

## Dislocated Worker and Federal Adult Programs (DWFAP)

### ADVISORY: Technical Assistance Response Letter (TAR) Letter 26-04

**TO:** Requester

**FROM:** Minnesota Department of Employment and Economic Development (DEED) DWFAP Unit

**PUBLICATION DATE:** June 12, 2026

**EXPIRATION DATE:** None (Continuing)

**NUMBER:** 26-04 (Public Version)

**SUBJECT:** Financial Needs Analysis (FNA) Requirements for Accessing Supportive Services

#### 1. Purpose

To clarify the requirements of a FNA in order to access supportive services in Minnesota's Workforce Innovation and Opportunity Act (WIOA) Adult, WIOA Dislocated Worker (DW), and State DW programs and in National DW Grants.

#### 2. Action Requested

Please carefully review this TAR Letter for its guidance and utilize it as appropriate.

#### 3. Relevant Laws, Policies and References

Workforce Innovation and Opportunity Act (WIOA) (42 USC 3101 et seq)

[Training and Employment Guidance Letter \(TEGL\) 19-16](#) (March 1, 2017)

[Training and Employment Notice 7-22](#) (October 18, 2022)

[Minnesota State Statute 116L.17](#)

[DWFAP Supportive and Follow-Up Services Allowable Activities Policy](#) (April 26, 2025)

#### 4. Changes to DWFAP Advisories

None

#### 5. Summary and Background

Clarification on what is required for a participant's FNA in order to access supportive services was requested. This TAR Letter clarifies those FNA requirements. It also shares guidance and examples of documenting supportive services needs. Attachment One below has a quick reference summary of this TAR Letter's key points for stakeholders to share with front-line staff.

Supportive services provide a participant with the resources necessary to enable their participation in individualized career services and/or training services (TEGL 19-16, Page 18) and achieve the goals listed in the participant's Individual Employment Plan (IEP). Supportive services include, but are not limited to, assistance with transportation, housing and/or childcare, and paying for employment and training-related application, test, and certification costs.

#### 6. Current Policy Requirements

DWFAP's current [Supportive and Follow-Up Services Allowable Activities Policy](#) (Supportive Services Policy) requires an FNA *"to document [a participants'] current financial situation and potential needs"* (Supportive Services Policy, Page Two). The policy also requires that *"Supportive services can only be paid for using WIOA or State funds when these services are not available through any other local agencies or organizations"* (Supportive Services Policy, Page Two). Support services also cannot pay for cost owned prior to enrollment (Supportive Services

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Policy, Page Two). All participants who receive supportive services must have completed an FNA and have a complete, signed and dated IEP (Supportive Services Policy, Page Two).

DWFAP's current Supportive Services Policy (Page Two) also requires providers to have a written and current local policy on supportive services. This local policy should include FNA requirements. The local policy can help determine FNA roles and responsibilities, processes, required forms, etc. at the provider level.

### 7. FNA Requirements

An FNA that meets DWFAP's policy expectations must document two things: 1) A participant's current financial situation, and 2) A participant's potential needs for supportive services. See below for guidance on meeting these two requirements.

#### When to Complete an FNA:

The FNA is done whenever a participant needs access to supportive services to enable their participation in individualized career services and/or training services. Participants that require support right away can receive an FNA when enrolling and completing their IEP. Current participants can also receive an FNA if, during the course of their enrollment, there is a sudden need for supportive services. While not all participants need supportive services DWFAP encourages providers to inform all participants enrolled in individualized career services and/or training services about supportive services and to have conversations about potential current and future supportive services needs.

#### Documenting a Participant's Current Financial Situation:

Providers must document a participant's current financial situation when the participant needs or asks for supportive services. Participants who already completed a financial check to show they are low-income for eligibility or priority of service (including those also enrolled in Supplemental Nutrition Assistance Program (SNAP)) already meet the requirement for documenting their current financial situation. These participants do not need to complete another financial analysis to access supportive services.

In this case, providers should note that the participant has already completed this part of the FNA and include a copy of that earlier analysis. See below for more information about participants who are co-enrolled.

While supportive services cannot cover costs incurred prior to enrollment (Supportive Services Policy, Page Two) those prior costs do impact a participant's current financial situation and should be documented. That documentation can help justify the type and level/amount of supportive services needed. See below for more information.

DWFAP does not require a particular type of form or review to satisfy the FNA requirement for documenting a participant's current financial situation.

#### Documenting a Participant's Potential Needs For Supportive Services:

Each participant's financial status and individualized career services and/or training services is unique. This means each participant's supportive services needs are unique. Providers must document each participant's unique needs for supportive services and why it is needed to help

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the participant participate in, and complete, their individualized career services and/or training services which then helps the participant complete their IEP goals.

This means documenting the following:

- The type of supportive services needed (transportation assistance, etc.),
- The potential level/amount of need (\$20 gas card, \$40 gas card, etc.), and,
- Why the supportive service is needed to support the participant's participation in their individualized career services and/or training services (gas card to attend training or travel to an interview, internet bill paid for to allow the participant to continue attending online classes, or virtual interviews, etc.).

Documenting a participant's potential needs for supportive services means not just taking about current needs but also future needs that may need support during next month, quarter, year, etc. For example, if supportive services help cover the cost of a utility bill for May what is the plan to cover June utility bill? If a participant's driver's license is expiring in two months and they need to drive to get to training or to their stop-gap job, having a conversation and case noting it need helps document and justify that supportive services cost later on.

At this stage providers do not need to note the exact level/amount of each supportive services type. It is okay to just write an estimate. The exact level/amount of supportive service may change during the course of enrollment. What matters at this stage is that the type of supportive services needed, and why those supportive service are needed, is documented.

Again, while supportive services cannot cover costs incurred prior to enrollment (Supportive Services Policy, Page Two) those prior costs/financial situations do impact a participant's current financial situation and can help justify the type and level/amount of supportive services needed. For example, if a participant enrolled on May 1 with a complete, signed and dated IEP and owes back rent for the month of April, then supportive services funds may be able to cover larger portion of their May and/or June rent in order for the participant to take the money saved to put it towards their April back rent. The rent helps stabilize the participant's living situation and makes sure they can focus on, and participate in, their training. In this example supportive services funds cannot be used to pay for the April rent that was owed prior to enrollment.

Supportive services can also be pro-rated where appropriate. For example, if a participant enrolled on October 17 with a complete, signed and dated IEP still owes rent for the month of October then pro-rated supportive services funds may be able to cover some of their October rent. This would be done by calculating the per-day cost of rent and then using supportive services funds to cover the October rent for the period the participant's been enrolled (October 17-31).

Providers can use the FNA stage to start conversations with participants around jobs, wages and budgeting. This can include conversations about if the job/career path a participant is seeking would cover monthly expenses and needs. Is the wage for their desired job high-enough to cover their budget and help participants and their families stay economically self-sufficient?

### **8. Supportive Services Not Available Through Other Local Agencies or Organizations**

While not required as part of FNA, TEGL 19-16 (Page 18) and DWFAP's [Supportive Services Policy](#) both require that WIOA and State DW supportive services can only be paid when those

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services are not available through any other local agencies or organizations. Because of this, DWFAP highly encourages providers to document if supportive services are (or are not) available through any other local agencies or organizations while completing the FNA. Below are some examples of documentation:

- Referrals from other local agencies or organizations to the provider for assistance, and,
- Documentation of wait lists, ineligibility, or benefit caps on assistance from other local agencies or organizations.

### Other Types of Supportive Services Inaccessibility:

This could include situations where services from other local agencies or organizations are available but accessing them would interfere with a participant’s individualized career services and/or training services responsibilities. For example, a participant can receive transportation assistance (a gas card) from another local agency but it can only be picked up during that participant’s training course period. However, the WIOA/State DW provider can provide the same gas card to the participant at a time that does not cut into that participant’s training. In this situation WIOA/State DW supportive services would be appropriate because that support services need is met and does not interfere with the participant’s training.

### Supportive Services For Co-Enrolled Participants:

Again, participants co-enrolled in multiple programs (i.e. co-enrolled in SNAP and WIOA Adult, etc.) do not need to go through a second FNA if one was already done for their other program(s). Braided funding should be used where possible to support participants co-enrolled in multiple programs. [TEN 7-22, Attachment I](#) is a good resource for braiding funds. Providers must coordinate and pro-rate supportive services to avoid duplicating and potentially overpaying supportive services (i.e. both SNAP and WIOA Adult providing fully funded and separate gas cards during the same week). The FNA should document current supportive services being provided by co-enrolled programs and how WIOA/State DW funds can help fill any gaps.

### **9. Inquiries**

Questions about this TAR Letter should be directed to the DWFAP email:

[Dwfaprograms.deed@state.mn.us](mailto:Dwfaprograms.deed@state.mn.us)

### **10. Attachments**

Attachment One: Financial Needs Analysis Requirements Quick Reference Summary

### **11. Advisory History**

Version Number	Description	Date
TAR Letter 26-04	Original Publication. TAR Letter 26-04 sent to requester on June 10, 2026	6/12/26

## **Attachment One: Financial Needs Assessment (FNA) Quick Reference Summary**

### **Purpose of the FNA:**

1. To document a participant's current financial situation, and,
2. Document and determine potential needs for supportive services to participate in individualized career services and/or training services.

### **When to Complete an FNA**

- Complete an FNA whenever a participant needs supportive services to access or continue individualized career services and/or training services.
- A new FNA can be completed at enrollment or any time a supportive services need emerges during participation.

### **Documenting Current Financial Situation**

- Documenting the participant's financial situation at the time supportive services are needed.
- If a participant already completed a financial analysis for eligibility or priority of service (e.g., SNAP co-enrollment), this meets the FNA requirement so no second analysis is needed.
  - Case note that the analysis was previously completed and attach a copy
- Prior costs cannot be paid, but they may still be documented because they impact the current situation and justify the level/type of supportive services needed.
- No specific form is required. Any reasonable documentation method is acceptable.

### **Documenting Potential Supportive Services Needs**

Providers must document:

- Type of supportive service needed (transportation, internet, tools, etc.)
- Estimated amount/level of need (e.g., \$20–\$40 gas card)
- Why the service is necessary to support participation in training or services

Include both current and future needs. Exact amounts are not required at this stage. Estimates are acceptable; amounts may change during enrollment.

### **Supportive Services Not Available Elsewhere and Co-Enrollment**

While not required for the FNA, providers are encouraged to document whether the service needed is not available through other local agencies. This includes:

- Referrals indicating another agency cannot help, and,
- Documentation of waitlists, ineligibility, or benefit caps.

Providers with co-enrolled participants must coordinate and pro-rate supportive services to avoid duplicating and potentially overpaying supportive services. The FNA should document current supportive services being provided by co-enrolled programs and how WIOA/State DW funds can help fill any gaps.