

PREMIUM PAY PROGRAM CHECKLIST

- 1. Adopt a written policy defining premium pay program that does all the following:
 - Sets eligibility parameters for receiving premium pay
 - Specifies time-period for awarding premium pay
 - Indicates if different eligibility criteria will be used for retroactive payments vs. prospective payments
 - Specifies how payments will be calculated
 - Specifies how payments will be distributed
 - Sets document retention requirements
 - Documents procedures for determining eligibility based on parameters.
 - Assigns roles and responsibilities for implementing the program
 - Establishes periodic monitoring and other internal controls
- 2. Identify eligible employees and document number of workers to be served
- 3. Identify if eligible employees meet the following requirements. If they do not, articulate additional justification for their inclusion.
 - 1. Less than or equal to 150% of state/county average annual wage, OR
 - 2. Not exempt from FLSA overtime provisions
- 4. Calculate estimated total costs of program
- 5. Implement premium pay program
- 6. Document number of workers that receive premium pay
- 7. Track total obligations and expenditures for premium pay
- 8. Implement monitoring and other internal controls
- 9. Report on program according to US Treasury guidelines

Essential Work

(1) Not teleworking

(2) Involves:

- Regular in-person interactions; OR
- Regular physical handling of items that were handled by others.

Note

US Treasury requires a local government to prioritize low- and moderate-income workers when awarding premium pay

Per-Person Maximums

(1) Up to \$13 per hour

(2) Overall (*not yearly*) total per employee payout is \$25,000

For more detailed information on developing a premium pay program, check out the [Coates' Cannon blog linked here!](#)