



WESTERN OKLAHOMA WORKFORCE DEVELOPMENT BOARD

1222 10th Street, Suite 115, Woodward, OK 73801

Workforce Innovation and Opportunity Act (WIOA)

Stipend and Incentive Policy

No individual in the United States may, on the basis of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship or participation in any WIOA Title I-financially assisted program or activity, be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any WIOA Title I-financially assisted program or activity.



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“Equal opportunity employment/program. Auxiliary aids and services are available upon request to individuals with disabilities.”

STIPEND AND INCENTIVE POLICY

I. PURPOSE:

The purpose of this policy is to provide guidance and establish the Western Oklahoma Workforce Development Board (WOWDB) standards of performance in the issuance of stipend and/or incentive payments to Workforce Innovation and Opportunity Act (WIOA) Title I Youth Program eligible and enrolled participants. This policy is established in accordance with applicable WIOA and Oklahoma Office of Workforce Development (OOWD) policy rules, regulation and laws.

Legal Use of Federal Funds: WIOA funds may not be used to help participants or employers fill positions that promote or support the use, possession or distribution of marijuana.

II. BACKGROUND:

As described in Section 129 of the WIOA, local elements and requirements include utilizing the Title I Youth Program (Youth Program) funds for:

- i. activities leading to the attainment of a secondary school diploma or its recognized equivalent, or a recognized postsecondary credential;
- ii. preparation for postsecondary educational and training opportunities;
- iii. strong linkages between academic instruction and occupational education that lead to the attainment of recognized postsecondary credentials;
- iv. preparation for unsubsidized employment opportunities, in appropriate cases; and
- v. effective connections to employers, including small employers, in in-demand industry sectors and occupations of the local and regional labor markets

Stipend and Incentive payments made to participants in the Youth Program are different from payments made as a supportive service. Supportive service payments may only be made when they are necessary to enable an individual to participate in program activities. Stipend and incentive payments, on the other hand, are designed to be used as a way of recognizing achievement and rewarding participation in a program activity.

When providing stipends and incentives, Service Providers must be mindful of the requirements of the State and Federal funding sources as well as other Board policies. This policy does not mandate that stipends and incentives are paid but only establishes the guidelines, minimum requirements, and procedures to be followed should the Service Provider decide to provide stipends and/or incentives. Stipends and Incentives are not intended to be the only avenue to provide direct client services and Service Providers should use caution when implementing this policy as all stipends and incentives are to be factored into the total amount of supportive services for each youth. The maximum amount of supportive services that can be provided to an enrolled youth is \$2000.

III. REFERENCES:

WIOA Section 129
OWDI #02-2016 CHANGE 2

BABEL NOTICE: (29CFR 38.9(g)(3)): This document contains vital service information. If English is not your preferred language, please contact:

Western Oklahoma Workforce Development Board
Tara Goldman, One Stop Operator
Phone: 580-716-7276
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Ponca City, OK 74601
Goldman.Tara@odlemaangement.com

To enable telephone conversation between people with speech or hearing loss and people without speech or hearing loss please call Oklahoma Relay at 711(<http://www.oklahomarelay.com/711.html>) or TDD/TTY: 800-722-0353

Or, State Equal Opportunity Officer
Oklahoma Office of Workforce Development
Ferris Barger, State Equal Opportunity Officer
900 N Portland Avenue, BT 300
Oklahoma City, OK 73107
Office: 405.945.9184
TDD/TTY: 800.722.0353
Email: Ferris.barger@okstate.edu

IV. POLICY: STIPEND AND INCENTIVE PAYMENTS TO YOUTH PARTICIPANTS:

Incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. Such incentives for achievement could include improvements marked by testing or other successful outcomes. DOL has also clarified that incentives are not allowed for activities such as recruitment, submitting eligibility documentation, or just simply showing up for the program. You are allowed to pay incentives to WIOA ISY and OSY for milestones such as receiving a high school diploma or high school equivalency or other acceptable credentials. Also, the work experience incentive must be directly tied to the completion of work experience.

While incentive payments are allowable under WIOA, the incentives must be in compliance with the Cost Principles 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. Additionally, there are requirements related to internal controls to safeguard cash, which also apply to safeguarding of gift cards, which are essentially cash.

V. PROCEDURES

A. Payment Procedures

The Service Providers may make incentive and/or stipend payments to eligible enrolled/active participants based on properly documented attainment of benchmarks and goals. The payment mechanisms the Service Providers must adhere to include appropriate review of procedures to ensure that all stipend and/or incentive payments are made in accordance with WOWDB guidelines and any appropriate 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 stipend/incentive payment as well as the payment amounts for each. A Quick Service entry must be made in OkJobMatch for a Stipend payment or an Incentive payment. The Service Provider will complete the "Request for Stipend/Incentive Payment" form for approval by their respective agency. Once approved, the Service Provider will put a copy of the form in the participant's case file in the appropriate case file section that relates to the stipend/incentive requested/being paid and upload the completed form. The Service Provider will make arrangements to issue a check or other appropriate payment mechanism as required. If the request is denied, **the Service Provider must enter a case notes in Program Notes** explaining why it was denied. The Service Provider will be responsible for presenting the payment to the participant.

B. Standard Stipend/Incentive Plan

This plan describes stipend and incentive payments that may be offered to eligible enrolled Youth Program participants served by Service Provider in the WIB Area. Service Providers are required to ensure all payments are made in a way to be fair to all participants within each category. Each type and benchmark should be considered a singular service/activity with singular payment and not in combination or conjunction with another type or benchmark at a time of service.

1) TYPE ~ Post-Secondary School Enrollment ... *Incentive Payment*

Eligibility: Any participant who is enrolled in a recognized post-secondary school who was not already enrolled in a recognized post-secondary school at the date of WIOA Title I Youth Program participation.

- **Benchmark:** Successful completion of a semester/trimester of post-secondary school at full-time status for one calendar year.
 - **Payment:** up to \$50.00 per semester/trimester, payable at the end of each semester/trimester after enrollment into the WIOA Program and at the end of each semester/trimester thereafter. This incentive is **not** available to students who enroll in a short-term training project (less than one semester in length) which do not result in a credential/certificate.
 - **Documented by:** Post-secondary school enrollment paperwork as well as a progress report from the school, attendance records, and grade reports (Participant must provide the original document. After review by Service Provider, a copy of the original will be maintained in the participant file and uploaded).

2) TYPE ~ Attainment of High School Diploma ... *Incentive Payment*

Eligibility: Any participant who has not yet completed a high school diploma or the High School Equivalency certificate (GED) at the time of enrollment into WIOA Title I Youth Program.

- **Benchmark:** Receipt of a high school or its equivalent.
 - **Payment:** up to \$200, payable upon the documented attainment of a high school diploma or its equivalent.

- **Documented by:** Diploma or its equivalent (Participant must provide the original document. After review by Youth Provider staff, a copy of the original will be maintained in the participant file and uploaded).

3) TYPE ~ Post-Secondary Occupational Skills Training ... *Incentive Payment*

Eligibility: Any participant who is enrolled in an occupational skills training program and has completed the program that is linked to the Board's Demand Occupations whether or not the training was paid for by WIOA funds.

- **Benchmark:** Completion of a post-secondary occupational skills certificate or degree granted by a Career Tech, college or university (including public or private schools), whether or not the training was paid for with WIOA financial assistance.
 - **Payment:** See "Type of Attainment" below for payment schedule.
 - **Documented by:** Receipt of certificate or degree from training institution (Participant must provide the original document. After review by Youth Provider staff, a copy of the original will be maintained in the participant file and uploaded).
 - **Type of Attainment**
 - **Career Tech Certificate/Industry Recognized Certificate up to \$100.00**
 - **Associates Degree up to \$200.00**
 - **Bachelor's Degree up to \$400.00**

"Demand Occupation" refers to skills training in support of an occupation that is included on the current Board's official list of Demand Occupations.

4) TYPE ~ Basic Skills Deficient ... *Incentive Payment*

Eligibility: Youth Participants who were assessed as having a deficiency in basic skills measured by a WIOA/Board approved assessment process during the objective assessment.

- **Benchmark #1 Out-of-school Youth:** Achievement of an increase one or more functioning levels in reading and/or math per approved standardized test/assessment utilized in the objective assessment for basic skills until the participant is no longer basic skills deficient.
 - **Payment:** up to \$50.00 per measure per functioning level increase (Maximum \$200.00 in a 12-month period). Payable only after verification of post-test/assessment results.
 - **Documented by:** Pre-assessment/test scores and Post-Assessment/test using an approved standardized test or performance assessment, documented in the appropriate testing section in the online system, and captured in Program Notes.

5) TYPE ~ Unsubsidized Employment ... *Incentive Payment*

Eligibility: Any participant who was not employed at of the date of participation. This incentive is reserved for participants who accept unsubsidized employment, which does not interfere with school attendance and which is considered employment that leads to self-sufficiency.

- **Benchmark:** Obtaining a job or jobs that: (a) Offers a work schedule of at least 32 hours per week; (b) Has an expected duration of at least six months; and (c) Is not subsidized by any State or Federal program funding.
 - **Payment:** up to \$100.00 (one time only) after 2 months of work.
 - **Documented by:** Participant statement self-certifying hours per week, status/duration of job, and hourly wage accompanied by the participant's first paycheck or a hiring letter signed by the employer indicating hours per week, status/duration of job, and hourly wage. (Participant must provide the original document. After review by Youth Provider staff, a copy of the original will be maintained in the participant file and uploaded).

Employment in a subsidized Work Experience activity/job or On-the-Job Training does not meet the qualification benchmark for this incentive.

6) TYPE ~ Retention in Employment ... Incentive Payment

Eligibility: Any participant who entered unsubsidized employment during the period of his/her enrollment in the WIOA Youth program.

- **Benchmark:** Successful retention in a job or jobs that: (a) Offers a work schedule of at least 32 hours per week; and (b) Is not paid for nor subsidized by State or Federal program funding.
 - **Payment:** See schedule below. The maximum amount of cumulative payments to an individual participant is \$500.00
 - **Documented by:** Presentation of an employer-generated record, letter, etc., indicating hours per week and duration of job. (Participant must provide the original document. After review by Youth Provider staff, a copy of the original will be maintained in the participant file and uploaded).
 - **Retention Period Incentive Payment Cumulative Incentive**
 - **3 Months up to \$ 50.00**
 - **6 Months up to \$ 100.00**
 - **9 Months up to \$ 150.00**
 - **12 Months up to \$ 200.00**

***Employment in a subsidized Work Experience activity/job or On-the-Job Training does not meet the qualification benchmark for this incentive.*

7) TYPE ~ Workshops and Conferences ... Stipend Payment

Eligibility: Any participant who has participated in a Workshop or Conference focusing on Leadership Development or any one of the 14 Elements. To be eligible for this stipend, the agenda for the workshop or conference must reflect a length of at least two (2) hours, at least three (3) hours, or at least four (4) hours. Cannot be used in conjunction with item 10 Work Readiness Workshops; participants can only be paid for one of the other of these. **Workshop total hours DO NOT include breaks for lunch.**

- **Benchmark:** Successful completion of the time allotted Workshop/Conference with evidence of a signed Attendance Record and description of the Workshop/Conference (such as an agenda, program or brochure).

- **Payment: *Conference Duration Stipend Payment***
 - ***2 hours up to \$30.00 total***
 - ***3 hours up to \$45.00 total***
 - ***4 or more hours \$60.00 total***
- **Documented by:** Attendance records and detailed description of the Workshop/Conference - - including date, time, and topic(s) – OkJobMatch program note and quick service entry and any follow-up documentation (such as a written report by the Youth on the Workshop/Conference). All documentation of workshop including all sign-in sheets, agendas, workbooks, etc. must be kept in a separate file from the participant file and must be available for review when monitored.

8) TYPE ~ Summer Employment Opportunities ... *Stipend Payment/Incentive Payment*

Eligibility: Any participant who is enrolled in a Service Provider Summer Employment Opportunities subsidized employment program (whether paid for by WIOA or not) during the ‘summer months’ starting in May and ending in September with the emphasis on increasing work readiness skills, employability skills, life skills, soft skills, etc. The work experience portion of the program must be at least three (3) weeks in length and may include a combination of other services, programs, and workshops but **MUST** include an academic enrichment piece.

- **Benchmark #1:** Successful completion of a work readiness class/program with an 85% attendance record and completion of all class assignments. Work readiness class/program should focus on increasing work readiness skills. Work readiness skills include world-of-work awareness, labor market knowledge, occupational information, values clarification and personal understanding, career planning and decision making, and job search techniques (resumes, interviews, applications, and follow-up letters). They also encompass survival/daily living skills such as using the phone, telling time, shopping, renting an apartment, opening a bank account, and using public transportation. They also include positive work habits, attitudes, and behaviors such as punctuality, regular attendance, presenting a neat appearance, getting along and working well with others, exhibiting good conduct, following instructions and completing tasks, accepting constructive criticism from supervisors and co-workers, showing initiative and reliability, and assuming the responsibilities involved in maintaining a job. This category also entails developing motivation and adaptability, obtaining effective coping and problem-solving skills, and acquiring an improved self-image. Cannot be used in conjunction with item 8 Workshops/conferences and/or 11 Work Readiness Workshops; participants can only be paid for one of the other of these.
 - **Payment: STIPEND up to \$10.00 per hour of attendance.**
 - **Documented by:** OKJobMatch Program note, quick service entry of stipend payment, and records of attendance and completion of any classroom assignments and uploaded.

- **Benchmark #2:** Completion of Service Provider developed and WOWDB staff approved Academic Enrichment workbook along with completion of the Work Experience worksite agreement (defined as not having been fired or quitting before contract estimated end date). The workbook/curriculum must provide an appropriate mix of work maturity and career exploration, basic academic skills (math, reading, writing, language, etc.), and should reinforce study skills techniques and drop-out prevention strategies as well as provide activities to develop leadership, decision making, and citizenship skills.
 - **Payment: INCENTIVE** up to \$300, max amount payable; one time only per enrollment.
 - **Documented by:** verification of workbook completion by Service Provider via program notes, grading of workbook by service provider/signature page by staff and participant, program notes detailing career counseling conducted with participant regarding all issues and items in the workbook that were incorrect or needed addressing, attainment of worksite agreement evaluations conducted by worksite supervisor, and Service Provider review of all participant time sheets for correct hours and satisfactory attendance and quick service entry of incentive payment. **NOTE* Each participants workbook does not need to be kept by the Service Provider; a blank copy kept at the case manager or admin office is sufficient for monitoring purposes.*

- **Benchmark #3:** Completion of Key Train assessment (not the 'pre-assessment'), any learning modules assigned, and completion of the Work Experience worksite agreement (defined as not having been fired or quitting before contract estimated end date).
 - **Payment: INCENTIVE up to \$200** total paid to youth at completion of all assigned modules to the satisfaction of Service Provider staff and completion of Work Experience
 - **Documented by:** Verification of completion of academic enrichment activities shall be through OkJobMatch Program notes as well as any progress reports (uploaded) from Key Train program documenting hours of work and progress within each module. Verification of completion of Work Experience will be review of contract and trainee plan as well as Service and Training Plan. Quick service entry of incentive payment.

9) TYPE ~ Work Readiness Workshops ... Stipend Payment

Eligibility: Any participant who has participated in a Work Readiness Workshop focusing on work readiness skills prior to being placed at a work experience worksite. Work readiness class/program should focus on increasing work readiness skills. Work readiness skills include world-of-work awareness, labor market knowledge, occupational information, values clarification and personal understanding, career planning and decision making, and job search techniques (resumes, interviews, applications, and follow-up letters). They also encompass survival/daily living skills such as using the phone, telling time, shopping, renting an apartment, opening a bank account, and using public transportation. They also include positive work habits, attitudes, and behaviors such as punctuality, regular attendance, presenting a neat appearance, getting along

and working well with others, exhibiting good conduct, following instructions and completing tasks, accepting constructive criticism from supervisors and co-workers, showing initiative and reliability, and assuming the responsibilities involved in maintaining a job. This category also entails developing motivation and adaptability, obtaining effective coping and problem-solving skills, and acquiring an improved self-image. To be eligible for this stipend, the agenda for the workshop must reflect a length of at least two (2) hours. Cannot be used in conjunction with item 7 Workshops/conferences; participants can only be paid for one of the other of these.

- **Benchmark:** Successful completion of the time allotted Work Readiness Workshop with evidence of a signed attendance record and description of the Work Readiness Workshop to include an agenda, related topics covered, any Q&A provided, handout materials, any follow-up documentation (such as a written report by the participant regarding the Work Readiness Workshop, evaluations, etc.) as appropriate.
 - **Payment: up to** \$10.00 per full hour of attendance (partial hours cannot be counted)
 - **Documented by:** OkJobMatch Program notes, quick service entry, and attendance records and detailed description of the Workshop including agenda, related topics covered, any Q&A provided, handout materials, and any follow-up documentation (such as a written report by the participant regarding the Work Readiness Workshop, evaluations, etc.) as appropriate. Documentation uploaded.

10) TYPE~ Attaining a CRC... *Incentive Payment*

Eligibility: Any participant who has successfully completed the work keys test and scored a bronze certificate or higher. Participants are only allowed to be paid one time for this type of incentive while participating in WIOA youth programs.

- **Benchmark:** Successfully attaining a bronze, silver, gold, or platinum Career Ready Certificate, with evidence of test scores in case files and uploaded to OkJobMatch.
 - **Payment scale/schedule:**
 - Bronze Certificate-Up to \$10.00
 - Silver Certificate-Up to \$50.00
 - Gold Certificate-Up to \$100.00
 - Platinum Certificate-Up to \$200.00
 - **Documented by:** OKJobMatch Program note and uploaded, participants WorkKeys testing 'receipt' or actual CRC card/Certificate.

VI. EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT:

All Recipients, and Sub recipients/Sub grantees 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.

VII. POLICY ADDITIONS AND CLARIFICATIONS

The WOWDB Executive Director is authorized to issue additional instructions, guidance, approvals and/or forms to further implement the requirements of this policy, without making substantive change to the policy, except in situations where new or updated state and federal guidance is issued.

ATTACHMENTS

Attachment A: Request for Stipend and Incentive Form

