

Title:

Gift Card and Voucher Guidance Memorandum 2015-3

Purpose:

To provide North Carolina's network of CSBG sub-grantee agencies consistent guidance on required procedures and documentation necessary for purchase and use of gift cards

and vouchers for client services.

Effective Date: November 24, 2015

Related

(No Related GM)

Resources: Contract Agreement Section 14. Disbursements; 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards; Generally Accepted Accounting Principles; NC Administrative Code 10A 97 A, B, C and D.

## Background

Numerous CSBG funded agencies use gift cards, gas vouchers and food vouchers as support services to participants. OEO is providing guidance to ensure that CSBG agencies in North Carolina consistently document and track gift card/voucher expenditures, verify gift cards/vouchers are spent on allowable costs and expensed in the correct contract period. 2 CFR Part 200 Subpart A -Acronyms and Definitions provides a definition of participant support under *General Provisions of Selected Items of Cost* 200.75 *Participant support costs* means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects.

## State Interpretation

The following processes should be implemented to when agencies purchase and provide gift cards/vouchers for participant services:

- 1. The OEO Budget Form 225 and/or the Budget Narrative 225N must include details on the use of gift cards/vouchers as a service to participants.
- 2. The Agency CSBG Policies and Procedures must include a detailed process for providing gift cards/vouchers to participants for consistent treatment.
- 3. The process for approval and purchasing gift cards must follow the agency procurement policies noted in the Board approved Financial Policies and Procedures Manual;
- 4. The timing of the purchase and distribution of the gift cards/vouchers must be within the contract period during which the gift cards/ vouchers were purchased; typically, between July 1 and June 30<sup>th</sup> of the particular fiscal year not carried forward into the next contract period.
- 5. The invoice listing all gift card/vouchers must contain identifying numbers for each gift card/voucher by the vendor should be attached to a gift card/voucher log used to support distribution of gift cards/vouchers.
- 6. The gift card/ voucher log must (at minimum) include the following fields for identification:
  - a. The date provided to participant,
  - b. The identifying gift card/voucher number assigned by the vendor.

- c. A unique identifier for the participant receiving the gift card such as their AR4CA number to confirm who is receiving the gift card/ voucher,
- d. The signature of the individual participant confirming receipt,
- e. The signature and date of staff person distributing the gift card/voucher.
- 7. Agencies must have the participant sign a declaration not to purchase alcohol and tobacco products.
- 8. Agencies are encouraged to obtain special gas cards that are noted for gas only.
- 9. The receipt of items purchased with the gift card/voucher must be submitted to the agency by the participant or the costs will be disallowed
- 10. The request for gift card/ voucher should be included in case notes with the identifying number and supported by a client service purchase request with explanation to support the service need providing a crosswalk for the gift card/voucher.

This GM is accessible at the OEO website and will be sourced during OEO's ongoing monitoring, training and technical assistance activities. All sub-grantee agencies will be accountable to this information.

Office of Economic Opportunity Administrator

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