



POLICY

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| SECTION: CSTB | POLICY# 020-C0103 | PAGE: 1 of 5 |
| TITLE: WIOA Youth Incentive Payments | | EFFECTIVE DATE: 2.18.2021 |
| REPLACES: N/A | | DATED: |

DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF

PURPOSE: To provide comprehensive guidance that ensures compliance with WIOA requirements for the provision of incentive payments to WIOA Title I Youth participants.

BACKGROUND: WIOA providers for a workforce system that is universally accessible and customer centered, with an emphasis on work based learning and training that is job driven. Among many service options available to WIOA Youth participants are youth incentive payments.

WIOA encourages the use of incentive payments whenever appropriate to ensure successful program participant in work experiences, education or training. 20 CFR § 681.640 states that incentive payments to WIOA 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.

POLICY:

Incentive payments are allowable for youth participants only and, unlike supportive services that are permitted for recognition of achievements directly tied to training activities and work experiences.

Opportunities for WIOA Youth to earn incentives will be outlined in writing and reviewed with the customer to ensure a thorough understanding of program requirements. Supporting documentation of the activities completed or milestones achieved will be documented in the participant's file as verification of achievement.

Eligibility:

Incentive payments may be issued to WIOA Youth participants for recognition and achievement directly tied to training activities, work-based learning programs (On-the-Job training, Paid Work Experience), or performance related outcomes specified in the customer's Individual Service Strategy (ISS) and are issued in compliance with requirements of 2 CFR Part 200. To qualify for receipt of incentive payments, staff in consultation with the program participant must:

- Qualify and enroll in WIOA Youth funded programs operated by CSTB;

- Demonstrate and document the program participant's recognition and/or achievement milestone directly tied to training activities;
- Complete a Youth Incentive Form which documents the incentive earned along with the described incentive amount.

While USDOL 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 directly connected to recognition of achievement of milestones timed to work experience, education or training. Such incentives for achievement could include improvements marked by acquisition of a credential, achievement of soft skills or vocational/occupational skills training, or other successful outcomes as defined in the Career Plan. In addition, because unsubsidized employment is a milestone of the program, as long as it is tied to work experience, education or training, incentive payments are permitted for the achievement of unsubsidized employment.

Outlined below are examples of incentives that may be issued to WIOA Youth participant, but not limited to:

| Category | Description |
|---|--|
| Work Readiness Training | Upon completion of attending assigned CSTB in-person or virtual work readiness training sessions. |
| Microsoft Office Specialist (MOS) Training | Upon completion and credential attainment of online training. |
| Hospitality Training | Upon completion and credential attainment of only training. |
| Workforce Development Training | Upon completion and credential attainment of online Bring Your 'A' Game; training provided by the Center for Work Ethic Development. |
| Literacy Gain for Basic Skills Deficient | Upon achievement of literacy gain in Reading/Math/Language. |
| GED Attainment | Upon completion of the GED. |
| Penn Foster Progression | Only at completion of 25%, 50% and 75%. |
| Penn Foster Diploma Attainment | Upon completion of the final Penn Foster Diploma. |
| OST: Report Cards and Progress Reports | Upon receipt of report card/ progress report from training provider. |
| Credential Attainment: | Upon full completion at the end of their training. |
| Employment | Upon securing unsubsidized employment. |

Incentives may be paid for the above achievements during participation or they may be paid during follow-up for:

- Achievement completed during participation but recognized after exit;
- A credential awarded during follow-up for completion of work experience, education or training completed during participation; or
- The achievement of unsubsidized employment that occurs during their first time during the first follow-up period.

Incentive payments may not be provided for completion of milestones during follow-up, such as job retention.

Methodology

Youth incentives may be issued in a variety of forms including: prepaid gift cards or reloadable eCards. CSTB utilizes a card tracking system, Card Tracker for prepaid cards to record all issuance of WIOA Youth incentives issued to program participants. The system records the customer's signature and documents the transaction, detailed reports are generated out of this system. In addition, CSTB utilizes eCard system, which is fully integrated into the ATLAS system, for issuance and tracking of incentive payments. The information on the type of incentives, issuance and funding of transactions, approving staff and various approval levels will be reflected in the system.

Documentation:

CSTB program staff are required to maintain documentation sufficient to ensure that funds are allowable and used for the intended purpose. At a minimum, documentation must include:

1. Determination of the participant's eligibility for incentive payments based on milestone achievement be documented through the Youth Incentive Form.
2. Outline Incentives on the participant's Career Plan and document ongoing issuance through the Youth Incentive Form.
3. Documentation to support issuance of the incentive provided to the program participant will be included in the participants WIOA EDMS file. Case notes documenting that the participant qualifies for the incentive payment, milestone achieved, date of issuance and incentive amount.
4. Records of incentive will be maintained in CSTB system of record either Card Tracker for prepaid cards or ATLAS system for eCard.

Employ Florida Service Codes:

The appropriate service codes for WIOA Youth Incentives must be entered in Employ Florida when participants are provided incentives. The Employ Florida Service Code Guide outlines the various code titles and definitions as well as the documentation/case note requirements.

CSTB staff and service provider staff are required to enter the appropriate service codes in Employ Florida when participants are provided incentive payments. Outlined below is the specific Employ Florida Service Code, definitions and documentation required for incentives.

| Service Code | Definition | Documentation |
|--|--|--|
| 484 - Supportive Service - Incentives / Bonuses | Code is recorded to identify support services that are reasonable and necessary to enable a jobseeker to participate in WIOA activities. | A case note is required and must include the type of incentive, or the amount when cash or a cash equivalent, e.g., gift card, is given. 20 CFR 681.570 |

Issuance Process:

Under no circumstances can an incentive card(s) be mailed out to participants. The CSTB incentive issuance process consists of two responsible parties: the incentive **requestor** and the incentive **issuer**. Staff members are prohibited from acting as both requestor and issuer when dealing with a single program participant. Staff members are prohibited from issuing services to program participants on their caseload. Under no circumstances can a CSTB Career Coach who is requesting services for

a program participant also act as the Career Coach who issues services to that program participant.

Safeguarding Cards and Internal Controls:

Security protocols for safeguarding CSTB incentive cards are of paramount concern for our organization. Each of our CSTB offices also has a safe onsite in the manager's office or dedicated safe room where the incentive cards are housed overnight and when there are no scheduled appointments. The incentive cards are further stored in lockboxes within each safe.

Incentive gatekeepers are the only individuals with authorization to access the safe. The gatekeeper is a CSTB staff member that is not on the programs team to ensure appropriate firewalls are in place. The lockbox is issued daily by the gatekeeper to the issuers with the allotted incentive cards needed for the scheduled appointments. Incentive cards are signed in and out daily by the gatekeeper and issuer to ensure accuracy and track the responsible party for the cards.

Incentive cards signed out to the CSTB staff issuer must remain in the lockbox until the time of issuance. When not in use, the lockbox should remain in a safe or a locked drawer or locked overhead compartment. At no point are staff authorized to leave incentive cards outside of the lockbox (i.e., placed in desk drawer, left out on desk, etc.). The Gatekeeper and a second staff member will perform an inventory count bi-monthly (mid-month and the last business day of the month, with limited exceptions due to holidays and/or office closures). The inventory count sheets are provided to the Finance Department (Program Coordinator – Finance). Program Coordinator – Finance reconciles the inventory count sheets to the inventory per Card Tracker System (defined below). No new cards issuances can occur until the inventory reconciliation process is completed and appropriated staff are notified by the Program – Coordinator Finance.

Internal monitoring is conducted over the issuance and on hand inventory of incentive cards. The internal monitoring is conducted to ensure issuance of incentive cards are to eligible participants, properly documented, within established limits, and on hand inventory is appropriately controlled and agrees to card tracker and financial records.

Periodically throughout the Program Year, CSTB may change the issuers to ensure another layer of internal control.

Monitoring

Programmatic monitoring will be conducted throughout the program year by our internal Program Monitors under the direction of our Director of MIS & Data Services. This will include a formal review of incentive issuance, activities and case noting for all programmatic funding to comply with federal, state and local policies and procedures.

Financial monitoring will be conducted under the direction of the CSTB Director of Fiscal Compliance.

Cancellation of Incentive:

This policy and some or all of its categories of incentive may be cancelled or changed, in whole or in part, by CSTB at any time without notice, effective immediately, or at any time CSTB determines necessary. Exceptions may be made to this policy by CSTB if it is in the best interest of CSTB or its participants.

Policy Exceptions:

Any exceptions to the above stated policy or any part thereof, must be documented and approved by the CareerSource Tampa Bay CEO or his/her designee for consideration.

CSTB may receive federal, state and local grant awards that may not be subject to the requirements outlined above. Those awards will be governed by the rules and guidelines set forth as defined in the grant document(s). Desk guide(s) or other internal documents will be established to outline the processes specific to the award(s).

REFERENCES:

- Workforce Innovation and Opportunity Act, Public Law (WIOA) Sections 3(59); 106(c)(1)(F); 133(b)(2)(B);133(b)(3);134(c)(3);134(d)(3); 134(d)(4); 134(c)(1)(A)(ii);134(c)(1)(A)(iii): <https://www.govinfo.gov/content/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf>
- CareerSource Florida Administrative Policy #109, Supportive Services and Needs-Related Payments: https://floridajobs.org/docs/default-source/lwdb-resources/policy-and-guidance/guidance-papers/2020-guidance-papers/adminpolicy109_wioa-suppsvcsneeds-relatedpymts.pdf?sfvrsn=bb5b4ab0_2
- 20 Code of Federal Regulations (CFR) Subpart G; 681.570; 681.640: <https://ecfr.federalregister.gov/current/title-20/chapter-V/part-680/subpart-G>
- TEGL 21-16: https://wdr.doleta.gov/directives/attach/TEGL/TEGL_21-16_Acc.pdf

INQUIRIES: Any questions about this procedure should be directed to the CEO, Chief Policy & Performance Officer, Youth Director or their designee.