

# CWP Policy and Procedure Manual

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| <b>Subject:</b> Incentives | <b>Effective Date:</b> 06/01/23 |        |

## A. Purpose

Incentives are awarded for recognition of achievement of milestones directly related to training services. (CTDOL WIOA Policy Manual Section 41)

## B. Policy

1. Incentive awards are provided to participants for:
  - a. Making progress, achievements, or milestones in a training-related service.
  - b. Completion of a training-related service including occupational skills training, on-the-job training, customized training, and work readiness and workforce preparation training.
  - c. Attaining a nationally recognized credential related to training.
  - d. Training-related job placement.
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.
  - 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 provision of an incentive award must be part of the participant's Individual Employment Plan (IEP) and tied to specific training-related accomplishment(s).
  - d. The recipient of the incentive must be an active participant in the WIOA program at the time of reaching the training-related milestone. The incentive may be provided within ninety (90) days post-exit as long as the training-related milestone was achieved prior to program exit.
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 any activity
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, etc.
5. Time period of issuance  
Incentives are paid as close as possible to the time of the training-related achievement and no more than thirty (30) calendar days after the date of milestone/goal achievement.

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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 \$25 or more than \$250 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. The program provider is to develop written standard incentive amounts for specific types of training-related accomplishments and issue incentives consistently and fairly 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 training-related milestone uploaded to the participant's record in CWP's designated MIS.
  - 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 regarding the provision of an incentive is recorded in the participant's Individual Employment Plan (IEP) and case notes in the CWP designated management information system (MIS) prior to the participant's achievement of said milestone. These details include:
  - a. A description of the training-related milestone
  - b. A description of how the incentive will contribute to the achievement of the milestone
  - c. The amount of the incentive
  - d. The method of issuance
  
2. Upon achievement of the training-related milestone, program provider staff obtains the documentation of the milestone and uploads it to the CWP's designated MIS and issues the incentive amount to the participants.
  
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.

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#### 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 payment. The provider's internal control document showing approval by designated program provider staff are uploaded to the designated CWP MIS 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. Description of training-related milestone
- 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.