



<p>District of Columbia Department of Health Ryan White HIV/AIDS Program Policies and Procedures on the Use of Customer Incentives</p>		<p>Policies and Procedures</p> <p>Implementing Office: HAHSTA Care and Treatment Division Ryan White HIV/AIDS Program</p> <p>Training Required: Yes</p> <p>Originally Issued: 02/04/22</p> <p>Revised/Reviewed: 01/30/24</p>
<p>Program Approval:</p>  <p>_____ Ebony Fortune Ryan White Program Manager</p>	<p>Recipient Authorization:</p>  <p>_____ Avemaria Smith Ryan White Recipient</p>	<p>Effective Date: January 31, 2024</p> <p>Valid Through Date: February 28, 2025</p>
<p>I. SUBJECT</p> <p>Customer Incentive use under Ryan White HIV/AIDS Program (RWHAP) Services</p>		
<p>II. PURPOSE</p> <p>The purpose of this policy document is to outline the process by which Sub-Recipients may provide incentives to customers of services funded by Ryan White Program funds.</p>		
<p>III. Definitions and Acronyms</p>	<p>Customer – A person living with HIV/AIDS who is uninsured or under-insured and meets the eligibility criteria as defined by the EMA in which services are sought. For specifics on eligibility criteria, refer to the Enrollment and Eligibility policy at Enrollment and Eligibility Policy Final eff6.10.22.pdf.</p> <p>Direct Costs –Reasonable and allowable charges with a particular cost objective that is directly associated with activities that benefit customers.</p> <p>EMA - Eligible Metropolitan Area (EMA) - Geographic regions that are heavily impacted by a particular disease, disparity and/or inequity of health, in this case, HIV/AIDS, and are appropriate for funding as deemed by the Health Resource and Services Administration (HRSA). According to the HRSA, Metropolitan areas with a cumulative total of more than 2,000 cases of AIDS during the most recent 5-year period and a population of 500,000 or more are eligible for funding as Eligible Metropolitan Areas (EMAs). Twenty-two regions qualify as EMAs. Continued eligibility as an EMA is contingent on having 2,000 or more cases of AIDS during the most recent 5 years and a cumulative total of 3,000 or more living AIDS cases as of the most recent calendar year. Available at: https://hab.hrsa.gov/livinghistory/timeline/2006.htm</p> <p>The Washington, DC, Eligible Metropolitan Area (DC EMA) is comprised of the following jurisdictions:</p>	

- **District of Columbia (Washington, DC)**
- **Northern Virginia:** City of Alexandria, Fairfax City, Falls Church City, City of Fredericksburg, Manassas City, Manassas Park City, and the counties of Arlington, Clarke, Culpeper, Fairfax, Fauquier, King George, Loudoun, Prince William, Spotsylvania, Stafford, and Warren
- **Counties of Suburban, Western and Southern Maryland:** Prince George’s County and Montgomery County (*Suburban*), Frederick County (*Western*), Calvert County and Charles County (*Southern*)
- **West Virginia:** Berkeley County and Jefferson County

Gift Cards –A prepaid card of nominal value used to incentivize customer enrollment, engagement, retention, or return to medical care. Gift cards cannot be exchanged for cash or used where direct provision of the service is already available (e.g., transportation or food). Gift cards must be tied to one or a collection of retailers. Visa, MasterCard and American Express gift cards are not allowed.

Incentives – Any item that can be provided as a voucher, e-gift/gift cards, and/or promotional materials to excite and encourage customers’ participation and engagement in HIV medical care.

Incentive Budget Cap - the maximum amount that a sub-recipient can budget to encourage customer enrollment, engagement, retention, or return to medical care. It is the lesser amount between one percent of the sub-recipient’s Ryan White budget for the service category and \$5,000 without prior approval from the assigned Program Officer.

Ryan White HIV/AIDS Program Eligible Service Categories

Early Intervention Services	Health Education and Risk Reduction
Home and Community-Based Care	Housing Services
Medical Case Management	Medical Nutrition Therapy
Mental Health Services	Non-Medical Case Management
Oral Health	Outpatient Ambulatory Health Services
Outreach Services	Other Professional Services
Substance Abuse Outpatient Services	Psychosocial Support Services

Note that service categories not listed may not purchase gift cards/voucher incentives using Ryan White funds.

Underinsured – An individual whose health insurance coverage does not cover expenses associated with their health care needs.

Uninsured – An individual that does not have health insurance coverage through an individual, or employer-sponsored plan, a federal healthcare program, or the Federal Employees Health Benefits Program at the time services are sought.

Ryan White HIV/AIDS Program -The program funded by the Ryan White Comprehensive AIDS Resources Emergency (CARE) Act. A Federal legislation created to address the health care and service needs of people living with HIV/AIDS (PLWHA) disease and their families in

IV. Policy Requirements

the United States and its territories. The law emphasizes providing lifesaving and life-extending services for people living with HIV/AIDS.

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.

Sub-recipients:

Sub-recipients may budget the lesser amount between one percent of the Ryan White budget for the service category and \$5,000 without prior approval from the assigned Program Officer for the purposes of supporting customer enrollment, retention, or return to medical care. Incentives **cannot include** VISA/MASTERCARD/AMEX or cash-equivalent gift cards. The use of gift cards over \$25 **is not allowed without prior approval** from the Ryan White Program Manager.

Justification for the use of incentives must specify the amount, frequency, and limitation of the incentive, as well as any planned criteria for use. 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 for all Ryan White eligible service categories. The letter must include:

- Service category the incentives will be used for, program need and expected outcomes with use of incentives
- Expected costs, distribution frequency and number of incentives
- Maximum number of incentives per customer
- 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-recipient 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.

	<p>Customers:</p> <ul style="list-style-type: none"> • 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 customer is held to an annual cap of \$250 worth of incentives. Cards may not be issued in batches and are limited to each visit or session, as determined by the use of incentives narrative submitted by the program. • 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>VIII. Key Contacts</p>	<p>Ebony Fortune, Ryan White HIV/AIDS Program Manager, 202.671.4900 or Ebony.Fortune@dc.gov</p>
<p>IX. Related Documents, Forms and Tools</p>	<ol style="list-style-type: none"> 1. HRSA PCN 16-02 2. https://effibarryinstitute.org/resources/grant-year-32-provider-kick-off-meeting-part-a/