



**COUNTY OF SAN LUIS OBISPO**  
**DEPARTMENT OF SOCIAL SERVICES**  
**WORKFORCE DEVELOPMENT BOARD**

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**POLICY NO:** 12-19  
**TO:** Service Providers  
**FROM:** Department of Social Services  
**EFFECTIVE:** January 01, 2020  
**SUBJECT:** Youth Incentives Policy

**REFERENCES:**

- Title 20 Code of Federal Regulations (CFR) Part 681.640
- 2 CFR Part 200 (Uniform Guidance)
- TEGL 21-16
- EDD Directive 17-07, WIOA Youth Program Requirements

**PURPOSE:**

The purpose of this policy is to provide guidance regarding the provision of incentive payments for enrolled youth under the Workforce Innovation and Opportunity Act (WIOA) Youth program.

**POLICY:**

The San Luis Obispo County Workforce Development Board will make incentives available to qualified WIOA Youth participants, as funding allows, to a maximum of \$300 per participant.

Incentives paid for with WIOA funds must be connected to recognition of achievement of milestones in the program tied to work experience, education, or training.

Award of incentives shall be:

1. Tied to services and goals identified in the Individual Service Strategy (ISS);
2. Outline in writing the incentive before the commencement of the program providing the payment;
3. Aligned with the program's organizational policies; and

4. In compliance with 2 CFR part 200 (Uniform Guidance).

## **PROCEDURES:**

Youth participants may be eligible to receive incentive payments in four (4) primary incentive categories. Each goal and potential incentive amount must be documented in the youth's Individual Service Strategy (ISS). Case managers must secure adequate documentation to support payment of incentives when earned. All incentive payments must be within the cap limits as identified in this policy.

Service Providers must ensure they have established protocols for the payment, documentation and awarding of incentive payments to eligible WIOA Youth.

The three (3) approved incentive categories are:

- Attainment of High School Diploma, General Education Diploma (GED) or equivalent, maximum of \$100
- Attainment of a recognized postsecondary credential, maximum of \$50
- Successful completion of 40 or more hours of Work Readiness curriculum, maximum of \$100

The incentive caps, relative definitions and documentation examples for each category are:

1. Attainment of High School Diploma, GED or equivalent

WIOA Youth program participants enrolled in a secondary education program that obtain a diploma or recognized equivalent are eligible to receive this incentive.

- a. Amount – not to exceed \$100
- b. Acceptable documentation may include:
  - Copy of Diploma
  - Copy of GED
  - Other documentation clearly identifying the attainment of diploma, GED or equivalent

2. Attainment of a recognized postsecondary credential

Individuals who complete a series of classes/courses or educational instruction leading to the attainment of a recognized postsecondary credential are eligible to receive this incentive. This incentive is intended to recognize the attainment of measurable technical or industry occupational skills, not work readiness or general safety/hygiene skills.

A recognized postsecondary credential is defined as a credential consisting of:

- An industry-recognized certificate or certification;
- A certificate of completion of an apprenticeship;
- A license recognized by the State or Federal government; or
- An associate or baccalaureate degree

A recognized postsecondary credential is awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills generally are based on standards developed or endorsed by employers or industry associations.

Work readiness certificates are not included in this definition as they are not recognized industry-wide and do not measure technical or industry/occupational skills necessary to gain employment or advancement within an occupation. Likewise, such certificates must recognize technical or industry/occupational skills for specific industry/occupation rather than general skills related to safety, hygiene, etc., (such as OSHA-10 or ServSafe) even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment.

Below is a list of the types of organizations and institutions that award recognized postsecondary credentials (not all credentials by these entities meet the definition of recognized postsecondary credential).

- A State educational agency or a State agency responsible for administering vocational and technical education within a State;
- An institution of higher education described in Section 102 of the Higher Education Act of 1965 (20 USC sec. 1002) that is qualified to participate in the student financial assistance programs authorized by title IV of that Act. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in Federal student financial aid program;
- An institution of higher education that is formally controlled, or has been formally sanctioned or chartered, by the governing body of an Indian tribe or tribes;
- A professional, industry, or employer organization (e.g., National Institute for Automotive Service Excellence certification, National Institute for Metalworking Skill, Inc., Machining Level I Credential) or product manufacturer or developer (e.g., Certified IT Professional (MCITP), Certified Novell Engineer, a Sun Certified Java Programmer, etc.) using a valid and reliable assessment of an individual's knowledge, skills and abilities;
- ETA's Office of Apprenticeship or a recognized State Apprenticeship

Agency;

- A public regulatory agency, which awards a credential upon an individual's fulfillment of educational, work experience, or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., Federal Aviation Administration aviation mechanic license, or a State-licensed asbestos inspector);
- A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans or other eligible person; or
- Job Corps, which issues certificates for completing career training programs that are based on industry skills standards and certification requirements.

Participants may receive a maximum \$25 for attaining a credential from instruction of less than one school quarter (10 weeks or less). For credential attainment from courses longer than one school quarter (11 weeks or more), they may receive a maximum \$50. Acceptable documentation includes a copy of the certificate or credential.

### 3. Attainment of Work Readiness certificate

This incentive is available for WIOA youth participants who complete a minimum of 40 hours of work readiness curriculum, as evidenced by pre/post tests and a certificate of achievement/completion. Service Provider must submit their proposed curriculum leading to a minimum of 40 hours of instruction to the Administrative Entity for approval prior to authorizing any payment for this category.

- a. Amount – not to exceed \$100
- b. Acceptable documentation must include:
  - Pre/Post tests; and
  - Timesheets; and
  - Certificate of Achievement/Completion

#### **A. Service Provider Responsibilities**

Service Providers shall accept unconditional fiduciary responsibility for issuing federal funds on behalf of the WDB as specified in this policy. Service providers shall establish and utilize appropriate checks and balances necessary to guarantee the integrity of the disbursement of incentive funding. Service Providers shall ensure

systems are in place for the review, approval and payment of incentives pursuant to current WIOA, State regulations, and local WDB directives, policies and procedures.

1. All incentive payments and collection of back-up documentation (i.e. credentials, certificates, timesheets) will be the sole responsibility of the Service Provider. Service Provider must ensure:
  - a. Payment records will be maintained, completed and readily available for monitoring or audit reviews.
  - b. Participant records and financial records will meet the standards for financial management and participant data systems.
  - c. Records will be maintained in accordance with records retention requirements.
2. Service Provider shall ensure that a case note regarding the type of incentive received and the corresponding activity for the incentive are entered in CalJOBS within five (5) working days from the service date.
3. Service Provider shall ensure that the total incentive expenditures for each participant do not exceed category limits and the maximum allowable amount of \$300.
4. To the extent possible, Service Provider shall ensure similarly situated participants will receive similar incentives.
5. Should gift cards be offered as an option for payment of incentives, Service Provider must ensure the use and purchase of gift cards complies with restrictions identified in 2 CFR Part 200, Uniform Guidance.

## **B. Availability of Funding**

Service providers will take necessary steps to manage the incentives budget so as to provide services throughout the program year to customers who meet the criteria for planned incentives.

### **ACTION:**

All WIOA Youth Service Providers shall comply with this policy. This policy will remain in effect from the date of issue until such time that a revision is required.

**INQUIRIES:**

Any questions regarding this policy may be directed to the DSS WIOA Program Manager at 805-781-1838.

Workforce Development Board (WDB) Approval Required? Yes X No

Initial approval date: 10/09/2019

WDB revision approval date: \_\_\_\_\_