

Division of Public Health Administrative Manual

Chapter:	Business Operations
Title:	DPH Incentive Gift Card Management Policy
Current Effective Date:	April 30, 2018
Revision History:	
Original Effective Date:	April 30, 2018
Last Reviewed:	April 30, 2018

Purpose

To provide clearly defined guidelines and procedures for the purchase and distribution of incentive gift cards for the Division of Public Health (DPH).

Policy

To allow the purchase and distribution of gift card incentives by DPH.

Implementation

1. Requisition to purchase gift cards will be completed according to the NC DHHS Cash Management Policy, DPH Policy, and Program/Section/Branch procedures. Programs will document the process of receiving gift cards, distributing gift cards to staff from a central inventory, and issuing gift cards to consumers.
2. All program, grant, and contractual requirements must be followed.
3. The following fiscal internal controls must be in place:
 - a. Programs/Sections/Branches will develop a documented estimate of the number of gift cards needed in a year. Orders of gift cards will be based upon this estimate or an update of this estimate.
 - b. When gift cards are needed, the following steps will be documented:
 - i. Card order approved
 - ii. Cards received
 - iii. Card tracking numbers assigned and logged in an encrypted spreadsheet
 - iv. Distribution of cards logged when cards are provided from the central inventory
 - v. Distribution of cards logged when cards are given to consumers
 - vi. Monthly audit of gift card inventory and Incentives Tracking Log

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- c. Only three individuals will have ongoing access to the gift cards and logs, though, as noted below, various program staff may handle paper copies of the logs for the purposes of documenting the distribution of gift cards to consumers. The three individuals with ongoing access are:
 - i. Card Purchaser
 - ii. Card Manager
 - iii. Card Auditor
- d. The individual gift card numbers will be documented on electronic versions of the Program/Section/Branch Incentives Tracking Log by the Program/Section/Branch's purchasing agent or their designee. This log will include, at a minimum: the individual gift card number; store; dollar amount; staff member name; date issued; and a place for recipient acknowledgement (used when printed out as described below). These logs must be password protected, using either the proprietary process within Excel, or another method of password protection, such as AxCrypt, and only the three individuals listed above should be in possession of the password. These logs are to be maintained until scheduled for destruction on the DHHS Controller's Office Retention Schedule and the DHHS Functional Records Schedule.
- e. Gift cards and printed copies of the Program/Section/Branch Incentives Tracking Log will be stored by the purchasing agent in a safe or in a secured area, such as a locked office, in a locked container, such as locking file cabinet. These logs are to be maintained until scheduled for destruction on the DHHS Controller's Office Retention Schedule and the DHHS Functional Records Schedule. If cards are maintained at the program level, only three individuals will have access to the cards and logs as noted in Section c.
- f. Upon request by authorized program staff, the Card Purchaser will provide the requested number of cards to the requesting program staff and record the transaction by card number on the Program/Section/Branch Incentives Tracking Log. Program staff will maintain unused cards securely as described above.
- g. If program staff will be using/distributing the cards to consumers directly as incentives, program staff will document the disposition of the cards in paper versions of the Program/Section/Branch Incentives Tracking Log.

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- h. When feasible, consumers/participants will acknowledge that they received the gift cards by initialing the Program/Section/Branch Incentives Tracking Log.
 - i. Programs shall conduct a monthly audit of inventoried gift cards against the electronic and paper tracking logs. The audit process shall include a physical count of all undistributed gift cards and a comparison of undistributed gift card numbers to the master list for all gift cards purchased. Audits shall be unannounced. The audit shall be performed by the designated Program/Section/Branch Card Auditor. Documentation of the audit shall be submitted to the Program/Section/Branch Manager.
- 4. If the cards are to be provided to external agencies:
 - a. Program/Section/Branch will implement financial controls for recipient agency handling and distribution of the gift cards through the DPH contract with the recipient agency to include, at a minimum: gift card tracking, safe-keeping, recipient acknowledgement, and periodic audits.
 - b. Program/Section/Branch staff will complete Incentives Shipment Receipt Form prior to the distribution of the gift cards.
 - c. Program/Section/Branch staff will send gift cards and the Incentives Shipment Receipt Form to the agency via Fed-Ex at no charge to the receiving agency. The Incentives Shipment Receipt Form may be customized by the program to include program staff names and applicable contact information (fax, e-mail, etc.).
 - d. Program/Section/Branch staff and the recipient agency's financial officer and/or program manager will conduct a joint quarterly audit of the gift card program and document their findings.
- 5. Paper files will be maintained per the DHHS Controller's Office Retention Schedule and the DHHS Functional Records Schedule.

Documents

[Program/Section/Branch Incentives Tracking Log Template](#)

[Incentives Shipment Receipt Form Template](#)