

ATTACHMENT 17.

**Youth Incentive Payment
Policy /Youth Monitoring of
Stand Alone Programs Policy**



**KANSAS CITY & VICINITY
WORKFORCE DEVELOPMENT BOARD**



Serving the city of Kansas City, Mo. and Cass,
Clay, Platte, and Ray counties.

The Full Employment Council, Inc. (FEC) is the fiscal
agent and workforce support organization for the
Kansas City & Vicinity Workforce Development Board.

Workforce Innovation and Opportunity Act (WIOA) Policy

INCENTIVE PROGRAM PROCEDURES AND DOCUMENTATION POLICY

POLICY NUMBER: 2018-010, [Modification 2](#)

EFFECTIVE DATE: 06-27-2017

[MODIFICATION DATE: 06-10-2020](#)

APPROVED BY

Clyde McQueen, President/CEO
Full Employment Council, Inc.,
Managing Entity/Fiscal Agent
Kansas City and Vicinity Workforce Development Board

INQUIRIES

Questions about this issuance should be addressed by email to Andrea Robins, Senior Director of Planning, Compliance and Management Systems at arobins@feckc.org, who shall disseminate the agency response after consulting with Full Employment Council Officers.

PURPOSE

The purpose of this Issuance is to provide guidelines and clarify incentive eligibility, the offering of incentives, procedures for incentives, and documentation required related to offering incentives to WIOA Youth participants.

BACKGROUND

Incentives are a way to encourage customers' participation and to reward participant for achieving specific goals in their Employment Plan. Attached to a goal, the incentive is provided to an eligible WIOA Youth program participant in recognition of attaining an allowable goal stated in their Employment Plan. Incentives are tied to training, education or work experiences. They are **not** tied to recruitment, employment, retaining employment, or entering the military. Examples of incentives for achievement include credential attainment, success completion of Work Experience, and educational performance.

The practice of offering incentives is governed by Missouri Office of Workforce Development Issuance No. 14-2019, Statewide WIOA Youth Incentive Policy.

INCENTIVE PROGRAM PROCEDURES AND DOCUMENTATION POLICY

POLICY NUMBER: 2018-010, [Modification 2](#)

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Statewide WIOA Youth Incentive Policy

POLICY

I. ACTIVITIES TIED TO INCENTIVES

Youth ages 16 through 24 may qualify for the following incentive payments for outcomes attained. Payments to Youth shall be related to Educational Attainment , Measurable Skill Gain attainment and Work Experience

A. Educational Attainment:

WIOA enrolled youth who obtain educational achievements from AEL, Post-Secondary Enrollment or Alternative Education are eligible for incentives. Payment in the form of a gift card will be made available immediately upon documentation of attainment.

Credential			
High School Diploma	\$200.00	Copy of diploma Documentation on school letterhead	Education
Post-Secondary Degree or Certificate	\$100.00	Copy of diploma, certificate, and/or transcripts	Education Training
HISSET Attainment	\$200.00	Certificate with date printed out from https://apps.dese.mo.gov/GEDManagement/Transcript_Search.aspx	Education

B. Measurable Skill Gains Attainment:

Youth who obtain a Measurable Skill Gain are eligible for the following incentives:

Measurable Skills Gain			
EFL Increase - Test administered by AEL is the only acceptable test	\$50.00	TABE test documentation and scores entered in MO Jobs.	Education
High School Grades: Participant achieving statewide minimum academic standards (2.5 GPA on a 4.0 scale)	\$50.00	High School Transcript or report card for one semester	Education
Post-Secondary Progress: 12 completed credit hours per semester for full time student; a part-time student must have 12 completed credit hours, in total, over two consecutive semesters since enrollment	\$50.00	Post-secondary transcript or report card Other official documentation from training provider	Education Training
Progress towards milestones: This can include completed stages of OJT; completion of benchmarks or milestones during an apprenticeship; or a report from an employer or training provider	\$50.00	Documentation from mid-point or end-point monitoring Copy of documentation for benchmark	Education Training
Passage of a knowledge based or skill based exam that is required for a particular occupation or that demonstrates progress in attaining technical or occupational skills	\$50.00	Copy of the results of the exam	Education Training

Work Experience/Training			
Successful mid-point monitoring of On the Job Training	\$50.00	Mid-point monitoring form in file that shows participant scored proficient	Training
Successful end-point monitoring of work experience	\$100.00	End-point monitoring form in file that shows participant scored proficient	Work Experience
Completion of all allotted hours for On the Job Training	\$100.00	Completed end-point monitoring that shows participant finished hours and retained by employer	Training

Payment in the form of a gift card will be made available immediately upon demonstration of achievement gains. Measurable Skill Gains will be documented in MOJOBS as a Measurable Skill Gain, documents must be uploaded under the WIOA application in the measurable skills gain section and case noted.

II. EXCLUSIONS AND LIMITATIONS FOR INCENTIVES

- (1.) Incentives shall not consist of incentives in the form of entertainment, such as tickets to or sponsorship for attendance at sporting events, movies, concerts or other entertainment activities.
- (2.) Incentives shall not be distributed or used for promoting recruitment, submitting eligibility documentation, program participation, participation in workshops, or for taking assessments such as the National Career Readiness Certificate. Incentives shall not be provided for TABE weekly remediation activities.
- (3.) Incentives are not tied to employment, retaining employment, or entering the military.
- (4.) Incentives are not available to Youth participants who have exited the WIOA Youth program and are in follow-up status.

III. REQUEST FOR INCENTIVES

Upon a Youth participant achieving a milestone which allows for the award of an incentive, the Career Development Executive will:

- 1) Document this achievement in MOJOBS by completing the appropriate record in MOJOBS.
- 2) Uploading the documentation on the WIOA Application and including case note.
- 3) This upload in MoJobs must occur for both the credential and recording the Measurable Skill Gain.
- 4) The Career Development Executive shall then submit a Supportive Service Request form to the Director of Career Services.
- 5) The Director of Career Services will review and approve if accurate and correct.
- 6) Career Development Executive will received gift card from Director and issue to WIOA Youth enrolled participant. The participant will sign this, indicating receipt of the incentive.

- 7) A copy of the sign supportive service request is returned to Director who provides to Fiscal for reconciliation.

IV. MOJOBS CODE 487 FOR INCENTIVES

The Career Development Executive shall add the WIOA Youth Incentive Payment activity Code 487 and case note that attainment of the outcome justifying the incentive.

WIOA Youth Incentive Payment Activity Code and Definition						
Service Code	Activity Description	Countable for Participation	Duration	Extended Duration	Max Duration	Definition
487	WIOA Youth Incentive Payment	No	1	0	1	Payments to Youth participants for recognition and achievement. Incentive payments must be directly tied to training activities and work experiences. Incentive payments may not include entertainment, such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment.

Attachment A
Weekly Reconciliation Form

WAL-MART CARDS

RECONCILIATION FOR THE WEEK ENDING :-

==

6/12/2020

<u>Description</u>			
Beginning Balance	6/8/2020	<input type="text" value="0"/>	cards you have
Additional Received During the week		<input type="text" value="0"/>	
Distributed		<input type="text" value="0"/>	cards distributed
Ending Inventory Balance	6/12/2020	<input type="text" value="0"/>	cards you have left
New Request		<input type="text"/>	any new request for cards

Prepared by: **Manager/ Coordinator** **Date**

Reconciled By: _____ **Accountant** _____ **Date**

Approved By: _____ **CFO** _____ **Date**

Attachment B:

**Missouri Office of Workforce Development Issuance No. 14-2019,
Statewide WIOA Youth Incentive Policy
And Frequently Asked Questions**



Missouri Department of Higher Education and Workforce Development

OWD Issuance 14-2019

Release Number—Program Year

Release Date: December 26, 2019
Effective Date: December 26, 2019
Expiration Date: Continuous, until further notice

SUBJECT:

Statewide WIOA Youth Program Incentive Policy

ATTACHMENTS: (1)—None

This Issuance is Official Policy of the Missouri Department of Higher Education and Workforce Development

ISSUING AUTHORITY:

Handwritten signature of Mardy Leathers

Mardy Leathers
Director
Missouri Office of Workforce Development

THIS ISSUANCE REQUIRES CREATION OR ALTERATION OF A CORRESPONDING LOCAL POLICY

KEYWORDS:

Statewide; Local Plans and Policies; Youth Program Incentive; Workforce Innovation and Opportunity Act (WIOA)

THIS ISSUANCE AFFECTS:

- Missouri One-Stop Delivery System (MJC/AJCs)
WIOA Title I Local Areas/Local Boards/Local Plans
WIOA Title I In-State Funding
WIOA Title I Performance/Accountability
WIOA Title I One-Stop Delivery/Service Providers
WIOA Youth Workforce Investment Activities
WIOA Section 188 Nondiscrimination Issues
WIOA Fiscal/Administrative Procedures

FOR THE ATTENTION OF:

- One-Stop frontline staff
Chief Elected Officials
Local Fiscal Agents
Local WDB Chairpersons
Local WDB Directors
Local WDB Members
One-Stop Operators
One-Stop Functional Leaders
Service Providers
Local Equal Opportunity Officers
Local Compliance Monitors

RESCISSIONS: None

REFERENCES:

- U.S Department of Labor, Employment and Training Administration, Training and Guidance Letter (TEGL) 21-16, "Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance," March 2, 2017.
20 CFR 681.640, "Are incentives payments to youth participants permitted?"
2 CFR 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards."
OWD Issuance 09-2019, "Local and Regional Plan Guidelines for Local Workforce Development Boards," October 7, 2019.

SUMMARY:

This Issuance transmits the Office of Workforce Development (OWD) guidance to Local Workforce Development Boards (LWDBs) regarding WIOA Youth Incentives in order to conform to federal laws and regulations.

BACKGROUND:

LWDBs have WIOA Title I performance outcomes to meet; therefore, incentives that inspire WIOA Youth participants to successfully complete training and/or work experiences are beneficial to youth, program providers and LWDBs.

SUBSTANCE:

WIOA permits incentive payments¹ to enrolled youth participants for recognition and achievement **directly tied to training activities and work experiences**. Incentives may be awarded to participant based upon their progress and/or achievement of milestones in the program tied to education, training, or work experience as outlined in their Individual Service Strategies (ISS). Allowable milestones may include, but not limited to:

- Obtaining Secondary or Postsecondary Credential
- Successful completion of work experiences
- Educational Functioning Level (EFL) Gains
- Educational performance

LWDBs must have written policies and procedures in place governing the award of incentives and must ensure that such incentives 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 CFR part 200. For example, Federal funds **cannot** be spent on entertainment costs; therefore, youth 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. There are also requirements related to internal controls to safeguard cash, which also apply to safeguarding of gift cards, which are essentially cash.

DOL **does not** allow incentives to be used as motivators for various activities such as recruitment, submitting eligibility documentation, and participation in the program². OWD has determined that incentives are not allowed for workshop participation or for taking assessments such as the National Career Readiness Certificate (NCRC).

OWD **does not** allow incentives to be paid to Youth who have exited the program and who are now in follow-up. LWDBs are encouraged to engage Youth while in the program to ensure successful outcomes in training, education and work experiences. Incentives must be tied to training, education and work experiences; therefore, OWD **does not** allow incentives for obtaining unsubsidized employment, entering the military or retaining employment. Unsubsidized employment is not a “work experience”³ which is a planned structured learning experience that takes place for a limited number of hours.

ROLES, RESPONSIBILITIES, and REQUIRED ACTIONS:

Each LWDB must develop a youth incentive policy and it will be a required component of the Local Plan⁴. Each LWDB local compliance monitor must ensure that all incentives paid are, if fact, allowable.

Effective immediately, all LWDB Directors and Missouri Job Center Leadership should inform Frontline Workforce System staff of these requirements.

All Frontline Workforce System Staff handling WIOA Youth case management services and incentive payments should immediately apply these requirements.

¹ [20 CFR 681.640](#)

² [TEGL 21-16](#)

³ [20 CFR 681.600](#)

⁴ [OWD Issuance 09-2019](#), “Local and Regional Plan Guidelines for Local Workforce Development Boards,” October 7, 2019.

TIMELINE:

All Missouri Workforce System Staff — Implementation of these rules Immediate and Continuous

INQUIRIES:

Please direct all questions or comments regarding this Issuance document to dwdpolicy@dhewd.mo.gov. All active Issuances are available at jobs.mo.gov/dwdissuances. Expired/rescinded Issuances are available on request.

*For information about [Missouri Office of Workforce Development](#) services, contact a [Missouri Job Center](#) near you.
Locations and additional information are available at jobs.mo.gov or 1-(888)-728-JOBS (5627).
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Auxiliary aids and services are available upon request to individuals with disabilities.
Missouri Relay Services at 711.*



Missouri Department of Higher Education and Workforce Development

FREQUENTLY ASKED QUESTIONS (FAQs) ABOUT...

**OWD Issuance 14-2019: Statewide WIOA Youth Program
Incentive Policy**

(Issued: December 26, 2019)

Last updated: February 2020.

Q: Youth incentives are not allowed after exit, but what will happen if an incentive is paid and posted to the record after an individual completes training and before the participant soft exits, but because the 487 service isn't countable then record shows an "Exit date" prior to the incentive?

A: State Monitors understand that a record exits 90 days after the last countable service. It is acceptable to pay/post the incentive during this time. However, it is not acceptable to pay an incentive after the 90-day soft-exit period has passed. (Ex. Paying an incentive a year after exit)

Last updated: January 2020.

Q: Can WIOA Youth in the Scholars program, or a similar program, receive a larger Incentive for obtaining their Hi-Set?

A: No. An incentive is tied to a goal of a specific program as required, then that incentive should be the same for everyone. Boards are paying for a HISET incentive, the amount should be set and not changed based on individual participants. Any deviation would open Boards up to possible discrimination and/or legal ramifications.

Last update: August 2019.

Q: Why can Youth incentives not be given while in Youth follow-up?

A: Incentives must be tied to Training activities and Work Experiences, therefore the State made the decision to not allow incentives while in follow-up. LWDBs are encouraged to engage Youth to actively participate in the WIOA Youth program to ensure successful outcomes in training and work experiences.

Please direct all questions or comments regarding the Issuance of this FAQ document to dwdpolicy@dhewd.mo.gov. All active Issuances are available at jobs.mo.gov/dwdissuances. Expired/rescinded Issuances are available on request.

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