



## **American Rescue Plan Act (ARPA) INCENTIVE PAYMENTS POLICY**

---

**Policy Number:** 2230

**Effective Date:** 2/1/2024

---

### **A. PURPOSE**

To provide clarification and guidance on incentive payments for Workforce Snohomish programs related to ARPA funding.

### **B. BACKGROUND**

Workforce Snohomish has no policy to support Incentive Payments for ARPA specific activities. This policy is meant to provide guidance to staff and managers at Workforce Snohomish to understand requirements specific to Incentive Policies.

### **C. POLICY**

1. All participants must be enrolled in the ARPA Data Analytics training program to receive incentives.
2. Incentives must be used for those who have newly entered employment subsidized or unsubsidized.
3. All incentives must be compliant with this local policy, and 2 CFR part 200 (e.g., federal funds must not be spent on entertainment costs, such as movie or sporting event tickets, gift cards to movie theaters, or other venues whose sole purpose is entertainment).
4. Providers must also internally maintain appropriate and identifiable expenditure records of incentive payments for the purposes of local, state, and federal monitoring/audits.
5. Provider agencies must safeguard cash and other similar items (e.g., gift cards) with internal controls.
6. Workforce Snohomish will limit the total amount of incentives payments an enrolled program participant may receive in a program year (July 1 through June 30) to \$5,000.
7. Providers must document (case note) the following in the case management system for each participant that receives an incentive payment(s):
  - a. The employment milestone they achieved.

### **C. DOCUMENTATION FOR STIPENDS**

1. Completed W9 form (only with the first incentive)
2. Case note documenting each Incentive, and the amount received

### **References:**

- OMB Uniform Guidance, 2 CFR 200.456 – Participant Support Costs
- OMB Uniform Guidance, 2 CFR 200.75 – Participant Support Costs



- OMB Uniform Guidance, 2 CFR 200.407(t) – Prior Written Approval
- Title 31 CFR Part 35 – Pandemic Relief Programs