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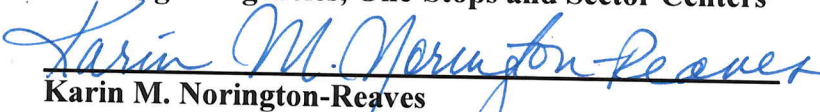
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Local Workforce Innovation And Opportunity Act (WIOA) Policy No. 2016-PL-05 (Revised)

To: All Delegate Agencies, One-Stops and Sector Centers

From:


Karin M. Norington-Reaves
CEO, Chicago Cook Workforce Partnership

Subject: LOW-INCOME INDIVIDUALS

Date: September 25, 2018

Purpose:

The purpose of this policy is to define who is a low-income individual.

References:

Illinois Department of Commerce (IDOC) WIOA POLICY 15- WIOA- 4.5
U.S Department of Labor WIOA Final Rule 20 CFR Part 680

Background:

WIOA identifies certain situations where Adult and Youth customers must meet low-income eligibility requirements for enrollment into the WIOA program.

POLICY:

A. Low income determination is part of the eligibility process in the following:

1. In the WIOA Youth program, low-income can be a qualifying criterion for determining eligibility. Low-income youth are considered having a barrier to employment.
2. In the WIOA Adult program, low-income is one of the three priorities of service criteria. Low-income adults must receive priority of services over Adults who do not meet one of the three priority categories.

B. A low-income individual is a person who:

1. Receives or received in the past six (6) months, or is a member of a family that receives or received in the past six (6) months, assistance through the supplemental nutrition assistance program (SNAP) established under the Food and Nutrition Act of 2008, the program of block grants to states for Temporary Assistance for Needy Families (TANF) program under part A of Title IV of the Social Security Act or the Supplemental Security Income (SSI) program established under Title XVI of the Social Security Act, or State or local income-based public assistance; or

2. Is in a family with total family income that does not exceed the higher of:
 - a) The poverty line; or
 - b) Seventy percent (70%) of the lower living standard income level (*The IDOC will update the income levels on an annual basis*); or
 3. Is a homeless individual (as defined in section 41403(6)) of the Violence Against Women Act of 1994 (42 USC. 14043e-2(6)), or a homeless child or youth (as defined under Section 725(2)) of the McKinney-Vento Homeless Assistance Act (42 USC. 11434a(2)) ; or
 4. Receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 USC 1751 et seq.); or
 5. Is a foster child on behalf of whom state or local government payments are made; or
 6. Is an individual with a disability whose own income does not exceed the higher of:
 - a) The poverty line; or
 - b) Seventy percent (70%) of the lower living standard income level, but who is a member of a family whose income does not meet this requirement; or
 7. Is a youth residing in a high poverty area. A high-poverty area is a Census tract, a set of contiguous Census tracts, Indian Reservation, tribal land or Native Alaskan Village or county that has a poverty rate of at least 25 percent as set every 5 years using American Community Survey 5-Year data. *The Partnership will provide an official listing, via procedure letter, of the high poverty Census tract areas and/or communities that meet the criteria in the service area on an annual basis.*
- C. In making determinations of low-income status, the list of income source inclusions and exclusions found in Attachment A to IDOC WIOA Policy Letter 15-4.5 should be referenced. This list along with Illinois Department of Commerce's "WIOA 1B General and Fund Source Eligibility Requirements and Documentation Source Guide is located on the Illinois WorkNet website at www.illinoisworknet.com/WIOA/Resources/Pages/WIA-WIOAPolicies
- D. When past income is an eligibility determinant for federal employment or training programs, any amounts received as military pay or allowances by any person who served on active duty, and certain other specified benefits must be disregarded for the veteran and for other individuals for whom those amounts would normally be applied in making an eligibility determination.
1. Military earnings are not to be included when calculating income for veterans or transitioning service members for this priority, in accordance with 38 U.S.C. 4213.
- E. All determinations of low-income status for customers must be supported by proper documentation.

Effective Date:

Immediately upon Board approval.



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Local Workforce Innovation And Opportunity Act (WIOA) Policy No. 2018-PL-06

To: Delegate Agencies, American Job Centers and Sector Centers

From:

Karin M. Norington-Reaves
CEO, Chicago Cook Workforce Partnership

Subject: YOUTH STIPENDS AND INCENTIVE

Date: September 25, 2018

Purpose:

The purpose of this letter is to establish The Chicago Cook Workforce Partnership's (The Partnership) policy and provide comprehensive guidance that ensures compliance with the WIOA requirements for the provision of for incentive payments to youth under Title I of the Workforce Innovation Opportunity Act.

References:

WIOA Section 129 - Use of funds for youth workforce investment activities
2 CFR part 200 of the OMB Uniform Guidance-Cost Principles
WIOA Final Rules, Part 680, Subpart F – Work-based training
WIOA Final Rules, Part 681, Subpart D – One-stop services to youth
TEGL 21-16: Third WIOA Title 1 Youth Formula Program Guidance

Background:

WIOA provides for a workforce system that is universally accessible and customer centered, with an emphasis on work based learning and paid work experience for youth. Youth incentive payments are one of the many service options available to youth participants. WIOA encourages the use of incentive payments whenever appropriate to ensure successful program participation in work experiences, education or training. Following are guidelines for implementation of youth incentive payments.

Requirements:

A. General Requirements:

The Youth Delegate Agency may provide youth incentives and/or stipend payments pursuant to the terms and conditions set forth within this policy and within their Sub-grant Agreement. The Partnership encourages Career Coaches to consult with public assistance case managers where applicable to ensure that the receipt of incentives or stipends does not negatively impact the youth participant's receipt of public assistance.

1. Stipends:

WIOA, Title I is silent on using the term “stipend”. Stipends involve payment via check. Reasonable stipends are allowable expenditures for unpaid work experience for youth when the provision of stipend is included in the participant’s ISS. Stipends are not considered income for WIOA eligibility purposes and are not required to meet minimum wage requirements, are not to be dispersed as payroll and income tax is not to be withheld.

2. Incentives:

Unpaid work experiences participants may receive remuneration in cash or non-cash incentives. The incentive must equate to an achievement and must be tied to training and education, a work readiness skill attainment and/or an occupation skill attainment goal identified in the ISS. Incentives for youth may include plaques, certificates, book bags, school supplies and/or calculators, recognition ceremonies for participants, caps and gowns and/or payment by check. One time activation fees for gift cards are an allowable expense. WIOA funds cannot be used to pay for incentives for recruitment or securing eligibility documentation.

Stipends and/or incentives are permitted when the following conditions are satisfied:

- The cost of the incentive/stipend program is included in the youth delegate agency budget and sub-grant agreement
- The incentives are reasonable and necessary
- The incentives or stipend must equate to an achievement, tied to reaching a measurable point as part of training and education, a work readiness skill attainment and/or occupational skill goal identified on the youth’s individual service strategy
- Incentives must be earned and paid during the period of youth participation in the program (after enrollment and prior to program exit).
- The incentive plan must be outlined in writing before the commencement of program activities related to the program; and compliance with 2 CFR part 200 of the Uniform Administrative Requirements

B. Uniform Administrative Requirements:

Incentives must be distributed in compliance with the requirements of 2 CFR part 200 of the Uniform Administrative Requirements and **cannot be spent on entertainment costs** (e.g. movie or sporting events, gift cards to movie theaters or other venues whose sole purpose is entertainment). Additionally there are requirements related to internal controls to safeguard cash, which also apply to the safeguarding of gift cards, which are essentially cash.

C. Case File Documentation:

The following documentation is required when youth incentive payments are being used:

- An ISS that ties the incentive payment to a training, education, work readiness skill attainment and/or occupational skill goal and that is dated prior to the commencement of the activities
- Entries into Career Connect that update the ISS with corresponding case notes that identify the achievement of skill resulting in an incentive payment

- If the payment is related to an outcome with its own documentation requirement such as a credential, the outcome must be documented.

NOTE: Although not required, placing a copy of the incentive payment issuance document in the case file is recommended.

Action Required:

This information should be disseminated to all service provider staff responsible for issuing youth stipend and incentive programs such as career coaches, directors, placement staff; and to staff responsible for budgeting, vouchering and accounting.

Inquiries:

Delegate agencies should contact their assigned Regional Manager with questions regarding any aspect of this policy letter.

Effective Date:

Immediately upon approval of the Board.