



CENTRAL OKLAHOMA

WORKFORCE INNOVATION BOARD

A proud partner of the **americanjobcenter** network

Youth Incentive Policy

Pursuant to 20 C.F.R. §681.640 & TEGL 21-16

Approved and Published: June 19, 2019, Updated: October 2022

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PURPOSE: To provide guidance and establish the COWIB standards of performance in the issuance of incentive payments to WIOA Title I Youth Program eligible and enrolled participants.

The Central Oklahoma Workforce Innovation Board (COWIB) is the policy and guidance board for the Workforce Oklahoma system in Central Oklahoma. We are business leaders with a goal to establish a highly skilled, productive workforce in our 9-county area.

The Central Oklahoma Workforce Innovation Board (COWIB) complies 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, the basis of citizenship status or participation in a WIOA Title-1 financially assisted program or activity.

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COWIB Policy on Youth Incentives

Purpose

To provide guidance and establish the COWIB standards of performance in the issuance of incentive payments to WIOA Title I Youth Program eligible and enrolled participants.

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

20 C.F.R. §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 and must ensure that such incentive payments are:

- 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 C.F.R. part 200”

Department of Labor guidance provided in TEGL 21-16 expands upon part (d) above, clarifying that incentives must be in compliance with the Cost Principles in 2 C.F.R. part 200. For example, Federal funds must not be spent on entertainment costs, i.e., movie or sporting event tickets, or gift cards to 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 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 Central Oklahoma Workforce Innovation Board (COWIB) 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 COWIB's Youth Provider who are responsible for implementing any aspect of the incentive reward strategy.

Incentives Procedures

The Service Provider may make incentive payments to eligible enrolled/active youth participants 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 made in accordance with COWIB guidelines and any applicable state policies and/or procedures.

Once the Service Provider has verified the proper attainment benchmark(s) is achieved and documented, the Service Provider will enter a Program Note clearly 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 Request" form (Attachment A) for approval by their respective agency. Once approved, the Service Provider will put a copy of the form in the youth participant's case file in the appropriate case file section that relates to the incentive request being paid. The Service Provider will make arrangements to issue a check. If the request is denied, the Service Provider must enter a case note explaining why it was denied. The Service Provider will be responsible for presenting the payment to the participant.

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.

General Incentives for Participants Available

School Retention

- **Eligibility:** Any youth participant who:
 - Is enrolled in a recognized secondary or post-secondary program; and
 - Is meeting the State unit's academic standards, as described in TEGL 10-16
- **Benchmark:** For secondary education, this gain may be documented through receipt of a

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secondary transcript or report card for one semester showing that the participant is achieving the State unit's policies for academic standards. For postsecondary education, this gain must demonstrate a sufficient number of credit hours – which is at least 12 hours per semester or, for part-time students, a total of at least 12 hours over the course of two completed consecutive semesters during the program year – that shows a participant is achieving the State unit's academic standards. (passing grades).

- **Payment:** \$100 per semester, payable at the end of the first semester after enrollment into the WIOA Program and at the end of each semester thereafter
- **Documented By:** Report card or other progress report from the school. (Participant must provide the original document. After review by Youth Provider staff, a copy of the original will be maintained in the participant file.)

Attainment of High School Diploma or HSE

- **Eligibility:** Any youth participant that has not yet completed a high school diploma or GED certificate.
- **Benchmark:** Completion of high school or HSE.
- **Payment:** \$200, payable upon the documented attainment of a diploma or certificate.
- **Documented By:** Diploma, certificate, letter, report, or completion notice from the school. (Participant must provide the original document. After review by the Youth Provider staff, a copy of the original will be maintained in the participant file.)

Attainment of a Recognized Postsecondary Credential

- **Eligibility:** Any youth participant who is enrolled in an education or training program that leads to a recognized postsecondary credential.
- **Benchmark:** Attainment of the recognized postsecondary credential while the participant is enrolled in the WIOA Youth program or within one year after exit from the program, whether or not the training was paid for with WIOA financial assistance.
- **Documented By:** Diploma, certificate, license, or similar documentation – which may include a letter, report, or completion notice from the training provider. Participant must provide the original document. After review by Youth Provider staff, a copy of the original will be maintained in the participant file).
- **Payment:**
 - Career Tech Certificate
 - Occupational Certificate: \$200
 - STEM-related: \$250
 - Associate's Degree
 - Occupational Certificate: \$200
 - STEM-related: \$250
 - Bachelor's Degree

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- Degree: \$300
- STEM-related: \$350
- Occupational Licensure
...Attainment of a license recognized by the State of Oklahoma or an agency of the Federal Government
 - Occupational Certificate: \$200
 - STEM-related: \$250
- Occupational Certificate
...including Registered Apprenticeship and Career and Technical Education educational certificates
 - Occupational Certificate: \$200
 - STEM-related: \$250
- Occupational Certification
e.g., National Institute for Automotive Service Excellence certification, National Institute for Metalworking Skills, Inc., Machining Level I credential, Microsoft Certified IT Professional (MCITP), Certified Novell Engineer, etc.
 - Occupational Certificate: \$200
 - STEM-related: \$250
- Other Recognized Certificates
...of industry / occupational skills completion sufficient to qualify for entry-level or advancement in employment.
 - Occupational Certificate: \$100
 - STEM-related: \$150

Numeracy / Literacy Gain

- **Eligibility:** Any youth participant who was assessed as having a deficiency in basic skills, based on an approved pre-test. The test must be based on the list of the tests the Secretary of Education determines to be suitable for use in the National Reporting System for Adult Education. The list of approved assessments is published annually in the Federal Register. See Tests Determined to be Suitable for Use in the National Reporting System for Adult Education; Education Department, 84 FR 8322 - <https://www.federalregister.gov/documents/2019/03/07/2019-04152/tests-determined-to-be-suitable-for-use-in-the-national-reporting-system-for-adult-education>
- **Benchmark:** The participant achieves an “educational gains” within a 6-month period. The educational gain shall be demonstrated by the results of an approved post-test of the same type. Before a post test can be administered 40 plus hours of instruction/remediation must be documented and uploaded into OKJM. In the post-test assessment, if the participant demonstrates an increase to the next functioning level in any of the areas – reading, writing, numeracy, speaking, listening, functional, and workplace areas – they have made an educational

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gain.

- **Payment: \$100 Educational Gain** (Maximum amount of time between pre and post-test 6 months)
- **Documented By:** Pre and Post Test results
- **Payment: \$200 40 plus hours of instruction/remediation**
- **Documented By:** Documentation must be noted in the participants IEP/ISS and documentation must be uploaded in the applicable enrollment upload.

Completion of ACT Compass Test

- **Eligibility:** Any youth participant who, as a pre-requisite to entering post-secondary education completes the ACT Compass Test
- **Benchmark:** Completion of ACT Compass Test
- **Payment:** \$50 (one-time only)
- **Documented By:** Presentation of ACT Compass Test results. After review by Youth Provider staff, a copy will be maintained in the participant file.

Completion of ACT Test

- **Eligibility:** Any youth participant who, as a pre-requisite to entering post-secondary education completes the ACT.
- **Benchmark:** Completion of the ACT
- **Payment:** \$50 (one-time only)
- **Documented By:** Presentation of ACT Test results. After review by Youth Provider staff, a copy will be maintained in the participant file.

Employability Skills/Job Readiness Training \$400 Max

- **Eligibility:** Any youth participant who successfully completes a Work Experience Orientation component, such as the Dynamic Futures program or Virtual Job Shadow
- **Benchmark:** Completion of 40+ hours of employability skills or job readiness training.
- **Payment:** \$300
- **Documented By:** Certificate of completion or Employability Skills/Job Readiness Training report documenting 40+ hours.
- **Benchmark:** 60 job shadow videos viewed within 60 days. Must have a minimum of 6 hours documented and uploaded.
- **Payment:** \$100
- **Documented By:** Report to indicate completion.

Work Experience \$200 Max

- **Eligibility:** Any youth enrolled in work experience 15 to 29 hours per week, not to exceed 480

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hours.

- **Benchmark 1:** Successful completion of Work Experience (WEX).
- **Payment 1:** \$200
- **Documented By:** Time sheets and 3 evaluations.

On the Job Training (OJT) \$300 Max

- **Eligibility:** Successful retention in an OJT placement that offers a work schedule of at least thirty-two (32) hours per week.
- **Benchmark:** Successful Completion of OJT.
- **Payment:** \$300 (one time only).
- **Documented By:** OJT Evaluations, employee check stubs, time sheets.

Unsubsidized Employment \$50 Max

- **Eligibility:** Obtaining a job or jobs that offers a work schedule of at least thirty-two (32) hours per week and is not paid for nor subsidized by State or Federal program funding.
- **Benchmark:** Two (2) months of work.
- **Payment:** \$50
- **Documented By:** Letter from employer or two months' worth of check stubs.

Retention in Unsubsidized Employment \$250 Max

- **Eligibility:** Obtaining a job or jobs that offers a work schedule of at least thirty-two (32) hours per week and is not paid for nor subsidized by State or Federal program funding.
- **Benchmark 1:** Six (6) months of work.
- **Payment 1:** \$100
- **Documented By:** Letter from employer or six months' worth of check stubs.
- **Benchmark 2:** Twelve (12) months of work.
- **Payment 2:** \$150
- **Documented By:** Letter from employer or twelve months' worth of check stubs.

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.

Addenda / Revisions

COWIB Policy on Youth Incentives

The COWIB Chief Executive Officer is authorized to issue additional instructions, guidance, approvals, and/or forms to further implement the requirements of policy, without making substantive change to the policy, except in situations when a new or updated state and federal guidance is issued.

Incentive Request

Central Oklahoma Workforce Innovation Board

Date

Youth Name:			
Program ID#:			
Address:			
City, State, Zip:	County:		
Telephone:	Funding Source:		

Incentive Type	Amount	Total
	\$	\$
	\$	\$
	\$	\$
All documentation must be included with this request. Career Navigators should verify that the youth has earned the incentive according to COWIB Policy.	Subtotal	\$
	Total	\$

Career Navigator
Date

Request Approved By
Date

Payment Authorized By: _____