



## **Workforce Innovation and Opportunity Act**

# **Youth Incentive Policy**

No individual in the United States may, on the basis of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship or participation in any WIOA Title I-financially assisted program or activity, be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any WIOA Title I-financially assisted program or activity.



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# Youth Incentive Policy and Procedures

## I. PURPOSE

The purpose of this policy is to provide guidance and establish the Northeast Workforce Development Board (NEWDB) standards of performance in the issuance of stipend and/or incentive payments to Workforce Innovation and Opportunity Act (WIOA) Title I Youth Program eligible and enrolled participants. This policy is established in accordance with applicable the WIOA, the Oklahoma Office of Workforce Development (OOWD) and all other applicable State and Federal laws, rules and regulations.

## II. BACKGROUND

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. Cash incentives can be effective tools to encourage participation in activities which lead to improved skills and to the achievement of academic, employment and leadership goals and positive outcomes. The WIOA Program Staff may provide such incentives through the use of stipends and bonuses. Incentives are not an entitlement and should be awarded as appropriate. All incentive awards will be subject to the availability of WIOA Funds. It is the discretion of the WIOA Program Staff to decide, on a case-by-case basis, the use and extent of stipends and bonuses and may be subject to the need of the client.

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 or 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.

The US Department of Labor (USDOL) has also clarified that incentives are not allowed for activities such as recruitment, submitting eligibility documentation, or just simply showing up for the program.

**Legal Use of Federal Funds:** WIOA funds may not be used to help employers to fill positions that promote or support the use, possession or distribution of marijuana.

## III. REFERENCES

- WIOA Section 129
- 20 CFR § 681.640
- Cost Principles in 2 CFR part 200
- OOWDI #02-2016 CHANGE 2

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**BABEL NOTICE:** (29CFR 38.9(g)(3)): *This document contains vital service information. If English is not your preferred language, please contact:*

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#### **IV. INCENTIVE POLICY**

Incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. Such incentives for achievement could include improvements marked by testing or other successful outcomes. You are allowed to pay incentives to WIOA In School Youth (ISY) and Out of School Youth (OSY) for milestones such as receiving a high school diploma or high school equivalency or other acceptable credentials. Also, the work experience incentive must be directly tied to the completion of work experience.

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 effective connections to employers, including small employers, in in-demand industry sectors and occupations of the local and regional labor markets.

Program notes, the Service & Training Plan (S&T), and the Individual Service Strategy (ISS) should document the use of activities or planned outcomes which result in stipend or bonus payments.

Please remember that the job shadowing work experience is a temporary, unpaid exposure to the workplace in an occupational area of interest to the participant.

## **A. STIPEND:**

- i. **Client Compensation** - An hourly stipend may be awarded to a WIOA youth during his/her enrollment for participation based on time in attendance for certain activities. Clients will be compensated at a rate equal to the current minimum wage. Because these activities do not involve an employee/employer relationship as defined by the Fair Labor Standards Act, compensation paid for attendance is **not** subject to labor standards including state and federal tax withholdings.

- ii. **Approved Activities** - Examples of activities for which stipend compensation may be used to encourage participation include, but are not limited to the following:

- Tutoring
- Summer academies
- Job readiness workshops
- Mentoring, limited internships, participation in community service projects, service-learning projects or job shadowing
- Financial Literacy Workshops

A stipend payment for participation in youth activities will not exceed 20 hours per week. All activities will have a stipend paid for the number of hours the client participates in the activity.

- iii. **Required Documents**

1. A “Stipend Obligation” for Staff-Provided Services or Partner-Provided Services must be completed prior to a client’s starting the activity. (See attachments). The forms may be modified or customized to fit specific situations or activities but should include, at a minimum, the following information:
  - Client’s name
  - The service being addressed by the activity
  - The start and end dates for the activity
  - Maximum funding being obligated
  - Dated signatures of the client and the career manager
2. Any stipend payment requires a completed “Attendance Report” for participation (see attached) to document attendance and participation. Time of participation should be rounded off to the nearest quarter hour. An “Attendance Report” may be submitted at the end of the stipend approved activity, or at the end of each month if the activity is

long-term.

**B. BONUS:**

- i. **Client Compensation** – An eligible youth client may be compensated for the attainment of goals, credentials or planned outcomes. The value of the most common bonus awards is listed in the following section. If a bonus value has not been addressed in this policy or in any other policy, the WIOA Program Staff may submit a written request to the Northeast Workforce Development Board Director identifying the assessed need, the proposed goal and a suggested bonus value to be awarded upon attainment of the goal.
- ii. For NEWDB Client Payments:  
 NEWDB will make payment to the participant upon receipt of the following documents and as they are received in the NEWDB fiscal office.
  - a. The bonus award with the assigned bonus value
  - b. Proof of the connected to a WIOA service
  - c. Proof of documentation in Ok Service Link.
  - d. Proof of the attainment of the goal, (copy of diploma, or HSE, sign in sheet from Elevate, Program notes and ISS showing the successful completion of a work-based learning activity, transcript showing the complete of a semester of post-secondary training, copy of Associate or Bachelor’s degree, etc.
- iii. Payments issued by the NEWDB service provider will follow the Service Provider’s payment procedures.
- iv. **Approved Activities** - Bonus awards and assigned bonus values for the attainment of skills, goals, or credentials are listed below. Bonus awards are not limited to those listed below; however, the procedure outlined in the previous paragraph should be followed to address activities not on this list. All youth incentive payments must be connected to a WIOA service and documented in Oklahoma Service Link. Listed below is guidance that outlines the process for linkage to services and financial tracking for Fiscal Link.

Incentive	Amount
<p><b>Activity:</b> Attainment of High School Equivalency (HSE) diploma during program participation or follow up</p> <p><b>Required Service and Training Entry:</b> Alternative Secondary School Offering</p>	<p>\$200</p>
<p><b>Activity:</b> Attainment of High School Diploma or equivalency during program participation or follow-up</p> <p><b>Required Service and Training Entry:</b> Individual Service Strategy Development (ISS) OR Tutoring, Study Skills, Instruction and dropout prevention. ISS must be developed if the ISS states the client is working toward their high school diploma and there are no other services provided to the client for attainment such as tutoring, study skills, etc.</p> <p>Tutoring, study skills, instruction and dropout prevention activities must be entered in OSL if any of these services are provided to the client while they are attaining their high</p>	<p>\$200</p>

school diploma or equivalent.	
<p><b>Activity:</b> Attendance at youth summit events such as Elevate</p> <p><b>Required Service and Training Entry:</b> Leadership development opportunities</p>	\$200
<p><b>Activity:</b> Successful completion of a work-based learning activity, such as On-The-Job training, Work Experience, Job Shadowing, Internships and Apprenticeships.</p> <p><b>Required Service and Training Entry:</b> As appropriate for each Work-Based Learning Activity i.e.: Work Experience, OJT, Job Shadowing, Internship or Apprenticeship</p>	\$100
<p><b>Activity:</b> Completion of a semester of post-secondary training</p> <p><b>Required Service and Training Entry:</b> Available to participants in multi-semester training. Participants successfully completing a semester of post-secondary training will be eligible to receive an incentive of \$100 per completed semester, not to exceed \$300 total for this incentive type. The completion of the semester must be for fulltime coursework, as defined by the training provider. Documentation includes a grades report demonstrating successful completion of the semester in the incentive packet, an OKJM S&amp;T entry for the training service, and properly updating relevant MSG data entry.</p>	\$100 (\$300 max per client)
<p><b>Activity:</b> Successful Completion of one of the following: Associates Degree, Bachelor's Degree.</p> <p><b>Required Service and Training Entry:</b> Occupational Skills Training</p>	\$200
<p><b>Activity:</b> Successful completion of an Industry Recognized Credentials, Certifications, or Licensure, in an occupational career pathway. No More than 3 Credential Bonuses may be awarded.</p> <p><b>Required Service and Training Entry:</b> Occupational Skills Training</p>	\$100 (\$300 Max per client)
<p><b>Activity:</b> Attainment of employment in a Career Pathway Occupation.</p> <p><b>Required Data Entry:</b> A detailed program note will be entered describing participant's attainment of employment and how that employment aligns with their career pathway (as identified in their ISS) will be entered. A correlating upload validating the attainment of employment will be entered in the form of a copy of the participant's pay stub or a statement from the participant's employer. Participant must have successfully completed two-weeks of employment.</p>	\$100
<p><b>Activity:</b> Retention of employment at 6-months after exit.</p> <p><b>Required Data Entry:</b> Eligible participants will be employed prior to their exit date, and will be employed at the same employer at 6-months after exit. Participant's may change positions within the employer. A detailed program note will be entered identifying that the participant has retained employment at the same employer for the duration of their Exit Date through the date of 6-months after their exit date. An upload validating the</p>	\$200

<p>employment retention will be entered in the form of a copy of the participant’s pay stubs or a statement from the participant’s employer.</p>	
<p><b>Activity:</b> Completion of Educational Functioning Level (EFL) Gain Post-Assessment <b>and</b> the appropriate number of instructional hours before post-assessment. The number of required instructional hours can be found in the NEWDB Assessment-ISS Policy and must be in accordance with the NRS-approved publisher guidelines based on the pre-assessment.</p> <p><b>Required Data Entry:</b> A completed <b>Attendance Report</b> documenting the number of completed instructional hours must be uploaded along with the participants EFL Post-Assessment.</p>	<p>\$200</p>
<p><b>Activity:</b> Completion of financial literacy, such as “Ready to Work” or comparable program.</p> <p><b>Required Data Entry:</b> A certificate or other form of validation of completion will be uploaded with incentive packet. Participants will have a completed Financial Literacy S&amp;T service and their IEP &amp; Program Notes will reflect its completion and incentive amount.</p>	<p>\$100</p>

**v. Required Data Entry**

1. Program notes, Service & Training Plan (S&T) and Individual Service Strategy (ISS) must address specifics of the activity, the use of the bonus award, and the amount.
2. Bonus payments for diplomas, credentials, licensures, and/or Measurable Skills Gains (MSG), must have related data entry elements updated in the OKJM Outcomes section and MSG Data entry sections.
3. The following items must be uploaded as a complete document packet:
  - a. Bonus Payment Authorization Form completed and signed by Career Manager
  - b. Copy of appropriate documentation verifying attainment of the goal or credential, as described above:
    - High school diploma or transcript
    - Postsecondary or occupational skills training degree, diploma, certificate, license or credential
    - High School Equivalency certificate/diploma
    - Test of Adult Basic Education score sheet - Summary of Scores
    - Test of Adult Basic Education results from technology center, online testing or partner agencies
    - Associate Degree, Bachelor’s Degree or Certificate.
    - Industry Recognized Credential or Certification attained with proof of self-sufficiency wage.
    - Additional Industry Recognized Credentials or Certifications leading to the successful completion of a career pathway.
    - Other documentation as appropriate

## **V. POLICY ADDITIONS AND CLARIFICATIONS:**

The NEWDB Executive Director is authorized to issue additional instructions, guidance, approvals, forms, etc. to further implement the requirements of this policy.

## **ATTACHMENTS**

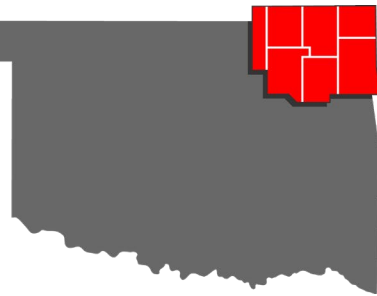
- Attachment A: Stipend Obligation for Staff-Provided Services
- Attachment B: Stipend Obligation for Partner-Provided Services
- Attachment C: Attendance Report
- Attachment D: Bonus Payment Authorization

**Approved by: All Board Members Present      05/11/2022**



# NEWDB

NORTHEAST WORKFORCE DEVELOPMENT BOARD



Attachment A

Revised 05.11.2022

## STIPEND OBLIGATION FOR STAFF-PROVIDED SERVICES

CLIENT NAME: \_\_\_\_\_ CLIENT PID: \_\_\_\_\_

ISY       OSY

SERVICE: \_\_\_\_\_

Start Date:	End Date:
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Student will be paid only for hours actually attended. Time attended will be validated by an *Attendance Report*.

Maximum Hrs. =      Hrs. X \$      per Hr.      = \$      Maximum Possible Stipend

\_\_\_\_\_  
Client's Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Career Manager's Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Staff Providing Service

\_\_\_\_\_  
Date



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NORTHEAST WORKFORCE DEVELOPMENT BOARD



Attachment B

Revised 05.11.2022

## STIPEND OBLIGATION FOR PARTNER-PROVIDED SERVICES

CLIENT: \_\_\_\_\_ PID# \_\_\_\_\_

SERVICE:

PARTNER PROVIDER:

TELEPHONE:

FAX:

Start Date:	End Date:
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Student will be paid only for hours actually attended. Time attended will be validated by a completed *Attendance Report*.

Maximum Hours = \_\_\_\_\_ X \_\_\_\_\_ per hour = \_\_\_\_\_ Maximum Possible Stipend

**The partner provider, \_\_\_\_\_, agrees to provide services to the Client named above as an in-kind service. The partner-provider agrees to submit Attendance Reports to verify attendance.**

\_\_\_\_\_  
Client's Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Partner Representative's Signature and Title

\_\_\_\_\_  
Date

\_\_\_\_\_  
Career Manager's Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Fiscal Approval

\_\_\_\_\_  
Date

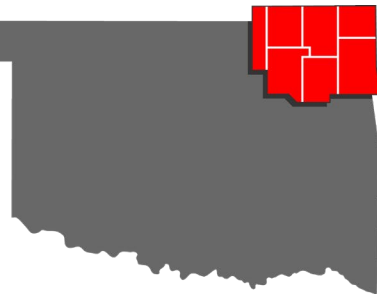


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NORTHEAST WORKFORCE DEVELOPMENT BOARD



Attachment C

Revised 05.11.2022

## ATTENDANCE REPORT

TRAINEE: \_\_\_\_\_ PID# \_\_\_\_\_

( ) ADULT ( ) DLW ( ) ISY ( ) OSY

TRAINING SITE: \_\_\_\_\_

CLASS/COURSE NAME: \_\_\_\_\_

FOR PERIOD ENDING: MONTH \_\_\_\_\_ YEAR 20 \_\_\_\_\_

SCHEDULED DAYS OF ATTENDANCE:(Circle Days That Apply) M – T – W – T – F – S

**" COMPLETE IN INK – NO WHITE OUT – TRAINEE AND INSTRUCTOR MUST INITIAL ALL CHANGES"**

DATE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

DATE	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31

Indicate hours of attendance on appropriate date. If student does not attend on a scheduled day, indicate with "A" for ABSENT.

### TRAINEE SIGNATURE & DATE INSTRUCTOR SIGNATURE & DATE

I certify that the above record of my daily I certify that this trainee is under my supervision attendance is correct. and the attendance recorded is correct.

The student listed above is in good standing with both grades and attendance.  Yes  No

If no, please explain: \_\_\_\_\_

\_\_\_\_\_  
Career Manager Signature

\_\_\_\_\_  
Date

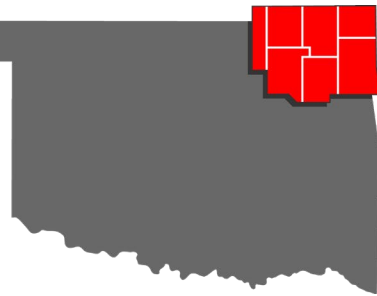


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NORTHEAST WORKFORCE DEVELOPMENT BOARD



Attachment D

Revised 05.11.2022

## BONUS PAYMENT AUTHORIZATION

The following individual has successfully completed requirements for a bonus award:

Client Name: \_\_\_\_\_ PID #: \_\_\_\_\_

ISY  OSY

Bonus Award Activity: \_\_\_\_\_

Completion Date: \_\_\_\_\_

Amount of Bonus Award: \_\_\_\_\_

Approved by: \_\_\_\_\_

Career Manager Signature

\_\_\_\_\_

Date

\_\_\_\_\_

Fiscal Approval

\_\_\_\_\_

Date

*(Documentation validating successful completion of bonus award activity must be attached before payment is issued.)*



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