

SOUTHERN WORKFORCE BOARD



YOUTH ACTIVITY INCENTIVE POLICY SWB – #111

September 28, 2005
(Revised June 13, 2006)
(Revised May 26, 2009)
(Revised December 15, 2010)
(Revised March 28, 2013)
(Revised June 14, 2017)
Revised January 9, 2019
Revised August 24, 2022
Revised August 23, 2023



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Purpose

To transmit the Board's policy concerning awarding Non-Cash and Cash Incentives or stipend to WIOA Youth Participants for participation, recognition and achievement in WIOA Related Activities. Incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. The award of incentives must ensure that such incentive payments are tied to the goals of the specific program outlined in writing before the commencement of the incentive payment. Incentive paid for with WIOA funds must be connected to recognition of achievement of milestones in the program tied to work experience, education, or training. Incentive payments may be provided to both ISY and OSY as long as they comply with the requirements of 20CFR§681.640

Authority

The authority for this policy is derived from the following:

- WIOA §129
- 20 C.F.R. §681.640
- TEGL 21-16
- OWDI 02-2016, Change 2
- OWDI 04-2019

Background

As described in Section 129 of the WIOA, local elements and requirements include utilizing the Title I Youth Program (Youth Program) funds for:

- i. activities leading to the attainment of a secondary school diploma or its recognized equivalent, or a recognized postsecondary credential;
- ii. preparation for postsecondary educational and training opportunities;
- iii. strong linkages between academic instruction and occupational education that lead to the attainment of recognized postsecondary credentials;
- iv. preparation for unsubsidized employment opportunities, in appropriate cases; and
- v. effective connections to employers, including small employers, in in-demand industry sectors and occupations of the local and regional labor markets

Section 681.650 of the Workforce and Innovation and Opportunity Act and compliant with 2 CFR 200, 20 CFR§681.640 stipulates that all youth engaged in a WIOA youth funded program tied to work experience, education, or training may be awarded cash incentives for participation, recognition and achievement in WIOA related activities. In addition, all incentive payments must be:

- a) Tied to the goals of the specific program;
- b) Outlined in writing before the commencement of the program that may provide incentive payments;
- c) Align with the local program's organizational policies; and
- d) Are in accordance with the requirements contained in 2 CFR part 200.

The Oklahoma Office of Workforce Development provides further guidance in OWDI 02-2016, Change 2, stating that incentive payments may be paid to WIOA ISY and OSY for milestones such as receiving a high school diploma or high school equivalency or other acceptable credentials.

OWDI 02-2016, Change 2, specifically lists the following as unallowable for incentive payments:

- Recruitment
- Submitting eligibility documentation
- Simply showing up for the program

Local Policy

It shall be the policy of the SWB and its Board of Local Elected Officials (LEO) that all WIOA title I funded services shall be delivered in a manner that fully complies with the WIOA law and regulations.

A copy of this policy shall be distributed to managers and staff members of the Youth Provider who are responsible for implementing any aspect of the incentive reward strategy.

All WIOA Youth Contractors are to adhere to this Board approved WIOA Youth Activity Incentive Policy. Cash incentives and/or stipends shall be awarded to WIOA youth for participation and achievement in WIOA related activities. Cash incentives and/or stipends must not exceed the specific amount of \$500 per program year-per participant, as approved by Southern Workforce Board. Additional activities may be eligible for an incentive however, the youth service providers must submit in detail, a written request to Board staff for any additional stipends or incentives not described in this policy, and specific reasoning thereof for prior approval.

Procedures

The Service Provider may request incentive payments to eligible enrolled/active youth based on properly documented attainment of benchmarks and goals. The service provider must establish and adhere to appropriate review procedures to ensure that all incentive payments are in accordance with SWB guidelines and any applicable state policies and/or procedures.

Once the Service Provider has verified the proper attainment benchmark(s) is achieved and documented in the ISS. The Service Provider will enter a Program Note clearly outlining documenting/explaining the attainment of the benchmark and the ensuing request for incentive payment as well as the payment amount for each. A Service Entry must be made in OkJobMatch for any incentive payment. The Service Provider will complete the "Incentive/Stipend Payment" form for approval.

Equal Treatment

Incentive payments shall be administered in a manner to assure that all participants receive equal rewards for equal achievements. The Service Provider must publish a summary of incentive

payments that are available to WIOA Youth Program participants, including a short description of the benchmark(s) that must be met and the amount of each incentive payment. This summary of available payments must be made reasonable available to each program participant (and, if the participant is a minor, to their parent or guardian) through methods such as pamphlets, brochures, videos, posters, websites, audio recordings, email messages, public announcements, etc.

Maximum Amount Allowable per Program Year

The incentive/Stipend amount awarded per participant is limited to \$500 for the entire program year (July 1 to June 30). The incentive/stipend may also award cash incentives as well as non-cash incentives according to the WIOA allowable youth activity. The following is a list of amounts of cash and/or non-cash incentives that may be awarded for a combined amount of any items not to exceed \$500 per program year per youth participant.

General Incentives for Participants Available

Work Experience:

Work experiences are a planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be paid or unpaid, as appropriate. A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists. Consistent with § 680.840 of this chapter, funds provided for work experiences may not be used to directly or indirectly aid in the filling of a job opening that is vacant because the former occupant is on strike, or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage. Work experiences provide the youth participant with opportunities for career exploration and skill development.

Work experiences **must** include academic and occupational education. The educational component may occur concurrently or sequentially with the work experience. Further academic and occupational education may occur inside or outside the work site.

The types of work experiences include the following categories:

- (1) Summer employment opportunities and other employment opportunities available throughout the school year;
- (2) Pre-apprenticeship programs;
- (3) Internships and job shadowing; and
- (4) On-the-job training (OJT) opportunities as defined in WIOA sec. 3(44) and in § 680.700 of this chapter.

Participants may be awarded a stipend for attendance of classroom training or other organized event such as the STEM, Extreme Youth Summit, etc. In addition, an incentive may be awarded at the end of the activity based on successful completion of the work experience component activity and/or

goals **and** academic enrichment activities. The Service Provider staff must provide a copy of timesheets and other required documentation in order for the participant to be eligible for an incentive or stipend payment for their participation in the summer employment opportunity activity not to exceed \$200 and will be based on attendance and successful completion of academic enrichment activity.

Those youth who are “hired” in unsubsidized full-time or part-time employment with the same “work experience” company with retention of 91 days may also receive an incentive payment of \$100.00. The activities must be documented in the participant’s ISS for documentation of “need” and career correlation as well as the Work Experience agreement completion documentation and documentation of hire and retention, if applicable.

High School Equivalent Certification:

Participants may not be awarded cash incentives for attending Adult basic education classes but may be awarded up to \$200.00 in a cash incentive/stipend for obtaining their High School Equivalent Certification. The Service Provider staff must provide a copy of the High School Equivalent Certification or letter from the adult basic education provider, school principal or school counselor for documentation. Also, the activity must be documented in the participant’s ISS for documentation of “need”.

Tutoring:

Cash and non-cash incentives may be paid for youth attending tutoring sessions and can demonstrate an increase in test, quiz or homework scores as a result of attending such tutoring sessions. For tutoring participation, the amount of the cash incentives shall not exceed \$25.00 for any one subject of tutoring. Non-cash incentives may also be used for attending and completing this activity, such as school supplies or any other item that may be of interest and appropriate for youth – not to exceed a purchase price of \$25.00 per each tutoring subject, including tax. Tutoring must be documented in the participant’s ISS for documentation of “need” and education correlation as well as documentation of the subject, test, quiz or homework increase.

Limited Internship:

Participants enrolled in Limited Internship activities shall be paid prevailing wage. The activity must be documented in the participant’s ISS for documentation of “need” and career correlation as well as the Limited Internship agreement completion documentation.

Cash Incentives for Attainment of a Skill Goal (Basic Skills, Work Readiness, or Occupational Skills)

Youth participants with deficiencies in basic skills, work readiness and occupational skills may be awarded an incentive with successful attainment of a goal not to exceed \$100.00. The activity must be documented in the participant’s ISS for documentation of “need”. Documentation must be provided for attainment of a skill goal, such as pre and post testing results or certificate of completion.

Attainment of Post-Secondary School Degree, License or Credential:

Youth participants who at the time of registration in WIOA youth services that had **not** attained a

post-secondary degree, license or credential and *are awarded* their post-secondary degree, license or credential during WIOA program participation or follow-up are eligible for an incentive. Participants may not be awarded cash incentives for attending post-secondary training but may be awarded up to \$200 in a cash incentive for obtaining their post-secondary degree, license, or credential. The Service Provider staff must provide a copy of the post-secondary degree diploma, credential, license or letter from a school official for documentation. The activity must be documented in the participant's ISS for documentation of "need" and career correlation.

Contractor/Service Provider Responsibility

Supporting documentation must be uploaded in each participant's OSL file of all cash and non-cash incentives made to WIOA participants. Award of all cash or non-cash incentives must be documented on the participant's ISS and supporting documentation of incentives awarded to the participant also placed in each individual participant file.

Incentives will be based upon availability of WIOA Youth funds. All procurement policies and procedures must be complied with for the procurement of all non-cash incentives.

Equal Opportunity and Nondiscrimination Statement

All Recipients, and Sub-recipients / Sub-grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex(including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.