

## WIOA YOUTH POLICY

**DATE ISSUED:** February 13, 2018

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**Date Updated:** November 5, 2019

**TO:** Workforce Solutions U LEAD Staff

**FROM:** WIOA Employment Services Division Manager

**SUBJECT:** Incentives for Youth Programming

**PURPOSE:** The Workforce Innovation and Opportunity Act (WIOA) 20 CFR § 681.640 states that “incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. The local program must have written policies and procedures in place governing the award of incentives outlined in writing before the commencement of the program that may provide incentive payments; align with the local program’s organizational policies; and are in accordance with the requirements contained in 2 CFR part 200.”

**BACKGROUND:** DOL included the reference to the Uniform Guidance at 2 CFR part 200 to emphasize that while incentive payments are allowable under WIOA, the incentives must be in compliance with the Cost Principles in 2 CFR part 200. For example, federal funds must not be spent on entertainment costs. Therefore, incentives must not include entertainment, such as movie, sporting event tickets, or gift cards to movie theaters or other venues whose sole purpose is entertainment. Additionally, there are requirements related to internal controls to safeguard cash, which also apply to safeguarding of gift cards, which are essentially cash.

While DOL recognizes that incentives could be used as motivators for various activities such as recruitment, submitting eligibility documentation, and participation in the program, *incentives paid for with WIOA funds must be connected to recognition of achievement of milestones in the program tied to work experience, education, or training.* Such incentives for achievement could include improvements marked by acquisition of a credential or other successful outcome.

All Incentive cards are to be kept and tracked, according to the program funding stream in which they were purchased, and according to which type/business they are attached to. For example, all WIOA In School Youth cards are to be locked in an individual folder, and it shall have sections for each support service gift card. WIOA Out of School Youth should have their own separate folder with the same sections specifically marked. By using this method all staff will be able to determine how many cards are left in each program, and for which businesses or services they can be used.

**PROCEDURES:**

U LEAD will utilize incentives to encourage and motivate youth to reach specific goals; develop leadership, financial literacy, and work readiness skills; and/or obtain positive program outcomes. Incentives may be in the form of cash awards, plaques, and certificates of achievement, gifts, in-kind certificates, or vouchers. Incentives will be provided to youth who have completed goals as outlined below.

1. Completing a goal from their Individual Service Strategy
2. Completing a post literacy/numeracy test
3. Bringing in documentation needed for data validation such as a diploma or certificate
4. Passing each GED test or obtaining a high school diploma
5. Youth in the follow-up phase who provide follow-up information
6. Improved school attendance

Youth may receive incentives if all eligibility documents are in their file and up to date, at the time the request is made for a youth who has achieved a goal. Youth will receive a gift card valued from \$10.00 to \$25.00 each, **not to exceed \$200.00 per calendar year.**

Qualifying achievements for incentive include (but are not limited to):

Type of Achievement	Paper Documentation	Amount Payable
Completion of GED test (incentive can be offered for <b>each</b> test completed)	Copy of official document showing passed test	The successful completion of each test = \$20.
Attainment of High School Diploma or HSED/GED (Only applies if incentive was not given for each individual tests).	Copy of GED/HSED or transcript showing graduation	Successful attainment = \$40

Post-Secondary Certificate or Degree	Copy of Diploma/Certificate or Transcript showing what was awarded	Successful attainment = \$40
Post-Secondary Semester Completion (with a pass)	Copy of Transcript	\$20
OSY within compulsory attendance age and who has not attended school for at least the most recent complete school year's calendar quarter who returns to school	Copy of letter or e-mail from school personnel stating re-enrollment	\$40
Basic Skills Improvement - Successful completion of TABE post-test – Increasing at least one Educational Functioning Level (EFL)	Copies of TABE Pre and Post Tests	\$20
Obtaining Unsubsidized Employment	Copy of Letter of offer from employer or pay stub. Other source such as UI records, etc.	\$40
Retention of employment for 90 consecutive days	Pay stub, Other source such as UI records, etc.	\$40
Completion of work readiness or occupational skills goals	Worksheets, Certificates	\$40 each
Apprenticeship Achievement milestones, which may include but is not limited to completing one semester	Verification regarding the milestone from the school, CESA or other official source	\$40 per semester

**The Process:**

Once a youth has completed a goal listed above. The Employment Guidance Counselor (EGC) is to request the Incentive from the program supervisor. After the program supervisor approves the request, the EGC can pick up the gift card from the supervisor, and sign off on the support service log.

When the EGC gives the incentive payment to the youth participant, the participant will sign a paper receipt, which shall then be put in the participant's file. That paper receipt shall be checked as either a Support Service or an Incentive, and the reason for either shall be indicated on the space provided on the receipt.

**Workforce One (WF1) Coding:**

The transfer of the Support Service between the EGC and participant shall be case noted using the Subject Line "**Incentive.**" The amount, type of incentive, and goal obtained (reason for the distribution of the incentive), shall all be included in the case note.

The Incentive shall also be recorded under the **Support Service** tab (as there is no Incentive tab in WF1) in WF1, including the Service, Date the transaction took place, and the total amount.

**Incentives vs. Support Services:**

Incentives and Support Services are tracked through different criteria, and therefore must be specified when distributed to each participant. This policy highlights the specifics of what an incentive is, and how to document those transactions. For definitions and procedures related to Support Services, please read the Support Services Policy.

**EFFECTIVE DATE:** February 13, 2018

**CONTACT PERSON:** WIOA Manager, Supervisor, and/or Planner