

## **Workforce Innovation and Opportunity Act (WIOA) Comprehensive Participant Incentive Policy**

**Policy Number:** WIOAP 1-2022

**From:** Danilo Cabrera, Workforce Administration Bureau Chief *Danilo Cabrera*

**Effective Date:** **April 1, 2023**

**Subject:** Policy on WIOA Program Participant Incentives

### **I. Purpose:**

To provide guidance on incentives to eligible Youth, Adult, and Dislocated Worker participants under Title I of the Workforce Innovation and Opportunity Act (WIOA).

### **II. Background:**

The Workforce Development Council (WDC), in its role as a local board, has authorized the Idaho Department of Labor (IDOL), as the state and local Administrative Entity (AE) to develop incentive options for WIOA Title I-B participants, as applicable. Taking into account the references noted in Section V., IDOL has established the following comprehensive policy and accompanying incentive options for implementation beginning April 1, 2023.

### **III. Policy:**

WIOA allows for incentive payments to be made to youth participants, provided the incentives are:

- Tied to the goals of the specific program;
- Outlined in writing before the commencement of (enrollment in) the program that may provide incentive payments;
- Aligned with the local program's organizational policies; and
- Issued following the requirements contained in 2 CFR part 200

All WIOA-funded incentives must be connected to recognition of the achievement of milestones in the program tied to work experience, education or training provided as detailed in the participant's assessment and Individualized Service Strategy (ISS).

Although there are specific references in the WIOA Final Rules regarding incentive payments to youth, there are no similar references to incentive payments to adults and dislocated workers. Although the WIOA Final Rules and WIOA operating guidance state that guidance in this area is forthcoming, states nationwide are still awaiting such guidance. The AE is issuing this policy to support comprehensive service delivery, including Adult and Dislocated Worker participants who may benefit from this service. If and when federal guidance is issued, the AE will review this policy and make necessary and appropriate revisions.

The state has incorporated the youth incentive criteria identified earlier to be applied to the Adult and Dislocated Worker program incentives. However, incentive payments to these participants are

limited to achievement milestones directly tied to work-based learning activities (job shadow, work experience, internships) and the following WIOA-recognized training services – occupational skills training, skills upgrade training, registered apprenticeship, and on-the-job training. Unlike Title I youth, this excludes incentive payments for attaining and retaining unsubsidized employment for adults and dislocated workers who complete work experience or training services.

WIOA provider staff should note that achievements completed prior to WIOA enrollment do not qualify for incentives. WIOA Title I-B program incentives are not intended as emergency assistance but rather as a tool to encourage ongoing participation and attainment of specific program goals. WIOA participants needing emergency assistance must be connected to an appropriate service provider. It should be noted that WIOA funds may not be used for recruitment and eligibility documentation incentives.

### **A. Application of Incentives:**

#### 1. Requirements for Youth, Adult, and Dislocated Worker incentives:

- a) Participant must be active in a WIOA Title I-B program or follow-up activity (youth only).
- b) Career planners must develop an ISS describing the participant's training and employment goals. WIOA Youth in a follow-up service may receive incentives if they achieve predetermined program goals during the follow-up period.
- c) Participants may work towards achieving two UNIQUE incentive options per program year. Overlapping or targeting similar objectives between the two options is not permitted.

#### 2. Incentive Documentation:

Incentive payments are not services but, rather, financial transactions. WIOA Title I-B, program service providers must document the following information related to the participant, the specific incentive, and its achievement as follows:

- a) Description of the achievement to qualify and justify a specific incentive award is documented in case file notes and as part of the participant's ISS, noting the WIOA career planner's guidance/direction to assist the participant in reaching their established goals leading to the incentive.
- b) Supporting documentation of attainment prior to issuance of incentive award (copy of credential/test scores/grades, employer evaluations, attendance record, etc.) retained in the case file.
- c) Service providers must maintain appropriate and identifiable incentive payment records for local, state, and federal monitoring and audits.

**NOTE:** If WIOA program funding levels become a concern during the year, WIOA service providers may submit a request to the AE to provide **all** incentives at a reduced level, i.e., 25%, 50% reduction from policy levels, to program participants beginning at a specific point in time. Each WIOA provider location may make this request as follows:

- Requests justifying the reduction and the specific percentage decrease must be submitted by WIOA Youth Area Managers or WIOA Adult/DW Operations Supervisors to the WIOA/TAA mailbox.
  - The AE will review the submission and notify the submitters whether the request is approved or denied.

- Once approved by the AE, all new incentives offered at this location to any potential participant eligible to receive an incentive must be funded at the reduced rate.
  - The incentive reduction will continue through the end of the WIOA service provider's contract period, again applying to all new incentives offered to participants.
  - However, if a WIOA staff member has planned and arranged (confirmed by notes and S&T plan) for a participant to receive an incentive prior to the implementation of the reduced rate, the provider must honor the original incentive policy rate initially presented/discussed with the participant.

Original incentive payment levels may not return to standard policy levels until the provider's new contract period begins.

**B. Incentive Options:**

**1. A progressive job retention incentive**

For youth who have completed WIOA Youth program activities and attained full-time, unsubsidized employment in the individual's selected career/industry as planned in the WIOA ISS. Verification of employment and retention by the career planner is required for reimbursement.

- a) \$200 for obtaining employment.
- b) \$300 for retaining the same position/employer for six months.

*This measure only applies to Youth.*

**2. A \$250 skill attainment incentive**

Allows a participant in a work-based activity (OJT, Internship, Work Experience, or Registered Apprenticeship) to demonstrate skill attainment (occupational/work-readiness/ employment preparedness/or other skill attainments) verified by the employer/worksites. A positive employer evaluation enumerates the skill obtained. The evaluations are incorporated as part of the overall process to show the participant's progress, either at the mid-point of the work-based activity or at the end of the activity, based upon the participant's goal as established in each activity's Memorandum of Agreement with the worksite/employer. **Note: This incentive is not tied to an MSG for youth.**

*This measure applies to Youth and Adult/DW participants.*

**3. \$150 GED Exam Completion Incentive**

Per section (up to four) passed during participation in any WIOA Title I-B Program or the 12-month follow-up period for youth. Career planners will be allowed the flexibility to provide the GED incentive individually as each test is passed or cumulatively once the GED is obtained.

*This measure applies to Youth and Adult/DW participants.*

**4. \$100 Incentive for a secondary or postsecondary transcript for a sufficient number of credit hours completed.**

- a) **Secondary:** transcript or report card for one semester, or
- b) **Postsecondary:** at least 12 hours per semester or, for part-time students, a total of at least 12 hours over two completed consecutive semesters

*This measure applies to Youth and Adult/DW participants.*

**5. \$250 incentive for an increase in each area in literacy and numeracy**

A participant identified as basic skills deficient demonstrates an increase of one or more educational functioning levels based on pre-and post-test scores from any of the assessments recognized by the National Reporting System for Adult Education programs, including the TABE (Test of Adult Basic Education), Casas, Gain, etc. However, the same assessment instrument must be used for pre-and post-tests. Click on the following link for the - [Test Benchmarks Educational Functioning Levels.](#)

*This measure applies to Youth and Adult/DW participants.*

**6. \$400 incentive for the successful passage of a required exam**

Some occupations require the attainment of technical or occupational skills as evidenced by passage of trade-related benchmarks, such as knowledge-based exams, which lead to a credential. These may include a welding test or passage of the NNAAP (National Nurse Aide Assessment Program). Exams for general skills, such as a typing test, or excluded credentials, as seen in #7. below, do not qualify for the incentive.

*For Adult/DW participants, this incentive only applies to those who pass the exam prior to program exit. Youth must pass the exam during participation or within the 12-month follow-up period.*

**7. \$400 incentive for obtaining a recognized postsecondary credential OR a secondary school diploma or its recognized equivalent.**

The postsecondary credential must reflect the attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation based on standards developed or endorsed by employers or industry associations. Certificates must recognize skills specific to the industry/occupation rather than general skills related to safety, hygiene, etc., excluding credentials such as CPR, OSHA Health and Safety, flagging certification, and other similar certifications.

*For A/DW participants, this incentive only applies to those who obtain their credential prior to program exit. Youth must obtain the credential during participation or within the 12-month follow-up period.*

**Listed below are examples of credentials eligible for this incentive:**

- Secondary School Diploma or recognized equivalent,
- Associate degree,
- Bachelor's degree,
- Occupational licensure,
- Occupational certificates, including Registered Apprenticeship and Career and Technical Education educational certificates,
- Occupational certification

**IV. Definitions:**

WIOA Section (3)

**V. References:**

WIOA Sec.3(a)(i-v); WIOA Final Regulations, 20 CFR 681.640 and 683.200(b)(2); OMB Uniform Guidance, 2 CFR 200.456, 2 CFR 200.75, and 2 CFR 200.407(t); Training and Employment Guidance Letters (TEGL) 21-16 and 19-16

**VI. Rescissions/Cancellations**

WDC-10-19-2015- WIOA Transmittal #3

WDC Transmittal #1, 10-26-2016

WDC Transmittal #1, 7-13-2017

**VII. Direct Inquiries to:**

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