



MontcoWorks, Montgomery County Workforce Development Board Incentives Policy and Procedure

I. Purpose:

The following defines the procedure for obtaining, securing, issuing, and reporting and monitoring an assortment of prepaid retail gift cards, for purpose of providing participants of WIOA and/or TANF funded programs with supportive services and performance incentives. Incentives are provided in the form of a gift card only purchase from Walmart, or pre-approved local retailer. Incentives can only be provided to participants for the following reasons: successfully passing the GED exam (WIOA In-School Youth (ISY)/Out-of-School Youth (OSY) only); graduating from high school (WIOA ISY/OSY only); and/or placement in advanced training, postsecondary education, the military or employment. Certain support services may qualify for incentives, if necessary to enable a participant to partake in activities such as their placement in employment or postsecondary education.

II. Internal Procedures:

It is the responsibility of Fiscal Staff and Program Supervisors to oversee the management of gift cards for applicable program(s).

Obtaining

- A. Program Supervisors will purchase an assortment of gift cards from Walmart or other pre-approved retailer.
- B. Upon purchase, the Program Supervisors will sign the receipt and give the signed original store receipt to the Fiscal Office.
- C. Gift cards may not be transferred from one program to another or from one participant to another without prior approval from the Program Supervisor and Fiscal Office.

Securing

- A. Gift cards will be secured at all times in a locked container and/or safe accessible only to the Fiscal Officer and a designated staff person.
- B. The Program Supervisors will verify the count and amounts on the gift cards once received.
- C. A signature log will be kept together in a secure location to protect Personally Identifiable Information (PII) and confidentiality.
- D. The Program Supervisor or designated staff will remove from the office only the number of gift cards and corresponding gift card receipts needed for a single off-site distribution. All unissued gift cards are to be returned to the Program Supervisor or designated staff by close of business the same day.

Issuing

- A. The Program Supervisor or designee will submit a gift card request form to the Fiscal Office so the correct gift card(s) can be given to each participant.



B. The Program Supervisor or designated staff will complete the following information on the appropriate signature log for each date of purchase:

a. Date gift cards were purchased
b. Funding Source
c. Name of retail company
d. Gift card dollar amount
e. Gift card number

f. Participant name
g. Participant CWDS I.D. No.
h. Purpose of issuance
i. Staff Signature

- C. A receipt of receiving the gift card will be signed by both the Program Supervisor or designee and participant. An alternate designated staff person will mark his/her initials on the receipt as a witness for each gift card issued. The original receipt will be placed in the participant’s case file.
- D. The Program Supervisor or designee will issue gift cards and corresponding gift card receipts to requesting staff for distribution.

Reporting and Monitoring

- A. Each completed signature log will be returned to the Fiscal Officer upon the issuance or return of the last gift card.
- B. Gift cards will only be purchased if the need for purchase is determined.
- C. Inventory of gift cards will not exceed more than \$1,500.00 at one time.
- D. Inventory and Signature Log will be inspected monthly with a minimum of one random check to verify the recipient of a gift card as an incentive met eligibility as described in this policy as well as verifying the appropriate original receipt with signatures can be found in the participant’s hard file.

Data Entry

- A. Case notes must be entered in the Commonwealth Workforce Development System (CWDS) to support the request, type, reason, and proof of disbursement of each incentive.
- B. The appropriate service code must be entered in CWDS once the incentive has been disbursed. The specific service code will vary based on program enrollment. WIOA Youth will have a WYS32 entered with a description of incentive in the comments field. WYS32 will solely be used to document incentives and will not be used to represent any support service. There is no service code available to enter for EARN incentives. To ensure proper tracking, when an incentive is requested for EARN participants, an objective must be entered off the most related goal to reflect the reason and date of request. Once the incentive is disbursed, the objective will be marked as “met” with the date of completion used to reflect the date of disbursement.

III. Vendors

- A. Vendors contracted with MontcoWorks to deliver Title I services, is required to submit proof of their incentives and/or gift cards policy and procedures as part of their budget if/when gift cards or another form of incentives are included in their line item budget for the upcoming program year.

