



## EMPLOY MILWAUKEE POLICY 24.02

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**POLICY:** 24.02

**SUBJECT:** ADULT INCENTIVES

**ISSUANCE DATE:** 08/29/24

**EFFECTIVE DATE:** 08/29/24

**REVIEWED DATE:** 09/04/25

#### REFERENCES:

- DOL grants Notice of Award
- Grant contract documents

#### POLICY SCOPE

- ☐ EMPLOY MILWAUKEE AGENCY
- ☐ WIOA WDA 2 SYSTEM
- ☐ WIOA TITLE I-B PROGRAM(S)
  - ☐ ADULT PROGRAM
  - ☐ DISLOCATED WORKER PROGRAM
  - ☐ YOUTH PROGRAM
- ☒ NON-WIOA PROGRAMS
- ☐ RE ENTRY PROGRAMS

## I. BACKGROUND

In EMI's previous grants, incentives have been shown to increase a participant's completion rate and the provision of information on grant outcomes (such as credential attainment or employment status) after they complete their training program, for the purpose of accurately reporting performance outcomes.

## II. POLICY

### A. Grant specifications

Individual grants may specify in the executed contract the offering of reasonable incentives to participants for reporting achievement for grant milestones. Examples of allowable grant specified milestones include but are not limited to obtaining education credentials, training completion credentials, progression to next step of individual pathway, , employment outcomes and job attainment. Grant allowable Incentive payments for each grant shall be made in a uniform and consistent manner that ensures all participants receive equal incentives for equal achievement and/or participation.

Incentive payments may be awarded as a physical gift card or check. Gift cards should not be purchased in advance.

### B. Limitations

All incentive payments are subject to the availability of grant funds and are not an entitlement. Employ Milwaukee (EMI) may suspend or withdraw authorization for incentive payments at any time and at its sole discretion. The justification for awarding incentives must be tied to the goals in the IEP. It is the responsibility of program staff to verify the allowability of the particular type of incentive, and the allowable grant funds.

Incentive payments have a lifetime limit per participant. The limit is set by each grant budget. Documentation of milestone completion should be received no later than four (4) weeks after completion of the milestone to receive incentive payment. Participants in Incumbent Worker Training or On-The Job Training (OJT's) are not eligible for incentive payments.

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### III. PROCEDURES

#### A. Program staff

1. Shall complete the required documentation such as the IEP, the Purchase Approval request form, and participant signature receipt of incentive.
2. Must review documentation substantiating the achievement meriting an incentive such as verification of employment form (VOE), pay stubs, or employer letter.
3. If credential attainment, program staff must receive verification of degree/diploma or certificate of completion, or license.

#### B. Documentation requirements:

1. The participant's IEP must identify the education or training activity that the participant will participate in and the corresponding incentive award(s) that can be achieved.
2. Incentive awards are payable as a gift card or check which must be distributed in person. Gift cards/checks must be tracked when purchased with grant funds and grant staff must document via spreadsheet who the gift cards/checks were issued to and obtain the signature of receipt by the participant. Log should be reconciled at least quarterly.

### IV. ACTION REQUIRED

- Posting of this Policy to the Employ Milwaukee website for open access to all personnel.
- All subrecipient staff will be introduced and trained on this policy.

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**RECISSIONS:** Not applicable

**BOARD APPROVAL DATE:** 08/29/24

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