

Approvable Use of Incentives/Gift Cards Based on SAMHSA Guidance

Exact language taken from <https://www.samhsa.gov/grants/grants-management/policies-regulations/additional-directives> in quotation marks and italics below, with emphasis added

“Only Non-Cash Incentives Before and After Programs

Non-cash incentives to participants in treatment and prevention programs are essential to retain individuals and to encourage attendance and attainment of treatment or prevention goals. You must build all the non-cash incentives into the program design, and they should be of minimal cash value.

Do not use discretionary grant funds to make direct cash payments to individuals during the treatment or prevention program.

*SAMHSA policy supports the appropriate, judicious, and conservative use of incentives in discretionary grant programs. Incentives should be the minimum amount necessary to meet the program and evaluation goals of the grant, **up to \$30**. You should determine the minimum amount to be effective as follows:*

Before the Program: *You may not use discretionary grant funds to make direct payments to individuals to induce them to enter treatment or prevention programs.*

During the Program: *You may use discretionary grant funds for "wrap-around services" (non-clinical supportive services) that intend to:*

- *Improve an individual's access to and retention in treatment that is deemed essential to meeting program goals as they relate to the target population*
- *Improve access to and retention in prevention programs*
- *Meet abstinence benchmarks”*

Non-Cash Incentives (Gift Cards) and BHDDH Prevention Programs

Overview

Typically, BHDDH will build use of an incentive into the proposal submitted to SAMHSA it is part of programmatic design. In cases where the Regional Prevention Task Force determines that the use of non-cash payment as an incentive (gift cards) is required to meet programmatic objectives, but it is not part of the programmatic design submitted by BHDDH to SAMHSA, it must be justified based on program and evaluation goals addressed in the Region’s strategic plan.

The implementation specifics for use of non-cash incentives must be referenced in the relevant section of regional or municipal strategic plan and relevant annual work plan. Furthermore, the amount should be the minimum amount needed to fulfill the goal or objective and may NOT exceed \$30 per participant. The plan, or request to amend the plan to add use of incentives, must be approved by BHDDH in consultation with any program evaluator working on the discretionary/Block grant program.

Use of incentives/gift cards for program participation or evaluation **must always be pre-approved by BHDDH and may be subject to additional approval processes by SAMHSA** if the use of incentives was not built into BHDDH's approved scope of work. If use of gift cards is allowed, there must be a detailed documentation process in place to track purchase and distribution of gift cards with back up submitted with invoices. For example, there must be a receipt for the purchase of the gift cards, a detailed list of the serial numbers of the gift cards purchased, documentation related to the event/program where the gift cards were distributed (e.g., a flyer or registration form), a sign in sheet, a receipt signed by each participant acknowledging receipt of the gift card with the serial number, recipient contact information (either a phone number and/or e-mail address would suffice) and why the gift card was distributed. These precautions are to protect both BHDDH and the provider in case of audit.

Examples of Evaluation and Data Collection

If use of an incentive is proposed for data collection, it must be a substantive data collection effort related to goals and objectives to develop or modify a strategic plan or apply for/meet a deliverable of a discretionary grant. It should target data that is otherwise difficult to obtain. The focus of data collection should target (1) substance use behaviors, (2) consumption patterns and/or (3) risk or protective factors associated with the substance use behaviors (4) targeted by the grant funding and (5) included as a priority target in the strategic plan. Two examples are provided below:

- Pre and post- tests designed to evaluate effectiveness of a specific program on (1) targeted risk or (2) protective factors or behaviors. Generally, there would be provision of an incentive to complete a post test at the conclusion of the program.
 - For example, a parenting program is offered during the evening to address low levels of perceived risk associated with marijuana use which was included in the regional (or municipal) strategic plan.
 - The one session, two- hour parenting program is designed to increase communication between parents and children about perceived risk of harm associated youth marijuana use.
 - There is a ten question posttest administered at the conclusion of the program to assess whether: parents experienced an increase in understanding the risk of harm to the developing brain and other health

risk; felt that they could describe the harm to their children; could develop strategies to incorporate the information about harm in discussions or communications with their children; how often parents had discussed these risks with their children prior to the program; if parents felt that they would discuss these risks more with their children as a result of participating in the program; and how many more communications they would predict having.

- Collection of Needs Assessment Data from focus group participants through structured focus group to (1) assess the prevalence of risk behaviors or consumption patterns among populations for whom data is not readily available; and/or (2) is necessary to complete the strategic planning process, and (3) is needed to select appropriate interventions.
 - Information is not necessarily available from quantitative surveys (YRBS, BRFSS, RISS) or;
 - Focuses on special populations subject to health disparities or elevated risk, for example LGBTQ youth of color; young adults not working and not in college; children in DCYF custody whose parent(s) are incarcerated.

- Supporting administration of survey data collection – for example, the RI Student Survey is administered in Anytown High School by 9th grade teachers during advisory period.
 - Anytown’s participation has traditionally been right on the border line of the minimum numbers necessary for data analysis.
 - The 9th grade teachers are asked to attend a proctor training so they can answer student questions about the survey and to monitor the completion of the survey by the students.

Retention Efforts

An incentive should only be provided for multi-session interventions and linked to retention to the point of completion. If the program design requires the use of an incentive, it would be permissible to include it as described in the design. If not, the incentive should be provided in a manner that incentivizes completion of the program and a post test. The purpose is not to entice participation in the intervention but to ensure completion.

An example may be a five to six session program for low income parents and children that takes place in a community center in the evening or on a weekend. The cost of transportation to the community center may be a barrier for parents, especially for those who don’t have a car. The incentive could potentially be a choice of an Uber gift card, bus “tokens” or a gas card based on the preference of the family at the time that they enroll in the program. The incentive could be

distributed at the midway point of the program and at the end of the program and should be calculated based on typical roundtrip fare for the bus, an Uber or federal reimbursement for local travel (mileage, for example .54/mile for 5 mile/10 mile roundtrip x 6 sessions).

Sample Disallowed Activities

- Use of a gift card to recognize or reward participation
- Use of a gift card to incentivize or entice participation
- Use of a gift card or multiple gift cards exceeding \$30 in value
- Distributing multiple gift cards to the same person