


CWP Policy/Procedure Transmittal

Policy and Procedures Transmittal Number: 23-10

Effective Date: May 1, 2023

To: CWP Staff and Subrecipient Staff

From: Julie Watson, Compliance & Accountability Administrator 

Issue Date: June 2, 2023

Subject: General Incentive Policy

With this transmittal, CWP is issuing General Incentive Policy which applies to all non-WIOA funded programs that allow for incentives. WIOA programs have separate incentive policies that adhere to WIOA regulations and CTDOL's WIOA policy.

In addition to being attached to this transmittal, this policy can be found in CWP's online Policy and Procedures Manual, Section 2, 2-67 General Incentive Policy at <https://capitalworkforce.org/policies/>.

Questions regarding CWP's General Incentive Policy should be addressed to Sandy Mackie, Chief Program Officer at smackie@capitalworkforce.org.

CWP Policy and Procedure Manual

Program: General	Section: 2-67	Page 1
Subject: Incentives	Effective Date: 05/01/23	

A. Purpose

Incentives are awarded to recognize and encourage participation in activities tied to the program and/or for the attainment of the participant's employment-related goals.

B. Policy

1. Incentive awards are provided to CWP program participants for:
 - a. Achievement and attainment of individual employment and training goals.
 - b. Completion of education and/or training-related services such as occupational skills training, on-the-job training, customized training, completion of a secondary school diploma or its equivalent and work readiness and workforce preparation training.
 - c. Making progress, achievements, or milestones in education and/or training-related service.
 - d. Attaining a nationally recognized credential related to training and/or an employment goal.
 - e. Obtaining full-time unsubsidized employment.
 - f. Participation in activities that are designed to improve program services, if permitted by the funder.
2. Criteria for providing an incentive award:
 - a. Sufficient program funds are available for awarding incentive payments consistently and equitably to all participants who are eligible, and incentive payments are allowed by the program funder.
 - b. If provided, incentives are provided consistently (same amount and method of issuance) and equitably to each individual eligible for the incentive for the same achievement.
 - c. The recipient of the incentive must be an active participant in the program providing the incentive at the time of reaching the milestone/goal described in the participant's employment plan.
3. Prohibited uses of incentive awards
Incentive awards are not to be used for the following purposes:
 - a. Entertainment costs such as movies or sporting event tickets or gift cards to movies theaters or other venues whose sole purpose is entertainment. (2 CFR Part 200)
 - b. Program recruitment
 - c. Cost of obtaining eligibility documentation
 - d. Payment for hours of work
 - e. Used to pay a stipend for participation in program or work-related activities
 - f. Provision of supportive services
 - g. Reward for attendance in regularly scheduled activities
4. Method of issuance
Incentives are issued in the form of cash or non-cash.
 - a. Cash incentives are issued in the form of a debit card or a check.
 - b. Non-cash incentives are issued in the form of gift cards, gift certificates to local retailers or other items such as plaques, framed certificates, class rings, tools related to participant's career goal, etc.

CWP Policy and Procedure Manual

Program: General	Section: 2-67	Page 2
Subject: Incentives	Effective Date: 05/01/23	

5. Time period of issuance
Incentives are paid as close as possible to the time of the achievement and no more than thirty (30) calendar days after the date of milestone/goal achievement.
6. Amount of incentive award
 - a. Incentive awards are only provided if there are sufficient program funds to award incentive payments consistently and equitably to all participants who are eligible.
 - b. Individual issuances of incentive awards amounts are set by the program provider but may be no less than \$10 or more than \$200 per issuance. The CWP Program Manager may approve incentive amounts that vary from these limits based on program provider's written request, including justification for the change. A program provider's executed contract budget containing incentive amounts that vary from these limits constitutes approval.
 - c. Program providers are to develop written standard incentive amounts for specific types of accomplishments and issue incentives fairly and consistently according to their standards. The written standard for incentive amounts for specific types of accomplishments is submitted to CWP for review and approval.
7. Documentation
Information regarding the issuance of incentive awards is documented in the participant's case record and tracked on an issuance log. The following information must be recorded and tracked for each issuance.
 - a. Type (e.g., debit card, check, gift card, gift certificate, commemorative item)
 - b. Serial number (or other unique identifying number)
 - c. Amount
 - d. Documentation of milestone/goal achieved as required by CWP (e.g., certificate, diploma, CCS appraisal results, transcript or report card, verification of unsubsidized employment).
 - e. Name and signature of recipient
 - f. Date issued
 - g. Name and signature of staff providing the award to the recipient

C. Procedures

1. Details including the method of issuance and amount of the incentive is written into the participant's record and tied to specific milestones or accomplishments prior to the individual's achievement of said milestones or accomplishments.
2. Upon achievement of a milestone or goal, program provider staff obtains documentation of the achievement for the record as required by CWP and issues the incentive amount to the participants within thirty (30) days of the date of the achievement.
3. The incentive is issued in either the form of cash or non-cash.
 - a. Cash incentives are issued in the form of a debit card or a check.
 - b. Non-cash incentives are issued in the form of gift cards, gift certificates to local retailers or other items such as plaques, framed certificates, class rings, tools related to training, etc.
4. Approval Process
According to local program provider incentive issuance process, the incentive payment request from the program staff is reviewed by the program provider director, manager or supervisor for compliance with this policy and to confirm that the participant is eligible for the incentive

CWP Policy and Procedure Manual

Program: General	Section: 2-67	Page 3
Subject: Incentives	Effective Date: 05/01/23	

payment. The provider's internal control document showing approval by designated program provider staff are uploaded to the case file.

5. Documentation

The following information regarding the issuance of incentive awards is documented in the participant's case record and tracked on an issuance log:

- a. Type (e.g., debit card, check, gift card, gift certificate, commemorative item)
- b. Serial number (or other unique identifying number)
- c. Amount
- d. Purpose of the incentive
- e. Name and signature of recipient
- f. Date issued
- g. Name and signature of staff providing the award to the recipient

6. Tracking Debit and Gift Cards and Gift Certificates

Debit and gift cards and gift certificates are purchased as needed and are accounted for. The number and value of gift cards on hand plus the properly recorded distributed cards are to reconcile to the original purchased number and value of debit/gift cards and gift certificates.