities to ensure equal access to services and benefits.

IX. DOCUMENTATION AND ELECTRONIC FILE REQUIREMENTS

All supportive service requests, approvals, receipts, proof of payment, and related case notes must be uploaded and maintained in accordance with the NALWDB Electronic File Policy. Documentation must clearly support:

- Need and justification.
- Approval authority.
- Allowability and allocability of costs. and
- Participant participation in WIOA activities.

X. RECORD RETENTION AND MONITORING

Records related to supportive services, needs-related payments, and incentives are subject to review by federal, state, and local monitoring entities and must be retained in accordance with 2 CFR § 200.334.

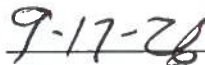
This policy rescinds any previous NALWDB policy regarding this subject.

INQUIRIES. Contact the WIOA Program Manager at (505) 986-0363.





NALWDB CHAIR



DATE

APPENDIX A
NEEDS-RELATED PAYMENT SCHEDULE AND CALCULATION METHODOLOGY
Applies to WIOA Title I Adult/Dislocated Worker participants only.

I. PURPOSE AND AUTHORITY

This appendix establishes the eligibility, financial-need determination, payment calculation, authorization, documentation, and monitoring requirements for Needs-Related Payments provided under NALWDB Policy No. 20. Needs-Related Payments may be provided to eligible unemployed Adult and Dislocated Worker participants when the financial assistance is necessary to enable the participant to enter or remain in an approved WIOA training activity.

Needs-Related Payments are not an entitlement, are subject to the availability of Adult or Dislocated Worker program funds, and may be issued only in accordance with this appendix and all required approval procedures.

Authority: WIOA §§ 134(c)(3) and 134(d)(3). 20 CFR §§ 680.930–680.970. 11.2.8.15 NMAC; 2 CFR Part 200; and applicable guidance issued by the U.S. Department of Labor and the New Mexico Department of Workforce Solutions.

II. BASIC ELIGIBILITY REQUIREMENTS

A. Adult Participants

An Adult participant may receive Needs-Related Payments only when the participant:

1. Is unemployed.
2. Does not qualify for, or has ceased qualifying for, unemployment compensation. and
3. Is enrolled in a program of training services under WIOA Section 134(c)(3).



B. Dislocated Worker Participants

A Dislocated Worker participant may receive Needs-Related Payments only when the participant is unemployed and meets one of the following conditions:

1. The participant has ceased qualifying for unemployment compensation or a Trade Readjustment Allowance under the Trade Adjustment Assistance program and is enrolled in a program of training services under WIOA Section 134(c)(3):
 - by the end of the 13th week after the most recent layoff that resulted in the participant's eligibility as a Dislocated Worker; or
 - if later, by the end of the eighth week after the participant was informed that a short-term layoff would exceed six months. or
2. The participant did not qualify for unemployment compensation or Trade Adjustment Assistance and is enrolled in a program of training services under WIOA Section 134(c)(3).

C. Participants Waiting to Begin Training

A participant accepted into an approved training program that will begin within 30 calendar days may receive Needs-Related Payments before classes begin. Payments may be issued for a longer waiting period only when the Governor has authorized the local area to extend the 30-day period and the local area maintains documentation of that authorization.

D. Individualized Determination

Eligibility for Needs-Related Payments does not automatically establish that a payment is necessary. Before approving the first payment, the participant's financial need must be established through an individualized assessment and documented in the participant's Individual Employment Plan.

E. Coordination with Other Resources

Needs-Related Payments may not duplicate unemployment compensation, Trade Adjustment Assistance, TANF, tribal assistance, vocational rehabilitation, educational financial aid, housing assistance, or other public, private, or community resources available to meet the participant's identified need.

III. FINANCIAL-NEED DETERMINATION

Meeting the basic eligibility requirements in Section II does not automatically qualify a participant for a Needs-Related Payment. Before the first payment and at each reauthorization, the Case Manager must complete the NRP Calculation Worksheet and determine that the participant has a documented financial need that would interfere with the participant's ability to enter or remain in training.



The determination must be based on reasonable verification of the participant's current essential living expenses, available monthly cash resources, and assistance available from other sources. Needs-Related Payments may be approved only when the calculation results in a monthly unmet financial need greater than zero.

A. Allowable Essential Living Expenses

Allowable expenses must be current, reasonable, necessary, and expected to occur during the NRP authorization period. They may include:

1. Rent, mortgage, or temporary housing costs.
2. Basic utilities, including electricity, gas, water, sewer, and basic telephone or internet service.
3. Food and essential household necessities.
4. Transportation required for training and essential household needs, to the extent the expense is not paid separately as a supportive service.
5. Childcare or dependent-care expenses, to the extent the expense is not paid by WIOA or another source.
6. Necessary medical, prescription, health-insurance, or disability-related expenses.
7. Court-ordered child support or other legally required family-support payments. and
8. Other essential living expenses approved by the Program Manager and supported by written justification.

B. Expenses Excluded from the Calculation

The following expenses may not be included:

1. Tuition, fees, books, tools, supplies, testing, or other training costs paid through an Individual Training Account, financial aid, or another funding source.
2. Expenses already paid or reimbursed as a separate supportive service.
3. Credit-card payments or unsecured debt payments that cannot be directly connected to an allowable essential living expense.
4. Fines, penalties, late fees, restitution, or other costs resulting from a violation of law or agreement.
5. Entertainment, recreation, alcohol, tobacco, or other nonessential personal expenses. and



6. Business start-up, self-employment, capital, or investment expenses.

C. Available Monthly Cash Resources

Available monthly cash resources include recurring cash income that is actually and reasonably available to the participant or the participant's family, including:

1. Wages or other earned income received by family members.
2. Social Security, retirement, or pension income.
3. TANF cash assistance.
4. Child support or alimony received. and
5. Other recurring cash payments available to meet household living expenses.

For purposes of this calculation, "family" has the meaning established in WIOA Section 3(26). Income of an unrelated roommate or other person who is not a member of the participant's family will not be counted unless that income is contributed toward the participant's living expenses.

Because receipt of unemployment compensation or a Trade Readjustment Allowance may affect NRP eligibility, any pending, retroactive, partial, or overlapping payment must be reported and reviewed before an NRP is issued.

D. Noncash and Restricted Assistance

Noncash assistance, such as SNAP or housing assistance, will not be treated as unrestricted cash income. Instead, it will be applied as an offset to the specific expense it is intended to cover.

Pell Grants, scholarships, and other educational assistance restricted to tuition, fees, books, supplies, or other educational costs will not be counted as cash available for basic living expenses. These resources must nevertheless be coordinated to prevent duplication of training or educational costs.

E. Verification

The Case Manager must obtain reasonable documentation supporting the income, expenses, and resources used in the calculation. Documentation may include current bills, leases, payment statements, benefit records, wage records, court orders, or other reliable records.

Self-attestation may be accepted only when third-party documentation is unavailable and the case note identifies the attempts made to obtain verification, explains why the documentation was unavailable, and supports the reasonableness of the amount reported, consistent with applicable NMDWS and NALWDB documentation requirements.

All supporting documentation must be maintained in the participant's electronic file in accordance with the NALWDB Electronic File Policy 30-A.



IV. CALCULATION METHODOLOGY AND PAYMENT LIMITS

A. Calculation of Unmet Financial Need

The Case Manager must calculate the participant's unmet financial need using the verified information collected under Section III.

Monthly Unmet Need = Allowable Essential Monthly Living Expenses – Available Monthly Cash Resources – Other Assistance Available for the Same Expenses

If the calculation is zero or less, the participant is not eligible to receive a Needs-Related Payment.

The monthly unmet need must be converted to a weekly amount as follows:

Weekly Calculated Need = Monthly Unmet Need ÷ 4.33

Round the weekly calculated need down to the nearest whole dollar. The amount approved may not exceed the participant's calculated financial need or the applicable payment limits in this section.

B. Adult Payment Level

The weekly Needs-Related Payment for an Adult participant will be the lesser of:

1. The participant's weekly calculated need. or
2. \$200 per week.

The \$150 weekly maximum is the local Adult payment level established by NALWDB under 20 CFR § 680.970(a).

C. Dislocated Worker Who Qualified for Unemployment Compensation

For a Dislocated Worker who was eligible for unemployment compensation because of the qualifying dislocation and has ceased qualifying for unemployment compensation, the weekly Needs-Related Payment may not exceed the applicable weekly unemployment compensation benefit level.

The approved weekly Needs-Related Payment will be the lesser of:

1. The participant's calculated weekly unmet financial need; or
2. The applicable weekly unemployment compensation benefit level.

D. Dislocated Worker Who Did Not Qualify for Unemployment Compensation

For a Dislocated Worker who did not qualify for unemployment compensation because of the qualifying layoff, the payment may not exceed the applicable poverty level for an equivalent period. NALWDB will use the current HHS Poverty Guidelines applicable to the 48 contiguous states and the District of Columbia.

The adjusted weekly poverty ceiling shall be calculated as follows:

Adjusted Weekly Poverty Ceiling = (Annual HHS Poverty Guideline for the Participant's WIOA



Family Size – Annualized Total Family Cash Income) ÷ 52

The adjusted weekly poverty ceiling may not be less than zero.

The approved weekly Needs-Related Payment will be the lesser of:

1. The participant's calculated weekly unmet financial need; or
2. The adjusted weekly poverty ceiling.

NALWDB may set a lower Dislocated Worker payment limit in a Board-approved policy, but it must apply it consistently and may not exceed the applicable federal ceiling in 20 CFR § 680.970(b).

E. Annual HHS Poverty Guideline Verification

NALWDB shall use the current HHS Poverty Guidelines applicable to the 48 contiguous states and the District of Columbia. The current guidelines are available on the official [HHS Poverty Guidelines webpage](#).

Before completing an initial NRP determination or reauthorization, the Case Manager must verify that the poverty guideline used is currently in effect. The NRP Calculation Worksheet must identify:

1. The guideline year.
2. The participant's WIOA family size.
3. The applicable annual poverty guideline.
4. The date the guideline was verified. and
5. The official source used for verification.

If the annual reference table in this appendix differs from the current HHS Poverty Guidelines, the current HHS guideline controls.

Updated HHS Poverty Guidelines will apply to initial NRP determinations and reauthorizations completed on or after the date established by NALWDB. Existing authorizations will be recalculated at the next scheduled reauthorization unless an earlier recalculation is required because of a change in family income, family size, training status, or another eligibility factor.

2026 Reference Table — Current Guidelines

WIOA family size	Annual poverty guideline	Weekly equivalent
1	\$15,960	\$306.92
2	\$21,640	\$416.15
3	\$27,320	\$525.38
4	\$33,000	\$634.62
5	\$38,680	\$743.85
6	\$44,360	\$853.08



7	\$50,040	\$962.31
8	\$55,720	\$1,071.54

For each additional family member over eight, add \$5,680 to the annual guideline (\$109.23 weekly) for 2026. The current HHS guideline controls if this reference table is not current.

F. General Payment Limitations

Needs-Related Payments:

1. May not exceed the participant's verified unmet financial need.
2. May not duplicate unemployment compensation, Trade Readjustment Allowances, supportive services, public assistance, or other resources available for the same need.
3. Are subject to the availability of Adult or Dislocated Worker program funds.
4. Must be applied consistently to similarly situated participants. and
5. May be reduced, suspended, or discontinued when the participant's financial circumstances, training status, or eligibility changes.

When funding is insufficient, NALWDB may prospectively suspend or limit new NRP authorizations. NALWDB must apply any funding limitation consistently and may not base it on a prohibited or discriminatory factor.

V. AUTHORIZATION, PAYMENT FREQUENCY, AND PARTICIPATION VERIFICATION

A. Authorization Period

Needs-Related Payments must be approved before issuing payment. An initial authorization may not exceed 13 consecutive weeks. Continued assistance beyond the initial authorization period requires a new determination confirming that the participant:

1. Continues to meet the eligibility requirements in Section II.
2. Remains enrolled in and actively participating in approved training.
3. Continues to have a verified unmet financial need.
4. Has reported any changes in income, family size, unemployment compensation, public assistance, or other available resources. and
5. Is making satisfactory progress in training.

A new 13-week authorization may be approved when all requirements continue to be met, and Adult or Dislocated Worker funds remain available.



B. Payment Frequency

Needs-Related Payments will normally be issued biweekly after the participant's training participation has been verified. Multiply the approved weekly amount by the number of eligible weeks in the payment period.

Payments may not be issued solely because an authorization is in effect. Each payment must be supported by current documentation showing that the participant remained eligible and participated in training during the applicable payment period.

C. Participation and Progress Verification

Before processing each payment, the Case Manager must obtain reasonable verification of the participant's continued enrollment, attendance, and progress. Acceptable documentation may include:

1. Attendance records.
2. Training-provider progress reports.
3. Transcripts or grade reports.
4. Instructor or training-provider verification.
5. Online training participation records. or
6. Other reliable documentation approved by the Program Manager.

The documentation must identify the applicable training or payment period and must be maintained in the participant's electronic file.

D. Partial Weeks and Absences

The participant may receive the full approved weekly amount when the participant meets the training provider's attendance and participation requirements for that week.

Payments must be reduced or withheld when the participant does not participate for the full week because of an unexcused absence, withdrawal, suspension, termination, or another circumstance that makes the participant ineligible for payment.

The Case Manager must document the reason for any reduction or withholding of payment. Excused absences may be considered when the training provider permits them, and they do not jeopardize the participant's satisfactory progress.



E. Advance and Retroactive Payments

Needs-Related Payments may not be issued retroactively for a period before the participant's eligibility, financial need, and payment amount were determined and approved.

Payments may not be issued before verified participation, except for an eligible participant accepted into approved training beginning within the period permitted under Section II.C. Any payment issued before training begins must be clearly documented and must stop if the participant does not begin training as scheduled.

F. Participant Reporting Responsibility

The participant must promptly report any change that may affect eligibility or the payment amount, including:

1. Employment or earned income.
2. Unemployment compensation or Trade Readjustment Allowance.
3. Family size or family income.
4. Public assistance or other financial resources.
5. Training schedule, attendance, or enrollment status.
6. Withdrawal, completion, suspension, or termination from training.

Failure to report a change may result in suspension or termination of payments and recovery of any overpayment.

VI. CHANGES, SUSPENSION, REDUCTION, AND TERMINATION

A. Recalculation Following a Change

The Case Manager must review and recalculate the Needs-Related Payment before issuing the next payment when the Case Manager becomes aware of a change that may affect eligibility, financial need, or the approved payment amount. Changes requiring review include:

1. Employment or earned income.
2. Eligibility for or receipt of unemployment compensation or a Trade Readjustment Allowance.
3. WIOA family size or family income.
4. Public assistance, financial aid, or other available resources.
5. Essential living expenses used in the calculation.
6. Training schedule, enrollment, attendance, or satisfactory progress. or
7. Any other circumstance affecting eligibility or calculated unmet financial need.



The revised calculation and the effective date of any payment change must be documented in the participant's electronic file.

B. Temporary Suspension

Payments may be temporarily suspended when:

1. Required income, expense, attendance, or eligibility verification has not been provided.
2. The participant's training or employment status is unclear.
3. A change in unemployment compensation or Trade Readjustment Allowance status is under review.
4. Possible duplication of assistance has been identified. or
5. Additional information is necessary to determine continued eligibility.

The Case Manager must document the reason for the suspension, the start date, and the actions needed to resolve it. Review a suspended case at least every 30 calendar days until eligibility is confirmed or the payment is terminated.

C. Reduction or Termination

Needs-Related Payments must be reduced or terminated when:

1. The recalculated unmet financial need is less than the currently approved payment.
2. The participant begins employment and is no longer unemployed.
3. The participant becomes eligible for unemployment compensation or a Trade Readjustment Allowance.
4. The participant completes, withdraws from, is dismissed from, or is otherwise no longer enrolled in approved training.
5. The participant fails to meet the training provider's attendance or satisfactory-progress requirements.
6. Required documentation is not provided.
7. The participant no longer has a documented unmet financial need.
8. The participant receives duplicative assistance for the same expense or need.
9. The authorization period expires and continued assistance is not approved. or
10. Funding is limited or unavailable under Subsection F.

D. Written Notice

The participant must receive written notice when an NRP is reduced, suspended, or terminated. The notice must state:

1. The action being taken.
2. The reason for the action.
3. The effective date.



4. The revised payment amount, when applicable.
5. Any documentation or corrective action needed to restore payment. and
6. The participant's right to use the applicable NALWDB grievance or complaint procedure.

NALWDB may place payment on an immediate temporary hold when continued payment could result in an unallowable or duplicative expenditure. Document the reason for the hold.

E. Reinstatement

NALWDB may reinstate a suspended payment during the current authorization period when the participant provides the required information, and NALWDB verifies continued eligibility, training participation, and financial need.

NALWDB may not issue payments for a period during which the participant was ineligible. However, NALWDB may release a payment that was temporarily withheld for an already approved period when documentation later confirms that the participant remained eligible and participated in training during that period. This is considered a delayed payment under an existing authorization and not a retroactive authorization.

F. Funding Limitations

NALWDB may prospectively reduce, suspend, or discontinue NRP authorizations when Adult or Dislocated Worker funds are insufficient. Any funding limitation must:

1. Be authorized in writing by the Executive Director.
2. Identify the effective date and participants or authorizations affected.
3. Be applied consistently to similarly situated participants.
4. Be communicated promptly to affected participants and service providers. and
5. Comply with equal opportunity and nondiscrimination requirements.

To the extent practicable, consider existing commitments to participants already attending training before approving new NRP authorizations.

VII. REQUIRED DOCUMENTATION AND APPROVAL

A. Documentation Required Before Initial Approval

Before an initial Needs-Related Payment authorization is submitted for approval, the participant's electronic file must contain:

1. Documentation supporting the participant's WIOA Adult or Dislocated Worker eligibility.



2. Current verification of unemployment status.
3. Verification of the participant's unemployment compensation and, when applicable, Trade Readjustment Allowance claim and benefit status.
4. Documentation showing acceptance into or enrollment in an approved WIOA training activity, including the training schedule and anticipated start and completion dates.
5. An Individual Employment Plan identifying the participant's employment goal, approved training activity, and need for the NRP.
6. A completed NRP Calculation Worksheet.
7. Supporting documentation for the income, essential expenses, family size, and other resources used in the calculation.
8. Documentation showing that other available public, private, partner, and community resources were considered and are unavailable or insufficient to meet the identified need.
9. A case note explaining the eligibility determination, financial need, calculation, approved weekly amount, authorization period, and any unusual circumstances. and
10. The participant's signed certification that the information provided is complete and accurate and that changes affecting eligibility or payment amount will be reported promptly.

B. Approval Responsibilities

The following approval steps must be completed before the first payment is issued:

1. **Case Manager:** Completes the eligibility determination, resource coordination, financial-need assessment, calculation, and supporting case documentation.
2. **Program Manager or Supervisor:** Reviews the determination to confirm eligibility, need, calculation accuracy, documentation, nonduplication, and consistency with this appendix.
3. **Executive Director:** Provides final written approval of the NRP authorization, payment amount, and authorization period.
4. **Finance Specialist or Fiscal Agent:** Verifies that the fully approved payment packet has been received and processes the payment in accordance with applicable fiscal controls.

The Finance Specialist or Fiscal Agent does not independently determine participant eligibility or change the approved weekly amount. The service provider must return an incomplete or inconsistent request for correction and, when the approved amount or authorization terms change, resubmit it through the required approval process.



Verbal approval is not sufficient. Required approvals may be documented through original signatures, approved electronic signatures, or another Board-authorized electronic approval process.

C. Documentation Required for Each Payment

Before each payment is processed, the electronic file must contain:

1. Attendance or participation documentation covering the applicable payment period.
2. Documentation of continued enrollment and satisfactory progress.
3. Confirmation that the participant continues to be unemployed and otherwise eligible.
4. Documentation of any reported changes in income, family size, unemployment compensation, public assistance, training status, or other available resources.
5. Any recalculation, reduction, suspension, or reinstatement applicable to the payment period. and
6. A case note identifying the eligible weeks, approved weekly amount, total payment, and documentation reviewed.

D. Fiscal Payment Records

Fiscal records for each payment must identify:

1. Participant name and state identification number.
2. Adult or Dislocated Worker funding source.
3. Authorization period.
4. Weeks covered by the payment.
5. Approved weekly amount.
6. Total amount issued.
7. Payment date and payment method.
8. Check, electronic payment, or transaction number. and
9. Proof that the participant received the payment.

Fiscal records must be sufficient to reconcile each payment to the approved authorization and participant-level documentation.

E. Electronic File and Confidentiality

All eligibility records, calculation documents, approvals, attendance records, case notes, fiscal records, and proof of payment must be uploaded and maintained in accordance with the NALWDB Electronic File Policy.

Safeguard records containing personally identifiable information, financial information, benefit records, medical information, or other confidential information, and allow access only to authorized personnel.



No Needs-Related Payment may be issued when the required eligibility determination, supporting documentation, and approvals are incomplete.

VIII. OVERPAYMENTS, RECOVERY, AND SUSPECTED FRAUD

A. Identification of an Overpayment

An overpayment occurs when a participant receives a Needs-Related Payment that exceeds the amount for which the participant was eligible. An overpayment may result from:

1. A payment issued for a period during which the participant was not eligible.
2. An incorrect calculation or administrative error.
3. A duplicate payment.
4. A payment exceeding the approved weekly amount or authorization period.
5. Failure to reduce or terminate payments after a change in employment, income, unemployment compensation, family size, training status, or other available resources.
6. Incomplete, inaccurate, or false information provided by the participant or another party. or
7. A payment that cannot be supported by required participation, eligibility, approval, or fiscal documentation.

B. Immediate Action

When a possible overpayment is identified, place additional payments on hold until the matter is reviewed. The Case Manager must promptly notify the Program Manager and NALWDB and provide all available supporting documentation.

The review must determine:

1. The reason the overpayment occurred.
2. The period affected.
3. The correct payment amount.
4. The total amount overpaid.
5. Whether the overpayment resulted from administrative error, an unreported change, inaccurate information, duplicate payment, or possible fraud. and
6. Whether any service-provider or fiscal correction is required.

The determination and calculation must be documented in the participant's electronic file and reconciled with the fiscal records.



C. Written Overpayment Determination

When an overpayment is confirmed, the participant must receive written notice stating:

1. The amount of the overpayment.
2. The payment period involved.
3. The reason the payment was determined to be incorrect.
4. The records and calculation supporting the determination.
5. The proposed recovery method.
6. The deadline and method for responding.
7. The participant's right to provide additional information. and
8. The participant's right to use the applicable NALWDB grievance or complaint procedure.

The notice must distinguish between an administrative error and an overpayment resulting from the participant's failure to report a change or provision of inaccurate information.

D. Recovery and Repayment

NALWDB will take reasonable and documented steps to recover confirmed overpayments in accordance with applicable federal and state requirements and the Board's debt-collection procedures.

Recovery may include:

1. Repayment in full.
2. A written repayment agreement approved by NALWDB.
3. Correction or reversal of a duplicate or incorrectly processed fiscal transaction. or
4. Another lawful recovery method approved by NALWDB.

A repayment agreement must identify the total debt, payment schedule, payment method, due dates, and consequences of nonpayment.

Recovery from future Needs-Related Payments may occur only when permitted by applicable law and Board procedure, approved in writing by NALWDB, and clearly documented. The participant may not receive future payments for any period in which the participant is otherwise ineligible.

A decision that collection is impracticable does not make an unsupported or unallowable cost allowable. Any unresolved amount must be handled through the applicable fiscal, debt-collection, questioned-cost, and audit-resolution procedures.



E. Administrative Errors

When an overpayment results solely from an administrative or fiscal error, NALWDB must determine the appropriate corrective action and whether recovery from the participant is required or legally permissible.

The participant will not be accused of wrongdoing solely because of an administrative error. However, the participant must document the cause of the error, corrective action, fiscal resolution, and steps taken to prevent recurrence.

F. Suspected Fraud, Waste, or Abuse

Any information indicating possible fraud, intentional misrepresentation, theft, forgery, falsification of attendance or financial records, duplicate billing, collusion, or other criminal misuse of WIOA funds must be reported immediately to the Program Manager and NALWDB Executive Director.

NALWDB will follow applicable NMDWS and U.S. Department of Labor incident-reporting requirements, including the procedures in 20 CFR § 683.620. WDB must preserve records, limit access to authorized personnel, and ensure staff do not alter documents or conduct an unauthorized criminal investigation.

Reporting suspected fraud does not by itself establish that fraud occurred. Eligibility and payment actions must be based on documented facts, applicable policy, and appropriate review.

G. Service-Provider and Fiscal Responsibility

When an overpayment results from the service-provider or fiscal processing error, the entity responsible must cooperate with NALWDB to:

1. Correct the participant and fiscal records.
2. Identify the cause of the error.
3. Complete any required repayment, adjustment, or reconciliation.
4. Implement corrective action. and
5. Provide documentation showing that the issue has been resolved.

Repeated errors may result in additional monitoring, corrective action, questioned costs, or other remedies permitted under the provider contract and applicable law.



IX. MONITORING, QUALITY ASSURANCE, AND RECORD RETENTION

A. Monitoring

Needs-Related Payments are subject to programmatic and fiscal monitoring by NALWDB, the New Mexico Department of Workforce Solutions, the U.S. Department of Labor, auditors, and other authorized oversight entities.

NALWDB will monitor service-provider and fiscal administration of Needs-Related Payments to determine whether:

1. Participants met the applicable Adult or Dislocated Worker eligibility requirements.
2. Unemployment compensation and Trade Readjustment Allowance status was properly verified.
3. Participants were enrolled in and participating in approved WIOA training.
4. Financial need was calculated accurately using verified and current information.
5. Other available resources were considered and payments did not duplicate assistance.
6. Payment amounts complied with the participant's calculated need and applicable payment limits.
7. Required approvals were obtained before payment.
8. Attendance and satisfactory progress were verified for each payment period.
9. Participant-level documentation agreed with fiscal records and payments issued. and
10. Changes, suspensions, terminations, overpayments, and recoveries were handled in accordance with this appendix.

Monitoring may include participant-file review, fiscal reconciliation, payment sampling, interviews, data-system review, desk review, and on-site review. Service providers and the Fiscal Agent must provide timely access to requested records.

B. Monitoring Frequency and Risk

NRP activity will be reviewed as part of NALWDB's regular programmatic and fiscal monitoring. NALWDB may conduct additional or more frequent monitoring when:

1. A significant increase in the number or amount of payments occurs.
2. Documentation or reconciliation problems are identified.
3. Duplicate, unsupported, or potentially unallowable payments are found.
4. A provider has repeated calculation or approval errors.
5. Complaints, suspected fraud, or internal-control concerns arise. or
6. Federal, state, audit, or Board findings require additional review.



C. Findings and Corrective Action

When monitoring identifies noncompliance, NALWDB may require:

1. Correction or completion of participant and fiscal records.
2. Recalculation or reconciliation of payments.
3. Repayment or recovery of unsupported or unallowable costs.
4. Staff training or technical assistance.
5. A written corrective action plan.
6. Additional approval or review requirements.
7. Increased monitoring or payment testing. or
8. Other appropriate contractual, administrative, or fiscal remedies.

Corrective action must identify the deficiency, responsible party, required action, due date, and documentation necessary to demonstrate resolution. Repeated or material noncompliance may result in questioned costs or other remedies available under the service-provider contract and applicable law.

D. Internal Quality Assurance

Service providers must establish an internal review process sufficient to verify the accuracy and completeness of NRP requests before submission to NALWDB. At a minimum, the review must confirm:

1. Completion of the required eligibility and calculation forms.
2. Accuracy of mathematical calculations.
3. Consistency among the IEP, case notes, attendance records, authorization, and payment request.
4. Completion of required supervisory approval.
5. Documentation of changes affecting eligibility or payment amount. and
6. Upload of required records to the participant's electronic file.

NALWDB may return incomplete or inconsistent requests without approval or payment.

E. Record Retention

NRP records must be retained for at least three years from the date of submission of the final financial report for the applicable federal award, or for any longer period required by NMDWS, the federal award, state law, contract, or NALWDB policy.

If litigation, a claim, an audit, a monitoring review, an investigation, a questioned cost, or other unresolved actions begin before the end of the retention period, retain the related records until all matters are resolved and final action is completed, even if that extends beyond three years.



Records subject to retention include:

1. Eligibility and UI or TRA verification.
2. IEPs and case notes.
3. Financial need and calculation worksheets.
4. Income, family size, expense, and resource documentation.
5. Training enrollment, attendance, and progress records.
6. Authorizations and approvals.
7. Payment requests, fiscal transactions, and proof of receipt.
8. Recalculations, suspensions, termination notices, and reauthorizations.
9. Overpayment, recovery, grievance, and fraud-related records. and
10. Monitoring findings, corrective actions, and resolution documentation.

F. Access to Records and Confidentiality

Service providers and the Fiscal Agent must provide authorized federal, state, local, audit, and monitoring personnel timely access to NRP records.

Records containing personally identifiable, financial, medical, benefit, or other confidential information must be safeguarded in accordance with applicable law, contract requirements, and the NALWDB Electronic File Policy. Limit access to personnel with an authorized business need.

X. EXCEPTIONS, INTERPRETATION, AND EFFECTIVE DATE

A. Requests for Exceptions

An exception may be considered only when this appendix expressly permits an exception, and the participant's individual circumstances justify a departure from a Board-established administrative limit or procedure.

The Case Manager must submit a written exception request through the Program Manager before authorizing the related payment. The request must identify:

1. The specific requirement or limit for which the exception is requested.
2. The participant's circumstances and documented need.
3. Why the exception is necessary to enable the participant to enter, continue, or complete training.
4. The amount and duration requested.
5. Other resources considered and why they are unavailable or insufficient.
6. The effect of denying the exception. and



7. Documentation supporting the request.

The Executive Director may approve or deny an allowable exception in writing. The approval must identify the amount, duration, conditions, and reason for the decision. The approved exception and supporting records must be maintained in the participant's electronic file.

B. Requirements That May Not Be Waived

An exception may not:

1. Waive federal or state NRP eligibility requirements.
2. Authorize payment to a participant who is not unemployed or is not enrolled in approved training, except for the limited pre-training period permitted under Section II.C.
3. Exceed an applicable unemployment-compensation or poverty-level payment ceiling.
4. Permit duplication of assistance.
5. Authorize an unsupported, unreasonable, or unallowable cost.
6. Waive required documentation, fiscal accountability, or approval controls.
7. Authorize payment for a period during which the participant was ineligible. or
8. Be based on a prohibited or discriminatory factor.

Exceptions must be applied consistently to similarly situated participants and may not be used to create an informal practice that conflicts with this appendix.

C. Policy Interpretation

Refer questions about applying this appendix through the Program Manager to the NALWDB Executive Director. Interpretations must be consistent with WIOA, federal regulations, applicable NMDWS guidance, the main Supportive Services Policy, and this appendix.

The Executive Director may issue written administrative guidance to clarify implementation when the guidance does not change participant eligibility, payment limits, calculation methodology, or other substantive requirements approved by the Board.

A substantive change to eligibility requirements, payment methodology, payment limits, authorization duration, or exception authority requires formal revision and approval of the policy or appendix by NALWDB.

D. Administrative Updates

The Executive Director may approve administrative updates to the following without requiring a full policy revision:



1. Annual HHS Poverty Guideline reference tables.
2. Links to official federal or state sources.
3. Staff titles or contact information.
4. Form numbers and formatting.
5. Calculation worksheets that implement, but do not alter, the approved methodology. and
6. Corrections to typographical errors or regulatory citations that do not change the substance of the policy.

Administrative updates must be dated, documented, communicated to service providers, and maintained with the official policy records.

E. Effective Date and Existing Authorizations

This appendix applies to initial NRP determinations and reauthorizations approved on or after its effective date.

An NRP authorization approved before the effective date may continue through the end of its existing authorization period if it was properly approved under the policy in effect at that time. Continued payments after that period require reauthorization under this appendix.

Existing authorizations must be reviewed sooner when:

1. A change occurs that affects eligibility or payment amount.
2. The authorization conflicts with controlling federal or state requirements.
3. Duplicate, unsupported, or potentially unallowable payments are identified. or
4. Continued payment would create a material compliance or fiscal risk.

F. Incorporated Forms

The forms and worksheets adopted to implement this appendix are incorporated as administrative tools. Service providers may add their organizational name and logo but may not remove required fields, alter the approved calculations, or change the eligibility and approval requirements without prior written authorization from NALWDB.

Equivalent electronic forms may be used when they contain all required information, follow the approved methodology, provide an adequate approval record, and are authorized by NALWDB.