



**LAS VEGAS TGA**  
**PART A HIV/AIDS PROGRAM**  
 CLARK | MOHAVE | NYE COUNTIES

***Acceptable Use of Incentive for Clients — Administrative Policy***

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Effective Date	Updated Date
September 5, 2023	N/A

**POLICY:**

Subrecipients may allocate Ryan White Part A, Minority Aids Initiative, Ending the HIV Epidemic and Status Neutral grant funds to provide incentives to clients within certain Core Medical and Support Service Categories.

This policy only pertains to incentives. An incentive is defined as a reward that encourages or motivates a person to engage in a desired behavior.

This policy does not pertain to regular service delivery that may be provided using gift cards or vouchers. For example, bus passes or gas cards provided to a client to attend HIV-related medical and support service appointments by a Medical Transportation program are not considered incentives and not subject to this policy. Refer to Las Vegas TGA Service [Standards and Policies](#) for individual Service Categories for further guidance.

**AUTHORITY:**

- 42 CFR 422.134
- 2 CFR 200.423
- 2 CFR part 200, subpart E
- 2 CFR 200.334
- PCN 16-02
- DHHS Program Letter (February 28, 2023)

**PURPOSE:**

The purpose of this administrative policy is to outline allowability of use and accepted processes by which subrecipients can provide **incentives** to eligible clients accessing services funded by the CCSS Office of HIV. For the purpose of this policy incentives include vouchers, gift cards and tangible incentive items.

**PROCEDURES:**

**I. Allowable Service Categories:**

The use of incentives is allowable under the following Ryan White/MAI Core/Support service categories:

- Mental Health Services
- Substance Abuse Services
- Early Intervention Services (EIS)
- Health Education/Risk Reduction (HERR)
- Psychosocial Support Services

The use of incentives under the Ending the HIV Epidemic and Status Neutral programs may be allowable depending on the HRSA Notice of Funding Opportunity, Project Officer-approved activities and/or an agency's contract with Clark County.

## **II. General Rules for Use of Incentives:**

An incentive program may include various types of incentives whose primary goal is aimed at supporting and encouraging clients' engagement in care and positive health outcomes.

### **a. Incentives must:**

- Have a programmatic benefit and be consistent with the goal of the specified category for which they will be used. Examples include:
  - A pre-paid phone card offered with the provision that the client is expected to "check in" with the sub-recipient at least once a month.
  - A blank book or notebook given to a client to journal thoughts and emotions.
  - A pedometer given to a client to encourage walking or running for exercise.
- Not include items that are offered as services provided under other Core/Support Service Categories (examples: Medical Transportation and Food Bank/Home Delivered Meals);
- Must not exceed **\$25** in value for a single incentive;
- Not exceed [Federal Per Diem](#) Rates for a provided meal;
- Be redeemable only at specific retailers or retail chains or for a specific category of items or services;
- Be offered identically to any qualifying participant who performs the target activity;
- Not be offered in the form of cash, cash equivalents, or other monetary rebates. An item is classified as a cash equivalent if it:
  - Is convertible to cash (such as a check); or
  - Can be used like cash (such as a general-purpose debit card).
- Not involve elements of chance (such as a lottery ticket);
- Not be able to be used for the purchase of alcohol, tobacco, illegal drugs or other illegal substances, or firearms; and
- Not be used for clothing or any other unallowable purpose listed in [HRSA Policy Clarification Notice 16-02](#).

- b. All use of funds for incentives are subject to review and written approval by the Recipient Office **prior** to their distribution.

### **III. Letter of Requesting Use of Incentives**

Prior to expending funds for incentives, subrecipients of CCSS Office of HIV must submit a letter to the Office of HIV requesting approval for the use of grant funds for this purpose. The letter must include:

- a. The service category under which the reward items will be used;
- b. Type of incentive(s) (voucher/gift card/incentive);
- c. The programmatic purpose of the incentive and anticipated impact on the client's HIV-related health outcomes;
- d. The expected number of incentives to be acquired and cost per item;
- e. A narrative justification for the incentive describing the type of incentive, and frequency for distribution.

### **IV. Subrecipient Policies**

Subrecipients shall develop and implement policies and procedures regarding the use and distribution of incentives that include but are not limited to:

- a. The criteria for determining who receives an incentive;
- b. The general programmatic purpose of the incentive and anticipated impact on the client's HIV-related health outcomes;
- c. Frequency of distribution;
- d. Systems in place for safe, secure storage (i.e., lockbox or safe);
- e. Statements that ensure cash payments to customers are not permitted under any circumstances;
- f. Statements that funds may not be used to purchase of items for subrecipient staff.
- g. Statements that incentives may not be used for the purchase unallowable items as listed in [HRSA Policy Clarification 16-02](#), including, but not limited to, purchase of clothing, alcohol, tobacco, illegal drugs or other illegal substances, or firearms;
- h. Individual recipients of gift card incentives must sign a statement acknowledging and agreeing to the purpose(s) and restrictions (unallowable costs) on the incentives; and
- i. Process for tracking incentives which must include, at a minimum:
  - URN of individual receiving the incentive;
  - Date client received the incentive;
  - Type of incentive;
  - Number of incentives received;
  - Dollar value of each incentive; and
  - Signature of client.
- k. A confidentiality and privacy statement that all information related to the incentive program, including clients' participation and reward history, shall be treated with strict confidentiality and in compliance with applicable federal, state, and local privacy laws.

### **V. Subrecipients should understand that the use of certain reward items may have potential Internal Revenue Service (IRS) tax implications for clients.**