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I. APPLICABILITY/SCOPE

This policy applies to staff and contractors delivering programs and services under the Workforce Innovative and Opportunity Act (WIOA) ARIZONA@WORK City of Phoenix Youth Workforce Program and the Strengthening Working Families Initiative (SWFI) federal grant.

II. PURPOSE

The purpose of this policy is to ensure that staff or contractors who provide direct services or oversee these services, to participants in ARIZONA@WORK City of Phoenix Youth Workforce Program and SWFI understand the requirements for providing incentives to participants in these programs. This policy is intended to ensure compliance with all state and federal regulations by providing guidance under the ARIZONA@WORK City of Phoenix.


III. BACKGROUND

Incentive awards can be provided to eligible participants enrolled in the WIOA Youth Workforce Program and SWFI under the following circumstances outlined below:

- a. **WIOA Youth Workforce Program:** An incentive is a benefit to an enrolled youth participant for successful participation and achievement of expected outcomes as identified in the participant’s Career and College Blueprint (CCB). The incentive must be linked to an achievement and must be related to a training and/or education activity that specifically addresses at least one of the fourteen required Youth Program Elements. Such achievements must be documented in the participants CCB as the basis for an incentive payment. Incentives may be paid to youth without pre-approval from the Department of Economic Security and are permitted for the purposes of recognition and/or achievements when directly related to training activities and work experience.
- a. **SWFI:** In accordance with the SWFI grant guidelines, from the United States Department of Labor, Employment and Training Administration, ARIZONA@WORK City of Phoenix may use up to 1.5 percent of grant funds for the provision of gift cards or other payments to participants for providing information on their employment status after they leave the program, for the purposes of reporting these employment and retention outcomes. All incentive payments must be tied to the goals of the grant. The use of grant funds for incentive payments other than to collect participant information on employment status after they leave the program is not allowed.

IV. POLICY

It is important to note that incentives are not an entitlement. All incentive awards will be subject to availability of funding under the approved WIOA or SWFI Program Budget and applied at the discretion of program staff. Incentives shall not be issued as actual direct cash payments to participants.

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Youth Workforce Program Incentive Policy:

A. Incentive Payment Criteria:

1. Upon successful completion of a work experience or upon receipt of a federally recognized credential by the participant;
2. When it is related to a training service that was provided prior to exit from the program;
3. For achievements during a work experience or training activities, including demonstration of soft skills, such as attendance/ punctuality and interpersonal relationships, obtainment of job skills, and specific task completion; and
4. When the participant obtains a federally recognized credential during participation or within one year of exit.
5. Incentives cannot be paid to maintain employment in the second and fourth quarter after exit.

B. Youth Incentive Tracking

1. All incentives must be justified and documented in the Arizona Job Connection (AJC) database by staff.
2. Staff must document the following in the AJC system case notes for each participant that receives an incentive(s):
 - a. The justification for contribution to the participant’s success as a result of the incentive payment; and
 - b. How the incentive payment was calculated
3. All incentives must comply with 2 CFR 200 (e.g., federal funds must not be spent on entertainment).
4. All staff must safeguard cash and other like items (e.g., gift cards) in accordance with internal controls as defined in WIOA Youth program policy.

C. Youth Incentive Amounts


WIOA youth participant can receive a maximum incentive of \$325 during a given program year:

1. Completion of Work Readiness - \$25.00
2. Completion of Occupational Skills Training - \$100.00
3. Credential /Certificate Attainment - \$100.00
4. Youth Placement/Follow-Up (employment, education, and training) -\$100.00

SWFI Incentive Policy:

A. Incentive Payment Criteria:

1. Participants are eligible to receive an incentive of \$25.00 per successful follow-up session for up to four quarters during 12 months of follow-up. A successful follow-up session is one in which the participant provides responses to the questions asked during a follow-up contact.
2. Incentives are in the form of gift cards/certificates and may not be redeemable for cash.

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3. Incentive awards are contingent upon available funding and the maximum amount a participant can receive for reporting employment and retention information is \$100.00.

B. Eligibility and Documentation Criteria:

1. All participants who have participated in training and have exited the SWFI program
2. Participant is required to provide documentation to support employment claims
3. The following documents are acceptable:
 - a. Check stub;
 - b. Letter of employment; or
 - c. Employment Verification Form completed by employer

C. SWFI Incentive Tracking

The following steps should be taken to provide an Employment and Retention Outcome incentive to a participant.

1. Program staff will fully complete and maintain, in the participant file, the original SWFI Incentive Tracking/Receipt Log and a copy of acceptable documentation, verifying that the participant has provided and supported the information.
2. Program staff and participant must sign the SWFI incentive Tracking Receipt Log. Program staff must also maintain in the participant file, the Disbursement Acknowledgement Form, with a copy of the gift card/certificate, signed by the participant as further verification of disbursement and receipt of each performance incentive.

VI. POLICY MANAGEMENT REQUIREMENTS

Administrative revisions to the policy may be made by the Phoenix Business and Workforce Development (PBWD) Board Executive Director, with notice to the PBWD Board’s Executive Leadership Committee. All other substantive revisions will go to the PBWD Board’s Executive Leadership Committee for review and recommendation to the PBWD Board for approval.

VII. ADDITIONAL OR MISCELLANEOUS INFORMATION

- SWFI FOA ETA 160-5 - <https://www.doleta.gov/grants/pdf/FOA-ETA-16-05.pdf>
- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR 200 - https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl