


CWP Policy/Procedure Transmittal

Policy and Procedures Transmittal Number: 23-07

Effective Date: May 1, 2023

To: CWP Staff and Subrecipient Staff

From: Julie Watson, Compliance & Accountability Administrator 

Issue Date: May 8, 2023

Subject: WIOA Youth Incentive and Stipend Policies

With this transmittal, CWP is issuing new WIOA Youth Incentive and Stipend policies. Previously, incentive and stipend policies were incorporated in the CWP WIOA Youth Supportive Services policy, but with this transmittal, CWP WIOA Youth incentive and stipend policies are being issued in standalone, separate policy sections and are no longer part of the revised CWP Supportive Services policy.

In addition to being attached to this transmittal, these policies can be found in CWP's online Policy and Procedures Manual, Section 5-65 WIOA Youth Incentive Policy and Section 5-66 WIOA Youth Stipend Policy at <https://capitalworkforce.org/policies/>.

Questions regarding CWP's WIOA Youth policies should be addressed to Angelica Heron, CWP Youth Services Manager at aheron@capitalworkforce.org.

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-65	Page 1
Subject: Incentives	Effective Date: 05/01/23	

A. Purpose

Incentives are awarded for recognition of achievement directly tied to program activities and are intended to encourage program participation and attainment of the participant's short- and/or long-term employment goals. (20 CFR 681.640 and TEGL 21-16)

B. Policy

1. Incentive awards are provided to participants for:
 - a. Achievement and attainment of individual goals that lead to success and completion of a secondary school diploma or its equivalent.
 - b. Completion of a training-related service such as occupational skills training, on-the-job training, customized training, and work readiness and workforce preparation training.
 - c. Making progress, achievements, or milestones in a training-related service.
 - d. Attaining a nationally recognized credential related to training and/or an employment goal.
 - e. Obtaining full-time unsubsidized employment.
2. Criteria for providing an incentive award:
 - a. Sufficient program funds are available for awarding incentive payments consistently and equitably to all participants who are eligible.
 - b. If provided, incentives are provided consistently (same amount and method of issuance) and equitably to each individual eligible for the incentive for the same achievement.
 - c. The provision of an incentive award must be part of the participant's Individual Service Strategy (ISS) and tied to specific accomplishment(s) prior to the individual's achievement meriting the incentive award.
 - d. The recipient of the incentive must be an active participant in the WIOA Youth program at the time of reaching the milestone/goal described in the ISS.
 - e. The recipient of the incentive must be an active participant in the WIOA Youth program at the time of receipt of the incentive.
3. Prohibited uses of incentive awards
Incentive awards are not to be used for the following purposes:
 - a. Entertainment costs such as movies or sporting event tickets or gift cards to movies theaters or other venues whose sole purpose is entertainment (2 CFR Part 200)
 - b. Program recruitment
 - c. Cost of obtaining eligibility documentation
 - d. Payment for hours of work
 - e. Used to pay a stipend for participation in program or work-related activities
 - f. Provision of supportive services
 - g. Reward for attendance in any activity
4. Method of issuance
Incentives are issued in the form of cash or non-cash.
 - a. Cash incentives are issued in the form of a debit card or a check.
 - b. Non-cash incentives are issued in the form of gift cards, gift certificates to local retailers or other items such as plaques, framed certificates, class rings, etc.

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-65	Page 2
Subject: Incentives	Effective Date: 05/01/23	

5. Time period of issuance

Incentives are paid as close as possible to the time of the achievement and no more than thirty (30) calendar days after the date of milestone/goal achievement.

6. Amount of incentive award

- a. Incentive awards are only provided if there are sufficient program funds to award incentive payments consistently and equitably to all participants who are eligible.
- b. Individual issuances of incentive awards amounts are set by the program provider but may be no less than \$5 or more than \$100 per issuance. The CWP Program Manager may approve incentive amounts that vary from these limits based on program provider's written request, including justification for the change.
- c. Program providers are to develop written standard incentive amounts for specific types of accomplishments and issue incentives consistently and fairly according to their standards. The written standard for incentive amounts for specific types of accomplishments is submitted to CWP for review and approval.

7. Documentation

Information regarding the issuance of incentive awards is documented in the participant's case record and tracked on an issuance log. The following information must be recorded and tracked for each issuance.

- a. Type (e.g., debit card, check, gift card, gift certificate, commemorative item)
- b. Serial number (or other unique identifying number)
- c. Amount
- d. Documentation of milestone/goal achieved uploaded to the participant's record in CWP's designated MIS. (e.g., certificate, diploma, CCS appraisal results, verification of unsubsidized employment)
- e. Name and signature of recipient
- f. Date issued
- g. Name and signature of staff providing the award to the recipient

C. Procedures

1. Details including the method of issuance and amount of the incentive is written into the participant's ISS and tied to specific milestones or accomplishments prior to the individual's achievement of said milestones or accomplishments.
2. The ISS includes a description of the link between specific milestones or accomplishments and the provision of incentive for achieving goals. The ISS documents the plans for providing incentives based upon the participant attaining one or more milestones or goals described in the ISS.
3. The provision of an incentive for achieving milestones and/or goals described in the ISS is also described in participant's case notes.
4. Upon achievement of a milestone or goal as described in the ISS, program provider staff obtains documentation of the achievement and uploads it to CWP designated management

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-65	Page 3
Subject: Incentives	Effective Date: 05/01/23	

information system (MIS) and issues the incentive amount to the participants by the method described in the ISS within thirty (30) days of the date of the achievement.

5. The incentive is issued in either the form of cash or non-cash.
 - a. Cash incentives are issued in the form of a debit card or a check.
 - b. Non-cash incentives are issued in the form of gift cards, gift certificates to local retailers or other items such as plaques.

6. Approval Process
According to local program provider incentive issuance process, the incentive payment request from the program staff is reviewed by the program provider director, manager or supervisor for compliance with this policy and to confirm that the participant is eligible for the incentive payment. The provider's internal control document showing approval by designated program provider staff are uploaded to the case file.

7. Documentation
The following information regarding the issuance of incentive awards is documented in the participant's case record and tracked on an issuance log:
 - a. Type (e.g., debit card, check, gift card, gift certificate, commemorative item)
 - b. Serial number (or other unique identifying number)
 - c. Amount
 - d. Purpose tied to program activity on the ISS
 - e. Name and signature of recipient
 - f. Date issued
 - g. Name and signature of staff providing the award to the recipient

8. Tracking Debit and Gift Cards and Gift Certificates
Debit and gift cards and gift certificates are purchased as needed and are accounted for. The number and value of gift cards on hand plus the properly recorded distributed cards are to reconcile to the original purchased number and value of debit/gift cards and gift certificates.

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-66	Page 1
Subject: Stipends	Effective Date: 05/01/23	

A. Purpose

To help support program participants' participation in assigned education or training activities.

B. Policy

1. Provision of stipends

Stipends are fixed, regular cash payments to program participants to support their participation in assigned education or training activities. Cash stipends are issued in the form of a check, debit card, or direct deposit to the participant's account.

2. Criteria for the provision of stipends

- a. Sufficient program funds are available for awarding stipend payments consistently and equitably to all participants who are eligible.
- b. If provided, stipends are provided consistently (same amount) and equitably to each individual eligible for the stipend.
- a. Participant must be active in the WIOA Youth program and be satisfactorily participating in the assigned education or training activity.
- b. The program provider must have a written attendance policy consistent with the requirements of the education or training provider.
- c. Program staff must review the attendance policy with participants before education or training activity begins and must provide a copy. Review of the attendance policy must be documented in case notes.
- d. Stipends are paid only to participants with satisfactory attendance as defined in the attendance policy.
- e. The activity supported by the stipend issuance is limited to education or training activities that are part of the participant's Individual Service Strategy (ISS).
- f. The provision of stipends for education or training activities must also be included in the participant's ISS and described in the participant's case notes in the CWP designated management information system (MIS).

3. Amount of stipend

- a. Stipends are only provided if there are sufficient program funds to award stipend payments consistently and equitably to all participants who are eligible and participating in similar education or training activities.
- b. Stipend amounts are set by the program provider but must be no less than \$25 and no more than \$100 per weekly issuance. The CWP Program Manager may approve stipend amounts that vary from these limits based on program provider's written request, including justification for the change.
- c. Stipends are not pro-rated. Participant must meet the minimum attendance standard for the weekly or bi-weekly period in accordance with provider's attendance policy.

4. Time period of stipend issuance

Stipends are paid directly to the participant at regular weekly or bi-weekly intervals.

C. Procedures

1. Program provider staff confirm that participant is enrolled in the education or training activity that is documented in the ISS and case notes.

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-66	Page 2
Subject: Stipends	Effective Date: 05/01/23	

2. Program provider staff follow local program provider procedures for requesting stipend issuances for the participant.
3. Prior to issuing each regular stipend payment, the participant's attendance in the education or training activity is documented in the participant's MIS record and in case notes. Stipend payments are issued for each weekly or bi-weekly period that the participant maintains satisfactory attendance until the activity is completed.
4. Program providers are to adhere to their local agency financial procedures for the issuance of stipends.