

## WIOA YOUTH POLICY

**DATE ISSUED:** February 13, 2018

**REVISED:** April 19, 2018

**REVISED:** July 12, 2019

**REVISED:** July 31, 2019

**REVISED:** November 5, 2019

**REVISED:** February 17, 2021

**TO:** Workforce Solutions (WFS) and Vendor Staff

**FROM:** WFS Director

**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.

**PROCEDURES:** Youth Programs 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 incentives not to exceed \$200.00 per calendar year.**

**Workforce One (WF1) Coding:**

The transfer of the Support Service between the staff 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 17, 2021

**CONTACT PERSON:** Agency Planner