

Approved by Executive Committee: January 3, 2017

Approved by Board: January 19, 2017

Approved by Board: June 18, 2020 (revision to individual incentive cap)

Purpose:

Incentives are awarded to participants for completing specific performance benchmarks. These incentives primarily take the form of gift cards.

The Workforce Innovation and Opportunity Act (WIOA) allows funds that are allocated to local areas to be used to provide incentives to youth enrolled in Title I programs. The Lancaster County Workforce Development Board (LCWDB) also allows incentives to be used for individuals enrolled in Employment Advancement and Retention Network (EARN) and Temporary Aid to Needy Families (TANF) programs.

This policy defines the procedure for obtaining, securing, issuing, and reporting for performance incentives to participants in the Lancaster County workforce region in the following programs: Out-of-School, In-School Youth, EARN, and TANF.

Incentives may be provided to participants for the following accomplishments while enrolled or tracked in the various programs:

- successful completion of high-school equivalency test or an industry-recognized credential (credential must be pre-approved by the LCWDB staff)
- placement in post-secondary education, training, military
- job placement (meeting program-specific goal)
- job retention (meeting program-specific goal)
- Activity Compliance Rate (ACR)

Other accomplishments may be recognized with the prior approval of LCWDB staff.

Limitations

Individual participants may receive up to \$1,000 of incentives in one program year.

Any purchase of gift cards must be approved by LCWDB staff prior to purchase. Program managers shall purchase the gift cards for an amount expected to be distributed in one month, not to exceed \$1,500. LCWDB expects the cards to be distributed in the program year in which they are purchased. Under unusual circumstances, the LCWDB staff may approve exceptions. Examples include anticipated outlay of incentives in first month of program year for work substantially completed in prior program year or delay of program completion for which incentive would be awarded due to unforeseen circumstances, such as illness of participant or inclement weather.

Obtaining Gift Cards for Performance Incentives

It is the responsibility of the program providers to obtain and secure the gift cards to be used for incentives.

Assets purchased with federal funds are considered to be part of those funds, and as such, they must be applied only to individuals eligible to receive funding from those sources.

The program providers and their staff are responsible for the safeguarding of all federal funds allocated for program use; in the event of theft or fraud, failing to establish and enforce policies to safeguard those funds will leave the program providers and their staff responsible.

Upon purchase of the gift cards, the program manager shall provide a signed copy of the original receipt to the LCWDB from the provider's accountant.

Gift cards may not be transferred from one program to another or from one customer to another without prior approval from the program manager and LCWDB staff.

Gift cards shall be purchased from local retail establishments, including but not limited to Wal-Mart, Sheetz, Boscov's, etc. Purchases of the gift cards shall follow program providers' internal process with notification of the purchases forwarded to the LCWDB.

Security

- 1) Gift cards will be secured at all times in a locked container and/or safe accessible only to designated program managers/supervisors.
- 2) The program managers/supervisor will verify the count and amounts on the gift cards.
- 3) Purchase/distribution logs and copies of signed receipts will be kept together in a secure location to protect participant data and confidentiality.
- 4) The program managers/supervisor or designated staff will remove from the secure location only the number of gift cards and corresponding blank gift card receipts needed for a single distribution. All un-issued gift cards will be returned to the program managers/supervisor or designated staff by close of business the same day.
- 5) Receipts must be secured and treated as Personally Identifiable Information (PII).

Provisions for Tracking

- 1) The program managers/supervisor will complete the following information on the appropriate signature log (purchase or distribution) for each date of activity.
 - Purchase log (Attachment A)
 - Date gift cards were purchased

- Name of retail company (use separate line for each different company)
 - Gift card dollar amount (noted on log and on gift card if needed)
 - Number of cards purchased
 - Gift card tracking number
 - Name of person purchasing cards
 - Initials of person verifying the purchase/deposit of gift cards
 - Distribution log (Attachment B)
 - Date of issuance
 - Participant name (printed)
 - Participant ID
 - Purpose of issuance
 - Name of retail company
 - Gift card dollar amount
 - Gift card tracking number
 - Staff signature
 - Witness signature
 - Initials of monitor/auditor who verified the issuance/eligibility of the recipient
- 2) Program provider staff will submit a gift card request (Attachment C) so the correct gift card(s) may be given to each participant. Program manager will sign the request form and indicate either their approval or disapproval of the request. If the request is not approved, the program manager will note the reason.
- 3) Program provider staff and participant will sign a gift card receipt form (Exhibit C); the original will be placed in participant's case file and a copy will be placed with the distribution log.
- 4) Designated staff will enter his/her initials as a witness for each gift card issued.
- 5) The program manager/supervisor or designated staff will issue gift cards and corresponding gift card receipts to requesting staff for distribution.
- 6) Incentives must be documented in CWDS in the following format: On DATE, PARTICIPANT received a DOLLAR AMOUNT gift card to NAME OF RETAIL ORGANIZATION as an incentive for obtaining REASON FOR INCENTIVE.

Dispensing Cards

Cards are to be issued in the order in which they were purchased; in accounting terminology, first in, first out.

Reporting

- 1) Each completed signature log will be kept on file with the program provider upon the issuance or return of the last gift card, but not later than the last working day of the month completed.
- 2) Incentives must be listed as part of the program provider budgets.

Monitoring

- 1) Gift cards shall be monitored by staff to the Board on a semi-annual basis. Spot checks for balances and independent verification of the eligibility of recipients shall take place randomly.
- 2) All documentation authorizing or supporting the dispersal of assets for stipends, incentives, and supportive services must be retained in accordance with the Records Retention policy. LCWDB requires records be retained for seven (7) years.

Assets and the associated logs associated with the stipends, incentive, and supportive services will be subject to remote and onsite monitoring and audit by BWDA Monitors, BWDA Fiscal Staff, and Federal Auditors. Any discrepancies discovered must be resolved as quickly as possible. Any discrepancies must be reported to BWDA immediately. Any additional information/discoveries must be reported on an ongoing basis until the discrepancy is resolved

Lancaster County Workforce Development Board
 PP 206 Incentives Policy - Attachment A – Purchase log
 Name of Program _____

Date of purchase	Name of Retail Company on card (use new line for different company card)	\$ value of card	# of cards purchased	Gift card number	Name of staff person making purchase (print name)	Initials of staff person making purchase	Copy of purchase receipt attached?	Initials of person verifying purchase
12/1/16	Boscov's	\$25	5	1100111 -1100116	Jane Dale	JSD	yes	GW

Lancaster County Workforce Development Board
 PP 206 Incentives Policy - Attachment B – Distribution log
 Name of Program _____

Date issued	Participant name (printed)	Participant ID (If using SSN, use last 4 digits only)	purpose	Name of Retail Company on card	\$ value of card	Gift card tracking number	Name of staff person issuing card (print name)	Initials of staff person issuing card	Initials of witness	Initials of monitor
12/1/16	Paula Johanson		Completed Ready2Work	Boscov's	\$25	1100111	Jane Dale	JT	MTM	ABA

Lancaster County Workforce Development Board
PP 206 Incentives Policy - Attachment C- Gift card request

In accordance with our incentives policy, I am requesting the following gift card(s):

Please print:

Participant name: _____

Participant ID: _____

Program _____

Reason for issuance of incentive _____

Gift card amount _____

Requested retail company card _____

Date card needed _____

Staff person requesting card _____

Lancaster County Workforce Development Board
PP 206 Incentives Policy - Attachment D – Participant receipt

Gift Card/Incentive Receipt Form

Participant's Name (printed/typed)

Participant's ID

(If using SSN, use last 4 digits only)

Program name

Date of Issuance (m/d/y)

Gift Card: Name of retail company

Gift Card: Card #

Gift Card: Amount

Purpose of Issuance (describe accomplishment)

Staff person issuing card (printed/typed)

Witness

I acknowledge that I am issuing this gift card/incentive in compliance with program policy

I acknowledge that I received the gift card/incentive described on this receipt today.

Signature of staff person issuing card

Signature of recipient