WORKFORCE INNOVATION AND OPPORTUNITY ACT

Youth Incentive Policy

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EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT: All Recipients and sub-recipients/subgrantees 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.

South Central Oklahoma Workforce Board's Workforce Innovation and Opportunity Act Title I program funding statement can be found at https://scowib.info/funding

Caddo County, Grady County, McClain County, and City of Chickasha Labor Market Area
Comanche County, Cotton County, Tillman County, and City of Lawton Fort Sill Labor Market Area
Jefferson County, Stephens County, and City of Duncan Labor Market Area

YOUTH INCENTIVE POLICY

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

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 Employment Security Commission provides further guidance in WSD #12-2024, 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.

WSD #12-2024, specifically lists the following as unallowable for incentive payments:

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

POLICY:

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 SCOWB 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 EmployOklahoma for any incentive payment. The Service Provider will complete the "Incentive Request" form 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 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. The training program must be aligned with an in- demand industry sector or occupation in the South-Central Oklahoma area (as determined by SCOWB).
- **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
  - Demand Occupation: $200
  - STEM-related: $250

  Associate's Degree
  - Demand Occupation: $200
  - STEM-related: $250

  Bachelor's Degree
  - Demand Occupation: $300
  - STEM-related: $350

  Occupational Licensure

  ...Attainment of a license recognized by the State of Oklahoma or an agency of the Federal Government
  - Demand Occupation: $200
  - STEM-related: $250

  Occupational Certificate

  ...including Registered Apprenticeship and Career and Technical Education educational certificates
  - Demand Occupation: $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.

- Demand Occupation: $200
- STEM-related: $250

Other Recognized Certificates

...of industry / occupational skills completion sufficient to qualify for entry-level or advancement in employment.

- Demand Occupation: $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 EmployOklahoma. 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 gain.
- **Payment: $100,** payable after documentation of 40 plus hours of instruction/ remediation and an increase to the next functioning level (Maximum amount of time between pre and post-test 6 months)
- **Documented By:** Pre and Post Test results. Documentation must be noted in the participants 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: $100** (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: $100** (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.

Virtual Job Shadow Flex Lessons Incentive Payment $250 Max

- **Eligibility:** Any youth participant who completes a Flex Lesson(s) by Virtual Job Shadow assigned by their case manager.
- **Benchmark:** completion of a lesson(s).
- **Payment:** $50 per flex lesson and payable upon documented completion.
- **Documented by:** a printed record of correct completion from Virtual Job Shadow verified and checked for content by a case manager, case manager signature and date signed, and uploaded

Employability Skills/ Job Readiness Training $400 Max

- **Eligibility:** Any youth participant who successfully completes a Work Experience Orientation component, such as Virtual Job Shadowing or Dynamic Futures Program.
- **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:** Watch 60 job shadow videos in 60 days.
- **Payment:** $100
- **Documented by:** Report to indicate completion.

Work Experience $200 Max

- **Eligibility:** Any youth enrolled in work experience 32 to 40 hours per week, not to exceed 520 hours.
- **Benchmark 1:** Perfect attendance and punctuality for the first month of work experience.
    - **Payment 1:** $50
    - **Documented by:** Time sheets and 1st evaluation.
- **Benchmark 2:** Perfect attendance and punctuality for the month or an overall increase of one (1) or more points on 2nd WEX evaluation.
    - **Payment 2:** $50
    - **Documented by:** Time sheet and second WEX evaluation.
- **Benchmark 3:** Perfect attendance and punctuality for the month, overall increase of one (1) or more points on 3rd WEX evaluation, and successful completion of the work experience.

- **Payment 3:** $100
- **Documented by:** Time sheets and WEX 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:** Completion of one month of subsidized employment with OJT employer up to six months.
- **Payment:** $50 per month.
- **Documented by:** OJT Evaluations, employee check stubs, time sheets.

Unsubsidized Employment $50 Max

- **Eligibility:** Obtaining a job or jobs that offer 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 offer 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.

ACTION REQUIRED: SCOWB will disseminate the Youth Incentive Policy to all SCOWB contractors, staff, and board members. All contractors, staff, and board members will be responsible for following this policy.

APPROVED: 9/14/2023