

## Southwest Ohio Region Workforce Investment Board

**POLICY:** Supportive Services and the Use of Incentives for Youth under WIA/WIOA

**APPROVAL DATE:** June 11, 2015

**PURPOSE:** To provide guidelines for provision of supportive services and incentives for youth participants.

**BACKGROUND:** Federal workforce law under WIA and new NPRMs for WIOA (not yet final) define the requirements for the provision of supportive services and incentives. Incentives were challenged during a March 2014 site visit to Area #13 as part of a statewide comprehensive site visit due to their use in encouraging youth for completing the arduous process of eligibility documentation which often requires WIA youth to obtain documents not readily available to them or for extraordinary participation in academic, community, policy or other events. Youth providers have also encouraged youth being served to outreach to their peers as part of successfully deploying "word of mouth" marketing strategies. The SWORWIB recognizes the widespread practice of loyalty benefits for use of services or the encouragement of referral marketing and recruitment of services. Since middle class parents and youth supporters are well known to incentivize youth behavior with rewards valued by youth and the SWORWIB has recognized the conventional wisdom behind these mainstream methods in outreach to youth and others, the SWORWIB also encourages youth service agencies to develop alternative resources to afford WIA/WIOA youth experiences and resources more similar to those of economically stable families and youth.

**ALLOWABLE USE:** The use of WIA/WIOA funds for supportive services and incentives is allowable if those services are necessary for the individual to participate in WIA/WIOA activities, obtain WIA/WIOA performance outcomes such as GED, Diploma, or progress gain(s), and the individual is unable to obtain those supportive services through other programs. Provision of a supportive service or incentive should effectively contribute to removing or addressing a specified barrier to employment and/or educational goals as specified in the ISS. The costs of the supportive services and incentives must be commensurate with the benefits of the service.

Incentives and stipends, whether in cash or gift cards, are allowable when they meet the conditions of supportive services. Incentives in the form of these payments are allowable for the purpose of obtaining priority performance results as previously outlined above.

Furthermore, supportive services for youth include: a) linkages to community services; b) assistance with transportation; c) assistance with child and dependent care; d) assistance with housing; e) referrals to medical services; and f) assistance with uniforms or other appropriate work attire and work-related tools, including such items as eye glasses and protective eye gear.

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**POLICY:** Supportive services and incentives should be "based upon individual client need and documented in the ISS". Incentive payments are allowable "for the purpose of obtaining priority performance results." Supportive services and incentives should be noted in the State of Ohio case management system only if the activities meet the criteria for the program element. Start dates and end dates must be noted. Case files must include appropriate case notes, such as: 1) objective assessment and ISS indicating need for supportive services; 2) justification of the need for purchased services or items for youth's participation in youth program activities; 3) description of type of payment method and amount with documentation of progress achievement; and 4) supportive services from other funding sources include other documentation as appropriate in paper case file, for example, a copy of the supportive services plan.

**ACTION:** The Southwest Ohio Region Workforce Investment Board will notify contracted agencies of this policy through email distribution. The Southwest Ohio Region Workforce Investment Board will provide oversight through Hamilton County Job and Family Services that conducts administrative and compliance oversight for the local area/SWORWIB to ensure that the policy is used consistently and in the intended spirit. The contracted agencies will comply with the policy and advise the Emerging Workforce Development Coordinator of any issues related to the implementation of this policy for WIAWIOA youth. The SWORWIB has responded to the DOL-NPRM public comments request sharing concerns about incentives when focused disproportionately on out-of-school youth and hopes these comments are considered in subsequent regulation. Meanwhile, the contracted agencies' representatives may contact the SWORWIB President to explore options for corporate, foundation or other private funding in support of WIAWIOA youth incentive(s) in the event of a just cause for action that is not to be funded by WIAWIOA in accordance with this policy.