

Gift Card Policy

BACKGROUND:

To assure compliance with legislative requirement 2604 (i) which prohibits payments to clients in the form of currency or cash equivalent "gift cards" that can be redeemed for cash (e.g. VISA cards). General-use prepaid cards are considered "cash equivalent" and are therefore not allowable.

POLICY:

The use of gift cards is restricted to those instances where the direct provision of the service is not possible. The use of vouchers, tickets, or gift cards is limited to those that can be exchanged for a specific service or commodity (e.g. food or transportation). Under no circumstances can Ryan White HIV/AIDS Program (RWHAP) funds be used to make case payments to clients.

DOCUMENTATION:

Vouchers, gift cards, and tickets must be tracked by date bought and date delivered to client, denomination, client name, purpose (i.e. food, transportation) and need. This should be documented in the client's treatment plan and into a data system such as CAREWare, in order to substantiate and track payment for reporting.

GUIDANCE:

When purchasing gift cards for clients the following must be taken in consideration:

- A. Store gift cards must be redeemed at one merchant or an affiliated group of merchants for specific goods or services that further the goals and objectives of the RWHAP. (i.e., gas cards, food cards, etc.).
- B. Merchant gift cards can be used as incentives for eligible program participants.
- C. Gift cards that cannot be exchanged for cash or used for anything other than the allowable core and support services.
- D. There must be systems in place to account for disbursed or non-disbursed vouchers and store gift cards.
- E. General-use prepaid cards are considered "cash equivalent" and are therefore not allowable
- F. Do not buy General-use prepaid cards. Such cards generally bear the logo of a payment network, such as Visa, MasterCard, or American Express, and are accepted by any merchant that accepts those credit or debit cards as payment. Gift cards that are co-branded with the logo of a payment network and the logo of a merchant or affiliated group of merchants are General-use prepaid cards, not store gift cards, and therefore are unallowable.

EXCEPTIONS:

Gift card bought with non-federal dollars.

REFERENCES:

Ryan White Legislation: <https://hab.hrsa.gov/about-ryan-white-hiv-aids-program/ryan-white-hiv-aids-program-legislation>

**Indiana State Department of Health (ISDH)
HIV Services Program (HSP)
HSP Policy # 18-06**

Implemented: September 1, 2018