



# EMPLOY MILWAUKEE POLICY 17-03 CHANGE 1: YOUTH INCENTIVE POLICY

EMPLOY MILWAUKEE POLICY: WIOA POLICY 17-03, Change 1

SUBJECT: YOUTH INCENTIVE POLICY

ISSUANCE DATE: 12/3/20

EFFECTIVE DATE: 12/3/20

### POLICY SCOPE

- EMPLOY MILWAUKEE AGENCY
- WIOA WDA 2 SYSTEM
- WIOA TITLE I-B PROGRAM(S)
  - ADULT PROGRAM
  - DISLOCATED WORKER PROGRAM
  - YOUTH PROGRAM
- NON-WIOA PROGRAMS

### REFERENCES:

20 CFR 681.640

2 CFR Parts 200 and 2900 United States Department of Labor Training and Employment Guidance Letter (TEGL)

WIOA 21-16

81 FR 56186 and TEGL 21-19, p. 10

Wisconsin WIOA Titles I-A and I-B Policy and Procedure Manual Chapter 10.6, Rev. September 4, 2018

Wisconsin Workforce Innovation and Opportunity Act (WIOA) Policy Update 16-01: Youth Incentive Awards Payment Policy

## I. BACKGROUND

WIOA permits incentive payments to participants of the WIOA Title I-B Youth Program for “recognition and achievement directly tied to training activities and work experiences” (20 CFR 681.640). Incentives must comply with the Cost Principles in 2 CFR Part 200.

## II. PURPOSE

Employ Milwaukee WIOA Policy 17-03: Youth Incentive Policy outlines the policy and procedures that govern the use of incentives in Workforce Development Area (WDA) 2’s WIOA Title I-B Youth Program.

## III. POLICY

### A. REQUIRED PREDECESSORS

Employ Milwaukee offers reasonable incentives to youth participants in recognition for achievement in their WIOA Title I-B Youth Program training, education, and work experiences. For the purposes of this policy, the term “incentive award payment” shall mean a reward intended to recognize the achievement of a training activity or work experience, which can help motivate a youth to set and then achieve a training activity or work experience goal.

The justification for awarding incentives must be tied to the goals in the youth’s WIOA Individual Service Strategy (ISS) and outlined in writing before the commencement of the program. Incentive award payments shall be made in a uniform and consistent manner that ensures all participants receive equal rewards for equal achievement.

### B. LIMITATIONS

All incentive award payments are subject to the availability of WIOA funds and are not an entitlement. Employ Milwaukee may suspend or withdraw authorization for incentive award payments at any time and at its sole discretion.

Youth incentive award payments are limited to a maximum amount of \$500 per eligible youth per



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program year and are to be processed through a Youth Incentive Form and tracked in Employ Milwaukee's ETO System and DWD's ASSET System.

### C. ALLOWABLE ACTIVITIES

Goals and/or training outcomes eligible for an incentive must be linked to an achievement directly tied to training, education, or work experience as stated in the clients' Individualized Service Strategy (ISS) and documented in accordance with applicable WIOA regulations. Participants may not receive multiple incentive payments for the same activity.

EMI may use WIOA funds for incentive payments to in-school youth (ISY) and out-of-school youth (OSY) participants to recognize achievement of program milestones directly tied to work experience, education, or training. Program milestones include but are not limited to:

- attaining a credential
- achieving a certain grade point average
- graduating from secondary school or an equivalent program
- completing a work experience
- entering unsubsidized employment
- being accepted into a post-secondary school, and
- showing improvements marked by testing

Attachment A clearly identifies the types of program milestones that qualify for incentive payments and award amount(s) and specifies any limitations.

## IV. PROCEDURES

### A. DOCUMENTATION OF JUSTIFICATION AND RECEIPT

Incentives are available to each WIOA eligible youth participant based on need documented in the participant's ISS. WIOA Title I service providers shall maintain required documentation detailing the distribution and management of awards. All incentives are taxable at the full amount of the award and subject to withholding in accordance with Internal Revenue Service (IRS) regulations.

Employ Milwaukee shall require all WIOA service providers and grantees receiving funds from a grant or contract administered by Employ Milwaukee to comply with this policy and applicable procedures. At a minimum, service providers shall:

1. Document the need for the incentive and justify issuance of the award in the participant's ISS and in the ASSET system (customer notes).
2. Request the incentive by submitting a Youth Incentive Form to Employ Milwaukee. If the incentive request is electronic, the career planner shall attach the approval email to the form to substantiate the approved request in the participant's file.
3. Maintain all records relating to the incentive, including documentation substantiating the achievement meriting an incentive and an original signature on a receipt form to verify the client received the award, in the participant's paper file.

### B. PROCUREMENT



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The procurement of non-cash incentives must follow standard procurement procedures as stipulated in 2 CFR §200.318 - 320.

## C. QUALITY ASSURANCE

Each service provider must remain aware of all applicable regulations and monitor personnel and client activities to ensure compliance. Employ Milwaukee shall review service provider compliance with this policy during monitoring.

## V. ACTION REQUIRED

WIOA Title I-B Service Providers in WDA 2 must share this policy with Career Planners and other WIOA staff immediately. All incentive payments made following this policy's effective date must meet the local requirements and follow prescribed procedures described herein.

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**RECISSIONS:** [EMPLOY MILWAUKEE WIOA YOUTH INCENTIVE POLICY, EFF. March 15, 2018](#)

**BOARD APPROVAL DATE:** [12/3/20](#)

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