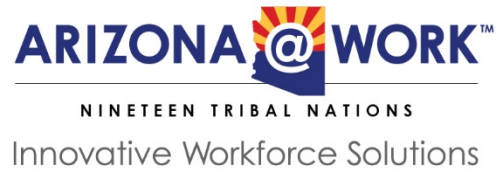




**NINETEEN TRIBAL NATIONS
WORKFORCE DEVELOPMENT BOARD
YOUTH INCENTIVES POLICY**

**Approved by NTNWDB
05/12/21**



Nineteen Tribal Nations Workforce Development Board

Youth Incentives Policy

Purpose

To provide guidance to the Nineteen Tribal Nations on the payment of incentives for Workforce Innovation and Opportunity Act (WIOA) Title IB Youth participants.

References

Workforce Innovation and Opportunity Act (WIOA) OF 2014: (P.L. 113-128); Final Rules; 20 CFR 681.640, 2 CFR 200.75, 2 CFR part 200; WIOA Incentive Policy – Chapter 2 – Fiscal Policies, Section 70; WIOA Youth Program Policy-Section 200 Chapter 2; and Training and Employment Guidance Letter (TEGL) 21-16.

Policy

Incentives may be awarded to WIOA In-school Youth (ISY) and Out of School Youth (OSY) participants to motivate, encourage or congratulate when certain goals and/or activities are completed. WIOA incentives may not be used for recruitment and eligibility determination. Incentive awards will be subject to availability of funding and will be reviewed by the NTN Board annually for approval. All incentive awards must be in compliance with 2 CFR Part 200 (e.g. federal funds must not be spent on entertainment. This includes gift cards, tickets to events, or other related entertainment. Incentive payments should not exceed \$5,000.00 per participant, per program year, but payment will be determined on a case by case basis.

Incentive Award Criteria for Youth

- A. Incentives may be paid to youth for the following purpose of recognition and/or achievements when directly related to training activities and work experience. Service Providers must ensure that incentive payments are tied to the goals of a specific program.
- B. Incentives must not be paid to maintain employment during the 2nd and 4th quarters after exit.
- C. Incentives must only be paid:
 - (a) For achievements during a work experience or training activities, including demonstration of soft skills (i.e. attendance, punctuality, interpersonal relationships, task completion, etc.), for acquiring job skills as outlined on the training plan; or

- (b) When a service is related to a training that was provided prior to exit from the program; or
- (c) When a federally recognized credential is obtained during participation or within the one year after exit (during follow-up period); or
- (d) Upon successful completion of a work experience or upon receipt of a federally-recognized credential by the participant.

Definition – Work Experience (WEX)

Work Experience is defined in section 20 CFR 681.600 as a planned, structured learning experience that takes place in workplace for a limited period of time in the private for-profit sector, the non-profit sector, or the public sector, and provide the youth with opportunities for career exploration and skill development. Labor standards apply in any work experience where and employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law exists. Consistent with 20 CFR 680.240, funds provided for work experience may not be used to directly or indirectly aid in the filing of a job opening that is vacant because the former occupant is on strike or is otherwise an issue in a labor dispute involving a work stoppage.

Work Experience must include academic and occupational education that includes contextual learning intended to help the participant learn information necessary to work in specific industries or occupations; this may occur inside or outside the worksite.

Incentives may be provided for the following:

Work Experience/Internship (Element 1)

Guideline for receiving the incentive payment for work experience are provided before the service is provided are:

1. Timesheet/progress incentive form is used to track participant time;
2. Must document progress to ensure objective is achieved;
3. Contract to identify worksite supervisor, authorized representative, supervisor, position, hours authorized, time frame for work experience and skills to be attained;
4. Contract must be signed, dated by staff and employer **prior** to start date of the Work Experience/Internship;
5. The contract for Work Experience may not exceed the total of 480 hours rated at the Federal minimum wage amount. **It is recommended that the pay is the higher of the Federal or State minimum wage.** Exceptions to this rule must be submitted in writing to the designated Manager/Director with a complete justification and expected outcome.

6. The contract for Internship may not exceed the total of 480 hours. Exceptions to this rule must be submitted in writing to the designated Manager/Director with a complete justification and expected outcome;
7. More than one Work Experience may be provided on a case by case basis.

On-The-Job Training (OJT) (Element 3)

An OJT is provided under a contract with an employer in the public, private non-profit, or private which is reimbursed 50% of the wage rate of the participant being trained while engaged in productive work in a job. The contract is limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. The required skills of the occupation, academic level of the participant and prior work experience are taken into consideration in order to determine the appropriate length of the contract. A contract is required to identify the employer worksite, authorized representative, supervisors, position, hours authorized, time frame and skills to be attained. The contract must be signed and dated by staff and employer prior to start date of OJT.

1. The contract for OJT may not exceed a total of 1040 hours.
2. An OJT is only to be given to the participant on a one-time occurrence throughout program participation.
3. Incentive may be provided upon successful completion.

Job Shadowing (Program Element 3)

Job Shadowing is a work experience option where youth participants learn about a job by walking through the workday as a shadow to a competent worker. It is temporary, unpaid exposure to the workplace in an occupational area of interest. The youth participant will:

1. Witness firsthand the work environment.
2. Employability and occupational skills in practice and potential career options.
3. Job Shadowing hours can vary from a few hours to a day or week. It provides the opportunity for the youth participant to learn more about a career.
4. Incentive payment will be at the completion of an 8 hour job shadowing experience not to exceed 3 job shadowing experiences during their participation.
5. An incentive resulting in a placement.
6. A description of the job shadowing conducted by the youth participant and signed by the employer will be required to be submitted for request of payment.

High School Diploma/High School Equivalence Certificate/GED (Program Element 1, 2 & Secondary Education Program Service for In-School Youth)

1. Incentive will be awarded when the participant receives a high school diploma or high school equivalency certificate during program participation;
2. Or within one year of exit (during Follow-Up period);
3. A copy of the certificate must be attached to the request for payment.

Occupational Skills Training/Federally Recognized Credential (Program Element 4)

1. An incentive will be awarded at the completion of a federally recognized credential or occupational certificate, which may include, but not limited to a degree, licensure during participation or within one year of exit during (Follow-Up period)
2. A copy of the certificate/credential must be attached to the request for payment.

Basic Skills Literacy Increase (Program Element 1, 2, 14 & Secondary Education Program Service for In-School Youth)

1. Incentive will be awarded to participants who have demonstrated an increase in the area of Reading, Math, Language;
2. And are no longer considered basic skills deficient (8.9 or above);
3. A copy of the Pre-Test and Post-Test results will be required for payment process.

High School Semester Credit (Secondary Education Program Service for In-School Youth)

In-school youth are given an incentive award:

1. Per semester, when participants have completed their semester courses with a passing grade of “C” or better;
2. A copy of school report card must be attached to the request for payment.

Leadership Development Opportunities (Program Element 6)

Leadership development opportunities are activities that encourage responsibility, confidence, employability, self-determination and positive social behavior. A copy of the flyer/letter signed by the agency/organization approving participants completion of service must be attached to request for payment:

1. An Incentive will be awarded to participants that attend and complete any of the following activities:
 - (a) Exposure to postsecondary educational opportunities (i.e. tour of college campus, college expo fair, etc.) or
 - (b) Community service learning projects and civic engagement activities such as working to make a difference in the civic life of the community (i.e. community volunteer work); or
 - (c) Peer-centered activities, peer mentoring/tutoring; or
 - (d) Teamwork/leadership training, decision-making priorities and problem solving; or
 - (e) Leadership activities such as serving on a standing youth committee.

Note: Pre-approval must be granted by the designated Director/Manager.

Youth Workshops

Workshops must be tied directly to a specific program element:

1. Incentives will be awarded per workshop upon completion;
2. A local certificate of completion must be attached to the request for payment;
 - (a) Financial Literacy Activities (Element 11) – Financial Literacy Workshop embraces financial principles such as money management and planning, budgeting, creating checking/savings account, educating on investments, understanding credit score reports, credit/borrowing and income in relation to choice of career.
 - (b) Work Experience Academic and Educational component (Element 3) – Customer Service Workshop incorporated within the Work Experience Service to provide introduction on what is customer service, key elements and qualities of customer service, first impressions, Do's/Don't of customer service, Work readiness and respect in the workplace (i.e. harassment in the workplace, etc.).
 - (c) Services That Provide Labor Market Information (Element 13) – The workshop prepares participants on employment applications, resume writing, cover letter, interviewing skills, and career exploration/occupational research packet.

- (d) Postsecondary preparation and transition activities (Element 14) – Geared for College Workshop gives participants the opportunity to explore and learn about the different community colleges, universities and or technical schools in our local area or State. Participants are provided with information on college admission/requirements, placement testing, guidance on Financial Aid application and providing resources for scholarship and grants.

Documentation Requirements

Supporting documentation must be attached to the request for payment and submitted to the Manager for processing. All incentives must be justified and documented in AJC program notes and ISS detailing how the incentive will contribute to the participant's success. The Incentives/Bonuses Service and appropriate AJC Activity/code must also be entered in the S&T plan when incentives are provided. The NTN must internally maintain appropriate and identifiable expenditure records of payments for purposes of monitoring and audits.