

District of Columbia Department of Health Ryan White HIV/AIDS Program Policies and Procedures		Policies and Procedures Implementing Office: HAHSTA Care and Treatment Division Ryan White HIV/AIDS Program Training Required: Yes Originally Issued: Revised/Reviewed:
Approved by: ___Lena Lago___ Name, Interim Bureau Chief	Review by Legal Counsel: _____N/A_____ Name, Deputy Director of Operations	Effective Date: February 4, 2022 Valid Through Date: February 28, 2023
SUBJECT Customer Incentive use under Ryan White Programs		
PURPOSE The purpose of this policy document is to outline the process by which Sub-Recipients can provide incentives to customers/participants of services funded by Ryan White Program funds.		
Applicability	<p>In accordance with HRSA’s Policy Clarification Notice on the Allowable Use of Funds – A nominal amount of grant funds may be used to provide gift cards to eligible participants as incentives but may not be redeemed for cash or used for unallowable items including (but not limited to) purchase of alcohol, tobacco, illegal drugs or other substances, or firearms.</p> <p>Sub-grants:</p> <p>Sub-recipients may allocate up to three percent* of their overall Ryan White grant award to costs supporting customer enrollment, retention, or return to medical care. Emphasizing this overarching goal, Sub-Recipients may designate the budget line item as Direct Customer Costs (Customer Incentives) for the following core medical service categories:</p> <ul style="list-style-type: none"> • Outpatient/ Ambulatory Health Services • Early Intervention Services • Medical Nutrition Therapy • Mental Health Services • Oral Health Care 	

- Substance Abuse Outpatient Care
- Medical Case Management, including Treatment Adherence

Justification for the incentives should specify the amount and frequency of the incentive, as well as any planned criteria for use or maximum amounts per customer. All use of funds for incentives are subject to review and approval by HAHSTA prior to purchase.

Sub-recipients must submit a letter requesting the use of customer incentives in all Ryan White funded programs. The letter must include:

- Service category the incentives will be used for, program need and expected outcomes with use of incentives
- Expected costs and number of incentives
- Type of incentives
- Systems in place for safe storage (i.e. lockbox or safe)
- Systems in place to monitor and track the distribution of the incentives; and
- Time period for which the incentives will be distributed.

Sub-recipients should consider incentives that have programmatic benefit. Examples include:

- A pre-paid phone card offered with the provision that the customer is expected to “check in” with the sub-grantee at least once a month.
- A food voucher used by the customer to purchase food specified by a medical nutrition plan.

Other examples of allowable customer incentives may include, but not be limited to, the following:

- Refreshments for group activities
- Toiletries or hygiene kits

Incentives should not include items that offer services provided by other service categories, including medical transportation and food banks.

Customers:

- Cash payments to customers are not permitted under any circumstances. Funds may not be used to purchase incentives or supplies for sub-recipient staff.
- Individual recipients of gift card incentives must sign a statement acknowledging and agreeing to the purpose(s) and restrictions (unallowable costs) on the incentives.
- Incentives may not be redeemed for cash or used for unallowable items including (but not limited to) purchase of alcohol, tobacco, illegal drugs or other illegal substances, or firearms.
- Each grant year each customer is held to an annual cap of

	<p>\$250 (\$250/per customer/per year) in incentives.</p> <ul style="list-style-type: none">• Recipients of customer incentives must sign a statement acknowledging they were notified of potential Internal Revenue Service (IRS) tax implications. Tax regulations are subject to change therefore all recipients of customer incentives must check the income limit reportable annually as indicated by current tax regulations. <p>*Note – For pilot programs, an exception of up to five percent of the overall grant budget is allowed.</p>
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