



Bay Consortium Workforce Development Board

Policy Number: 24-01

Effective Date: August 7, 2024

Title: Bay Consortium CSJQ Gift Card Policy

PURPOSE

The purpose of this policy is to define the procedure for obtaining, securing, issuing, and reporting for gift card incentives to participants in the Critical Sector Job Quality (CSJQ) Grant Worker Voice Roundtables conducted by Rappahannock Goodwill Industries in conjunction with WorkED Consulting, Inc. in the Bay Consortium Workforce region.

Gift Card Incentives may be provided to participants for the following deliverables while tracked in the grant activities: participation and providing feedback in CSJQ Worker Voice Roundtable.

DEFINITIONS

Participants – A individual interested in the target sector industries directly-related to the CSJQ Grant, this can include individuals enrolled in secondary or post-secondary education who are currently studying or interested in employment in the target sector industries related to the CSJQ grant. This also includes current and/or former workers of the target sector industries directly-related to the CSJQ grant. The purpose of these participants involvement in the Worker Voice Roundtables is to gather diverse perspectives and insights to inform policy decisions, improve working conditions, and address challenges faced by workers in essential roles. Participants are expected to contribute their experiences, knowledge, and suggestions to shape the outcomes of the grant program and enhance job quality in the targeted sectors.

POLICY

Limitations

Individual participants may receive up to \$20.00 of incentives in one program year. Any purchase of gift cards must be approved by Bay Consortium Workforce Development Board (BCWDB) staff prior to purchase. The BCWDB shall purchase the gift cards for an amount (\$20.00 per gift card) expected to be distributed in one month, not to exceed \$2,000.00. BCWDB expects the cards to be distributed in the month in which they are purchased.

Obtaining Gift Cards for Performance Incentives

It is the responsibility of the BCWDB to obtain and secure the gift cards to be used for incentives. Assets purchased with federal funds are considered to be part of those funds, and as such, they must be applied only to individuals eligible to receive funding from those sources. The BCWDB and subrecipient staff are responsible for the safeguarding of all federal funds allocated for CSJQ grant use; in the event of

theft or fraud, failing to establish and enforce policies to safeguard those funds will leave the BCWDB and subrecipient responsible. Upon purchase of the gift cards, the BCWDB shall provide a signed copy of the original receipt to the BCWDB Fiscal Manager.

Gift cards may not be transferred from one customer to another without prior approval from the BCWDB staff. Gift cards shall be purchased from local retail establishments in the region, including but not limited to Wal-Mart. Purchases of the gift cards shall follow BCWDB's internal process utilizing a purchase order for the purchasing of gift cards.

Security

1. Gift cards will be secured at all times in a locked container and/or safe accessible only to designated BCWDB staff.
2. The BCWDB staff will verify the count and amounts on the gift cards.
3. Purchase/distribution logs and copies of signed receipts will be kept together in a secure location to protect participant data and confidentiality.
4. The BCWDB staff will remove from the secure location only the number of gift cards and corresponding blank gift card receipts needed for a single distribution. All un-issued gift cards will be returned to the BCWDB staff by close of business the same day.
5. Receipts must be secured and treated as Personally Identifiable Information (PII).

Provisions for Tracking

1. The BCWDB staff will complete the following information on the appropriate signature log (purchase or distribution) for each date of activity:
 - Purchase log (Attachment A)
 - Date gift cards were purchased
 - Name of retail company (use separate line for each different company)
 - Gift card dollar amount (noted on log and on gift card if needed)
 - Number of cards purchased
 - Gift card tracking number
 - Name of person purchasing cards
 - Initials of person verifying the purchase/deposit of gift cards
 - Distribution log (Attachment B)
 - Date of issuance
 - Participant name (printed)
 - Purpose of issuance
 - Name of retail company
 - Gift card dollar amount
 - Gift card tracking number
 - BCWDB Staff signature
 - Initials of BCWDB staff who verified the issuance of gift to the recipient
2. BCWDB staff will submit a gift card request (Attachment C) so the correct gift card(s) may be given to each participant. BCWDB Fiscal Manager staff will sign the request form and indicate either their approval or disapproval of the request. If the request is not approved, the program manager will note the reason.
3. BCWDB staff and participant will sign a gift card receipt form (Attachment D); the original will be placed with the distribution log.
4. BCWDB staff will enter his/her initials as a witness for each gift card issued.

5. The Fiscal Manager will issue gift cards and corresponding gift card receipts to requesting BCWDB staff for distribution.

Dispensing Cards

1. Cards are to be issued in the order in which they were purchased; in accounting terminology, first in, first out.

Reporting

1. Each completed signature log will be kept on file with the BCWDB upon the issuance or return of the last gift card, but not later than the last working day of the month completed.

Monitoring

1. Gift cards shall be monitored by staff to the Board on a semi-annual basis.
2. All documentation authorizing or supporting the dispersal of assets for gift cards must be retained in accordance with the Records Retention policy. BCWDB requires records be retained for five (5) years.

Assets and the associated logs associated with the gift cards will be subject to remote and onsite monitoring and audit by BCWDB Monitors, BCWDB Fiscal Staff, and Federal Auditors. Any discrepancies discovered must be resolved as quickly as possible. Any discrepancies must be reported to BCWDB Executive Director immediately. Any additional information/discoveries must be reported on an ongoing basis until the discrepancy is resolved.