

Ryan White HIV/AIDS Program: use of incentives policy and procedures

Policy

This policy refers only to the use of incentives purchased with Ryan White funds, or with program income derived from Ryan White-funded activities. 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 to support client enrollment or retention in medical care, or adherence to medication regimes. Incentives must be tied to the activities and outcomes associated with contracted Ryan White activities. Incentives should not include items that offer services provided by other service categories, including medical transportation and food banks.

Procedures

Ryan White funded subrecipients may use incentives in their Ryan White funded program(s) by reviewing this Use of Incentives Policy and Procedures and submitting the Ryan White Program Participant Incentives Information and Attestation Form. The Information and Attestation Form must be received by the Hennepin County Ryan White Program within the first quarter of the fiscal year. Any substantial changes to the subrecipient incentive process are to be submitted to the Hennepin County Ryan White Program via the Information and Attestation Form within a quarter of implementation. Examples of substantial changes include, but are not limited to, significant changes to services prompting the provision of incentives, the incentive amounts, and/or the incentive type. The Hennepin County Ryan White Program has final decision-making authority over how incentives can be used.

Exclusions

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 substances, firearms, or lottery.

Cash payments or cash look-alike payments are not an acceptable incentive. These include VISA and other credit card gift cards that can be used like cash. Funds may not be used to purchase incentives for subrecipient staff.

Quality assurance

Programs must have established policies and procedures for ensuring that incentives are secured, tracked, and distributed appropriately to prevent loss or theft. Clients receiving incentives must certify that they completed the activities necessary to receive the incentive and will not use the gift card to purchase prohibited items as well as understand potential Internal Revenue Service (IRS) tax implications. Tax regulations are subject to change therefore all recipients of participant incentives must check the income limit reportable annually as indicated by current tax regulations.

A tracking log of disbursed gift cards is to be maintained by the subrecipient for review during annual audits and/or site visits. A disbursement workbook has been developed and may be adapted for use by the subrecipient; it is available at <https://www.hennepin.us/ryan-white#service-providers>.

Invoicing

Hennepin County can only reimburse for gift cards that have been disbursed to Ryan White eligible clients. Only disbursed gift cards can be included on monthly invoices.

Contact

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