Incentives and Supportive Services Gift Card Policy

I. PURPOSE:

To establish policy and procedures for the purchase, custody, issuance, reconciliation, and reporting of gift cards used as participant incentives or supportive services under Workforce Innovation and Opportunity Act (WIOA) and other Federal or State funding grant programs through the North Central Workforce Development Board.

II. REFERENCES:

- Workforce Innovation and Opportunity Act (WIOA) of 2014, Public Law 113-128
- WIOA Final Rules, 20 CFR Parts 600–899
- TEGL 21-16, Change 1, Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance
- TEGL 23-14, WIOA Youth Program Transition Guidance
- TEGL 8-15, Second Title I WIOA Youth Formula Program Guidance (supportive services, incentives)
- 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- 20 CFR 683.200–220, Administrative and financial requirements for states and local areas
- Pennsylvania Department of Labor & Industry, Workforce System Directives and WIOA State Policies (Supportive Services; Internal Controls; Youth Program Requirements)
- Workforce Solutions policies

III. DEFINITIONS:

Distribution - The act of physically providing a gift card to a participant, including all required documentation, signatures, and verification.

Gift Card - A prepaid card issued by a retail store or vendor that has a fixed monetary value and is used as an allowable supportive service or incentive for WIOA and other Federal or State funded grant program participants.

Program Gift Card Signature Log - A controlled document used to track the purchase, assignment, issuance, and remaining balance of gift cards, including card numbers and values.

Incentive – An incentive is an allowable participant reward funded through WIOA and other Federal or State funded grant program and provided to participants for achieving a defined and documented program milestone or performance outcome. Incentives must be tied to specific program activities or achievements.

Monitoring - Periodic review conducted by Workforce Solutions to ensure compliance with federal, state, and local policies governing the use of gift cards.

Participant – *Is an* individual who has been formally enrolled in a WIOA Title I program (Youth, Adult, or Dislocated Worker) or other Federal or State funded grant program and are eligible to receive supportive services or incentives.

Separation of Duties - A required internal control in which no single staff member may request, approve, and issue a gift card. Duties are distributed among different individuals to reduce the risk of fraud or misuse.

Supportive Service - Financial or non-financial assistance provided to a participant to enable their participation in program activities, as defined by WIOA, federal, state, and/or local policy. Supportive services must be necessary, reasonable, and directly related to program participation.

Program Director - The individual designated by the contracted Program provider to oversee procurement, security, issuance, reconciliation, and documentation of gift cards.

Program Staff - Staff employed by the Program provider who are responsible for requesting, issuing, documenting, and maintaining accountability for gift cards in accordance with this policy.

IV. BACKGROUND:

Workforce Solutions and program providers may use prepaid retail gift cards as allowable supportive services and/or incentives for eligible participants, particularly youth, when such use is necessary, reasonable, and properly documented.

This policy outlines required internal controls to ensure accountability, prevent misuse, and maintain compliance with federal, state, and local requirements.

V. POLICY AND PROCEDURES:

Roles and Responsibilities

1. ***Program Director (or designee) / Workforce Solutions -*** Responsible for purchase, inventory control, security, reconciliation, and oversight of all gift card activity.
2. ***Program Staff -*** Responsible for requesting, issuing, documenting, and safeguarding gift cards assigned to them.

3. ***Workforce Solutions Oversight Staff -*** Responsible for periodic monitoring of compliance with this policy.

Procurement of Gift Cards

1. **For WIOA Title I Providers**: The Title I Program Director may purchase prepaid retail gift cards for approved incentive and supportive service purposes.
    - No single purchase may exceed **$3,000**.
    - Only allowable WIOA and other Federal or State funded grant program funded incentives/supportive service expenditures may be used.
    - The original store receipt and supporting documentation must be submitted to the accounting office immediately following purchase.
    - A limited inventory may be stored at PA CareerLink® sites.
    - Total value stored onsite may not exceed **$500**.
    - Gift cards may not be transferred between programs, participants, or funding streams.

2. **For all Federal and State Grant Providers:**
    - Workforce Solutions for North Central PA will purchase gift cards, as needed and allowable, following the previous procurement outline above.

Security and Storage

1. All gift cards must be secured at all times in a locked container or safe accessible only to designated staff.
2. The Program Director (or designee) will maintain and routinely verify the complete inventory of gift cards, including card numbers and values.
3. Signature logs, inventories, and related documentation must be stored securely to protect participant confidentiality.
4. Only the number of cards needed for a specific off-site event or distribution may be removed from the office.

Issuance Procedures

1. For each gift card purchase, the Program Director or Workforce Solutions will complete the Program Gift Card Signature Log (Attachment #1) including:
    - Purchase date
    - Retailer name
    - Gift card value
    - Gift card number
    - Funding program and Program code
    - Signature of staff requesting the gift cards
    - Signature of Director issuing the gift cards

2. Staff must complete the Participant Gift Card Signature Log (Attachment #2) for each participant. The following must be documented for each card issued:
    - Participant name
    - Purpose of Issuance
    - Signature of staff dispersing card and date
    - Signature of participant receiving card and date received
    - Signature of second staff observing/verifying the disbursement

3. Separation of duties is required. The staff member who requests the gift card may not be the same staff member who disburses it to the participant**.**

Reporting and Reconciliation

1. Completed signature logs must be returned to the Program Director when all cards on that log are issued or returned no later than the last working day of each month.
2. All logs and supporting documentation must be retained for six (6) years following the end of the contract period.
3. Logs must be made available to Workforce Solutions staff upon request for monitoring or audit purposes.

Monitoring and Quality Assurance

Workforce Solutions will periodically monitor incentive and supportive service gift card usage to ensure that procedures, internal controls, and documentation requirements are followed.

VI. POLICY EXCEPTIONS:

Any discrepancies arising between Workforce Solutions policy and/or procedures with federal and state provisions due to current or future revisions will default to the current minimum federal and state regulations and guidance available. Workforce Solutions policy/or procedures may set forth stricter requirements than provided by federal and state guidance, but in no case will local policy and/or procedures not meet minimum federal and state policy.

VII. RESCISSIONS:

None

VIII. EXPIRATION:

Ongoing

IX. INQUIRIES:

Questions shall be directed to:
Pam Streich, Executive Director at pstreich@ncwdb.org; or
Tonya Mauk, Oversight and Project Manager at tmauk@ncwdb.org; or
Donna Hottel, Strategic Planning and Project Manager at dhottel@ncwdb.org

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X. POLICY HISTORY:

This policy is reviewed annually (at a minimum), typically during the first week of July, by Workforce Solutions' staff to assess and implement any necessary changes, edits, updates and revisions.

Name of Policy Reviewer	Date of Review	Description of Change	Effective Date
Pam Streich Tonya Mauk Donna Hottel Vanessa Hasselman	November 21, 2025	Updated policy format and procedures	November 21, 2025
Susan Snelick / Pam Streich	July 1, 2016	Policy Issue Date	July 1, 2016