



**COLORADO**  
Department of Public  
Health & Environment

## Health Equity and Immunization Fund Incentive Guidance

Updated July 14, 2022

This guidance outlines the approval process of which subrecipients of the Health Equity and Immunization Fund before they can use incentives. This is a living document; we will update it with more information from our federal partners as we receive it.

For the purpose of this document, “incentive” means An anticipated positive or desirable reward designed to directly appeal to, motivate, and influence the performance of an individual or group to achieve the desired impact of grant-supported health care or other services.

Prior approved incentives may be given to individuals in exchange for

1. Participation in educational opportunities related to COVID-19.
2. Participation in surveys, focus groups, or other community engagement activities related to COVID-19.
3. Transportation vouchers to encourage participation in testing and/or vaccination.
4. Receiving a COVID-19 vaccination or returning for a subsequent COVID-19 vaccination (where applicable). **Awarding retroactive incentives to individuals who are already fully vaccinated is not permissible with these funds\*.**
5. Incentives may not be given to subrecipient staff or family members.

*\*Individuals are limited to receiving \$100 when fully vaccinated (one dose of Johnson & Johnson or two doses of Moderna or Pfizer) or getting additional or follow-up doses. Another option is to offer separate gift cards after the first dose and after the second or additional/follow-up doses. **The total value of all cards cannot exceed \$100.***

Incentive programs must take into account equity considerations. For example, subrecipients should not exclusively issue incentive e-gift cards if people may not have an email address or access to the internet to use the incentive.

### Approved Incentives

Centers for Disease Control and Prevention (CDC) approved Colorado’s statewide incentive plan and a template for documenting and approving incentive plans. A list of approved gift cards can be used as incentives. Any incentives not on that list will require review and approval by CDC. Organizations can choose to offer one or more of the cards on the list that would be the best incentives for the population they are targeting.

List of approved incentives:

- Fuel cards.
- Visa cards.
- Gift cards purchased from these specific retail chain stores:
  - Ace Hardware.
  - Amazon.
  - Big R.
  - City Market/Krogers/King Soopers.
  - Dollar General.
  - Dollar Tree.
  - Family Dollar.
  - Murdoch’s.
  - Safeway.
  - Target.
  - Tractor Supply Co.
  - True Value Hardware.
  - Walmart.

**PRIOR APPROVAL IS REQUIRED FOR ALL INCENTIVES:** If subrecipients want to offer vaccine incentives, they must complete the [Health Equity and Immunization Fund Incentive Form](#). Subrecipients must ensure the incentive plan can be linked to COVID-19. Subrecipients must provide their written gift card/incentive agency policy for managing incentives for our

review. Continued evaluation of risk may occur at any time in the funding period. The incentive plan may be suspended or revoked if the subrecipient is out of compliance with program and/or fiscal guidance. **NOTE: As the policy states, you cannot begin implementing or allocating funds until your incentive plan is officially approved by CDPHE. This approval process can take a minimum of 7-10 business days from the time of submission. Plan accordingly.** A budget revision may be required after the approval of the vaccine incentive plan.

#### Incentive Plan request and Approval process

Subrecipients must submit incentive plans describing their project using the Health Equity and Immunization Fund Incentive Form. The subrecipient incentive plan must include the following:

- Completed Health Equity and Immunization Fund Incentive Form.
- Documented subrecipient incentive policy, which includes purchasing, securing, storage, and distribution of incentives, including a log to track inventory and distribution of cards.
- Supporting documentation, including incentive inventory and distribution logs for invoices with incentive expenses.
- If offering incentives for vaccination, report the number of people who become up to date through the incentive project.
- Incentives must benefit the budget and performance period. Incentive purchase dates will be scrutinized to ensure budget and performance periods compliance.

\*\*Subrecipients with approved incentive programs must submit source documentation with invoices, including inventory and distribution logs. Personal health information must be redacted. Qualifications for the issuance of incentives and the method of issuance tracking are vital. **Incentives purchased by the subrecipient but not included in the distribution log will not be reimbursed.** CDPHE requires the use of these procedures, guidelines, and inventory logs. If existing documented procedures are not in place for tracking incentives, procedures must be drafted and submitted for review before incentives will be approved. Refer to: [EXAMPLE Gift Card Guidelines and Procedures](#) and [EXAMPLE Gift Card Log Template](#).

The Colorado Department of Public Health and Environment (CDPHE) Health Equity branch will use the information submitted through the Health Equity and Immunization Incentive form F to draft an incentive plan using the CDC-approved template. The template will be reviewed by the subrecipient and the Health Equity branch. An incentive plan will be formally approved when both the subrecipient and CDPHE sign the template.

- Subrecipients cannot purchase or request reimbursement for incentives until their Incentive plan is signed by both CDPHE and the CDC. Incentives purchased before approval will not be reimbursed.
- Subrecipients can only request incentive reimbursement after the incentives have been distributed to qualifying individuals.

### **UNALLOWABLE INCENTIVE COSTS**

1. Vaccine providers are not allowed to receive incentives.
2. Employees of subrecipient are not allowed to receive incentives.
3. No retroactive expenses are allowed before the date of approval.
4. Incentives do not apply to non-COVID funds (COVID-19 funding only).
5. Cash.
6. Alcohol or drugs.
7. Lotteries, raffles, or other games of chance.
8. Movie tickets.
9. Food and beverages.
10. Amusement/theme park entrance fees.
11. Membership dues (professional, club memberships, etc.).
12. Commemorative items (coins, plaques, etc.).
13. Sporting events (ex: baseball games, football games, etc.).