



# Hennepin-Carver Workforce Development Board

## **Hennepin-Carver Workforce Development Board**

**Action Request: 2026-3**

**Topic: WIOA Youth Program Policies**

**Board Meeting Date: May 19<sup>th</sup>, 2026**

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### **Item Description**

New and revised local policies governing the Workforce Innovation & Opportunity Act (WIOA) Youth program in WDA 09 (Hennepin-Carver).

### **Action Needed**

A motion (and second) to approve the new and revised Local Policies governing the WIOA Youth program in WDA 09 (Hennepin-Carver).

### **Background**

Per the Department of Employment and Economic Development (DEED), Local Workforce Development Areas (WDAs) areas are required to adopt local policies that align with State policies and govern various aspects of service delivery, program operations, and oversight of the WIOA Youth program. Per DEED guidance, WDA 09 proposes adopting and/or revising the following policies to govern the WIOA Youth Program:

#### (New) Local Youth Additional Assistance Policy

This policy defines clear, quantifiable criteria under WIOA Sec. 129 for low-income youth needing Additional Assistance (beyond standard eligibility barriers) to enter, complete education, or secure/hold employment.

#### (New) Local Youth Basic Skills Deficiency Policy

This policy outlines how WDA 09 determines whether a youth is basic skills deficient in alignment with federal WIOA requirements, Minnesota statutes, and DEED's Office of Youth Development policies.

#### (New) Local Youth Follow-Up Policy

This policy defines appropriate follow-up duration, services, and reporting requirements for the WIOA Youth Program in WDA 09.

#### (Revised) Local Youth Support Services Policy

This policy has been revised to reflect new guidance from DOL Employment and Training Agency (ETA) via TEN 06-25. TEN 06-25 rescinds TEG 21-16 which allowed Support Services that support a youth's ability to participate in Work Experience may be charged to the OSY/ISY Work Experience budget categories.

#### (Revised) Local Youth Incentives and Stipend Policy

This policy has been revised based on guidance from DEED's Youth Team, "DOL monitors would not approve a policy that permitted an incentive to be awarded for "perfect attendance" under WIOA Youth Program." As such, the example referring to "perfect attendance" has been removed from the policy language.

Updating and implementing the policies above will ensure compliance with the state and federal local policy requirements and will provide additional clarity and guidance for local providers in WDA 09.

WIOA Youth programs must be administered following the parameters outlined in these policies by all Youth service providers of the Hennepin-Carver WDA 09.

### **Staff Recommendation**

Approve the Local Policies governing the WIOA Youth programs in WDA 09 (Hennepin-Carver).

**Attachments**

- Local Youth Additional Assistance Policy
- Local Youth Basic Skills Deficiency Policy
- Local Youth Follow-Up Policy
- Local Youth Support Services Policy
- Local Youth Incentives and Stipend Policy



## Policy: Local Youth Additional Assistance Policy

Effective Date: XX/XX/XXXX

Last Reviewed Date: XX/XX/XXXX

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### Summary

This policy defines clear, quantifiable criteria under WIOA Sec. 129 for low-income youth needing Additional Assistance (beyond standard eligibility barriers) to enter, complete education, or secure/hold employment.

### Relevant Laws, Rules, or Policies

WIOA Sec. 129(a)(1)(B)(iii)(VIII)

WIOA Sec. 129(a)(1)(C)(iv)(VII)

20 CFR 681.300

20 CFR 681.310

TEGL 21-16

TEN22-19

DEED's Office of Youth Development Policies

### Background

The purpose of this policy is to establish clear, consistent, and compliant standards for identifying WIOA-eligible youth who “require additional assistance to enter or complete an educational program or to secure and hold employment,” as defined under WIOA Sec. 129. This policy ensures that ensures WIOA-funded youth who lack traditional barriers—but face significant life, educational, or employment challenges—can be enrolled under the Requires Additional Assistance eligibility category, as well as ensures that WDA 09 Youth Program Providers apply the Additional Assistance criterion in a manner that is equitable, measurable, federally compliant, and aligned with DEED's Office of Youth Development expectations.

### Policy

#### WIOA Out-of-School Youth (OSY)

For OSY in WDA 09, the criteria for “An individual who requires additional assistance to complete an education program or to secure and hold employment” includes the following:

- Refugee or Immigrant Youth
- Youth who identify as LGBTQIA+
- Youth with one or more parent or guardians currently incarcerated
- Youth with one or more parent or guardian that has not received a High School Diploma or GED
- Youth with ongoing chronic medical, mental health, and/or substance abuse issues
- Youth that are victims of domestic violence or abuse
- Youth that are victims of sexual or romantic partner violence or abuse

#### WIOA In-School-Youth (ISY)

For ISY in WDA 09, the criteria for “An individual who requires additional assistance to complete an education program or to secure and hold employment will also include the following in addition to the criteria listed for OSY above:

- Youth with school truancy concerns
- Youth with a school record of ongoing emotional and behavioral issues

#### 5% Window

A maximum of 5% of In-School Youth (ISY) participants will be enrolled in a program year based on the Requires Additional Assistance eligibility criterion. WIOA Youth Program Providers are responsible for ensuring no more than 5% of their respective ISY caseloads in a program year are enrolled based on the Requires Additional Assistance eligibility criterion.

#### Documentation

When a youth participant is enrolled using the “Requires Additional Assistance” barrier, one or more of the following acceptable forms of documentation must also be included in the participant’s Workforce One record:

- Detailed case notes clearly explaining how the youth meets the specific criterion listed above
- Source documentation (i.e attendance records, transcripts, disciplinary reports, health documentation, court orders, letters from case managers or social service providers, etc.)
- Youth self-attestation, where applicable.

## Contact

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# Policy: Local Youth Basic Skills Deficiency Policy

Effective Date: XX/XX/XXXX

Last Reviewed Date: XX/XX/XXXX

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## Summary

This policy outlines how WDA 09 determines whether a youth is basic skills deficient in alignment with federal WIOA requirements, Minnesota statutes, and DEED's Office of Youth Development policies.

## Relevant Laws, Rules, or Policies

WIOA Sec 3(5)

20 CFR 681.290

TEGL 19-2

TEGL 21-16

TEGL 09-22

DEED's Office of Youth Development Policies

## Background

WIOA identifies specific eligibility criteria for youth to participate in WIOA programs. Per WIOA regulations at 20 CFR 681.290, Local Workforce Development Boards (LWDBs) must create a basic skills deficiency policy for youth meeting the definition of basic skills deficiency.

## Policy

WIOA Sec 3(5) defines a basic skills deficient individual as an individual with 1) "English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test;" or 2) "who is unable to compute or solve problems, or read, write or speak English at a level necessary to function on the job, in the individual's family, or in society." To demonstrate that a youth is reading below the 8th grade level, only standardized testing instruments including records from the schools, should be used. LWDBs may use previous basic skills assessment results if the assessments were conducted within the past six months. Assessment options may include the following.

### Accepted Assessments:

- Comprehensive Adult Student Assessment System (CASAs)
- Test of Adult Basic Education (TABE)
- Basic English Skills Test (BEST)
- Assessments administered by Local School Districts
- Alternative valid, reliable assessments may be accepted if first reviewed and approved by Hennepin County Youth Programs Manager.

### Acceptable Documentation:

- Detailed case notes that clearly attest to the youth's inability to compute or solve problems, or read, write or speak English at a level necessary to function on the job, in the individual's family, or in society
- Applicable records from education institution (transcripts, academic assessments, signed attestation from school official, or other school documentation) demonstrating the youth is performing below the 8<sup>th</sup> grade level or unable to compute or solve problems, or read, write or speak English at a level necessary to function on the job, in the individual's family, or in society

- Assessment Test Results (must be results from an accepted assessment, listed above).

### Basic Skills Deficiency Screening Tools

WDA 09 Youth Program providers may implement a Basic Skills Deficiency screening tool, defined as a short questionnaire that is completed by the youth under observation of the employment counselor. The questionnaire should include questions that prompt the youth to attest to their English reading, writing, and computing skills as well as their ability to compute or solve problems, or read, write or speak English at a level necessary to function on the job, in the individual's family, or in society. If the participant indicates that they cannot meet the requirements in the questionnaire, or if the Employment Counselor observes the youth struggling to complete the form by themselves, the youth should be administered one of the acceptable assessments listed above to verify Basic Skills Deficiency. If a Youth Program Provider chooses to implement a Basic Skills Deficiency Screening Tool, it must first be reviewed and approved by the Hennepin County Youth Programs Manager.

## Contact

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## Policy: Local Youth Follow-Up Policy

Effective Date: XX/XX/XXXX

Last Reviewed Date: XX/XX/XXXX

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### Summary

This policy defines appropriate follow-up duration, services, and reporting requirements for the WIOA Youth Program in WDA 09.

### Relevant Laws, Rules, or Policies

29 U.S.C. § 3164(c)(2)(I)

20 C.F.R. § 681.580

TEGL 21-16

TEGL 10-16, Change 1

TEGL 14-18

DEED's Office of Youth Development Policies

### Background

Follow-up services support WIOA Youth participants' continued success in employment, education, or training. Follow-up Services are an essential WIOA Youth program element aimed at creating smooth and supportive transitions for youth and preventing regression after program exit.

### Policy

#### Program Exit

The exit date is determined when the participant has not received services in the Youth program or any other DOL-funded program in which the participant is co-enrolled for 90 days and no additional services are scheduled. At that point, the date of exit is applied retroactively to the last date of service. Once 90 days of no services, other than follow-up services, self-service, and information-only services and activities, has elapsed and the participant has an official exit date applied retroactively to the last date of service, the program continues to provide follow-up services for the remaining 275 days of the 12-month follow-up requirement. The 12-month follow-up requirement is completed upon one year from the date of exit.

#### Duration and Frequency of Follow-Up Services

For WIOA Youth participants, follow-up services must be offered for no less than 12 months after the participant is exited from the program. Follow-up services may begin immediately following the last expected date of service in the WIOA Youth program without triggering re-enrollment or causing the participant's exit date to change. Follow-up services may be provided beyond 12 months at the providers' discretion and with the approval of the Hennepin County Youth Programs Manager.

#### Allowable Follow-Up Services

The following program elements (as defined in [DEED's Ch. 11 Program Elements Policy](#)) may be provided during the 12-month follow-up period, in alignment with the goals and activities established in the participant's Individual Service Strategy (ISS):

- 1) Supportive Services (monetary and non-monetary)
- 2) Adult Mentoring
- 3) Financial Literacy Education
- 4) Services that provide Labor Market Information
- 5) Post-Secondary Preparation and Transition Activities

### Documenting Follow-Up Contact

All follow-up contact attempts with WIOA Youth participants must be detailed in the Workforce One (WF1) case notes. Successful quarterly contact should be recorded under the “Follow-Up” tab in WF1, including any information collected pertaining to the participant’s employment status, occupation, wages, enrollment in post-secondary training or education, or ongoing service needs.

### Documenting Performance Measures

WIOA Youth service providers must ensure the accurate and timely reporting of the following performance measures in WF1 during the four quarters after a participant is system exited from WF1. Documentation supporting the successful achievement of these performance measures, including pay stubs, transcripts, enrollment records, offer letters, etc., must be uploaded to WF1 Electronic Document Storage (EDS).

- 1) Entered unsubsidized employment or enrolled in post-secondary education or training during the 2<sup>nd</sup> and 4<sup>th</sup> quarters after exit:
  - a. Defined as the percentage of individuals who are in unsubsidized employment during the 2nd and 4th quarters after exit.
  - b. For the WIOA Youth program, this indicator also includes young adults actively enrolled in education or training activities in addition to those who obtained unsubsidized employment 2nd and 4th quarters after exit.
  - c. If employment is related to training the individual received while enrolled in the WIOA Title I program, service providers must indicate this in WF1.
  - d. Individuals are not required to provide evidence of continued, uninterrupted employment or training during the entire 12 months after exit. Rather, DOL performance reporting requirements limit the verification of an individual’s employment or training status to any time during the 2nd and 4th quarter after exit.
  - e. The optimal time to collect employment and wage information, and training information for young adults, is any time during the 2nd and 4th quarters after exit or as soon as possible following the close of the 2nd and 4th full quarters after exit, however, this information may be collected at any point during the 12 months after exit.
- 2) Credentials earned 2<sup>nd</sup> and 4<sup>th</sup> quarters after exit:
  - a. Defined as the percentage of participants enrolled in an education or training program (excluding those in on-the-job training and customized raining) who obtained a recognized post-secondary credential or secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program.
    - i. Note: A participant who has attained a secondary school diploma or its recognized equivalent is included in the percentage of participants who have attained a secondary school diploma or its recognized equivalent only if the participant is also employed or is enrolled in an education or training program leading to a recognized post-secondary credential within one year after exit from the program
  - b. The following are reportable credentials:
    - i. Secondary school diploma or its equivalency
    - ii. AA or AS diploma/degree
    - iii. BA or BS diploma/degree
    - iv. Occupational licensure
    - v. Occupational certification
    - vi. Other recognized diploma, degree, or certificate
  - c. Credentials earned may be collected at any time during the 12 months after exit.

### Sample Reporting Quarters

The following table provides an illustration of when the reportable “four quarters after exit” begins for an individual who received their last participation-level service on December 1, 2025:

<b>Exit Quarter (Exited 12/1/2025)</b>	<b>1<sup>st</sup> Quarter After Exit</b>	<b>2<sup>nd</sup> Quarter after Exit</b>	<b>3<sup>rd</sup> Quarter after Exit</b>	<b>4<sup>th</sup> Quarter after Exit</b>
October – December 2025	January – March 2026	April – June 2026 Reportable Quarter	July – September 2026	October – December 2026 Reportable Quarter

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## Policy: Local Youth Support Services

Effective Date: XX/XX/XXXX

Last Reviewed Date: 11/12/2025

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### Summary

The Workforce Innovation and Opportunity Act (WIOA) allows eligible program participants of WIOA Title I-B Youth to access supportive services that ensure resource and service coordination in the local area. Supportive services may be provided to participants that are unable to obtain similar or equivalent supportive services through other programs or resources; and supportive services may be provided at any point during a participant's time in the program, including during enrollment and follow-up services.

The Minnesota Youth Program does not require grantees to offer or provide supportive services to youth participants. However, it is generally a best practice to offer supportive services to youth participants to help ensure successful completion of programming. Per MN Statute 116L.561, Supportive services include items that are necessary for a youth to participate in the program, such as transportation, clothing, tools, childcare, housing/rental assistance, school-related expenses, etc. These expenses may be paid directly to the youth or to a third-party vendor or may be provided through referral to another organization.

The Youth at Work Competitive Grant program does not require grantees to offer or provide support services to youth participants. However, it is generally a best practice to offer supportive services to youth participants to help ensure successful completion of programming. Per MN Statute 116L.562, items that are necessary for a youth to participate in the program, such as transportation, clothing, tools, childcare, housing/rental assistance, school-related expenses, etc. These expenses may be paid directly to the youth or to a third-party vendor.

### Relevant Laws, Rules, or Policies

Workforce Innovation and Opportunity Act (WIOA), §3(59) and 134(d)(2) and (3) 20 CFR 680 Subpart G 20 CFR 681 Subpart C §681.570  
TEGL 19-16  
DEED's Financial Assistance for Computer Hardware and Similar Technology Policy TEGL 09-22  
TEN No. 12 - 21  
MN Statute 116L.561  
MN Statute 116L.562

### Purpose

This policy outlines the allowable Support Services and funding limits for the **WIOA Youth, Minnesota Youth, and Youth at Work programs**. Individuals who are eligible for and are enrolled in the WIOA Youth, Minnesota Youth, and Youth at Work programs may be eligible to receive Support Services so long as they meet the criteria outlined in DEED's policies pertaining to allowable activities for each of the respective programs. This policy includes additional criteria that has been established by the Hennepin-Carver Workforce Development Area (WDA).

This policy also serves as guidance to govern the use of support service and/or training service dollars to fund purchases of computer hardware or similar technology (i.e. software purchases, repairs, etc.) for the Hennepin-Carver Workforce Area per the requirement in DEED's Financial Assistance for Computer Hardware and Similar Technology policy.

Additionally, this policy serves as guidance to govern the use of support service dollars to provide food for program participants for the Hennepin-Carver Workforce Area per the requirement in [DEED's WIOA Youth Policy Chapter 11: Program Elements](#) and in accordance with [Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit](#)

[Requirements for Federal Awards \(2 CFR 200.40\).](#)

This policy amends the prior policy issued by Hennepin-Carver WDA, titled “Policy: Local Youth Support Services” effective 11/12/2025.

Hennepin-Carver subgrantees’ internal Support Service policies may vary based on special circumstances. Any deviation from the standards established by this Local Policy must be submitted in writing and approved by the appropriate staff at Hennepin County prior to the policy being implemented.

## Policy

An employment counselor must determine eligibility for support services when it is identified that a program participant requires additional assistance outside of career and training services in taking the necessary steps towards self-sufficiency. Eligibility and the need for support services must be documented in the Individual Employment Plan (IEP) or Individual Service Strategy (ISS) and signed by both the program participant & employment counselor prior to obligating support services.

Support Services are subject to the following conditions and must be documented in the participant record:

1. Employment counselors must coordinate with community resources to provide linkage to community services in the local area to ensure that any services that are available, are used before program funds. Program resources may not be used unless no other available resources can be secured and attempts to secure other available resources are documented in the case notes of the participant’s file.
2. If unable to obtain support services through other community resources providing such services, support services may only be provided when necessary to enable the individual to actively participate in career or training activities;
3. Delivery of support services must be documented in the participant case file/Workforce One (WF1) record. Copies of receipts or expenditure back-up documentation must also be maintained in the participant file.
4. Support service transactions must also be included in the Support Services tab and case notes (the support service type, amount, participant needs identified, and expenditure rationale described) in WF1.
5. Support services may be included in WIOA Youth follow-up services and must be coded as follow-up services post exit in WF1 when provided as such.
6. Support service payments should be made directly to the vendor (i.e. car repair shop, property owner, utility company, bookstore, clothing store, etc.). On rare occasions, participants may be reimbursed if the expense is clearly tied back to the participant and valid documentation (i.e. receipt, invoice, notice of payment due) is provided. It is best practice to encourage support service expenses to be pre-approved by service provider.
7. If there is uncertainty about whether a purchase can be made using support services funds, contact the Youth Program Manager with the Hennepin County Department of Workforce Development.
8. Support services are not an entitlement and may be offered at the discretion of the employment counselor and funding is subject to availability of funds and limited **up to** the following maximums per program year or to the discretion of the service provider(s) of the Hennepin-Carver WDA:

<b>Participants receiving Training and/or Work Experience services:</b>	\$2,000.00
<b>Participants NOT receiving Training and/or Work Experience services:</b>	\$1,500.00

Exceptions to these limits may be at the discretion of the service provider(s) of the Hennepin-Carver WDA on a case-by-case basis for participants who are most in need. To consider exceeding the limits, the participant’s specific exceptional needs and/or barriers must be identified in the IEP and case notes. Requests for exceptions must be submitted in writing by the employment counselor and are subject to review and approval by the supervisor of that agency. If, after supervisory review, there is any question about the provision of a particular request, the service provider will consult with the appropriate program staff at Hennepin County Workforce Development. If an exception to these limits is approved, it must be documented in the participant’s case notes.

DOL ETA has determined that support services that enable WIOA Youth participants to participate in training may count toward training expenditures. The chart below outlines support services that may be considered an allowable training cost.

<b>Allowable Support Services</b>	<b>*Allowable Training Cost?</b>	<b>Funding Limit Per Participant</b>
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Books, Fees, and Supplies for Post-Secondary Students	Y	<p>Funding limits are to the discretion of the service provider(s) of the Hennepin-Carver WDA based on availability of funding and determined on a case-by-case basis and must supply an internal policy that references funding limits for each category. The total funding limits by Program Year cannot exceed the amounts set forth this policy- the only exception is the case-by-case determination of a participant's exceptional need that has been clearly documented in the participant's WorkforceOne record, as described above.</p> <p>Hennepin County maintains the right to require service providers to pay back funds that are determined unallowable per the law and policies referenced above and/or due to the lack of justification for an amount that exceeds the established funding limits set in this policy or the service providers' internal policies.</p> <p>Bulk purchases of gift cards, cash cards, and/or gas cards (as support services) cannot be submitted for reimbursement requests at the time of purchase. Reimbursement requests must be made after the service (gift, cash or gas card) is provided to the individual participant.</p>
Child & Dependent Care	N	
Transportation	N	
Counseling – Personal, Financial & Legal	N	
Dental	N	
Drug & Alcohol Counseling	N	
Educational Testing	Y	
Employment and Training – Related Fees	Y	
Emergency Financial Assistance	N	
Emergency Health Insurance	N	
Health Care	N	
Housing or Rental Assistance	N	
Out-of-Area Job Search	N	
Professional Membership	Y	
Reasonable Accommodations for Individuals with Disabilities	Y	
Relocation	N	
Tools & Clothing	Y	
Financial Assistance for Computer Hardware and Related Technology	Y	<p>To qualify for financial assistance for computer hardware and related technology, a participant must meet the following requirements and the file must contain supporting documentation for the need:</p> <ol style="list-style-type: none"> <li>1) The participant must be enrolled in a training program that requires specific use of a computer/technology</li> <li>2) The computer/technology should be required to complete training or successfully participate in the participant's Work Experience.</li> <li>3) There must be specific supporting documentation that the use of particular technology is needed to complete the training or Work Experience Activity.</li> <li>4) Documentation should be from the school/training vendor or Employer/Site Supervisor evidencing the technology is required and how the student will use the technology</li> <li>5) There must be documentation that the participant does not own or have reasonable access to the technology required <ul style="list-style-type: none"> <li>• This can be documented in writing by the participant stating that they do not have access to the technology required to meet training or Work Experience requirements. <b>Not owning a computer is not sufficient basis alone as schools generally provide access to technology as well as libraries, CareerForce centers, etc.</b></li> </ul> </li> <li>6) Documentation should support evidence that the cost is the lowest, reasonable price that still meets the needs of the technology required (accessing refurbished technology is</li> </ol>

		<p>preferred if available).</p> <ol style="list-style-type: none"> <li>7) All documentation should be submitted to designated service provider and stored in the participant file.</li> <li>8) All computer/technology purchases must be submitted for agency supervisor review and approval prior to purchasing or obligation to purchase technology for the participant.</li> <li>9) All computer/technology purchases as support service expenses must meet the conditions outlined in this policy as well as requirements 5-8 above.</li> </ol> <p><b>Funding limit for computer hardware and related technology up to: \$750.00 per participant</b></p>
Food as a Support Service	N	<p>Training and Employment Guidance Letter 09-22 (TEGL 09-22) states that on a limited basis and in certain situations, food, at a reasonable cost, may be provided to WIOA Youth program participants as a supportive service. Food may be provided to WIOA youth participants when it will assist or enable the participant to participate in youth program activities and to reach their employment and training goals, thereby achieving the program's overall performance goals. To qualify as a support services, the following requirements must be met and documented in the participant case file:</p> <ol style="list-style-type: none"> <li>1) Program should provide food directly to youth during a program activity. Sign-in attendance sheets, agendas, timecards should document that the food was provided during a program activity.</li> <li>2) Support Service funds may not be used to purchase grocery or food gift cards or to provide food for any one other than the enrolled individual.</li> <li>3) Original receipts or invoices for the food purchase must be included in the participant file.</li> <li>4) Food may NOT be provided for celebrations, graduation ceremonies, or events. Food should only be provided to WIOA Youth participants to enable program participation.</li> <li>5) There must be documentation that the participant does not have reasonable access to the food necessary to participate in program activities. This may be self-attested by the participant.</li> </ol> <p>All documentation should be submitted to designated service provider and included in the participant's case file/Workforce One Record.</p> <p><b>Food may be provided as a supportive service when program services occur over a mealtime or when program services are of a duration greater than three (3) hours. Organizations should adhere to the following limits on expenditures per meal per participant:</b></p> <ul style="list-style-type: none"> <li>• <b>Breakfast \$10.00</b></li> <li>• <b>Lunch \$13.00</b></li> <li>• <b>Dinner \$19.00</b></li> </ul>

\* To establish whether a service can be covered by training funds, the file must contain documentation that indicates the equipment, materials, tools, additional fees and/or exams are a necessity and are required in order for an individual to successfully complete the training correlated with said items.

## Contact

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## Policy: Local Youth Incentives and Stipend Policy

Effective Date: XX/XX/XXX

Last Reviewed Date: 5/11/2026

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### Summary

The Workforce Innovation and Opportunity Act (WIOA) and Department of Employment and Economic Development (DEED) allows for payment of stipends and the provision of incentives to eligible Minnesota Youth Program (MYP), WIOA Youth, and Youth at Work participants. These services are intended to encourage and motivate participants to reach specific goals, earn competitive wages, and obtain positive outcomes outlined in their Individual Service Strategy (ISS).

Incentives and stipends are not intended as emergency assistance, but rather as a compliment to services provided and/or recognition of goal attainment outlined on the ISS. Participants in need of emergency assistance must be referred to appropriate resource/service providers.

### Relevant Laws, Rules, or Policies

2 CFR Part 200

20 CFR 681 Subpart C §681.640

TEGL 21-16

TEGL 19-16

TEGL 8-15

DEED's Office of Youth Development Policies

MN Statute 116L.561

MN Statute 116L.562

### Purpose

Local workforce areas must have written policies and procedures in place governing the use of incentives and stipends and must ensure that such payments follow federal regulations and state statutes. This policy provides guidance on the issuance of stipend and incentive payments for WIOA Youth, Minnesota Youth Program, and Youth at Work eligible participants.

### Background

As described in Section 129 of WIOA, local elements and requirements include utilizing the WIOA Title I Youth Program funds for:

- Activities leading to the attainment of secondary school diploma or its recognized equivalent, or a recognized postsecondary credential;
- Preparation for postsecondary educational and training opportunities;
- Strong linkages between academic instruction and occupational education that lead to the attainment of recognized postsecondary credentials;
- Preparation for unsubsidized employment opportunities, in appropriate cases; and
- Effective connections to employers, including small employers, in in-demand industry sectors and occupations of the local and regional labor markets

Stipend and Incentive payments made to participants are different from payments made as a support service. Support service payments may only be made when they are necessary to enable an individual to participate in program activities (refer to Hennepin-Carver Local Support Services Policy). Stipend and Incentive payments, on the other hand, are designed to be used as a way of recognizing achievement and rewarding participation in program activity. Incentive payments must be tied to the goals of the specific program and outlined in writing before the commencement of the program that may provide incentive payments.

When providing stipends and incentives, service providers must be mindful of the requirements of the State and Federal funding sources and requirements as well as other Board policies. This policy does not mandate that stipends and incentives are paid but only establishes guidelines, minimum requirements, and procedures to be followed should the service provider decide to provide stipends and/or incentives.

## Policy

### Incentives:

**Definition:** An incentive is a payment to an eligible program participant for the successful completion of expected outcomes in the participant's ISS and core program activities. The incentive must be linked to an achievement and must be tied to training and education, work readiness skills, and/or an occupational skill as identified in their ISS. Such achievements must be documented in the participant's file as the basis for an incentive payment.

Service providers of Hennepin-Carver workforce area may use WIOA Youth, MYP, and Youth at Work funds for incentive payments to youth to recognize achievement of program milestones directly tied to work experience, education, or training. Program milestones may 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
- showing improvements marked by testing

While incentive payments are allowable under WIOA Youth, MYP, and Youth at Work program policies, the Department of Labor does not allow incentive payments for activities such as recruitment, submitting eligibility documentation, or for just simply showing up for the program for WIOA participants. MYP and Youth at Work program policies do not prohibit or limit the use of funds for incentives for eligible youth participants. Incentives must be awarded following the parameters below:

- Incentives must be awarded equitably to eligible participants
- Incentives are awarded upon completion of activities that are tied to goals in each participant's ISS and service provider staff have the ability to determine when and if a participant receives incentives
- Incentives must be tracked in Workforce One (WF1) utilizing the Support Services section and a case note must be entered for each incentive awarded
- All incentives may be limited by program funding availability
- Typical incentives may include but are not limited to retail gift cards, gas cards
- Incentives may never be issued for entertainment establishments (i.e. movie or sporting event tickets, or gift cards to movie theaters or other venues whose sole purpose is entertainment); Cost Principles 2 CFR part 200

**Incentives are not to exceed \$300 in a 12-month calendar year for a program participant.** An exception to exceed this incentive limit can be considered under special circumstances to be determined by the service provider. The exception to exceed the \$300 limit must be documented in the participant's file via case notes.

Service providers of the Hennepin-Carver Workforce Development Area (WDA) have sole discretion of the amount payable for an incentive based on the achievement made while participating in programming. **Service providers of the Hennepin-Carver WDA must have a written internal policy that sets parameters and/or amounts for incentives and the types of achievements.** The types of

achievements made as well as the required file documentation can include, but are not limited to:

Type of Achievement	File Documentation
Completion of GED test (incentive can be offered for <b>each</b> test completed)	Copy of official document showing passed test
Attainment of Diploma	Copy of diploma or transcript
Measurable skills gain	Measurable skills gained related to ISS
Securing permanent employment (30 hours/week for 90+ days)	Employment information (wage, start date, hours) AND a copy of hire letter or pay stub
Credential earned (during program enrollment or up to one year after exit)	Copy of credential (degree, certificate, license, etc.)
Employment retention – 2 <sup>nd</sup> and 4 <sup>th</sup> quarter after exit	Copy of pay stub or letter from employer
Individualized incentives	Service providers may award an incentive that is tied to an educational or work experience goal that is outlined in the ISS that is tailored to the individual needs of the youth and approved by program staff (i.e. attainment of driver's permit/license).

**Stipends:**

Definition: A stipend is a fixed payment made to an eligible program participant during program enrollment to encourage participation in and completion of certain education or training activities. Stipends may be paid to participants for their successful participation in education, career services, or training services. Stipends may be paid based on actual hours of attendance and attendance must be documented in the participant's file as the basis for a stipend payment.

Service providers of Hennepin-Carver workforce area may use WIOA Youth, MYP, and Youth at Work funds for stipend payments to eligible participants from direct services funding and contracted service providers have authority to determine a participant's eligibility to receive stipends. Program participants can obtain stipends through work readiness, leadership and professional skills development, training, and online learning activities following the parameters below:

- Education or training must be approved and included in the participant's ISS
- Stipends may be paid based on actual hours of attendance; Participants must document participation time, hours must be verified by the training provider or program counselor, and verification must be maintained in the participant's file
- Attendance records and/or evidence of completion must be submitted prior to a stipend being awarded
- Online learning and classroom attendance is allowable if participation time can be verified, and appropriate documentation is provided
- Stipends must be tracked in WF1 utilizing the Support Services section and a case note must be entered for each stipend awarded

- Stipends may be paid weekly
- Stipends may not exceed the state's current hourly minimum wage

Stipends may be awarded for attendance or participation in:

- Short-term training programs (i.e., CNA, Computer Training)
- Work readiness training
- Completion of entrepreneurship training and developing a business plan
- Verifiable in-person workshops

Stipends are intended to encourage and motivate participants to reach goals and complete assignments as they relate to career exploration and learning skills needed for employment. Stipends are not an entitlement and are subject to availability of funds as well as contingent upon the individual's progress and follow-through. Stipends are considered taxable income to program participants and participants (and their parent/guardian) must be notified of Internal Revenue Services (IRS) implications.

*Stipends may not be provided to participants in paid activities including work experience, on-the-job training, and internships.* In emergency or unforeseen circumstances (i.e. health/medical, sudden change in stability or accessibility, called to active duty, institutionalized, other), partial payment of stipends may be made to participants that fail to complete a portion of their training/activity. The participant's case file must contain documentation (at a minimum, a case note) regarding the reason for failure to complete and the period of time or activities that were completed.

## Contact

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