



**Buffalo and Erie County
Workforce Investment Board, Inc.**

LOCAL POLICY BULLETIN

BECWIB Bulletin # 1-21

Date: June 8,2021

TO: Lavon Stephens, Administrative Director, WDC
FROM: Geoffrey Szymanski, Executive Director, WIB
SUBJECT: WIOA Youth Incentive Policy

Effective Date: IMMEDIATELY

Effective immediately, active WIOA enrolled youth or youth in follow up may be considered for incentive disbursements for **achievement directly tied to workforce training activities and outcomes.**

Incentives are a way to encourage workforce participants' participation or to reward participants for achieving specific elements indicated in the participants' employment plan. An incentive is a payment to an eligible WIOA Youth registrant for the successful participation and achievement of expected outcomes as defined in the individual's Individual Service Strategy (ISS). The incentive must be linked to an achievement and must be tied to training and education, work readiness skills and/or an occupational skills attainment goal as identified in the ISS. Such achievements must be documented in OSOS and in the participant's file as the basis for an incentive payment.

If the youth has exited the WIOA Youth enrollment and is in WIOA Youth Follow-up the youth is still eligible to receive incentives.

Incentive payments may be awarded for goal accomplishments or activities for participants in good standing. Examples of goal accomplishments include, but are not limited to, the following:

- Attainment of a Degree or Certificate (i.e., high school diploma or HSE)
- Work Readiness Skill Attainment;
- Placement & Retention in Employment or Education; and

- Skill Gains

Incentive goals must be indicated on the Individual Services Strategy (ISS) goal planning worksheet and be a part of their employment plan.

Specifically, WIOA Final Regulations allow incentive payments to youth for recognition and achievement directly tied to training activities and work experiences. Local programs 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) Accord with the requirements contained in 2 CFR part 200. For example, **Federal funds must not be spent on entertainment costs.** Therefore, 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.

Incentive payments will be awarded for the following goal accomplishments or activities:

- A one-time incentive valued at up to \$100 will be issued to a WIOA Youth registrant who enters the program without a high school diploma or HSE, and who earns a high school diploma or HSE as part of their participation in the program. Proof of attainment shall include a copy of the high school diploma, HSE (or letter of attainment), or verification of same by issuing agency.
- A one-time incentive valued at up to \$100 will be issued to a WIOA Youth who attains a certificate and/or license for completion of a training program. Proof of attainment to include copy of the certificate and/or license.
- A one-time incentive valued at up to \$100 will be issued to a WIOA Youth registrant who obtains unsubsidized employment. Proof of employment shall include pay stubs, letter of employment, etc. Incentives will be issued for 30 days of employment.
- A one-time incentive valued at up to \$100 will be issued to a WIOA Youth registrant who retains unsubsidized employment for 90 days. Proof of employment retention shall include pay stubs, letter from employer, etc.
- A one-time incentive valued at up to \$75 will be issued to a WIOA Youth registrant whose TABE scores increase one or more EFL levels for reading, writing, numeracy, etc. Proof of educational upgrades shall include pre and post test scores demonstrating EFL increase.
- A one-time incentive valued at up to \$75 will be issued to a WIOA Youth registrant who completes an authorized service project or paid work experience, as approved by BECWIB or one of its subrecipients.

An active WIOA Youth registrant will be considered for incentives not to exceed a value of \$200 in a 12-month period while involved in a WIOA Youth Program. Incentives do not include wage or training subsidies. Incentives are not retroactive.

In the case of WIOA youth services delivered by subrecipients, BECWIB staff, at the time of contract award, will request the subrecipient's written incentive policy for review and approval. Subrecipient incentive policies will be reviewed for compliance with this local policy, all WIOA regulations as stated above, and approved on this basis. This includes the assurance that the non-Federal entity (subrecipient) has established and maintains effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. This applies to the safeguarding of gift cards, which are essentially cash.

c: Jeff Conrad, Ivy Diggs-Washington, Kate DeCarlo, Ken Colon, Anthony Scello, Deborah Miller, Karen Simmons, Russell Sferlazza and Anthony Messina