

# PARTNER WORK

## YOUNG ADULT REENTRY INCENTIVE POLICY

### Purpose

The Young Adult Reentry Project (YARP) aims to connect Allegheny County/Pittsburgh young adults aged 18-24 who have been incarcerated or served in alternative sentencing programs to a holistic reentry program that provides case management, mentoring, supportive services, connections to employment and training, GED and credit recovery programs, and other needed support to obtain quality employment.

The purpose of this policy is to articulate how incentive payments may be provided to participants in the Pennsylvania Department of Labor & Industry - funded program in Allegheny County and the City of Pittsburgh.

### Affected Parties

This policy applies to all YARP participants. YARP program staff are responsible for implementing this policy.

### References

- 20 CFR 681.650
- 2 CFR 200

### Definition of Key Terms

**Incentives:** Incentive payments are awarded to participants in recognition of a measurable achievement directly tied to training activities or work experiences. Incentive payments differ from stipends, as they must be awarded in response to a specific outcome achieved (e.g. credential attainment, job placement, placement in post-secondary education) rather than time of program participation/attendance.

### Eligibility Requirements

The following are the eligibility requirements for youth incentives:

- Participants must be eligible to participate in the YARP program.
- Participants must be active and in good standing with the YARP program.
- Participants must have achieved an outcome directly connected to a goal within their Council of Thought and Action (COTA) plan.

### Policy

Each Partner4Work-funded program that utilizes incentive payments must maintain a clear and concise written incentive policy that outlines a uniform and consistent strategy for awarding incentives with YARP funds.

At a minimum, the provider's incentive policy must include:

- The method and justification for the issuance of incentives;

- The method by which gift cards for incentives are purchased (e.g. with a purchasing card), if applicable;
- The method by which gift cards for incentives are stored, if applicable; and
- The internal controls for incentive awards (e.g. number of signatures required).

Programs may not award direct cash payments to participants as part of an incentive strategy. A cap of **\$100** in value per instance (e.g. obtainment of a GED, placement in employment, retention of a job for 90 days) is required. Participants cannot receive multiple incentives for the same achievement. Incentives may not include entertainment costs, such as movie or event tickets or gift cards to movie theaters.

Incentive payments may only be awarded in recognition of an achievement directly tied to training and work experience and must be tied to the goals of the program. Incentives must be administered in a manner that ensures all participants receive equal awards for equal achievements.

At least three individuals must sign off to indicate that an incentive has been awarded: two staff members of the YARP provider and the participant receiving the incentive. The provider's written incentive policy must clearly describe this process.

All incentives are taxable at the full amount of the award and subject to withholding in accordance with Internal Revenue Service (IRS) regulations. It is the responsibility of the service provider to maintain required documentation detailing the distribution and management of awards.

Providers may not have more gift cards on hand than enrolled participants at any given time (i.e. if a program has 25 enrolled participants, no more than 25 gift cards can be on hand at once. If a program has 100 enrolled participants, no more than 100 gift cards can be on hand at a time). Partner4Work encourages providers to limit the number of gift cards stored on site when possible. Providers should maintain a consistent method for purchasing gift cards where possible (e.g. purchasing card or company credit card).

### **Policy Exceptions:**

Under limited circumstances, Partner4Work may grant exceptions to requirements within this policy. Requests for exceptions may be submitted to [policy@partner4work.org](mailto:policy@partner4work.org). Requests must be made using the Policy Exception Form available at [www.partner4work.org](http://www.partner4work.org).

Exception requests will be reviewed based on their allowability under any applicable legislation, regulation, and policy. Partner4Work will also consider funding availability, how an exception will lead to improved outcomes for the customer(s) being served, and other relevant factors.

**Effective Date:** December 15, 2023