5581POL Adult and DW Incentive Payments

Effective Date: November 17, 2023 Last Modified: October 5, 2023

To ensure Olympic Workforce Development Council (OWDC) policy compliance, this policy provides clarification and guidance of Workforce Innovation and Opportunity Act (WIOA) Title I-B Adult and Dislocated Worker funds for incentive payments.

- 1. Incentive payments to WIOA Title I Adult and Dislocated Worker participants are permitted for recognition and achievement directly tied to training and work experiences. Subrecipients must ensure the incentive payments are:
 - a. Awarded in recognition and achievement directly tied to training activities or work experiences;
 - b. Tied to participant goals expressly determined in the Individual Participant Plan;
 - c. Outlined in a written, local policy prior to the start date of training programs or work experiences that might provide incentive payments;
 - d. Aligned with other WIOA Title I program polices; and
 - e. Provided in accordance with the requirements and cost principles in 20 CFR part 200.
- 2. All incentive payments are contingent on fund availability.
- 3. Participants may receive up to \$500 in incentives per program year.
 - Recognized achievement or milestones of program training or work experience may include improvements marked by acquisition of a credential or other successful outcomes.
 - i. Successful Measurable Skills Gain \$50.
 - ii. Earned an industry-recognized credential \$100.
 - iii. Completed successful on-the-job training \$100.
 - iv. Completion of a Work Experience (WEX) \$100.
- 4. Internal controls must be established to safeguard any cash or other forms of payment used to award incentive payments, such as gift cards or gift certificates.
 - The following are <u>NOT</u> allowable milestones.
 - i. Recruitment purposes
 - ii. Returning eligibility documentation to the case manager.
 - The following are <u>NOT</u> allowable incentive payments methods.
 - i. Entertainment costs, such as:
 - 1. Movie or sporting event tickets
 - 2. Gift cards to movie theaters
 - 3. Other venues whose sole purpose is entertainment.
- 5. Total amount of incentive payments in any single program year may not exceed the total lineitem budget expenditure, if any, cited in the subrecipients contract. Exceptions to any incentive payment line-item budget expenditure in the subrecipient contract are not permitted.
- 6. Documentation and Data Entry Requirements.

- Full WIOA Registration a full WIOA Title I eligibility determination and enrollment in to a WIOA Title I program is required to receive an incentive payment.
- Justification Subrecipients must document the justification for each participant who receives an incentive payment. This justification must include:
 - i. The business case for the incentive payment's contribution to the participant's success, and
- Data entry requirements information regarding the incentive payment must be entered into the statewide case management system (i.e., ETO).
 - i. A case note documenting the incentive payment justification and details of the incentive provided must be entered into the system.
 - **ii.** Expenditure records of incentives payments must be uploaded to the corresponding service recorded in the system.
 - **iii.** Documentation of achievement prior to dispensing the incentive to participant. Documentation may include, but are not limited to
 - 1. Recognized Credential
 - 2. Quarter grade printout
 - 3. Pay Studs, timesheets, or supervisor letter of documented attendance.
 - iv. All documentation must be the final signed and dated forms, purchase orders, receipts, etc.
- 7. WIOA Title I Adult and Dislocated Worker incentive funds require OWDC Program Supervisor or Program Analyst approval prior to allocation of funds towards incentive payments. Therefore, Adult and Dislocated Worker Subrecipients are required to provide a completed <u>WIOA Incentive Payment Request</u> Cognito form or the PDF version available in attachments (5581ATT WIOA Incentive Payment Request Form).
 - Completed WIOA Incentive Payment Request forms need to be submitted to the OWDC.
 - The OWDC will notify subrecipients of approval or denial in writing.

References

Allowable Costs and Cost Principles, WIOA Final Regulations, 20 CRF 683.200(b)(2)

Are incentive payments to youth permitted? WIOA Final Regulations, 20 CRF 681.640.

Guidance on Services, Implementation of WIOA Final Rules, Training and Employment Guidance Letter, <u>TEGL 19-16</u> Incentive Payments to WIOA Title I Participants, <u>Worksource System Policy 5621 (Rev4)</u>

OWDC Case Note Policy, 5210POL

OWDC Records and Documentation Retention Policy, 1600POL

Participant Support Costs, OMB Uniform Guidance, 2 CFR 200.456

Youth Formula Program Guidance, Training and Employment Guidance Letter, TEGL 21-16, Change1.