

EMPLOYERS' TRAINING RESOURCE

1600 E. Belle Terrace

Bakersfield, CA 93307

POLICY BULLETIN: #ETR 27b-20

TO: ETR and WIOA Youth Subrecipients
FROM:  Teresa Hitchcock
Assistant County Administrative Officer
DATE: January 3, 2020
SUBJECT: Youth Incentive Policy

**This Policy Bulletin Supersedes Any Previously Issued Policy Statements
Concerning Youth Incentive Policies and Procedures**

PURPOSE:

The Kern, Inyo and Mono Counties Workforce Development Board (KIM WDB) has developed this policy to ensure that allowable and appropriate incentives are provided as recognition for achievement related to training activities, education, and work experiences. This policy is intended to ensure compliance with all federal and state regulations by providing guidance to Employers' Training Resource (ETR) and its youth subrecipients on the use of youth incentives in the Local Workforce Development Area (LWDA). This policy applies to all LWDA funded in-school youth (ISY) and out-of-school youth (OSY) participants. ETR and subrecipient staff are responsible for implementing this policy. In addition, the KIM WDB Youth Incentive Committee will be responsible for approving additional incentives not included in the list provided herein to the Workforce Innovation and Opportunity Act (WIOA) youth subrecipients.

BACKGROUND:

The WIOA 20 CFR Section 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 tied to the goals of the specific program; 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."

While the Department of Labor 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 (WEX), education, or training. Such incentives for achievement could include improvements marked by acquisition of a credential or other successful outcomes. ETR and its subrecipients may leverage private funds for incentives that WIOA cannot fund. Incentive payments may be provided to both ISY and OSY as long as they comply with the requirements of 20 CFR Section 681.640.

POLICY:

Eligibility: Participants must be enrolled in a WIOA Youth Program in order to receive incentive payments. Incentives cannot be provided for accomplishments achieved prior to WIOA enrollment. Participants must achieve an outcome listed as a goal within their Individual Service Strategy (ISS) in order to receive an incentive. Incentives can only be provided during follow-up for goals determined prior to exit.

The following are the eligibility requirements for youth incentives:

- Participants must be enrolled in a WIOA Youth Program;
- Participants must be active or in follow-up;
- Participants must be in good standing with a program, including regular contact with program staff;
- Participants must have achieved an outcome listed as a goal within their ISS.

Incentives: Incentives provided to participants served directly by ETR will be in the form of Visa Gift Cards. Subrecipients may choose to provide incentives in the form of cash. No participant can receive more than \$2,000 in cumulative incentives per WIOA Program Year (i.e. July 1 through June 30).

The following is a list of incentives that may be awarded at the discretion of the KIM WDB to youth participants based on funding availability/the youth service provider's WIOA budget:

1. Attainment of GED/HS Diploma - \$200

Youth participants are eligible for this one-time incentive following the submission of the appropriate respective certificate and/or official document from the test site. This incentive can be earned during active participation or follow-up.

2. Internship Program (ETR direct-serve participants only) - \$250

Youth participants are eligible for the Internship Program incentive following the completion of the 80-hour program. In order to achieve the incentive, the Intern must have completed the 80-hour program, have participated in the internship at least eight hours per week, and must have earned at least "satisfactory" on all criteria listed on the WIOA Youth WEX/Internship Evaluation Form. This incentive can only be earned during active participation.

3. Increase in Education Functional Level (EFL) - \$50 each

Youth participants are eligible to receive the EFL incentive following the submission of a Comprehensive Adult Student Assessment Systems (aka CASAS) test result showing an increase in functioning level. The EFL goal must be declared at time of intake on the CASAS test form. This incentive can only be earned during active participation.

4. Enroll in Post-Secondary Education - \$150

Youth participants are eligible to receive this incentive after submission of proof of at least 2.0 GPA after completing at least one semester/quarter of full-time post-secondary education, or after submitting documentation indicating a completion of 25% of the required credential hours, signed by an authorized educational representative. This incentive can be earned during active participation or follow-up.

5. Obtaining an Industry-Recognized Certificate - \$50 each

Youth participants are eligible to receive this incentive following the submission of an industry-recognized certificate. Examples of industry-recognized certificates include but are not limited to: Typing (at least 40 wpm); 10 Key (at least 120 spm); forklift; CPR; ServSafe; bilingual. This incentive can only be earned during active participation.

6. Completion of an Occupational Skills Training Program - \$300

Youth participants are eligible to receive this incentive following submission of a Certificate of Completion for an Occupational Skills Training Program. Programs include but are not limited to: those provided by Kern High School Career Resource Department such as Customer Service/Retail Sales; Auto Tech; Medical Billing and Coding; and Logistics/Warehousing, vocational training through Bakersfield Adult or other Adult School, Regional Occupational or Career Technical Center in our LWDA. This incentive can only be earned during active participation.

7. Obtaining an Industry-Recognized Credential/License - \$500

Youth participants are eligible to receive this incentive after submission of an industry-recognized credential and/or proof of state licensing. Examples of industry-recognized credentials include but are not limited to: Certified Welder; Certified Logistics Technician; Licensed Vocational Nurse; Registered Nurse; Cosmetologist; Barber; and Automotive Service Excellence. This incentive can only be earned during active participation.

8. Completion of Work Experience - \$200

Youth participants are eligible to receive this incentive after completing at least 160 (ISY) or 240 (OSY) hours of work experience and earning at least "satisfactory" on all criteria on the WIOA Youth WEX/Internship Evaluation Form, as documented in their ISS. The WIOA Youth

WEX/Internship Evaluation Form participant must be completed by the worksite Supervisor and WIOA Coordinator. This incentive can only be earned during active participation.

9. Completion of Post-Secondary Education – AA - \$300; BS/BA - \$500

Youth participants are eligible to receive this incentive following the submission of the appropriate respective transcript, certificate and/or official document from the educational institution. This incentive can be earned during active participation or follow-up.

10. Work Readiness Training – \$50 for four hours (\$200 maximum)

Youth participants are eligible to receive this incentive after completing four hours of work readiness training workshops that may include such topics as workplace harassment, financial literacy, entrepreneurial skills, team leadership, citizenship, and career awareness. The four hours can be spread across topics and need not be continuous. Documentation should include certificate(s) and sign-in sheets. This incentive can be earned a total of four times (maximum of \$200) and can only be earned during active participation.

PROCEDURE:

Additional incentives may be awarded with approval of the KIM WDB Youth Incentive Committee, which shall consist of at least (1) Departmental Analyst; (1) Monitor; (1) Program Coordinator; and (1) Youth Program Support Supervisor.

Each KIM WDB subrecipient that utilizes incentives must follow this written incentive policy, which outlines a uniform and consistent strategy for awarding incentives with KIM WDB funds. Subrecipients may choose to award cash in lieu of Visa Gift Cards. If awarding incentives, subrecipients must show internal procedures that include all of the following:

- The manner in which incentives will be awarded (e.g. cash or gift cards);
- If awarding gift cards, the method by which the cards are purchased and stored;
- The internal controls for incentive awards (e.g. number of signatures required); and
- Compliance and alignment with this KIM WDB Youth Incentive Policy.

When awarding an incentive to a youth participant, ETR Staff and its subrecipients must adhere to the following process:

1. Document the achievement on the WIOA Youth Incentive Request Form;
2. Provide the completed WIOA Youth Incentive Request Form with related documentation to the ETR Youth Program Support Supervisor or designee for approval;

3. Once approved by the ETR Youth Program Support Supervisor or designee, provide incentive to participant;
4. Document the participant receipt of the incentive; and
5. Retain all documentation in the participant's file.

Participants served directly by ETR have sixty (60) days from the date of issuance of the incentive to pick up their Visa Gift Card.

RELATED DOCUMENTS:

WIOA Youth Incentive Request Form

WIOA Youth WEX/Internship Evaluation Form

WIOA Youth Incentive Request Form

Participant Name: _____ CalJOBS #: _____ Date Submitted: _____
 Agency: _____ Program: _____ Enrollment Date: _____
 WIOA Staff Name: _____ Phone #: _____
 Participant Status: ☐ Enrolled ☐ In Follow-Up
 Total amount in incentives received this program year: _____
 (If over \$2000, ETR CAO Manager Approval Required)

Incentive(s) Achieved:

Achievement	Date of Goal on ISS	Date Earned	Incentive Amount
Attainment of GED/HS Diploma (\$200)			
Internship Program (\$250)			
Increase EFL (\$50 each)			
Enroll in Post-Secondary Education (\$150)			
Obtaining an Industry Recognized Certificate (\$50)			
Completion of Occupational Skills Training Program (\$300)			
Obtaining an Industry Recognized Credential/License (\$500)			
Completion of Work Experience (\$200)			
Completion of Post-Secondary Education (AA - \$300)			
Completion of Post-Secondary Education (BA - \$500)			
Work Readiness Training (\$50) (maximum of \$200)			
TOTAL			

Appropriate documentation must be
provided with this request.

WIOA Staff Signature Date

To be completed by ETR Staff

Incentives Approved: ☐ YES ☐ NO

If denied, please explain: _____

ETR Youth Program Support Supervisor Signature Date

CAO Manager (ETR) Approval (if applicable) Date

WIOA Youth WEX/Internship Evaluation Form

To be filled out at completion of participant's WEX/Internship

TO BE COMPLETED BY WIOA STAFF

Participant Name: _____ CalJOBS #: _____ WIOA Staff: _____

Worksite: _____ Address: _____ Phone# _____

Did participant complete WEX/Internship? ☐ Yes ☐ No

Please explain: _____

Did participant's WEX/Internship match participant's WIOA Training Plan: ☐ Yes ☐ No

If no, please explain: _____

Participant's WEX/Internship Information:

Start Date: _____ End Date: _____ Total Completed Hours: _____

Total Excused Absences: _____ Total Unexcused Absences: _____ Total Tardies: _____

TO BE COMPLETED BY WORKSITE SUPERVISOR

(5=Excellent; 4=Above Average; 3=Satisfactory; 2=Needs Improvement; 1=Not Acceptable)

Please Rate Participant's:	5	4	3	2	1
Attendance					
Punctuality					
General behavior - politeness and courtesy to others					
Follows directions					
Cooperative, flexible					
Appearance - good hygiene, appropriate attire, etc.					

Participant's Job Duties: _____

Skills Learned by Participant: _____

Comments: _____

Name of Worksite Supervisor

Signature of Worksite Supervisor

Date

WIOA STAFF USE ONLY

WIOA Staff Comments (should include comments regarding any differences between participant's WIOA Training Plan and WEX/Internship):

Participant Comments: _____

WIOA Staff Signature

Date

Participant Signature

Date

This form is required for WEX/Internship related incentives and should not replace agency's regular WEX evaluation.