**PATHWAY HOME INCENTIVE POLICY**

**Purpose**

The Pathway Home program aims to assist returning citizens in the reintegration process and reduce recidivism through pre- and post-release services in occupational training, career-specific work readiness activities, and meaningful employment opportunities by utilizing the public workforce system’s extensive employer networks to cultivate direct employer connections. By implementing these strategies in tandem comprehensive case management and supportive services, this program intends to provide industry-recognized credentials and successful employment placement in order to lower recidivism rates for justice-involved participants across Allegheny County.

The purpose of this policy is to articulate how incentive payments may be provided to participants in the US Department of Labor Pathway Home program in Allegheny County.

**Affected Parties**

This policy applies to all Pathway Home participants. Pathway Home staff are responsible for implementing this policy.

**References**

* 20 CFR 681.650
* 2 CFR 200
* Pathway Home - FOA-ETA-20-02
* Midwest Urban Strategies - Partner Handbook (DOL Pathway Home PE-35039-20-60-A-55 program)

**Definition of Key Terms**

“Incentive payments” are payments awarded to participants in recognition of achievement directly tied to training activities and work experiences.

**Eligibility Requirements**

The following are the eligibility requirements for youth incentives:

* Participants must be eligible to participate in the Pathway Home program.
* Participants must be active and in good standing with the Pathway Home program.
* Participants must have achieved an outcome directly connected to a goal within their Individual Employment Plan.

**Policy**

Each Pathway Home 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 Pathway Home 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 theatres.

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 Pathway Home 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 [kkadisevskis@partner4work.org](mailto:kkadisevskis@partner4work.org) (Special Projects Director). Requests should include the following:

* The specific policy requirement for which an exception is being requested;
* A clear summary of the exception being requested and the reason for the exception; and
* The full name of the participant(s) for which an exception is being requested; or
* The name and FEIN of the business customer for which an exception is being requested.

Exception requests will be reviewed based on their allowability under the USDOL Pathway Home program and any other applicable legislation, regulation, and policy/guidance. 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:**