

**COUNTY BOARD OF HEALTH
POLICY # 191A
POLICY FOR PROCUREMENT AND USE OF GIFT CARDS**

Approval:		7-15-21
	District Health Director	Date

1.0 PURPOSE

This policy contains guidelines for procurement and use of gift cards.

2.0 AUTHORITY – This policy is published under the authority of CBOH and in compliance with the following:

- 2.1 District 2 Public Health, “Clinic Fees Policies and Procedures”, policy #169.
- 2.2 Health District 2, “Purchasing & Inventory Policies and Procedures, policy #190
- 2.3 District 2 Public Health, “Financial Management, Fees and Cash Handling Policy Procedures, policy #191.

3.0 SCOPE

This policy applies to all employees of the County Board of Health.

4.0 POLICY

The purchase of gift cards is restricted to purposes defined by specific departmental programs. Gift card purchases outside the scope of these authorized programs are generally prohibited.

Gift cards are considered equivalent to cash and petty cash funds. Therefore, strict protocols and controls must be developed and implemented to a) maintain accountability for all gift cards purchased and distributed, and b) avoid mishandling, misuse, abuse, and theft of gift cards. County Board of Health employees may not be gift card recipients.

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5.0 DEFINITIONS

- 5.1 DHD: District Health Director
- 5.2 DPH: Department of Public Health
- 5.3 CBOH: County Board of Health

6.0 RESPONSIBILITIES

- 6.1 The DHD shall ensure compliance with this policy.
- 6.2 The DHD shall appoint a designee, who may be a county nurse manager, at each CBOH, to ensure compliance with the screening components of this policy.

7.0 PROCEDURES

7.1 ELIGIBILITY TO RECEIVE GIFT CARDS

- 7.1.1 Clients and patients must be eligible for the program that distributes gift cards as incentives.
- 7.1.2 Clients and patients receiving gift cards cannot be CBOH employees or family members, contractors, or other staff working on behalf of DPH.

7.2 GOALS CLIENTS AND PATIENTS MUST MEET TO BE ELIGIBLE MUST BE SET IN ADVANCE

- 7.2.1 CBOH and/or program coordinators must establish in advance the goals clients and patients must achieve for them to qualify to receive gift cards. Goals may serve as incentives to encourage clients and patients to meet health goals, assist DPH (e.g. outreach and client engagement activities), or other health purposes.
- 7.2.2 The pre-set goals must be established within specific areas of client and patient achievement and within a specific timeframe.
- 7.2.3 Clients and patients must present – and managers and/or program coordinators – must verify- sufficient and appropriate proof that they met the goals that entitle them to receive gift cards.

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7.3 PURCHASE OF GIFT CARDS

7.3.1 AUTHORIZATION TO PURCHASE

- 7.3.1.1** The DHD must approve the general use and purchase of gift cards as incentives.
- 7.3.1.2** The county nurse manager and/or program coordinator must approve each purchase of gift cards.

7.3.2 FUNDING SOURCE

- 7.3.2.1** Gift card purchases must be listed as an approved use of the specified funds.
- 7.3.2.2** In cases where gift cards are purchased with specified funds the use of which is restricted, the use of the gift cards must be subject to the same restrictions as the use of the specified funds.

7.3.3 ACTUAL PURCHASE

- 7.3.3.1** Gift cards must be purchased in compliance with the purchasing policies.
- 7.3.3.2** The value of a gift card purchased may not exceed \$25 per card.
- 7.3.3.3** The number of gift cards purchased may not exceed the anticipated fiscal year quantity.
- 7.3.3.4** Employees may not purchase gift cards as a reimbursable expense.

7.3.4 INVENTORY RECEIPT

- 7.3.4.1** Gift cards must be delivered to District 2 Public Health at 1280 Athens Street to the attention of the procurement manager.
- 7.3.4.2** Documentation of the packing slip must include the name and signature of the receiving staff and corresponding date.
- 7.3.4.3** Staff must verify the gift card types and quantities by type and in total from the shipment(s) and the packing slip(s) of the shipment.

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7.3.4.4 Staff must review, sign, and date packing slip(s) of the gift card shipment(s).

7.4 SEPARATION OF DUTIES

7.4.1 STAGES OF HANDLING AND TRANSFER OF GIFT CARDS

7.4.1.1 A different person must be responsible at each stage in the handling and transfer of gift cards:

- 7.4.1.1.1** Request the order of gift cards
- 7.4.1.1.2** Approve the order of gift cards
- 7.4.1.1.3** Purchase the gift cards
- 7.4.1.1.4** Receive the gift cards
- 7.4.1.1.5** Distribute the gift cards
- 7.4.1.1.6** Monitor usage of the gift cards

7.4.2 STAFF HANDLING GIFT CARDS CANNOT USE THEM

7.4.2.1 Under no circumstances may an employee involved in any stage of handling or transferring gift cards issue or use a gift card for his or herself or family member.

7.5 GIFT CARD INVENTORY

7.5.1 INVENTORY RECORDS

7.5.1.1 The following internal controls must be used in the storage of gift cards:

- 7.5.1.1.1** Maintain complete and accurate inventory records by gift card, gift card type and in total, including the gift card vendor and last four digits of the serial number, the beginning balance, gift cards received and distributed and corresponding dates, and the ending balance,
- 7.5.1.1.2** Restrict access to gift card inventory records to manager/program coordinator. Ensure access rights are immediately terminated once the employees no longer need access.

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7.5.1.1.3 Conduct daily physical inventory counts, and match results to inventory records.

7.5.1.1.4 Report to district administrator any discrepancies in the quantities and amounts between the physical inventory counts and inventory records.

7.5.1.1.5 Investigate discrepancies between the physical inventory counts and inventory records, and document the reason for discrepancy.

7.5.1.1.6 Review and approve any adjustments to inventory records. This must be done by a manager/program coordinator and the district administrator.

7.5.2 INVENTORY STORAGE AND SECURITY

7.5.2.1 Store all gift card inventories in a locked box/bank bag within a safe and restrict access to key and/or combination.

7.5.2.2 Keep the safe in a room with restricted lock access.

7.5.2.3 Maintain a log documenting who has had access to the room and when (each entry and exit).

7.5.2.4 Exercise dual custody controls at all times during each stage of handling and transferring gift cards. Two managers should be present. Each signing the log documentation and inventory sheet.

7.5.2.5 Hold no more than \$500 supply of gift cards at health department or at programmatic events. Gift card inventories above these amounts will remain in the safe at the district office. Other arrangements must have approval from DHD.

7.5.3 GIFT CARD DISTRIBUTION

7.5.3.1 Review and approve all eligibility documentation for each client or patient upon each round of gift card distribution. This should be done by the manager/program coordinator and/or their designee.

7.5.3.2 Maintain complete and accurate distribution records by gift card type, and in total, including the gift card vendor and serial number, client name(s), and date on which the gift card was distributed. The manager/program coordinator and procurement manager

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must review and approve such records before each round of gift card distribution.

7.5.3.3 Maintain a log for clients and patients to sign upon receiving their gift card in person. If client or patient names are confidential, then the client or patient alias and the signature of CBOH employee distributing gift cards are required. Client information that includes client and patient names must be available for audit purposes.

7.5.3.4 Return to the district office any gift card(s) not distributed to a client or patient and properly record the card in the inventory records.

7.5.4 GIFT CARD USAGE BY RECIPIENTS

7.5.4.1 Gift cards must be provided only to clients and patients as incentives for participation.

7.5.4.2 Gift cards must be used only for the purposes stated and determined by the health department and/or program.

7.5.4.3 The value of gift cards distributed to each client or patient must not exceed the per-person limit determined by the health department and/or program.

7.5.4.4 Gift cards cannot be used to purchase prohibited items.

7.5.4.5 Any instance of loss, theft, fraudulent use or abuse of gift cards must be immediately reported to the district administrator.

7.5.4.6 The annual audit will include monitoring the usage of distributed gift cards.

7.5.5 RECORD RETENTION

7.5.5.1 For audit purposes, retain all documentation for no less than five years.

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8.0 REVISION HISTORY

REVISION #	REVISION DATE	REVISION COMMENTS
0	7/1/2021	Initial Issue


9.0 RELATED FORMS

Gift Card Access Log
Gift Card Inventory Log
Patient Distribution Log


Patient Distribution Log

Received by: _____	Date: _____	Gift Card Receipt
Issued by: _____	Date: _____	
Last 4 Digits of Card: _____	Program/County: _____	


Patient Distribution Log

Received by: _____	Date: _____	Gift Card Receipt
Issued by: _____	Date: _____	
Last 4 Digits of Card: _____	Program/County: _____	

Patient Distribution Log

Received by: _____	Date: _____	Gift Card Receipt
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