



## NextGen Program INCENTIVE POLICY (NGPP 04-02) ARWDB Approved: October 27, 2021

**DATE:** August 2021 (*Revised*)  
**TO:** ARC/ARWDB Staff & NextGen Service Providers  
**FROM:** Marsharee O'Connor, NextGen Program Director  
**SUBJECT:** **Guidance & Guidelines for Incentive Awards**

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### 2 – PURPOSE

To establish a policy providing guidance and guidelines in the provision of Title 1-B, WIOA sec. 129, Use of funds for Youth Activities, 20 CFR § 681.640, Youth Incentives. The policy serves to establish a process for awarding incentives to participants receiving WIOA services. Awarding of incentives acknowledges recognition and achievement of pre-determined milestones directly linked to education, training or WEx activity.

### 3 – POLICY

Incentives funded through WIOA must be connected to milestones achieved through a work-based learning (OJT, pre/apprenticeship, other WEx activities), education, or training activity that is reflected in the participant's individualized assessment and ISS/ISP/IEP. Achievement of milestones include improvements marked by testing, attainment of a credential, or other successful program outcomes. **Participants may earn incentive awards up to \$500 per participant, per program year.** Total incentives must not exceed the \$500 cap unless approved by ARC prior to issuance. Unlike supportive services, incentive awards for financial eligibility and determination of need **DOES NOT** need to be documented to provide incentive award to participants.

- ❖ The incentive award of up to \$500 will count towards the \$3,000 supportive services cap outlined in NGP Supportive Services Policy.

## 4 – PROVISIONS

Incentives may be made available to participants during enrollment in WIOA Title-I activities and/or after WIOA program exit (during the 12-months follow-up) period. The incentive awards must align with WIOA outcomes of remediation of basic skills, attainment of HSD/GED, gaining industry-recognized skills and credentials that will lead to in-demand, self-sustaining employment. Achievements obtained prior to WIOA enrollment do not qualify for incentives. Incentives are not intended for use as emergency assistance. See the NGP's "Supportive Services Policy" regarding emergency assistance.

## 5 – ELIGIBILITY

Participant must be active in the NGP or in 12-months follow-up activity. Incentives are awarded for recognition and achievement directly tied to training activities and work experiences provided it is made a part of the participant's ISS/ISP/IEP. Accordingly, the participant in collaboration with a Career Advisor, must develop an ISS/ISP/IEP delineating the training, employment and WEx goals. Awarding of incentives shall commence no earlier than participant's WIOA enrollment date and shall end upon completion of the 12-months follow-up period.

Incentives awards made to participants must comply with the following requirements:

- a) Tied to the goals of the specific program;
- b) Outlined in writing before the commencement of the program that may provide incentive awards;
- c) Aligned with the NGP and NGSP's organizational policies; and
- d) Issued in accordance with the requirements contained in the Cost Principles in 2 CFR Part 200 and 20 CFR § 681.640.

## 6 – DOCUMENTATION OF ELIGIBILITY & SERVICE DELIVERY

Incentive services data and document requirements for the WorkSource Georgia Portal (also known as VOS):

1. Documents to be uploaded – The Career Advisor must acquire verification documentation of attainment (copy of credential/test scores/grades, employer evaluations, attendance record, etc.) prior to issuance of the incentive award. The verification documentation must be uploaded to VOS.
2. Service Plan – Description of the achievement to qualify for specified incentive award must be documented in VOS under the Service Plan ISS/ISP/IEP.
3. Case-notes – Any other relevant information regarding progress, challenges, and successes.
4. Service Activity Code – The appropriate Incentives service activity code must be assigned:
  - 484 – Support Services – Incentives/Bonuses

## 7 – AWARD OPTIONS

Incentives may be awarded in the form of:

- Gift cards (not to exceed \$100 per card);
- Gas cards (not to exceed \$50 per card); and
- Gift certificates (not to exceed \$100 per certificate).

Cash incentives are **NOT** allowable.

## 8 – ALLOWABLE AWARD CRITERIA

There are two types of incentive expenditure classifications:

1. Career Services – Incentives awarded for participants in WEx and follow-up services.
2. Training Services – Incentives awarded for participants in training (e.g. ITA or GED).

The following are some, but not all, recognized criteria for incentive awards:

- a) **Credential Attainment** – Attainment of a secondary school diploma or equivalent (HSD/GED), recognized post-secondary credential, or occupational industry-recognized credential obtained during participation in the NGP or during the 12-month follow-up period;
- b) **Measurable Skills Gain** – Attainment of a skill gain as defined by USDOL for program reporting (Federal Performance Measure):
  - Achievement of at least one educational functioning level, if receiving instruction below postsecondary education level;
  - Attainment of secondary school diploma or equivalent (HSD/GED);
  - Secondary or postsecondary transcript for sufficient number of credit hours
    1. Secondary – Transcript or report card for one semester, or
    2. Postsecondary – At least 12 hours per semester or, for part-time students, a total of at least 12 hours over two completed consecutive semesters.
  - Satisfactory progress report toward established skill-based milestone from an employer or training provider;
  - Passage of an exam required for an occupation or progress attaining technical/occupational skills as evidenced by trade-related benchmarks.
- c) **WEx** – Successful completion of WEx activities.
  - ❖ According to TEGL 21-16, incentives awarded for WEx MAY BE counted toward the WEx expenditures pending it is directly tied to the completion of WEx;
- d) **Placement in Education (post-secondary/Advanced Training) or Unsubsidized Employment (including Military)** – Attainment of full-time employment in the participant's selected occupation/industry or placement in post-secondary or advanced education as reflected in the ISS/ISP/IEP.
- e) **Retention** – Employment retention in the same occupation/industry during the second and fourth quarters during the 12-months follow-up period.

❖ **Participants CANNOT receive multiple incentives for the same activity.**

## **9 – UNALLOWABLE AWARDS**

According to TEGL 21-16, all incentive awards paid with WIOA funds must be in compliance with outlined Uniform Guidance (Cost Principles) under 2 CFR Part 200. The following are unallowable uses of WIOA funds for incentive awards:

1. Entertainment costs such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment;
2. Recruitment or referrals;
3. Rewards for submitting eligibility documentation or for completing the eligibility certification process;
4. Possession of a credential (diploma or certificate) attained prior to WIOA enrollment; and
5. Regular attendance or participation in the NGP where award is to sustain the participant's ongoing attendance or participation.

### **Use of non-WIOA funds as incentives:**

- TEGL 21-16 permits the leveraging of private funds for incentives that WIOA cannot fund. NGSP "must adhere to and maintain documentation in accordance to 2 CFR Part 200 Cost Principles and other related federal and state regulatory requirements when leveraging such funds, which are subject to federal and state monitoring review."

## **10 – INTERNAL CONTROL & COMPLIANCE**

NGSP must establish a clear and concise written policy that outlines the uniform and consistent procedures for awarding incentives. At a minimum the policy must include the following:

- a) The method and justification for the issuance of incentives. Also, the policy must provide the types of incentive awards being offered (i.e., what activity/service/program the participant is participating in and how success is measured), and the amount of the incentive awards for each activity/service/program successful outcome.
  - Incentives must be administered in a manner that ensures all participants receive equal awards for equal achievements.
- b) Method by which gift cards, gas cards and gift certificates for incentives are purchased.
- c) Method by which gift cards, gas cards and gift certificates for incentives are stored.
- d) Adequate systems of internal control to accurately and timely track (purchase and issuance) and report all incentive awards. The system for tracking must include signatory compliance, tracking document to include issuance date, etc. Also, a minimum of three individuals must sign off to indicate that an incentive has been awarded:
  1. Career Advisor – The individual who is accountable for case managing the participant.
  2. NGSP Director – The individual who is responsible for the program's budget.

3. Participant – The WIOA enrolled individual who is receiving the incentive award.
- ❖ For letters “c” and “d” above, must ensure safeguard of items (gift cards, gas cards and gift certificates) purchased.
  - ❖ **If items are purchased in bulk, NSGPs will ONLY be reimbursed for the purchase cost of items issued to participants.**

e) Assurances of compliance and alignment with NGP Incentive Policy.

## 11 – DEFINITIONS

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|---|---|
| <ul style="list-style-type: none"> <li>▪ <b>ARC</b> – Atlanta Regional Commission</li> <li>▪ <b>ARWDB</b> – Atlanta Regional Workforce Development Board</li> <li>▪ <b>CFR</b> - Code of Federal Regulations</li> <li>▪ <b>HSD/GED</b> – High School Diploma/ General Education Diploma</li> <li>▪ <b>ISS/ISP/IEP</b> – Individual Service Strategy/ Individual Service Plan/ Individual Employment Plan</li> <li>▪ <b>ITA</b> – Individual Training Account</li> <li>▪ <b>NGP</b> – NextGen Program</li> <li>▪ <b>NGPP</b> – NextGen Program Policy</li> <li>▪ <b>NGSP</b> – NextGen Service Provider</li> <li>▪ <b>OJT</b> – On-the-Job Training</li> </ul> | <ul style="list-style-type: none"> <li>▪ <b>Sec./ §</b> – Section</li> <li>▪ <b>TCSG/OWD</b> – Technical College System of Georgia, Office of Workforce Development</li> <li>▪ <b>TEGL</b> – Training and Employment Guidance Letter</li> <li>▪ <b>USDOL</b> – United States Department of Labor</li> <li>▪ <b>VOS</b> – Virtual OneStop System (WorkSource Georgia Portal)</li> <li>▪ <b>WEx</b> – Work Experience</li> <li>▪ <b>WIG PS</b> – Workforce Implementation Guidance Programmatic Services</li> <li>▪ <b>WIOA</b> – Workforce Innovation and Opportunity Act</li> </ul> |
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## 12 – ATTACHMENTS

There is no attachment.

## 13 – ACTION REQUIRED

ARC/ARWDB NGP shall:

- Take the necessary action(s) to ensure compliance with this Policy.
- Ensure that the NGSPs are informed, trained, and provided a copy of this Policy.

## 14 – INQUIRIES

Inquiries regarding this Policy and its guidance should be directed to an ARC/ARWDB NGP staff.

## 15 – POLICY EFFECTIVE DATE

This policy shall be effective upon the ARWDB approval date indicated on the first page of this document, and shall remain in effect until further notice.

## 16 – REFERENCES

- **Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.640**
- **NGPP – *Supportive Services Policy 03***
- **State Workforce (TCSG) – *Policies and Procedures Manual 02/18/21***
- **TEGL No. – 21-16**
- **Uniform Guidance – 2 CFR Part 200**
- **WIGS PS – 17-001**
- **WIOA Public Law Sec. – 129**