



District of Columbia Department of Health Ryan White HIV/AIDS Program Policies and Procedures Use of Customer Incentives		Policies and Procedures Implementing Office: HAHSTA Care and Treatment Division Ryan White HIV/AIDS Program Originally Issued: February 4, 2022 Revised: November 18, 2025
Program Approval:  _____ Ebony Fortune Deputy Chief	Recipient Authorization:  _____ Avemaria Smith Ryan White Recipient	Effective Date: January 6, 2026 Valid Through Date: February 28, 2027
I. SUBJECT Customer Incentive usage under Ryan White HIV/AIDS Program (RWHAP) Services		
II. PURPOSE The purpose of this policy is to outline the process by which subrecipients may provide incentives to customers receiving services funded by Ryan White Program funds.		
III. Definitions and Acronyms	<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.</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.</p> <p>The Washington, DC, Eligible Metropolitan Area (DC EMA) is comprised of the following jurisdictions:</p> <ul style="list-style-type: none"> • 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 <u>counties</u> 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 (<i>Suburban</i>), Frederick County (<i>Western</i>), Calvert County and Charles County (<i>Southern</i>) • West Virginia: Berkeley County and Jefferson County 	

	<p>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. Cash equivalent cards such as Visa, MasterCard and American Express gift cards are not allowed.</p> <p>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.</p> <p>Incentive Budget Cap - The maximum amount that a subrecipient can budget to encourage customer enrollment, engagement, retention, or return to medical care. It is the lesser amount between one percent of the subrecipient’s Ryan White budget for the service category and \$10,000 without prior approval from the assigned Program Officer.</p> <p>Incentive-Eligible Service Categories</p> <table> <tr> <td>Early Intervention Services</td><td>Health Education and Risk Reduction</td></tr> <tr> <td>Home and Community-Based Care</td><td>Housing Services</td></tr> <tr> <td>Medical Case Management</td><td>Medical Nutrition Therapy</td></tr> <tr> <td>Mental Health Services</td><td>Non-Medical Case Management</td></tr> <tr> <td>Oral Health</td><td>Outpatient/Ambulatory Health Services</td></tr> <tr> <td>Outreach Services</td><td>Other Professional Services</td></tr> <tr> <td>Substance Abuse Outpatient Services</td><td>Psychosocial Support Services</td></tr> </table> <p>NOTE: Service categories not listed are not permitted to purchase gift cards or voucher incentives using Ryan White funds.</p> <p>Incentives cannot include items that provide services covered under medical transportation or foodbank services.</p> <p>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 the United States and its territories. The law emphasizes providing lifesaving and life-extending services for people living with HIV/AIDS.</p>	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
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IV. Policy Requirements	<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. Subrecipients that chose to incorporate gift card incentives into their Ryan White-funded programs must adhere to the following requirements.</p> <ol style="list-style-type: none"> 1. Budgeting and Approval <ul style="list-style-type: none"> • Subrecipients may allocate the lesser of 1% of the Ryan White budget for the service category or \$10,000 for incentives without prior approval from the assigned 														

	<p>Program Officer.</p> <ul style="list-style-type: none"> • All proposed incentive expenditures must be reviewed and approved by HAHSTA prior to purchase. • A detailed justification must be included in the budget, specifying: <ul style="list-style-type: none"> • Amount • Number of incentives • Frequency • Intended use within eligible service categories <p>2. Allowable and Unallowable Incentives</p> <ul style="list-style-type: none"> • Prohibited: Cash, VISA/MasterCard/AMEX/Amazon or other cash-equivalent gift cards. • Gift cards over \$45 require prior approval from the Ryan White Program Manager. • Cash payments to customers are not permitted under any circumstances. • Incentives for staff are not allowed. <p>3. Examples of Allowable Incentives</p> <ul style="list-style-type: none"> • Food vouchers aligned with a medical nutrition plan • Refreshments for group activities • Toiletry or hygiene kits <p>4. Distribution and Tracking</p> <ul style="list-style-type: none"> • Subrecipients must have secure systems in place to store, monitor, and track incentive distribution. • Program Officers will verify these systems during site visits and/or monthly monitoring calls. <p>5. Customer Acknowledgment and Restrictions</p> <ul style="list-style-type: none"> • Customers must sign a statement acknowledging: <ul style="list-style-type: none"> • The purpose and restrictions of the incentive • That incentives may not be redeemed for cash or used for unallowable items (e.g., alcohol, tobacco, illegal drugs, firearms) • Potential IRS tax implications • Customers are responsible for checking current IRS income reporting requirements. <p>6. Limits and Conditions</p> <ul style="list-style-type: none"> • Annual limit per customer: \$500 • Incentives must be issued one per visit/session; batch issuance is not allowed. • Any exceptions require prior approval from the Ryan White Program Manager.
V. Key Contacts	<p>Ebony Fortune, Deputy Chief, Care and Treatment Services, 202.671.4900 or Ebony.Fortune@dc.gov</p>

VI. Related Documents, Forms, Links, and Tools	<ol style="list-style-type: none">1. Enrollment and Eligibility Policy2. Ryan White HIV/AIDS Program Services: Eligible Individuals & Allowable Uses of Funds (PCN # 16-02)
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