CareerSource SOUTH FLORIDA

BOARD POLICY

POLICY NUMBER POL 100-26

Title:	**Career Advancement Program (CAP) Incentive Policy**		
Effective:	October 29, 2026	**Revised:**	TBD
Supersedes:	N/A	**Version:**	01

I. OF INTEREST TO

This policy is applicable to CareerSource South Florida (CSSF) American Job Centers (AJC), partners and service providers

II. PURPOSE AND SCOPE

This policy establishes the governing requirements for providing incentives to eligible Career Advancement Program (CAP) participants. Incentives are intended to promote meaningful engagement, recognize participant achievement, reduce barriers to participation, reinforce measurable outcomes, and support the transition from public assistance to employment and economic self-sufficiency.

III. BACKGROUND

The Career Advancement Program introduces participant incentives to encourage consistent participation, improve engagement, recognize participant achievements, and support successful completion of employment and training activities. The incentive framework is designed to reduce participation barriers and contribute to positive workforce and self-sufficiency outcomes.

IV. STATUTORY AUTHORITIES

CAP incentives shall be administered in accordance with applicable federal and state laws, rules, funding requirements, and approved CareerSource South Florida guidance.

Approved By: Rick Beasley, Executive Director	

(a) FEDERAL AUTHORITY

Citation	Subject
Social Security Act, Title IV-A (Temporary Assistance for Needy Families), 42 U.S.C. § 601 et seq.	Establishes TANF and its four statutory purposes, including promoting job preparation, work, and reduced dependence on government benefits — the purpose category under which participant work incentives are generally administered.
Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. No. 104-193, as amended	Establishes TANF as a state block-grant program, referenced in Fla. Stat. § 445.004(5)(b)6. as the federal basis for welfare transition services.
45 CFR Parts 260-265	General TANF program regulations, including work-activity and participation-rate requirements at 45 CFR Part 261.
2 CFR § 200.334	Federal record-retention floor of three years from submission of the final expenditure report for records supporting federal award expenditures, including TANF-funded incentive payments; CSSF's five-year retention standard (Section IX below) exceeds this floor.
Workforce Innovation and Opportunity Act (WIOA), Pub. L. 113-128 (29 U.S.C. § 3101 et seq.)	Federal workforce development statute; governs WIOA Title I Adult and Dislocated Worker program funds proposed to be blended with TANF funds for CAP incentive payments under this policy.
WIOA sec. 134(d)(2); 20 CFR § 680.900	Defines WIOA supportive services as services necessary to enable an individual to participate in career or training services, available only when the service cannot be obtained through another program — a narrower authority than TANF's incentive-payment structure.
WIOA sec. 134(d)(3); 20 CFR §§ 680.930–680.970	Defines needs-related payments, a category of WIOA supportive services limited to participants enrolled in training under WIOA sec. 134(c)(3) who are unemployed and ineligible for (or have exhausted) unemployment compensation. Does not on its face authorize a general milestone-based incentive.
2 CFR § 200.405	Allocable costs standard: a cost charged to a federal award must be assignable to that award in accordance with relative benefits received. Governs the cost-allocation methodology required whenever a single CAP incentive is charged to blended TANF and WIOA funds (see new "Funding Source and Cost Allocation" subsection below).

Citation	Subject
45 CFR §§ 261.10–261.16	Individual work requirements, the Individual Responsibility Plan (IRP), and the penalties for failing to follow it — the federal basis for the participant-level compliance checks in this policy.
45 CFR §§ 261.30–261.31	Defines the countable work activities and the hours of participation that determine whether a family counts toward the State's TANF work participation rate (WPR).
45 CFR §§ 261.60–261.65 (Subpart F)	Requires the State to maintain an approved Work Verification Plan and internal controls ensuring the accuracy of work-participation data reported on the TANF Data Report. CAP incentive records must support, not conflict with, this data.
WIOA sec. 116; 20 CFR Part 677	Establishes the WIOA performance accountability system and its six primary indicators (e.g., employment and median earnings in the 2nd/4th quarter after exit, credential attainment). CAP incentive timing and data entry for co-enrolled participants must not distort these measurements.

(b) STATE AUTHORITY

Citation	Subject
Florida Statutes Chapter 445 (Workforce Innovation and Opportunity Act; Welfare Transition Program)	Florida's Welfare Transition Program and CareerSource Florida/local workforce development board administration of TANF-funded welfare transition services.
Fla. Stat. § 445.004	Defines welfare transition services funded by TANF and designates CareerSource Florida's role providing policy direction for TANF-funded activities.
Fla. Stat. § 445.024	Governs Welfare Transition Program work requirements and participant standards and authorizes performance-based incentive payment structures in program contracting.
Fla. Stat. § 445.028	Requires transitional benefits and services, including case-manager contact and information, for families leaving temporary cash assistance.

Citation	Subject
Fla. Stat. § 445.0281 (created by Ch. 2024-240, Laws of Florida)	Establishes transitional case management services — including career planning, job search assistance, résumé building, basic financial planning, and benefits management using a tool that demonstrates the future financial impacts of changes in income and benefits (CSSF designates the Career Ladder Identifier and Financial Forecaster (CLIFF) Navigator for this purpose) for families leaving temporary cash assistance.
Fla. Stat. § 445.035	Requires standardized intake and exit surveys to track participant barriers and program effectiveness.
Fla. Stat. § 414.065	Govern penalties for noncompliance with Temporary Cash Assistance (TCA) work requirements: a minimum 10-day (or until compliance) termination for a first occurrence, a 1-month (or until compliance) termination for a second occurrence, and a 3-month (or until compliance) termination for a third occurrence, with six months of continuous compliance resetting the penalty count. This is the statutory basis for this policy's sanctioned-participant limitation (Section VIII).
House Bill 1267 (2024 Regular Session), Ch. 2024-240, Laws of Florida, "Economic Self-Sufficiency," approved June 13, 2024, effective July 1, 2024,	Amended Fla. Stat. §§ 414.065, 414.105, 414.455, 445.009, 445.011, 445.017, 445.024, 445.028, and 445.035, and created §§ 445.0281 and 1002.935 — including the benefits-management tool requirement of transitional case management referenced in this policy. This resolves the source policy's placeholder reference to "House Bill 1267."
CSF Policy 109 — Supportive Services and Needs-Related Payments (CareerSource Florida Board of Directors, rev. 02/23/2021)	States expressly that supportive services must not be used as incentive payments and that WIOA incentive payments are allowable for youth participants only. This is the controlling state-policy basis for excluding all CAP milestones from WIOA Adult/DW funding (see Table 2).
CSF Policy 37 — Work Requirement Penalties and Pre-Penalty Counseling (rev. 10/07/2024)	Governs the sanction/penalty process referenced in this policy's Limitations section and requires staff, when a participant reports obtaining employment, to counsel the participant on both transitional benefits and the Cash Assistance Severance Benefit (CSF Policy 24) in the same conversation.

Citation	Subject
CSF Policy F50 — Cost Allocation Plans for Regional Workforce Boards (approved 07/27/2005)	Requires CSSF to maintain an approved Cost Allocation Plan on file with Florida Commerce and confirms that a cost allocable to one funding source may not be shifted to another to avoid restrictions — consistent with 2 CFR § 200.405. CAP's cost-allocation methodology must be reflected in that existing plan, not developed as a freestanding determination.
CSF Policy O115 — Common Exit (approved 06/09/2021)	Defines the WIOA/Wagner-Peyser/TAA common-exit mechanic (a system-generated, retroactive determination after 90 days without a participating service) and confirms this framework does not apply to TANF/Welfare Transition, which follows its own closure process. Governs the WIOA Performance Compliance checks in this policy.

(c) DEFINITIONS

Term	Definition
CAP	Career Advancement Program
CSSF	CareerSource South Florida
CLIFF	Career Ladder Identifier and Financial Forecaster — the financial-planning and benefits-cliff forecasting tool that CSSF designates to satisfy the benefits-management tool requirement of Fla. Stat. § 445.0281, created by House Bill 1267 (2024).
IRP	Individual Responsibility Plan
OSST	One-Stop Service Tracking System
TANF	Temporary Assistance for Needy Families
WFMS	Workforce Management System
CAP	Career Advancement Program
WIOA	Workforce Innovation and Opportunity Act
ITA	Individual Training Account
NRP	Needs-Related Payment — a WIOA supportive service under WIOA sec. 134(d)(3) and 20 CFR §§ 680.930–680.970; not a CAP incentive
MSG	Measurable Skill Gain — a WIOA primary indicator of performance under WIOA sec. 116 and 20 CFR § 677.155(a)(1)(v)

Term	Definition
Full-Time Employment	Employment averaging at least 30 hours per week across all of the participant's qualifying jobs during the retention period.
Part-Time Employment	Employment averaging at least 20 but fewer than 30 hours per week across all of the participant's qualifying jobs during the retention period.
Participation Episode	A continuous period of CAP enrollment from Program Activation until CAP case closure. Re-enrollment after case closure begins a new participation episode.
Program Year	The WIOA program year, July 1 through June 30.

V. POLICY

General Requirements

CSSF may provide approved incentives to eligible CAP participants who complete verified program milestones. Incentives shall be administered consistently, equitably, subject to funding availability, and in accordance with applicable CAP / Welfare Transition, TANF, fiscal, monitoring, and records requirements.

No incentive shall be authorized or issued unless eligibility and milestone completion have been verified, required approvals have been obtained, and supporting documentation has been retained.

Effective Date and Classification Condition. No CAP incentive category shall be implemented or issued until CSSF has obtained and retained written guidance from FloridaCommerce or appropriate state program counsel identifying whether the category constitutes TANF assistance or non-assistance under 45 CFR § 260.31. The written determination must address the treatment of the payments under the participant's 48-month TANF time limit, TANF data-reporting, child-support, eligibility, and fiscal-treatment requirements, and the treatment of incentive payments as income for other benefits in coordination with the Department of Children and Families. Any category determined to constitute assistance shall remain suspended until corresponding procedures, participant notices, system controls, and reporting requirements are approved.

Funding Source and Cost Allocation

CAP incentives shall be charged to TANF (Welfare Transition) funds, except in the narrow WIOA Youth case described in the "Note" to Table 2. WIOA Title I Adult and Dislocated Worker funds may not be charged for CAP incentives, but may fund WIOA services for co-enrolled participants, including supportive services and needs-related payments as provided in the "WIOA Needs-Related Payments for Co-Enrolled CAP Participants" subsection below. Program staff must determine and document, on a milestone-by-milestone and participant-by-participant basis, the funding source charged for each incentive payment (TANF or, in the narrow Youth case, the qualifying WIOA Youth authority) before it is authorized.

Shared allowable service costs between TANF and WIOA, such as the braided activities identified in Table 1, may be allocated under CSSF's approved Cost Allocation Plan on file with Florida Commerce (CSF Policy F50) using a documented methodology consistent with 2 CFR § 200.405, in proportion to the relative benefit each funding stream receives. The methodology and the basis for each allocation must be retained and available for audit. This allocation does not apply to CAP incentive payments, which are not allocated between TANF and WIOA funds and may not be paid from more than one funding source for the same occurrence.

CAP incentive milestones are paid from TANF funds only. WIOA career, training, and supportive services, including needs-related payments, follow their own requirements under WIOA sec. 134 and 20 CFR Part 680 and are not CAP incentives. CSF Policy 109 (Supportive Services and Needs-Related Payments) states expressly that supportive services must not be used as incentive payments and that WIOA incentive payments are allowable for youth participants only. Accordingly, none of the milestones in Table 2 below may be charged to WIOA Adult or Dislocated Worker funds. Any WIOA Youth incentive requires its own qualifying authority (20 CFR § 681.640) and a documented participant-specific determination retained in the policy file, and is outside the scope of the Table 2 milestones.

Table 1 — Activities Covered by TANF and WIOA Funding

Activity	TANF	WIOA	Basis for Allocation
Eligibility determination / redetermination (CAP, TCA, WIOA Adult/DW)	Yes	Yes	Each program determines its own eligibility independently; not a shared or allocable cost.
Basic career services (labor market information, initial job search resources)	Yes	Yes	Braided; allocate per 2 CFR § 200.405 based on relative benefit to each program.
Job search and job readiness workshops	Yes	Yes	Braided; a single workshop may satisfy both the TANF work-activity requirement (Fla. Stat. § 445.024(1)(g)) and the WIOA career service (WIOA sec. 134(c)(2)) simultaneously.
Work experience / subsidized employment placement	Yes	Yes	Braided; allocate by the funding source of the participant's placement slot or wage subsidy.
Employer engagement / job development (Business Services function)	Yes	Yes	Braided; typically, a shared Business Services function — allocate by staff time or relative caseload benefit.
Supportive services (transportation, childcare)	Yes	Yes	Braided under Fla. Stat. § 445.025 and WIOA sec. 134(d)(2); allocate by which program's activity the support enables. The same expense may not be billed to both sources.
Individual Responsibility Plan (IRP) development and TANF work-activity hour verification	Yes	No	Core TANF program-administration function (Fla. Stat. § 445.024); not allocable to WIOA.

Activity	TANF	WIOA	Basis for Allocation
Sanction determination and penalty-period administration	Yes	No	Core TANF compliance function under Fla. Stat. § 414.065; not a WIOA-authorized activity.
TANF intake/exit survey administration	Yes	No	TANF-specific statutory requirement (Fla. Stat. § 445.035); not allocable to WIOA.
Transitional case management after TCA exit	Yes	No	TANF-specific statutory authority (Fla. Stat. § 445.0281); WIOA has no equivalent post-exit case management authority.
Individual Employment Plan (IEP) development	No	Yes	WIOA-specific case-management document; not a TANF requirement.
Occupational skills training funded through an Individual Training Account (ITA)	No	Yes	WIOA-specific funding mechanism (WIOA sec. 134(c)(3)); TANF may separately fund training under its own authority, but not through an ITA.
Needs-related payments	No	Yes	WIOA-only; limited to participants enrolled in WIOA training and meeting unemployment/UI-eligibility criteria (WIOA sec. 134(d)(3); 20 CFR §§ 680.930–680.970). For co-enrolled CAP participants, needs-related payments are provided only as set out in the "WIOA Needs-Related Payments for Co-Enrolled CAP Participants" subsection; a needs-related payment is not a CAP incentive.
On-the-Job Training (OJT) employer wage reimbursement	Yes	Yes	Braided; OJT is a TANF work activity under Fla. Stat. § 445.024(1)(d) as well as a WIOA training service (WIOA sec. 134(c)(3)(C)), subject to applicable state requirements. Allocate by the funding source of the OJT agreement; the same wage reimbursement may not be billed to both sources.
WIOA performance follow-up (2nd/4th-quarter employment, credential attainment, median earnings)	No	Yes	WIOA sec. 116 performance-reporting function; not a TANF requirement.
CAP participant incentive payments	Yes	No	TANF-funded only; see Table 2 and the Effective Date and Classification Condition.

Table 2 — CAP Incentive Milestones by Funding Source

Milestone	Incentive Amount	TANF	WIOA	Basis / Note
Program Activation and First Verified Activity	$75	Yes	No	Paid once per participation episode when orientation, the required assessment, barrier screening, and an executed or updated IRP are complete, the first assigned countable activity has started, at least one week of verified participation is recorded, and required OSST entries are complete. TANF-funded only; not an independently authorized WIOA career, training, or supportive service.
Job Search & Job Readiness	$50	Yes	No	The bonus itself does not meet the WIOA supportive-services (sec. 134(d)(2)) or needs-related-payment (sec. 134(d)(3)) definitions; the underlying workshop, not the incentive, is the allocable WIOA activity (see Table 1).
Employer Engagement	$50	Yes	No	Same rationale as above.
Training Enrollment	$100	Yes	No	Paid once per approved training program upon documented enrollment and verified attendance through the first 14 calendar days. TANF-funded only; the training itself may be WIOA- or TANF-funded, but the incentive is not an allowable WIOA Adult/DW cost (CSF Policy 109).
Measurable Skill Gain (MSG)	$75 per MSG	Yes	No	Paid per verified MSG, max. 2 per participant per program year. Documented MSG under 20 CFR § 677.155(a)(1)(v) (educational functioning level gain, transcript or report card showing satisfactory progress, training milestone, or passed technical/occupational exam). TANF-funded only; it may not be paid twice for the same documented gain.
Credential Attainment	$150 per credential ($200 for a targeted occupation)	Yes	No	Paid once per credential, max. 2 per participant per program year. Recognized postsecondary or industry-recognized credential under 20 CFR § 677.155(a)(1)(iv), verified by issuer documentation. TANF-funded only. The higher amount applies to a credential for a targeted occupation, as defined in Milestone Definitions and Measurement Rules.

Milestone	Incentive Amount	TANF	WIOA	Basis / Note
Employment Achievement	$50	Yes	No	Participants are eligible for this incentive upon obtaining unsubsidized employment, either full-time or part-time, provided that the part-time employment results in case closure due to income. Once per program year.

Milestone	Incentive Amount	TANF	WIOA	Basis / Note
Training-Related Employment	$100 ($150 for a targeted occupation)	Yes	No	One-time payment, in addition to Employment Achievement, for unsubsidized employment in an occupation related to the completed training or credential, verified within 180 days of training completion or credential attainment. Does not replace or reduce the Employment Achievement or retention incentives. TANF-funded only. The higher amount applies to employment in a targeted occupation, as defined in Milestone Definitions and Measurement Rules.
Participation Requirement (First Month of Activity Enrollment)	$75	Yes	No	Directly tied to the TANF work-participation requirement (45 CFR Part 261); not WIOA use of funds. Once per participation episode, and not more than twice per participant per program year.
Sustained Participation (Second Month of Activity Enrollment)	$50	Yes	No	Paid when the countable work-activity hours required by the participant's IRP are verified in OSST for the second month of enrollment (45 CFR §§ 261.30–261.31). TANF-funded only. Not payable if the participant is sanctioned, or is deferred without an approved alternate requirement plan, at issuance. Not issued until the Effective Date and Classification Condition is satisfied. Once per participation episode, and not more than twice per participant per program year.
Sustained Participation (Third Month of Activity Enrollment)	$50	Yes	No	Same conditions as the second-month milestone, for the third month of enrollment. After the third month, continued participation is rewarded only through the Sustained Participation (Months 4 through 12) milestone; all other later payments are outcome-based. Once per participation episode, and not more than twice per participant per program year.

Milestone	Incentive Amount	TANF	WIOA	Basis / Note
Sustained Participation (Months 4 through 12 of Activity Enrollment)	$25 per month	Yes	No	Paid for each of months 4 through 12 of enrollment in which the countable work-activity hours required by the participant's IRP are verified in OSST (45 CFR §§ 261.30–261.31), up to nine payments ($225) per participation episode. A month that is not compliant is not paid but does not end eligibility for later months. Excused absences and approved alternate requirement plans count as provided in Milestone Definitions and Measurement Rules. Not payable if the participant is sanctioned, or is deferred without an approved alternate requirement plan, at issuance. TANF-funded only. Not issued until the Effective Date and Classification Condition is satisfied, and subject to the Incentive Checks and Balances subsection.
Re-Engagement After Penalty Period	$50 ($25 at return / $25 at completion)	Yes	No	Paid in two installments, once per participant per program year (unless the Executive Director approves an exception in writing). The first $25 is paid after the penalty period is served, the TCA case reopens, pre-penalty counseling and barrier reassessment are complete, and the IRP is updated. The second $25 is paid when the participant completes the required countable hours on every required scheduled day during a 30-calendar-day period. Not payable during the penalty period or as a substitute for a sanction determination (CSF Policy 37; Fla. Stat. § 414.065). TANF-funded only.
30-Day Employment Retention	PT $50 / FT $100	Yes	No	Not WIOA-eligible for Adult/Dislocated Worker participants. CSF Policy 109 limits WIOA incentive payments to youth participants only; supportive services may not be used as incentive payments for Adult/DW.
60-Day Employment Retention	PT $75 / FT $150	Yes	No	Same as above — not WIOA eligible for Adult/DW participants under CSF Policy 109.
90-Day Employment Retention	PT $125 / FT $200	Yes	No	Same as above — not WIOA-eligible for Adult/DW participants under CSF Policy 109.

Milestone	Incentive Amount	TANF	WIOA	Basis / Note
Self-Sufficiency Wage Supplement	$200 ($100 / $50 / $50)	Yes	No	Paid in three installments, in addition to the retention milestones: $100 at the 90-day retention verification, $50 at the 180-day verification, and $50 at the 365-day verification. Each installment is payable when employment continues and the participant's verified earnings at that verification are at or above the self-sufficiency wage threshold set in the CAP Incentives Procedures under the Earnings and Self-Sufficiency Provisions subsection. TANF-funded only; verified by pay records or wage data.
180-Day Employment Retention	PT $175 / FT $250	Yes	No	Same as above — not WIOA-eligible for Adult/DW participants under CSF Policy 109.
365-Day Employment Retention	PT $225 / FT $300	Yes	No	Same as above — not WIOA-eligible for Adult/DW participants under CSF Policy 109. Retention through 365 days is intended to align with the fourth-quarter-after-exit measurement of the Reduction in Public Assistance metric.
Wage Progression	$100	Yes	No	One-time payment per employment episode, in addition to the retention milestones, when the participant's verified hourly wage or average weekly earnings at the 180-day or 365-day retention verification exceed the verified starting wage or earnings by at least the percentage set in the CAP Incentives Procedures and employment continues. TANF-funded only; verified by pay records or wage data.
Durable TCA Exit (6 Months After Closure)	$100	Yes	No	One-time payment per participation episode when the participant's TCA case closed because verified earnings exceeded eligibility limits and the case remains closed six months after the closure date, as verified by DCF recipient data. Not payable for closures due to sanctions, time limit, or administrative reasons. TANF-funded only.

Participation Strengthening Provisions

To increase and sustain CAP participation, CSSF shall apply the following provisions together with the incentive milestones in Table 2.

(a) **Sustained Participation.** The Second Month and Third Month milestones are paid when the countable work-activity hours required by the participant's IRP for that month are verified in OSST consistent with 45 CFR §§ 261.30–261.31 and reconciled under the Work Verification Plan. Each is paid once. Non-sanctioned status, and either non-deferred status or participation in an approved alternate requirement plan, must be verified at issuance. After the third month, the Sustained Participation (Months 4 through 12) milestone is the only attendance-based incentive. It is paid for each month, from the fourth through the twelfth, in which the IRP hours are verified, subject to the same non-sanctioned and non-deferred verification at issuance. A month that is not compliant is not paid but does not end eligibility for later months. No attendance-based incentive is payable after the twelfth month of enrollment.

(b) **Re-Engagement After Penalty Period.** A participant whose penalty period under Fla. Stat. § 414.065 has been served and whose Temporary Cash Assistance case has reopened may receive the Re-Engagement incentive in two installments, once per participant per program year, unless an exception is approved in writing by the Executive Director: $25 after (1) completing the pre-penalty counseling required by CSF Policy 37; (2) a documented barrier reassessment; and (3) an updated IRP; and a second $25 after (4) completing the required countable hours on every required scheduled day during a 30-calendar-day period, not simply some participation. No incentive is payable during a penalty period, and the incentive does not replace or defer a sanction determination or the pre-penalty counseling required by CSF Policy 37. Program management shall track the 30- and 90-day outcomes of re-engaged participants separately and report them as provided in the Performance Targets, Evaluation, and Reporting subsection.

(c) **Barrier Screening and Supportive Services.** At enrollment and at each IRP review, case managers shall screen for childcare, transportation, and other participation barriers and shall authorize needed supportive services under Fla. Stat. § 445.025 (and WIOA sec. 134(d)(2) where the participant is co-enrolled and the need cannot be met through another program) no later than the participant's first scheduled activity. Supportive services shall not be replaced by, or charged as, incentives.

(d) **Early Outreach.** Within two business days after receiving a Notice of Mandatory Attendance (NOMA) or a required appointment notice, case managers shall contact the participant, attempt to resolve any barriers, and document each outreach attempt in OSST before making any noncompliance referral, consistent with CSF Policy 37.

Progress Reviews

Program staff shall conduct and document a progress review at 30, 60, and 90 days after Program Activation, at the midpoint of any approved training program, and upon job loss or training withdrawal. Each review shall assess verified hours, barriers, skills progression, job-search activity, training progress, employment prospects, and whether the IRP requires modification. Each 90-day review shall result in one of the following documented determinations: (1) continuation with documented progress; (2) assignment to a more intensive employment or training intervention; (3) barrier remediation; (4) referral for compliance action where appropriate under Fla. Stat. § 414.065 and CSF Policy 37; or (5) transition to another service strategy.

Participation-based incentives shall not be issued for any period after a required review is overdue until the review is completed; the incentive is then payable if all other requirements were met, so that a participant is not penalized for staff delay. A review that documents no progress requires an updated IRP before further participation-based incentives are issued. Reviews do not affect incentives already earned for training, employment, or retention outcomes, and an incentive is never a substitute for a required review. Incentive payment status shall be reviewed with the participant at each progress review so that barriers affecting participation are identified and addressed.

Employment Retention Rules and Participant Limits

(a) **Retention Clock.** Retention periods are measured from the first day of verified unsubsidized employment. The clock does not reset when the continuity rules below are met.

(b) **Employer Changes, Gaps, and Leave.** Retention is not limited to a single employer. A change of employer, including a change that advances the participant's career, preserves retention if the break between jobs does not exceed 30 calendar days. Approved leave and a temporary layoff of up to 30 calendar days do not break continuity if the participant returns to the same employer. A longer break ends the employment episode: milestones already earned are retained, later retention milestones are measured from the first day of new qualifying employment, and no milestone is paid twice within a participation episode.

(c) **Hours and Multiple Jobs.** For Employment Achievement, participants may qualify based on unsubsidized full-time employment (30 hours) or part-time (20 hours) employment that results in case closure due to income.

(d) **Self-Employment and Variable Hours.** Self-employment qualifies when verified by business records, tax filings, or bank deposits showing hours worked and earnings. Variable schedules are averaged over the preceding 30 calendar days.

(e) **Participant Limits.** Unless this subsection states otherwise, each milestone is payable once per participant per participation episode. Training Enrollment is payable once per approved training program, for not more than two approved programs per participant per program year. Measurable Skill Gain and Credential Attainment are each limited to two payments per participant per program year, counted by the date of the documented gain or credential issuance. Re-Engagement is limited to one payment (two installments) per participant per program year unless an exception is approved. The First, Second, and Third Month milestones are payable once per participation episode and not more than twice per participant per program year. Sustained Participation (Months 4 through 12) is payable once for each qualifying month, up to nine times per participation episode; Wage Progression is payable once per employment episode; and Durable TCA Exit is payable once per participation episode. A participant who re-enrolls after case closure begins a new participation episode but may not receive Program Activation again within 12 months after the prior payment. A milestone that spans more than one program year is counted in the program year of its achievement event: the credential issuance date, the documented gain date, the employment start date for Employment Achievement, or the verification date for retention milestones.

Milestone Definitions and Measurement Rules

The following definitions and rules apply to the incentive milestones in Table 2.

(a) **Month of Enrollment.** A month of enrollment is a consecutive 30-calendar-day period beginning on the Program Activation date. For the First, Second, and Third Month milestones, and for each month under the Sustained Participation (Months 4 through 12) milestone, the required hours are the countable hours required by the IRP (prorated for a partial month), verified in OSST under the Work Verification Plan.

(b) **Absences, Good Cause, and Accommodations.** Absences excused under the program's good-cause standards, approved reasonable accommodations, and participation under an approved alternate requirement plan count toward participation requirements as provided in the IRP and the Work Verification Plan, and shall be documented in OSST. A participant shall not be disqualified from a participation milestone solely because of an excused absence or a documented barrier for which a needed supportive service was not yet in place.

(c) **Training Enrollment.** Satisfied by attendance at all scheduled training sessions during the first 14 calendar days of an approved training program. Daily attendance is not implied; only scheduled sessions count.

(d) **Targeted Occupation.** The higher Credential Attainment and Training-Related Employment amounts apply when the credential qualifies the participant for, or the employment is in, an occupation on the targeted occupations list approved by the SFWIB for LWDA 23 and in effect on the date the credential is issued or the date of hire. The case file shall identify the list entry relied upon.

Earnings and Self-Sufficiency Provisions

The following provisions support the local performance metrics for Participants With Increased Earnings (second quarter after exit) and Reduction in Public Assistance (fourth quarter after exit), and apply to CAP participants whether or not they are co-enrolled in WIOA.

(a) **CLIFF Plan Before Employment Incentives.** The participant shall be offered a benefits-management plan prepared with the CLIFF Navigator, or another approved tool that demonstrates the future financial impacts of changes in income and benefits, consistent with Fla. Stat. § 445.0281, before the Employment Achievement, Training-Related Employment, or 30-Day Employment Retention incentive is issued. A completed plan, or the participant's written declination, shall be documented in the case file before issuance. A declination does not forfeit the incentive.

(b) **Self-Sufficiency Threshold, Installments, and Wage Progression.** The self-sufficiency wage threshold shall be determined using the following methodology, which the CAP Incentives Procedures shall implement and which CSSF shall review annually on a stated update date: (1) household size; (2) county of residence; (3) the participant's verified hourly wage and expected weekly hours; (4) the result of the CLIFF Navigator or other approved local standard, including a documented benefits-impact assessment of expected changes in income and benefits; and (5) treatment of variable schedules and self-employment under the Employment Retention Rules and Participant Limits subsection. The CAP Incentives Procedures shall also set the minimum percentage increase over the verified starting wage or average weekly earnings required for the Wage Progression milestone. The Self-Sufficiency Wage Supplement installments and Wage Progression are in addition to the retention incentives, are not chargeable to WIOA funds, and are subject to the Effective Date and Classification Condition.

(c) **Benefit Counseling and Tracking.** When a participant reports employment or receives an incentive, staff shall counsel the participant on how incentive payments and increased earnings may affect SNAP, housing assistance, other public benefits, and taxes, using the CLIFF Navigator where available, in the same conversation required by CSF Policy 37, and shall document the counseling. Program management shall track each CAP participant's SNAP and TANF status through the fourth quarter after exit using Employ Florida, OSST, and DCF recipient data.

(d) **Employment, Wage, and Case-Closure Verification.** For each employment-based milestone, staff shall record whether the employment is expected to appear in Unemployment Insurance wage records and, where it is not (for example, self-employment, cash-paid, out-of-state, or federal employment), shall document the alternative verification relied upon. Wage Progression shall be verified by pay records or wage data, and Durable TCA Exit by DCF recipient data confirming the closure reason and that the case remained closed for six months.

Phased Implementation, Measurement, and Evaluation

(a) **Phased Rollout.** As approved by the Executive Director, CSSF shall implement the incentive categories in phases across American Job Centers, so that results can be compared between centers that have implemented a category and centers that have not yet done so.

(b) **Baselines.** Before each phase begins, program management shall establish baselines for orientation-to-first-activity conversion; 30-day verified participation; average weekly verified hours; training completion and credential attainment; 90-, 180-, and 365-day retention; wage progression; TANF and SNAP receipt in the fourth quarter after exit; and returns to TCA within 12 months.

(c) **Reporting and Cost per Outcome.** Program management shall report to the Executive Director quarterly, by milestone, center, and provider, on outcomes compared with baseline and on cost per verified participant-month, cost per employment, cost per 180-day retained employment, cost per case leaving TCA, and public-assistance reduction net of incentive cost.

(d) **Annual Amount Review.** At least annually, program management shall review milestone amounts against results and available TANF funding and recommend adjustments to the SFWIB or its designated committee, so that the largest share of potential payments rewards outcome milestones. Early engagement incentives shall remain smaller than long-term employment and wage outcomes. A milestone that shows no measurable effect on outcomes may be reduced or discontinued as provided in the Limitations section.

(e) **Separation from Official Measures.** These local measures are distinct from the official TANF work participation rate and from the WIOA performance indicators.

Incentive Checks and Balances

The following controls apply to all CAP incentives and, in particular, to the monthly Sustained Participation milestone.

(a) **Classification Gate for Recurring Payments.** Because Sustained Participation is payable monthly, it is a separate category under the Effective Date and Classification Condition. The written determination must specifically address recurring monthly payments, including whether payments continuing beyond four months constitute assistance under 45 CFR § 260.31 and the resulting effect on the 48-month time limit, TANF Data Report elements, and child-support assignment. The monthly category shall not be issued until that determination is

retained in the policy file. Other approved categories may be implemented once each has been determined to be non-assistance.

(b) **Work Participation Integrity.** A monthly or other participation-based incentive shall be issued only for hours verified in OSST under the Work Verification Plan; self-report alone is not sufficient. Program management shall reconcile incentive payments against OSST work-activity hours at least monthly and before the affected period is reported, and shall correct any discrepancy. Hours shall not be recorded, rounded, or reclassified in order to qualify a participant for an incentive.

(c) **Fiscal Modeling and Cost Limits.** Before each implementation phase and annually, program management shall model projected expenditures across all incentive categories, including monthly Sustained Participation at full compliance ($225 per participant), and shall confirm available TANF funding. Any increase in an incentive amount or addition of a category shall be accompanied by a funding check and, where practicable, an offsetting adjustment elsewhere in Table 2. If projected or actual expenditures exceed the amount authorized by the Executive Director, the Executive Director may suspend or reduce an incentive category as provided in the Limitations section. The model shall be retained in the policy file.

(d) **Uniform Amounts and Supportive Services.** Incentive amounts shall be uniform for every participant eligible for a milestone; no participant-specific or risk-based amounts may be set without written approval of the Executive Director following legal review. Supportive services, including childcare and transportation, shall not be provided in place of, funded as, or conditioned on an incentive and shall be in place no later than the participant's first scheduled activity.

(e) **Gaming and Duplicate-Payment Controls.** Staff shall not delay, accelerate, or otherwise manipulate case closure, re-enrollment, IRP updates, or activity assignments to create or avoid an incentive payment. Supervisors shall review each monthly payment request for compliance with this policy before authorization, and program management shall review payment patterns by center, provider, and case manager at least quarterly and refer anomalies for corrective action.

(f) **Evaluation of Monthly Payments.** In the first implementation phase, CSSF may implement monthly Sustained Participation at selected American Job Centers only and compare verified participation in months 4 through 12, retention of participation after month three, and cost per additional compliant month against centers that have not implemented it. Results shall be reported to the Executive Director under the Phased Implementation, Measurement, and Evaluation subsection, and the amount and frequency of the payment shall be adjusted based on results.

Service Delivery Standards and Participant Information

Subject to operational capacity, program staff shall:
(a) contact new referrals within two business days;
(b) complete orientation and initial planning within five business days, where practicable;
(c) offer job-ready participants a documented employer referral within 10 business days;
(d) escalate unresolved participation barriers to a supervisor, and;
(e) issue approved participation-based incentives (Program Activation, Participation Requirement, Sustained Participation, and Re-Engagement installments) within five business days, and all other approved incentives within 10 business days, after complete verification is received. Each participant shall receive a one-page, plain-language incentive schedule at orientation, and again when the participant enters training or employment, stating what earns each incentive and when payment is made. At least monthly, program staff shall notify each

participant, by the participant's preferred method (text, email, or mail), of the hours verified, the next incentive for which the participant is eligible, and the expected payment date.

WIOA Needs-Related Payments for Co-Enrolled CAP Participants

A CAP participant who is co-enrolled in WIOA Title I Adult or Dislocated Worker services may receive a needs-related payment (NRP) only as provided in this subsection. An NRP is a WIOA supportive service. It is not a CAP incentive, is not a milestone under Table 2 or Appendix B, and is determined, calculated, approved, paid, and recorded solely under WIOA sec. 134(d)(3), 20 CFR §§ 680.930–680.970, and CSF Policy 109. NRPs are charged to WIOA Title I funds only; CAP incentives remain funded from TANF funds as provided above.

Participant Eligibility

- The participant must be actively enrolled in CAP, opened in OSST in Mandatory or Transitional status, and in good standing with CAP. For the employment-retention milestones, the Self-Sufficiency Wage Supplement, Wage Progression, and Durable TCA Exit, a participant who has left Temporary Cash Assistance remains eligible while the participant's CAP record remains open in Transitional status and the participant is receiving voluntary transitional case management or other transitional services under Fla. Stat. §§ 445.028 and 445.0281. That transitional authority supports continued engagement but does not itself authorize any incentive.

- The participant must complete an approved milestone and satisfy the milestone-specific conditions in this policy.

- Eligibility is subject to program compliance, verified documentation, approval, funding availability, and the prohibition against duplicate payment for the same milestone.

Approval, Distribution, and Documentation

- Program staff shall verify completion of the required milestone before requesting approval.

- Staff shall complete the approved incentive request form and provide supporting documentation.

- Supervisory review and approval at the American Job Center level shall be obtained before issuance, as required by approved procedures.

- Approved incentives may be distributed by check or ACH; participation-based incentives shall be distributed by ACH or another approved electronic method where the participant has elected it, so that the five-business-day standard can be met. Participants shall acknowledge receipt by signing and dating the appropriate documentation.

- All incentives shall be recorded in OSST. Case notes shall identify the incentive type, amount, date issued, reason for issuance, verification reviewed, and approval information.

- Incentive payments shall be recorded in WFMS using the applicable funding source and service code.

- The applicable benchmark code shall be entered each time an incentive is issued.

- Supporting documentation, approvals, receipts, vouchers, invoices, and payment records shall be maintained in the participant file, as applicable.

- Services and payments funded in whole or in part with WIOA funds, including needs-related payments, shall also be entered in the applicable WIOA case management system (e.g., Employ Florida) in addition to OSST/WFMS, and the case file shall identify the funding source(s) used and the basis for any cost allocation applied.

- Approved participation-based incentives (Program Activation, Participation Requirement, Sustained Participation, and Re-Engagement installments) shall be issued within five business days, and all other approved incentives within 10 business days, after complete verification and documentation are received, and the issue date shall be recorded in OSST.
- Needs-related payments shall be requested on a separate NRP request form, approved under the NRP subsection of this policy, recorded under a separate WIOA service code and funding source in Employ Florida (and in OSST/WFMS as required), and shall not be combined in a single payment or transaction with any CAP incentive.

TANF and WIOA Compliance Assurance

Issuing a CAP incentive is a consequence of demonstrated program compliance, not a substitute for it. This policy does not create, and shall not be construed to create, any independent basis for continued CAP, TANF, or WIOA participation; each incentive must be verified against the compliance requirements below before it is authorized.

TANF Work Participation Compliance

- Before authorizing a milestone tied to a specific period of program participation (Participation Requirement, Sustained Participation, and Re-Engagement), staff must confirm that the participant's countable work-activity hours for that period have been verified and are accurately reflected in OSST consistent with 45 CFR §§ 261.30–261.31, so that CAP records support — rather than conflict with — the data the State reports on the TANF Data Report.

- Employment-retention milestones (30-, 60-, 90-, 180-, and 365-Day), the Self-Sufficiency Wage Supplement, Wage Progression, and Durable TCA Exit are not participation-hour milestones. They require verified employment, the applicable retention period, and continued eligibility under this policy, and they do not require verified TANF work-participation hours. A participant who has left Temporary Cash Assistance is not required to reopen cash assistance or satisfy a mandatory participation requirement to receive an otherwise allowable retention incentive.

- No incentive may be authorized in lieu of, or in a manner that defers or substitutes for, a required Individual Responsibility Plan (IRP) review or an unresolved sanction determination under 45 CFR §§ 261.12–261.14 and Fla. Stat. § 414.065. For participation milestones, non-sanctioned status, and either non-deferred status or participation in an approved alternate requirement plan, must be verified at the time of each issuance, not only at initial CAP enrollment.

- Program management shall periodically reconcile CAP incentive records against OSST work-activity data as part of the State's Work Verification Plan procedures under 45 CFR § 261.62, and shall correct any discrepancy before the affected period is reported.

- CAP incentives are separate from, and are not a substitute for, the Cash Assistance Severance Benefit under CSF Policy 24 (Fla. Stat. § 445.026). Consistent with CSF Policy 37, when a participant reports obtaining employment, staff must present both the applicable CAP incentive and the Cash Assistance Severance Benefit as separate options in the same counseling conversation, and document the participant's choice regarding the Severance Benefit in the case file.

WIOA Performance Compliance

- Before any WIOA-funded service or payment (including a needs-related payment) is issued to a CAP participant, staff must confirm the participant's record in the applicable WIOA case management system (e.g., Employ Florida) reflects current, accurate enrollment, service, and (where applicable) exit data consistent with WIOA sec. 116 and 20 CFR Part 677, so that issuance does not create data inconsistent with the local area's performance-indicator calculations.

- Employment-retention milestones must be understood against Florida's common-exit framework under CSF Policy O115: a WIOA/Wagner-Peyser/TAA participant's exit is a system-generated, retroactive determination triggered by 90 days without a participating service and is distinct from the case-management "case closure" recorded when a participant obtains employment. TANF/Welfare Transition is not part of this common-exit framework and follows its own closure process under CSF Policy 37. For the narrow WIOA Youth case described above where a milestone is independently supportable, its timing must be checked against this 90-day mechanic — not a manually recorded date — so CAP recordkeeping does not distort the measurement window for the second- and fourth-quarter employment and median-earnings indicators under WIOA sec. 116(b)(2)(A).

- A TANF sanction or penalty-period determination does not, by itself, alter a participant's WIOA enrollment, service, or exit status; milestones charged to WIOA funds remain subject solely to WIOA's own eligibility, service, and exit rules unless the participant is independently exited from WIOA services.

VI. LIMITATIONS

Incentives are subject to approved categories, funding availability, and the current CAP Incentive Milestones by Funding Source (Table 2). Under the current milestones, a single participant's scenario total across all incentive milestones is $2,525 on a part-time employment path or $2,875 on a full-time employment path, assuming two Measurable Skill Gain payments; two Credential Attainment payments and the Training-Related Employment payment at the targeted-occupation amounts; nine Sustained Participation (Months 4 through 12) payments; one Re-Engagement payment (both installments); and one Self-Sufficiency Wage Supplement (all three installments), Wage Progression, and Durable TCA Exit payment; this figure is a scenario total provided for fiscal-exposure reference, is not an enforceable maximum, and is not itself an independent authorization — actual payment remains subject to every other limitation in this section.

- An incentive shall not be issued without documentation supporting milestone completion and the approval of the AJC Director.

- Multiple incentives may be issued for separate milestones; duplicate payment for the same milestone is prohibited.

- Deferred TANF participants who are not participating in an alternate requirement plan are not eligible.

- Sanctioned TANF participants are not eligible during the penalty period. Eligibility may resume after the penalty period is served and the Temporary Cash Assistance case reopens if all other requirements are met. The Re-Engagement After Penalty Period milestone is the only incentive earned by reference to a penalty period, and it is payable only after the penalty period has been served.

- Incentives shall not be substituted for support services or charged to a support-service category unless expressly allowed by approved policy, funding rules, and the Incentives Matrix.

- Falsified, altered, insufficient, or unverifiable documentation may result in denial, corrective action, or recovery of funds in accordance with applicable requirements.

- CSSF may modify, suspend, discontinue, or eliminate an incentive category, subject to applicable authority and funding conditions.

- A single incentive milestone may not be paid, in whole or in part, from more than one funding source for the same occurrence; the prohibition on duplicate payment for the same milestone applies across TANF and WIOA funds as well as across contracted providers.

- A WIOA needs-related payment issued under the NRP subsection is not a CAP incentive milestone, is not listed in Table 2, and does not count toward the maximum incentive totals stated in this section.

- A CAP incentive and a needs-related payment are separately authorized, funded, calculated, paid, and recorded. Staff shall assess applicable income and need rules, shall document whether an incentive received affects the participant's documented need for an NRP, and shall not combine the two payments or convert either into the other.

VII. EXCEPTIONS

Exceptions to this policy, or any part thereof, must be approved in writing by the SFWIB Executive Director.