



# CONTRA COSTA COUNTY

## AGENDA

### Internal Operations Committee

Supervisor Candace Andersen, Chair  
Supervisor Diane Burgis, Vice Chair

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**Monday, September 22, 2025**

**10:30 AM**

**1516 Kamole Street, Honolulu, Hawaii  
3361 Walnut Blvd, Suite 140, Brentwood  
<https://cccouny-us.zoom.us/j/810798429>**

**19**

**Call in: (888) 278-0254, Conference  
code: 845965**

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**The public may attend this meeting in person at either above location. The public may also attend this meeting remotely via Zoom or call-in.**

Agenda Items: Items may be taken out of order based on the business of the day and preference of the Committee.

1. Introductions
2. Public comment on any item under the jurisdiction of the Committee and not on this agenda (speakers may be limited to two (2) minutes).
3. RECEIVE and APPROVE the Record of Action for the July 28, 2025 Internal Operations Committee meeting. (Julie Enea, County Administrator's Office) [25-3923](#)  
**Attachments:** [DRAFT IOC ROA 7-28-25](#)
4. RECEIVE presentation and CONSIDER proposed updates to the County's Social Media Policy. (Kristi Jourdan, Director, Office of Communication and Media) [25-3924](#)  
**Attachments:** [IO Social Media Policy Presentation 092225](#)  
[Social Media Policy - redline update 9.22.25](#)  
[Social Media Policy - Final Draft 9.22.25](#)

5. CONSIDER follow-up report and recommendations for updating the County's policy on purchasing and distributing gift cards as program incentives, especially by contracted community organizations. (Julie Enea, County Administrator's Office) [25-3925](#)

**Attachments:** [Attachment 1: Admin Bulletin 615 Incentives for County Programs 12-12-09](#)  
[Attachment 2: DRAFT Updated Gift Card Policy Mark-up from 2009 Original version](#)  
[Attachment 3: DRAFT Updated Gift Card Policy Clean No Mark-up](#)  
[Attachment 4: Draft Gift Card Special Conditions Mark up Compared to July IOC](#)  
[Attachment 5: DRAFT Gift Card Special Conditions for Contractors Clean No Mark-up](#)

6. The next meeting is currently scheduled for October 27, 2025.

Adjourn

General Information

This meeting provides reasonable accommodations for persons with disabilities planning to attend a the meetings. Contact the staff person listed below at least 72 hours before the meeting. Any disclosable public records related to an open session item on a regular meeting agenda and distributed by the County to a majority of members of the Committee less than 96 hours prior to that meeting are available for public inspection at 1025 Escobar St., 4th Floor, Martinez, during normal business hours. Staff reports related to items on the agenda are also accessible on line at [www.co.contra-costa.ca.us](http://www.co.contra-costa.ca.us).

#### HOW TO PROVIDE PUBLIC COMMENT:

Persons who wish to address the Committee during public comment on matters within the jurisdiction of the Committee that are not on the agenda, or who wish to comment with respect to an item on the agenda, may comment in person, via Zoom, or via call-in. Those participating in person should offer comments when invited by the Committee Chair. Those participating via Zoom should indicate they wish to speak by using the “raise your hand” feature in the Zoom app. Those calling in should indicate they wish to speak by pushing \*9 on their phones.

Public comments generally will be limited to two (2) minutes per speaker. In the interest of facilitating the business of the Board Committee, the total amount of time that a member of the public may use in addressing the Board Committee on all agenda items is 10 minutes. Your patience is appreciated.

Public comments may also be submitted to Committee staff before the meeting by email or by voicemail. Comments submitted by email or voicemail will be included in the record of the meeting but will not be read or played aloud during the meeting.

For Additional Information Contact: [Julie.Enea@cao.cccounty.us](mailto:Julie.Enea@cao.cccounty.us)



# CONTRA COSTA COUNTY

1025 ESCOBAR STREET  
MARTINEZ, CA 94553

## Staff Report

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**File #:** 25-3923

**Agenda Date:** 9/22/2025

**Agenda #:** 3.

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### INTERNAL OPERATIONS COMMITTEE

Meeting Date: September 22, 2025

Subject: RECORD OF ACTION FOR THE JULY 28, 2025 MEETING

Submitted For: Monica Nino

Department: County Administrator

Referral No:

Referral Name:

Presenter: Julie Enea

Contact: [julie.enea@cao.cccounty.us](mailto:julie.enea@cao.cccounty.us)

### **Referral History:**

County Ordinance requires that each County body keep a record of its meetings. Though the record need not be verbatim, it must accurately reflect the agenda and the decisions made in the meeting.

### **Referral Update:**

Attached is the Record of Action for the July 28, 2025 Internal Operations Committee meeting.

### **Recommendation(s)/Next Step(s):**

RECEIVE and APPROVE the Record of Action for the July 28, 2025 Internal Operations Committee meeting.

### **Fiscal Impact (if any):**

None.



# CONTRA COSTA COUNTY

## Committee Meeting Minutes

### Internal Operations Committee

Supervisor Candace Andersen, Chair  
Supervisor Diane Burgis, Vice Chair

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Monday, July 28, 2025

10:30 AM

309 Diablo Rd, Danville  
3361 Walnut Blvd, Suite 140, Brentwood  
<https://cccouny-us.zoom.us/j/81079842919>  
Call in: (888) 278-0254, Conference code:  
845965

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1. Introductions

*Chair Andersen called the meeting to order at 10:30 a.m. In attendance were Noel Garcia, Steven Kwok, Tolfa Sezer, Dyanne Fankhauser, Sarah Shkidt, Sandra Bewley, Jamie Schecter, Alexandra Heinitz, Jill Ray, Anissa Basoco-Villarreal, Chris De Dios, District 3 Office, Kiki Farris, Esa Ehmen-Krause, Andrew Mainardi, Navi Singh, Kaitlyn Jeffus, and Julie Enea.*

**Present:** District II Supervisor Candace Andersen and District III Supervisor Diane Burgis

2. Public comment on any item under the jurisdiction of the Committee and not on this agenda (speakers may be limited to two (2) minutes).

*No public comments were offered.*

3. RECEIVE and APPROVE the Record of Action for the June 23, 2025 Internal Operations Committee meeting. (Julie Enea, County Administrator's Office)

**Attachments:** [DRAFT IOC Record of Action for June 23, 2025](#)

**Aye:** Chair Candace Andersen and Vice Chair Diane Burgis

**Result:** Passed

4. CONSIDER report and recommendations for improving the County's policy on purchasing and distributing gift cards as program incentives, especially by contracted community organizations. (Julie Enea, County Administrator's Office)

**Attachments:** [Admin Bulletin 615 Incentives for County Programs 12-12-09](#)  
[Contractor Gift Cards by Dept](#)  
[Board Referral to IOC Gift Cards 5-13-25](#)

*Julie Enea presented the staff report, detailing data tables and attachments. She noted that since 2009, about \$220,000 annually is spent on gift card incentives. Most transactions authorized less than 5% of grant funds for incentives, except one at 10%. Utilization is highest in Health Services, followed by Employment and Human Services, Probation, and the District Attorney. The Conservation and Development department's use was limited to the Keller grant under former Supervisor Glover.*

*Julie referenced the current Program Incentives policy, attached to the staff report, and reviewed the most common findings of noncompliance by County departments as identified by the County's Internal Audit Division, which periodically audits the use of gift cards.*

*Julie provided a summary of the responses from an informal survey of high utilization departments regarding their authorization of contractors to purchase and distribute gift cards. Departments reported 38 current or recent contracts involving gift cards. She noted that while many service contracts did not specifically mention the purchase and distribution of gift cards as program incentives, departments indicated that payment demands were supported by receipts, logs with card details, and sometimes beneficiary confirmations.*

*Julie summarized the recommendations, which were to clarify that the current policy applies to County programs whether administered by County staff or indirectly through a contractor, to require a set of special conditions be incorporated into contracts that authorize the purchase and distribution of gift cards as program incentives, and to direct the CAO to update the County's policy to be consistent with the Committee's direction.*

*Vice Chair Burgis emphasized accountability and efficient use of public funds. She raised concerns about repeat incentives going to the same individuals and non-county residents, suggesting in-person verification for reliability. Chair Andersen highlighted that this approach could be unfair to those with disabilities or busy parents. Vice Chair Burgis proposed requiring contractors to specify their methods for ensuring incentives reach the intended audience.*

*Deputy County Counsel Andrew Mainardi advised the Committee to avoid strict quid-pro-quo transactions and instead require clients to make a good faith effort to complete tasks for program incentives.*

*Anissa Basoco-Villarreal from the County's Employment and Human Services (EHS) Department commented that EHS issues gift cards for emergency needs of juveniles in custody, a use not directly addressed in the policy recommendations, and that the Workforce Development Board issues incentives for specific and verified achievements.*

*Jamie Schecter from the County's Health, Housing and Homeless Services program stated that incentives for online participation are rarely used by Health Services. When they are, IP addresses are verified to exclude those outside of the target community based on location or frequency. Digital gift cards are utilized for their added security. She also mentioned that HSD staff already adhere to the guidelines outlined in the County's program incentives policy, so the recommended actions can be implemented with minimal additional effort.*

*The Committee staff will enhance the language regarding the eligibility determination*

*for program incentives and present updated recommendations to the Committee in September.*

**Aye:** Chair Candace Andersen and Vice Chair Diane Burgis

**Result:** Passed

5. The August 25, 2025 has been canceled. The next meeting is currently scheduled for September 22, 2025

*The Committee confirmed the next meeting date of September 22.*

6. Adjourn

*Chair Andersen adjourned the meeting at 11:07 a.m.*

For Additional Information Contact: [julie.enea@cao.cccounty.us](mailto:julie.enea@cao.cccounty.us)

DRAFT



# CONTRA COSTA COUNTY

1025 ESCOBAR STREET  
MARTINEZ, CA 94553

## Staff Report

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**File #:** 25-3924

**Agenda Date:** 9/22/2025

**Agenda #:** 4.

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### INTERNAL OPERATIONS COMMITTEE

Meeting Date: September 22, 2025

Subject: Update to the County's Social Media Policy

Submitted For: Monica Nino

Department: County Administrator

Referral No: IOC 25/8

Referral Name: Review of Proposed Updates to the County's Administrative Bulletins

Presenter: Kristi Jourdan, Director, Office of Communication and Media

Contact: [Kristi.jourdan@contracostatv.org](mailto:Kristi.jourdan@contracostatv.org)

### **Referral History:**

In June 2014, the Board of Supervisors approved the County's first Social Media Policy, updated in August 2023. The Board requested annual updates thereafter.

### **Referral Update:**

This report begins the annual update. Today's slides highlight last year's activities and suggest policy changes. The revised policy aims to improve clarity, support evolving needs, and maintain consistency across the County's 100+ accounts and myriad platforms, while offering flexibility to meet department needs. Attached are a redline and final draft of the revised policy for the Committee's review.

### **Recommendation(s)/Next Step(s):**

RECEIVE presentation and CONSIDER proposed updates to the County's Social Media Policy.

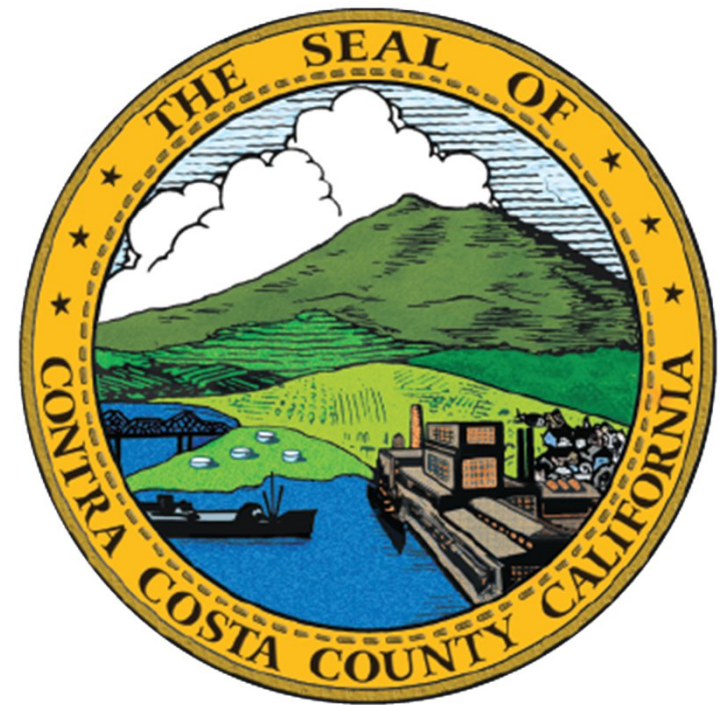
### **Fiscal Impact (if any):**

No fiscal impact.

# Social Media Policy Update

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Office of Communications & Media  
September 22, 2025







# Background & Timeline

- June 2014 – Board of Supervisors approves County's first social media policy
- February 2023 -- Office of Communications & Media collaborates with Public Information Officers throughout the County to review and update
- August 2023 – Board of Supervisors approves current social media policy





# First Few Years

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- Goal was to create consistency for departmental use of social media
  - Guidance on information to post
  - Usage during emergencies
  - Records retention
- Enforcing comment policy:
  - Only removing comments that meet criteria
- Observations and Recommendations



# Proposed Changes

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- **Direct Messages:** Defining direct messaging and providing departments with the discretion to turn them off;
- **Advertising:** Defining advertising and clarifying that departments should avoid content that could be perceived as endorsements, testimonials, or promotion of political positions;
- **Page Management:** Permitting the use of personal accounts for page management, in compliance with the administrative requirements of most social media platforms;
- **Archiving:** Clarifying that departments should be using archiving tools to capture, store, and manage all social media records; and
- **Comments:** Allowing departments to turn off the comment function at their discretion.



# The Use of AI

- Broader use policy developed by the County Administrator's Office and DoIT
- Separate but connected
  - Content creation opportunities





# Banning Platforms Update

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- Internal Operations Committee considerations
  - TikTok for safety and cybersecurity concerns
  - “Divest or ban” – September 17, 2025 compliance deadline





# Recommendations

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- DEFINE direct messaging and provide departments with the discretion to turn them off;
- DEFINE advertising and CLARIFY that departments should avoid content that could be perceived as endorsements, testimonials, or promotion of political positions;
- PERMIT the use of personal accounts for page management, in compliance with the administrative requirements of most social media platforms;
- CLARIFY that departments should be using archiving tools to capture, store, and manage all social media records to ensure that the County is complying with retention requirements; and
- ALLOW departments to turn off the comment function at their discretion.

## **Contra Costa County - Social Media Policy**

**9/22/25**

### **Contents:**

- I. Definitions
- II. Social Media Usage
  - a. Process for Posting Social Media
  - b. Information Posted on Social Media Sites
  - c. Advertising on Social Media
  - d. Use of Social Media During Countywide Emergency Events
- III. The Public Records Act & Retention of Posted Information
- IV. Employees' Personal Social Media Accounts

Social media is an important tool that can be used as part of a comprehensive communications strategy for providing time-sensitive information and increases the ability for the County to share its messages to the widest possible audience, including audiences that might not seek information through more established messaging channels like radio and television. Social media can help the County government build trust with the community, solve problems, and provide a better understanding of how County government improves the quality of life for Contra Costa County residents.

This policy establishes guidelines governing the use of social media by Contra Costa County departments and employees for informing the public about County programs and services. No changes can be made to this policy without Board of Supervisors approval.

### **I. Definitions**

**Blog:** A self-published diary or commentary on a particular topic that may allow visitors to post responses, reactions, or comments.

**Content:** Any text, metadata, quick response (QR) codes, digital recordings, videos, graphics, photos, or links on approved sites.

**Direct Messaging:** A private form of communication on social media where messages are sent between two or more users, visible only to the sender and recipient(s).

**Page:** The specific portion of a social media website where content is displayed and managed by an individual or individuals with administrator rights.

**Post:** The act of publishing content on a site.

**Profile:** Information that a user provides about themselves on a social networking site.

**Public Record:** Includes any writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics.

**Social Media Comment Policy:** An external facing social media policy used to set guidelines and protocols for public interaction with County content on social media accounts.

**Social Media Representative:** A County employee designated to establish and/or maintain a social media account on behalf of the County, departments, or divisions. Each representative must be designated by the department or division before they begin utilizing social media on the County's behalf.

**Social Media:** Internet-based technology communication tools with a focus on immediacy, interactivity, user participation and information sharing. These online technologies are operated by non-County hosted services and are used by the Department. Examples include but are not limited to blogs, microblogs, wikis, social and professional networks, video or photo sharing, and social bookmarking.

- Examples include but are not limited to Facebook (social networking), YouTube (video sharing), Twitter (microblogging), Instagram (social networking), Pinterest (social networking) and LinkedIn (professional networking). Social media should be understood to include any web-based tool that allows for open communication on the internet, including but not limited to micro-blog sites (Twitter,) social networking sites (Facebook, LinkedIn, Nextdoor) video-sharing sites (YouTube,) and image-sharing sites (Instagram).

**Terms of Service:** The set of rules and regulations a provider attaches to a software service or web-delivered product.

## **II. Social Media Usage**

### **A. PROCESS FOR POSTING SOCIAL MEDIA:**

When using social media, County departments shall do the following prior to posting content:

- 1) Have an official business or public purpose in posting the media that clearly serves County objectives;
- 2) Review the Terms of Service for the site where the social media will be posted and, as appropriate, obtain approval from County Counsel and the department's CAO analyst before agreeing to the Terms of Service;
- 3) Check that content to be posted complies with County policies, including but not limited to technology use and personnel policies;
- 4) Ensure federal, state, and local laws are followed, including:
  - a) Copyright law: For example, posting a video, image (including individuals' names or likenesses), or music without receiving a license or authorization may violate copyright law;
  - b) Trademark law; and
  - c) Other third-party rights, including individuals' rights of privacy, are respected.
- 5) Direct any questions regarding legal issues, including compliance with trademark and copyright laws, to the Office of the County Counsel.
- 6) Publish using platform and tools approved by the Office of Communications and Media.
- 7) Adjust settings to allow public comments only on County social media posts and not directly on County platforms.



- 8) Reset the social media password after a Social Media Representative is removed as a social media account administrator;

The Office of Communications and Media reserves the right to terminate any County social media site at any time.

**B. INFORMATION POSTED ON SOCIAL MEDIA SITES**

- 1) Social media should be used by County departments to communicate County information to the public, but not for other purposes.
- 2) To help prevent errors and liability issues, social media postings should be made by a Social Media Representative for the department who has been authorized to do so by the Department Head. The Social Media Representative shall only post content reflecting the views of the County, not his or her personal views or concerns.
- 3) If a mistake occurs, the department should correct the mistake as soon as it is made aware of the error. If an earlier post is modified, it should be clear that the posting has been corrected. Consider designating corrections with "Fixed link" or "Fact correction" prior to the correction.
- 4) The public is not allowed to post content on a County platform but, if permitted by the department, may comment on posts made by the County. If public comment is permitted, social media account settings shall be adjusted to enable public comments only on individual posts, not on the Department's overall platform or page.

County departments may allow public comments on all platforms. County departments must moderate any such comments.

- 5) County departments may not post the following content and must remove any such content, regardless of whether posted by the County department or outside individuals:

- Electioneering for or against candidates or issues, unless such promotion or opposition is inherently related to discussion of an item posted by the County
- Information affiliated with political campaigns
- Confidential information
- Content that is unrelated to the post or work done by the County
- Threats against any person or organization
- Highly repetitive posts that amount to harassment
- Obscenity, profanity, and vulgar language
- Promotion of discrimination
- Indication or encouragement of illegal activity
- Advocacy of violence

- Spam or links to unrelated sites
- Promotions of services, products or political candidates or organizations
- Infringement of copyrights, trademarks, or other intellectual property
- Information that may compromise the safety, security, or proceedings of public systems or any criminal or civil investigations
- Personal or sensitive information (social security numbers, credit card numbers, medical information, account numbers, banking information, phone numbers, email addresses, postal addresses, and similar materials).

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For questions about whether a posting falls within one of the above categories or whether a posting containing content not appearing on the list should be removed, the County department should contact the Office of County Counsel prior to taking action to remove the post.

- 7) County departments should direct users back to the County's website when appropriate and possible for further information;
- 8) County departments must use branding, such as logo use, on social media postings;
- 9) County departments are encouraged to use social media platforms to share information about partnerships that align with the County's mission and objectives, and to highlight collaborative efforts, shared initiatives, and joint achievements .
- 10) County departments should include the Social Media Comment Policy (see Appendix A), indicating the discussion is moderated and inappropriate content will be removed, if the profile settings can accommodate it. If the profile settings cannot accommodate the Social Media Comment Policy, the social media site shall include a link to the policy. This Social Media Comment Policy must be included, or a link provided to the policy, on all social media sites.
- 11) County departments may choose to disable Direct Messaging on County social media accounts. However, if Direct Messaging is disabled, county departments must provide an alternate method for members of the public to contact the department, such as an email address or phone number.
- 12) Direct or indirect communications between members of a legislative body, such as members of the Board of Supervisors, commissions and/or boards, should be strictly avoided to prevent potential violations of the Brown Act or the Better Government Ordinance. Among other precautions,

members of legislative bodies should not respond to, “like,” “share,” resend or otherwise express opinions about any issue within the subject matter jurisdiction of the body.

13) If any County department posts an item regarding a specific Supervisorial district, the Department must notify the District office before tagging and posting.

**C. ADVERTISING ON SOCIAL MEDIA**

- 1.) Purpose: If a County department chooses to advertise on social media, the advertising should align with the County's mission, priorities, and strategic goals, focusing on informing, educating, and engaging the public.
- 2.) Content: Ads must be clear, accurate, and consistent with County messaging. Ads must not include endorsements, testimonials, or promotion of private entities or political positions, and should avoid content that could be perceived as partisan, promotional, or controversial.
- 3.) Targeting: Ad targeting should be inclusive and nondiscriminatory, ensuring fair access to information for all audiences. Use targeting to enhance reach and relevance while respecting privacy and equity.
- 4.)

**D. USE OF SOCIAL MEDIA DURING COUNTYWIDE EMERGENCY EVENTS**

- 1) In the event of an emergency, County departments should coordinate all social media content with the Office of Communications and Media, unless otherwise directed by the County Administrator.
- 2) To ensure that messages are consistent across the various accounts and platforms managed by the County, with permission of the CAO, County Public Information Officer (PIO) or designee, will take the lead in delivering County emergency information via social media and keep the CAO and the Office of Communications and Media informed.
- 3) Depending upon the incident, communication managers may be asked to point to specific departmental social media sites that will serve as the main source of information.

**III. The Public Records Act & Retention of Posted Information**

- A. Information posted on County social media sites is subject to the California Public Records Act.
- B. Departments must retain comments, posts, and other content on County social media sites, including prohibited content removed by staff, for the period required by law and in accordance with department policy. Records of removed prohibited content must include the the name of the staff member who removed the content, and the date, time and reason for the removal.

- C. Departments must use and approved archiving tools to capture, store, and manage all social media activity. Archiving solutions should ensure that records are searchable, accessible, and compliant with retention and public disclosure requirements.

**IV. Employees' Personal Social Media Accounts:** The line between personal and professional, public, and private can be easily blurred in social media. The following guidelines, in addition to those in the County's Administrative Bulletins, must be followed when using a personal social media account:

- 1) Because many social media platforms require personal accounts for administrative access, personal social media accounts may be used to manage County media accounts. When using personal accounts for County page management, the following guidelines should be followed :

**Maintain Professional Boundaries:** Staff should use their personal accounts solely for administrative purposes. Staff should remain mindful of their roles and avoid any activity that could blur the lines between their personal and professional identities, such as interjecting personal opinions or information into County posts.

- **Do Not Speak on Behalf of the County:** Staff should refrain from using personal accounts to make statements or comments as an official County representative unless specifically authorized.

- 2) Employees with personal social media accounts are prohibited from posting on their accounts confidential information obtained from the County, such as personnel data, medical information, and attorney-client privileged information.

- 3) When commenting on County business, employees, supervisors, or policies on a personal account, employees should take care to make it clear that their personal opinions are their own and do not represent the official policy position of the County.

## APPENDIX A

### Contra Costa County's Social Media Comment Policy:

Social media is an important tool that can be used as a channel for disseminating time-sensitive information and as a communications tool which increases the ability of the County to broadcast its messages to the widest possible audience and include new audiences that don't rely on traditional media channels.

Social media can help us build our community, improve knowledge, solve problems, and provide a better understanding of how our work impacts the quality of life for residents. This policy governs all sites and websites of Contra Costa County. Public comments expressed on our social media channels do not reflect the opinions of the County, nor do we approve the content of any public commentary on our

## **Contra Costa County - Social Media Policy**

**9/22/25**

social media channels. You, as the commenter, are responsible for the content of your messages. Our social media channels are limited to discussion of matters related to the County and its mission. We welcome all comments, questions, and concerns about these topics that foster discussion and communication.

To further this goal, the County reserves the right to delete, hide comments, without notice, that contain:

- Electioneering for or against candidates or issues, unless such promotion or opposition is inherently related to discussion of an item posted by the County
- Information affiliated with political campaigns
- Confidential information
- Content that is unrelated to the post or work done by the County
- Threats against any person or organization
- Highly repetitive posts that amount to harassment
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- Promotion of discrimination
- Indication or encouragement of illegal activity
- Advocacy of violence
- Spam or links to unrelated sites
- Promotions of services, products or political candidates or organizations
- Infringement of copyrights, trademarks, or other intellectual property
- Information that may compromise the safety, security, or proceedings of public systems or any criminal or civil investigations
- Personal or sensitive information (social security numbers, credit card numbers, medical information, account numbers, banking information, phone numbers, email addresses, postal addresses, and similar materials).

The County's use of external social media is provided as a public service.

By commenting, you are subject to the Terms of Service of the host site. Posting comments to this site will grant the County and anyone reading this site permission to copy, distribute, make derivatives, display, or perform the commenter's work.

The comments posted on this site do not reflect the views of Contra Costa County or its elected officials and employees. Reference in any comment to a viewpoint, product, service, entity, or organization is solely attributable to the individual commenter. Comments may not be reproduced for the purpose of stating or implying County endorsement or approval of any viewpoint, product, service, entity, or organization. Inappropriate comments may remain posted for a significant amount of time prior to being noticed and deleted by an administrator; however, this should not be construed as an approval of the comment or an exception to the comment policy.

Comments made through the County's online locations will in no way constitute a legal or official notice or comment to the County or any County official or employee for any purpose. Additionally, emails or messages sent via this site may not be viewed or responded to. Communications with County elected

**Contra Costa County - Social Media Policy****9/22/25**

officials, officers and employees should be made through correspondence to their physical addresses or County email addresses.

This policy is subject to amendment or modification at any time to ensure that use of this site is consistent with its purpose as a limited forum.

## Contra Costa County - Social Media Policy

9/22/25

### Contents:

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This policy establishes guidelines governing the use of social media by Contra Costa County departments and employees for informing the public about County programs and services. No changes can be made to this policy without Board of Supervisors approval.

### **I. Definitions**

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## **Contra Costa County - Social Media Policy**

**9/22/25**

Social Media: Internet-based technology communication tools with a focus on immediacy, interactivity, user participation and information sharing. These online technologies are operated by non-County hosted services and are used by the Department. Examples include but are not limited to blogs, microblogs, wikis, social and professional networks, video or photo sharing, and social bookmarking.

- Examples include but are not limited to Facebook (social networking), YouTube (video sharing), Twitter (microblogging), Instagram (social networking), Pinterest (social networking) and LinkedIn (professional networking). Social media should be understood to include any web-based tool that allows for open communication on the internet, including but not limited to micro-blog sites (Twitter,) social networking sites (Facebook, LinkedIn, Nextdoor) video-sharing sites (YouTube,) and image-sharing sites (Instagram).

Terms of Service: The set of rules and regulations a provider attaches to a software service or web-delivered product.

## **II. Social Media Usage**

### **A. PROCESS FOR POSTING SOCIAL MEDIA:**

When using social media, County departments shall do the following prior to posting content:

- 1) Have an official business or public purpose in posting the media that clearly serves County objectives;
- 2) Review the Terms of Service for the site where the social media will be posted and, as appropriate, obtain approval from County Counsel and the department's CAO analyst before agreeing to the Terms of Service;
- 3) Check that content to be posted complies with County policies, including but not limited to technology use and personnel policies;
- 4) Ensure federal, state, and local laws are followed, including:
  - a) Copyright law: For example, posting a video, image (including individuals' names or likenesses), or music without receiving a license or authorization may violate copyright law;
  - b) Trademark law; and
  - c) Other third-party rights, including individuals' rights of privacy, are respected.
- 5) Direct any questions regarding legal issues, including compliance with trademark and copyright laws, to the Office of the County Counsel.
- 6) Publish using platform and tools approved by the Office of Communications and Media.
- 7) Adjust settings to allow public comments only on County social media posts and not directly on County platforms.
- 8) Reset the social media password after a Social Media Representative is removed as a social media account administrator;



## **Contra Costa County - Social Media Policy**

**9/22/25**

The Office of Communications and Media reserves the right to terminate any County social media site at any time.

### **B. INFORMATION POSTED ON SOCIAL MEDIA SITES**

1) Social media should be used by County departments to communicate County information to the public, but not for other purposes.

2) To help prevent errors and liability issues, social media postings should be made by a Social Media Representative for the department who has been authorized to do so by the Department Head. The Social Media Representative shall only post content reflecting the views of the County, not his or her personal views or concerns.

3) If a mistake occurs, the department should correct the mistake as soon as it is made aware of the error. If an earlier post is modified, it should be clear that the posting has been corrected. Consider designating corrections with "Fixed link" or "Fact correction" prior to the correction.

4) The public is not allowed to post content on a County platform but, if permitted by the department, may comment on posts made by the County. If public comment is permitted, social media account settings shall be adjusted to enable public comments only on individual posts, not on the Department's overall platform or page.

County departments may allow public comments on all platforms. County departments must moderate any such comments.

5) County departments may not post the following content and must remove any such content, regardless of whether posted by the County department or outside individuals:

- Electioneering for or against candidates or issues, unless such promotion or opposition is inherently related to discussion of an item posted by the County
- Information affiliated with political campaigns
- Confidential information
- Content that is unrelated to the post or work done by the County
- Threats against any person or organization
- Highly repetitive posts that amount to harassment
- Obscenity, profanity, and vulgar language
- Promotion of discrimination
- Indication or encouragement of illegal activity
- Advocacy of violence
- Spam or links to unrelated sites
- Promotions of services, products or political candidates or organizations

## Contra Costa County - Social Media Policy

9/22/25

- Infringement of copyrights, trademarks, or other intellectual property
- Information that may compromise the safety, security, or proceedings of public systems or any criminal or civil investigations
- Personal or sensitive information (social security numbers, credit card numbers, medical information, account numbers, banking information, phone numbers, email addresses, postal addresses, and similar materials).

•

For questions about whether a posting falls within one of the above categories or whether a posting containing content not appearing on the list should be removed, the County department should contact the Office of County Counsel prior to taking action to remove the post.

- 7) County departments should direct users back to the County's website when appropriate and possible for further information;
- 8) County departments must use branding, such as logo use, on social media postings;
- 9) County departments are encouraged to use social media platforms to share information about partnerships that align with the County's mission and objectives, and to highlight collaborative efforts, shared initiatives, and joint achievements .
- 10) County departments should include the Social Media Comment Policy (see Appendix A), indicating the discussion is moderated and inappropriate content will be removed, if the profile settings can accommodate it. If the profile settings cannot accommodate the Social Media Comment Policy, the social media site shall include a link to the policy. This Social Media Comment Policy must be included, or a link provided to the policy, on all social media sites.
- 11) County departments may choose to disable Direct Messaging on County social media accounts. However, if Direct Messaging is disabled, county departments must provide an alternate method for members of the public to contact the department, such as an email address or phone number.
- 12) Direct or indirect communications between members of a legislative body, such as members of the Board of Supervisors, commissions and/or boards, should be strictly avoided to prevent potential violations of the Brown Act or the Better Government Ordinance. Among other precautions, members of legislative bodies should not respond to, "like," "share," resend or otherwise express opinions about any issue within the subject matter jurisdiction of the body.
- 13) If any County department posts an item regarding a specific Supervisorial district, the Department must notify the District office before tagging and posting.

**C. ADVERTISING ON SOCIAL MEDIA**

- 1.) Purpose: If a County department chooses to advertise on social media, the advertising should align with the County's mission, priorities, and strategic goals, focusing on informing, educating, and engaging the public.
- 2.) Content: Ads must be clear, accurate, and consistent with County messaging. Ads must not include endorsements, testimonials, or promotion of private entities or political positions, and should avoid content that could be perceived as partisan, promotional, or controversial.
- 3.) Targeting: Ad targeting should be inclusive and nondiscriminatory, ensuring fair access to information for all audiences. Use targeting to enhance reach and relevance while respecting privacy and equity.
- 4.)

**D. USE OF SOCIAL MEDIA DURING COUNTYWIDE EMERGENCY EVENTS**

- 1) In the event of an emergency, County departments should coordinate all social media content with the Office of Communications and Media, unless otherwise directed by the County Administrator.
- 2) To ensure that messages are consistent across the various accounts and platforms managed by the County, with permission of the CAO, County Public Information Officer (PIO) or designee, will take the lead in delivering County emergency information via social media and keep the CAO and the Office of Communications and Media informed.
- 3) Depending upon the incident, communication managers may be asked to point to specific departmental social media sites that will serve as the main source of information.

**III. The Public Records Act & Retention of Posted Information**

- A. Information posted on County social media sites is subject to the California Public Records Act.
  - B. Departments must retain comments, posts, and other content on County social media sites, including prohibited content removed by staff, for the period required by law and in accordance with department policy. Records of removed prohibited content must include the the name of the staff member who removed the content, and the date, time and reason for the removal.
- C. Departments must use and approved archiving tools to capture, store, and manage all social media activity. Archiving solutions should ensure that records are searchable, accessible, and compliant with retention and public disclosure requirements.

**IV. Employees' Personal Social Media Accounts:** The line between personal and professional, public, and private can be easily blurred in social media. The following guidelines, in addition to those in the County's Administrative Bulletins, must be followed when using a personal social media account:

1) Because many social media platforms require personal accounts for administrative access, personal social media accounts may be used to manage County media accounts. When using personal accounts for County page management, the following guidelines should be followed :

**Maintain Professional Boundaries:** Staff should use their personal accounts solely for administrative purposes. Staff should remain mindful of their roles and avoid any activity that could blur the lines between their personal and professional identities, such as interjecting personal opinions or information into County posts.

- **Do Not Speak on Behalf of the County:** Staff should refrain from using personal accounts to make statements or comments as an official County representative unless specifically authorized.

2) Employees with personal social media accounts are prohibited from posting on their accounts confidential information obtained from the County, such as personnel data, medical information, and attorney-client privileged information.

3) When commenting on County business, employees, supervisors, or policies on a personal account, employees should take care to make it clear that their personal opinions are their own and do not represent the official policy position of the County.

## APPENDIX A

### Contra Costa County's Social Media Comment Policy:

Social media is an important tool that can be used as a channel for disseminating time-sensitive information and as a communications tool which increases the ability of the County to broadcast its messages to the widest possible audience and include new audiences that don't rely on traditional media channels.

Social media can help us build our community, improve knowledge, solve problems, and provide a better understanding of how our work impacts the quality of life for residents. This policy governs all sites and websites of Contra Costa County. Public comments expressed on our social media channels do not reflect the opinions of the County, nor do we approve the content of any public commentary on our social media channels. You, as the commenter, are responsible for the content of your messages. Our social media channels are limited to discussion of matters related to the County and its mission. We welcome all comments, questions, and concerns about these topics that foster discussion and communication.

To further this goal, the County reserves the right to delete, hide comments, without notice, that contain:

## Contra Costa County - Social Media Policy

9/22/25

- Electioneering for or against candidates or issues, unless such promotion or opposition is inherently related to discussion of an item posted by the County
- Information affiliated with political campaigns
- Confidential information
- Content that is unrelated to the post or work done by the County
- Threats against any person or organization
- Highly repetitive posts that amount to harassment
- Obscenity, profanity, and vulgar language
- Promotion of discrimination
- Indication or encouragement of illegal activity
- Advocacy of violence
- Spam or links to unrelated sites
- Promotions of services, products or political candidates or organizations
- Infringement of copyrights, trademarks, or other intellectual property
- Information that may compromise the safety, security, or proceedings of public systems or any criminal or civil investigations
- Personal or sensitive information (social security numbers, credit card numbers, medical information, account numbers, banking information, phone numbers, email addresses, postal addresses, and similar materials).

The County's use of external social media is provided as a public service.

By commenting, you are subject to the Terms of Service of the host site. Posting comments to this site will grant the County and anyone reading this site permission to copy, distribute, make derivatives, display, or perform the commenter's work.

The comments posted on this site do not reflect the views of Contra Costa County or its elected officials and employees. Reference in any comment to a viewpoint, product, service, entity, or organization is solely attributable to the individual commenter. Comments may not be reproduced for the purpose of stating or implying County endorsement or approval of any viewpoint, product, service, entity, or organization. Inappropriate comments may remain posted for a significant amount of time prior to being noticed and deleted by an administrator; however, this should not be construed as an approval of the comment or an exception to the comment policy.

Comments made through the County's online locations will in no way constitute a legal or official notice or comment to the County or any County official or employee for any purpose. Additionally, emails or messages sent via this site may not be viewed or responded to. Communications with County elected officials, officers and employees should be made through correspondence to their physical addresses or County email addresses.

This policy is subject to amendment or modification at any time to ensure that use of this site is consistent with its purpose as a limited forum.



# CONTRA COSTA COUNTY

1025 ESCOBAR STREET  
MARTINEZ, CA 94553

## Staff Report

**File #:** 25-3925

**Agenda Date:** 9/22/2025

**Agenda #:** 5.

### INTERNAL OPERATIONS COMMITTEE

Meeting Date: SEPTEMBER 22, 2025  
Subject: GIFT CARDS AS PROGRAM INCENTIVES  
Submitted For: MONICA NINO  
Department: COUNTY ADMINISTRATOR  
Referral No: IOC 25/9  
Referral Name: GIFT CARDS AS PROGRAM INCENTIVES  
Presenter: JULIE ENEA  
Contact: Julie.Enea@cao.cccounty.us

### Referral History:

At the March 2025 IOC meeting, Vice Chair Burgis inquired about contractors issuing gift cards under County-funded contracts after the Auditor-Controller's annual internal audit plan presentation. On May 13, 2025, the Board of Supervisors (BOS) tasked the IOC with reviewing the County's policy and procedures for purchasing and distributing gift cards as program incentives, especially by community-based organizations contracted by the County.

The CAO presented a report with findings and recommendations to the IOC at its regular meeting on July 18, 2025. Briefly, to recap, the County Administrator issued Administrative Bulletin 615 in 2009 to manage the purchase and distribution of gift cards, addressing risks of fraud, waste, and abuse. From July 2009 to June 2025, 142 Board of Supervisors (BOS) actions authorized about \$3.5M for gift card programs, primarily for Health Services Department initiatives. Regular audits by the Internal Audit Division flagged issues like unauthorized gift card allocations by contractors without BOS approval. A survey found 38 contracts involving gift card distribution managed by various county agencies, with fiscal divisions overseeing transaction documentation. Only Employment and Human Services included specific contract language for handling gift cards.

The CAO suggested updating the gift card incentive policy to clarify that the policy covers County programs managed by staff or contractors, and to require the incorporation of special conditions for contracts involving gift card incentives.

Vice Chair Burgis raised concerns about repeat incentives for the same individuals and non-residents, suggesting in-person verification. Chair Andersen reasoned this might be unfair to people with disabilities or busy parents. Vice Chair Burgis proposed that contractors take measures to ensure incentives reach the intended recipients. Deputy County Counsel Mainardi recommended clients be considered eligible for an incentive if they make a good faith effort to complete tasks rather than strictly in exchange for achieving a specific task (no *quid-pro-quo* transactions).

EHS's Anissa Basoco-Villarreal mentioned using gift cards for juveniles' emergency needs, verified by the Workforce Development Board, which is not considered part of a gift card incentive program. Jamie Schecter

from Health Services said online participation incentives are rare and, in such cases, IP addresses are verified to prevent outsiders from receiving incentives. The Committee indicated it preferred digital gift cards to physical gift cards for better security.

### **Referral Update:**

Based on the input received from County department staff and direction provided by the IOC on July 28th, Committee staff, in consultation with County Counsel, modified the proposed Special Conditions for Contractors originally presented to the IOC on July 28, and prepared corresponding updates to County Administrative Bulletin 615 governing gift card incentives. Marked up and final drafts of both the Special Conditions and the administrative policy bulletin are attached for the Committee's review and consideration.

Following are the material changes from the information provided at the July 28 meeting:

- For both documents, the definition of Gift Card was modified to include either physical or electronic vouchers that are for a fixed monetary amount that depletes with each use.

### **Special Conditions for Contractors (Attachments 4 and 5):**

- Section 1, A ensures incentives are given only to clients meeting the programmatic goals defined in the contract Service Plan.
- In Section 1, E, iii of the Special Conditions for Contractors, a limit was added to address concerns about clients receiving multiple gift cards. It restricts the issuance of gift cards to one per client per year for each programmatic goal.

### **Policy (Attachments 1-3):**

- Sections I and V now extend the policy to County departments and, to the extent applicable, to County contractors.
- Section IV defines Purchase Order and Warrant Request and updates the definitions for Gift Card and Agenda Item Request.
- Section VI, 3 limits clients to one gift card per programmatic goal annually, addressing concerns about multiple gift cards for the same program.
- Section VI, 4 permits gift cards for public transportation.
- Section VI, 8(a) allows gift card procurement via purchase order or warrant request.
- Sections VII, 2 and 3 require service contracts using gift card incentives to include gift card parameters in the Contract Service Plan and incorporate the proposed Special Conditions (Attachment 5).

### **Recommendation(s)/Next Step(s):**

1. CLARIFY that the County's policy on incentives for County programs and services applies to certain programs and services, whether provided by County departments or their contractors.

2. DIRECT that the proposed Special Conditions and any applicable grant funding conditions should be incorporated with all future County service contracts under which County funding will be used to purchase and distribute gift card or other monetary program incentives, substantially in the form contained in Attachment 5 and as approved by County Counsel.
3. DIRECT the County Administrator to update the administrative policy on incentives for County programs and services substantially as proposed to be consistent with Recommendations 1 and 2, and to promulgate the revised policy to all County departments.

**Fiscal Impact (if any):**

Implementing the recommendations is expected to incur little to no cost. Department heads will ensure their staff follow County policy and procedures. The County Administrator's Office, with help from the Auditor's Internal Audit Division and the Purchasing Agent, will address noncompliance issues arising from lack of awareness or lack of training.



# CONTRA COSTA COUNTY

## Office of the County Administrator

### ADMINISTRATIVE BULLETIN

**Number:** 615  
**Date:** December 10, 2009  
**Section:** Purchasing

**SUBJECT:** Incentives for County Programs and Services (such as gift cards and vouchers)

**I. APPLICABILITY.** This bulletin is applicable to all County departments and special districts, implementing incentive programs, such as gift cards and vouchers, to promote certain County program and services.

**II. AUTHORITY.** In accordance with the provisions of County Ordinance Code Section 24-4.008, the County Administrator has the authority and responsibility to establish and enforce purchasing policies in County departments and agencies, including the purchasing of incentives for certain County programs and services.

Article XVI, section 6 of the California Constitution prohibits the gift of public funds. However, if a gift card or voucher promotes a valid and substantial public purpose within the authorized mission of a public agency, the prohibition does not apply.

**III. PURPOSE.** The County Budget, as adopted by the Board of Supervisors, includes budgetary provision for specific programs and services administered by County Departments. County Departments may wish to promote certain County programs and services by providing incentives, such as gift cards or vouchers, which are related to the program or service. In some instances, outside funding is secured for the specific purpose of providing incentives. This bulletin sets forth County policy and procedures for the purchase and distribution of incentives, such as gift cards and vouchers.

**IV. POLICY.** The use of incentives, such as gift cards and vouchers, to promote certain County programs and services may be authorized consistent with this Administrative Bulletin.

**V. AUTHORIZATION FOR PURCHASING INCENTIVES.** The Board of Supervisors authorization must be obtained prior to the purchase of incentives for a certain County program or service. Board approval may be obtained when the

Board approves funding provided to the County by an outside entity, such as a grant, if the Board Order to accept the funds also includes approval for the purchase of incentives as set forth in 1-4 below. If the Board Order to accept funding does not also include authorization to purchase incentives, then the Department Head or designee must obtain separate Board approval to purchase incentives.

Department Heads may request approval by the County Administrator's office to seek the Board of Supervisor authorization to purchase incentives when funding is provided to the County by an outside entity, such as a grant, via an Agenda Item Request. The Request must:

1. Document how the proposed incentive program will effectively promote a certain County program or service.
2. Include the amount provided to the County for the purchase of incentives.
3. Identify the number, dollar amount, and type of incentives to be purchased by the County.
4. Specify whether or not a County match is required as part of the incentive program. If a County match is required, the Board Order must clearly state the total amount of County funds to be expended.

The County Administrator's Office will review the Agenda Item Request and, if appropriate, forward the item to the Board of Supervisors with a recommendation.

## **VI. PROCEDURES FOR PURCHASING, PAYING, AND DISTRIBUTING INCENTIVES.**

1. The Purchasing Agent may purchase, on behalf of a County Department, gift cards, vouchers, or other incentives only by order or resolution of the Board of Supervisors.
2. Reimbursement for gift cards or vouchers may not be made on an Employee Demand, Procurement Card, or from Petty Cash.
3. A certified board order or grant document that specifies the number, amount and type of incentive must be attached to the accounts payable voucher in order for the expenditure to be paid. No expenditure will be paid that exceeds the limit specified on the board order or grant document.
4. Gift cards shall not be distributed to County employees or members of County Advisory Boards or Commissions.
5. Only gift cards or vouchers for department stores and other retail cards (e.g., Starbucks, Jamba Juice, etc.) qualify as non-cash awards. Such gift certificates,

vouchers or cards must confer only the right to receive tangible personal property, not cash or the ability to reduce the balance due on the recipient's account with the merchant.

6. Visa, MasterCard, or American Express Gift Cards purchases are prohibited. Such gift cards closely resemble cash and could be "gifts of public funds."
7. The purchase of gift certificates for services is prohibited.
8. The value of the gift card, voucher, or incentive must be reasonable in relation to the actual or expected County benefit.
9. Departments must have procedures in place on the secure handling and distribution of gift cards, vouchers and other incentives. Procedures shall include, but not be limited to, the following:
  - a. Paying against a purchase order allows the Department to track the amount paid so as not to exceed the authorized limit. Should a department choose to make payment on warrant requests, then some other method of tracking would need to be developed, e.g., insert grant number or board resolution number into description field.
  - b. Gift cards, vouchers, and other incentives are a form of cash and should be treated as such. Departments that purchase gift cards, vouchers and other incentives, must have a written procedure on how to distribute, safeguard, and document their use that will provide sufficient oversight and security against any misuse or loss. The Department will appoint a custodian to oversee the safeguarding and tracking of these items. Gift cards, vouchers, and other incentives shall be kept in a locked and secure location with access limited to authorized personnel only. Gift Card Log (sample attached) shall be maintained documenting the following:
    - Date received into inventory
    - Serial number of each item
    - Date issued
    - Client name or identification number
    - Reason for issuance
    - Monetary value
    - Client initials upon receipt
    - Custodian initials verifying client receipt

Management should conduct periodic, unannounced audits of the log and gift cards, vouchers, and other incentives to ensure that the undistributed items listed on the log correspond to the inventory on hand. Shortages must be reported when discovered in accordance with the procedures in Administrative Bulletin 207. The Auditor will include a review of the

Department procedures and compliance with those procedures during its routine departmental audit.

A handwritten signature in black ink, appearing to read 'David Twa', is positioned above a horizontal line.

David Twa  
County Administrator

*Originating Department: County Administrator*

## INCENTIVE CARD LOG

Department: \_\_\_\_\_

Program Name: \_\_\_\_\_

Purchase Date	Type of Incentive (i.e. Target, etc)	Giftcard Number	Issue Date	Client Name/ID	Reason for Issuance	Amount	Client Initial	Staff Initial
6/1/2009		5001-0000-0000-0001	6/15/2009	***SAMPLE***	***SAMPLE***	10.00		
/ /			/ /					
/ /			/ /					
/ /			/ /					
/ /			/ /					
/ /			/ /					
/ /			/ /					
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**CONTRA COSTA COUNTY**  
**Office of the County Administrator**  
**ADMINISTRATIVE BULLETIN**

**Number:** ~~\_\_\_\_\_~~ 615  
**Section:** ~~December 10, 2009~~ Purchasing

**SUBJECT:** Issuance of Incentives for County Programs and Services (~~such as gift cards and vouchers~~) Gift Cards and Vouchers, for Program Participation

**I. APPLICABILITY.** This bulletin ~~is applicable~~ applies to all County departments and special districts, ~~implementing incentive programs, such as using incentives like~~ gift cards and vouchers, to promote ~~certain~~ County program programs and services, directly or through a contractor.

**h.**

**II. AUTHORITY.** In accordance with the provisions of County Ordinance Code Section 24-4.008, the County Administrator has the authority and responsibility to establish and enforce purchasing policies in County departments and agencies, including the purchasing of incentives for certain County programs and services.

Article XVI, ~~section~~ Section 6 of the California Constitution prohibits the ~~gift of~~ County from spending state or local, public funds. ~~However, if a gift card or voucher promotes a valid and substantial to purchase gifts for private persons unless doing so serves a legitimate, public purpose within the authorized a public agency's mission of a public agency, the prohibition does not apply.~~

**III. PURPOSE.** ~~The County Budget, as adopted by the Board of Supervisors, includes budgetary provision for specific programs and services administered by County Departments. County Departments may wish to promote certain County programs and services by providing incentives, such as gift cards or vouchers, which are related to the program or service. In some instances, outside funding is secured for the specific purpose of providing incentives. This bulletin sets forth County policy and procedures for the purchase and distribution of incentives, such as gift cards and vouchers. This bulletin outlines the policies and procedures for County Departments to follow when issuing gift cards or similar incentives to promote participation in County programs and services.~~

POLICY. The use of incentives, such

**IV. DEFINITIONS.**

Following are definitions for terms used in this bulletin:

1. Gift Card: A prepaid, stored-value card or electronic record that can be used as gift cards an alternative to cash for purchasing goods or public transportation from a specific retailer or group of affiliated merchants. The recipient is entitled to items or public transportation of a specific value from the issuer, and vouchers, to promote certain the card's value is decreased with each use.

2. Agenda Item Request: A request for the Board of Supervisors to consider a staff recommendation in a staff report along with any related resolution or ordinance. The County programs Administrator's Office reviews and presents the report to the Board with a recommendation. See County Code 24-4.009(b).

3. Purchase Order: A formal document issued by the County Purchasing Agent to buy materials, supplies, or equipment. It details the goods, quantity, price, payment terms, shipment date, and other conditions. When accepted by the seller, it becomes a binding contract for both parties.

~~IV.4.~~ Warrant Request: An allowable method to purchase goods and one-time services may be authorized consistent with this under \$5,000, and certain items over \$5,000. County Ordinance Code section 1108-2.222 and Resolution No. 2023/260 allow departments to buy, with limitations, directly from vendors without using the Purchasing Agent. Administrative Bulletin No. 600 lists eligible purchases.

~~V.~~ **AUTHORIZATION FOR PURCHASING INCENTIVES. PURCHASE OF GIFT CARDS.** The Board of ~~Supervisors~~Supervisors' authorization must be obtained prior to the purchase of incentives for a certain County program or service. Board approval may be obtained when the

**V.** ~~Board approves funding provided to the purchasing Gift Cards, whether directly or through a contractor, for any County by program or service. This can be included in the Board's approval when accepting funding from an outside entity, such as a grant, if the Board Order to accept the funds also includes approval for authorizes the purchase of incentives as set forth in 1-4 outlined below. If the Board Order to accept funding does not also include authorization to purchase incentives, then not, separate Board approval must be obtained by the Department Head or designee must obtain separate Board approval to purchase incentives.~~

~~Prior to seeking authorization from the Board of Supervisors, Department Heads may request approval by the County Administrator's office to seek the Board of Supervisor authorization to purchase incentives when funding is provided to the County by an outside entity, such as a grant, via an must submit an Agenda Item Request, to the County Administrator for review. The Request must:~~

~~1. Document how the proposed incentive program will effectively promote a certain County program or service.~~

~~2. Include the amount provided to the County for the purchase of incentives.~~

~~Identify the number, dollar amount, and type of incentives to be purchased by the County.~~

~~3.~~

~~4. Specify whether or not a County match is required as part of the incentive program. If a County match is required, the Board Order must clearly state the total amount of County funds to be expended.~~

~~1. Explain how issuance of Gift Cards will advance or promote a County program or service;~~

~~2. Indicate whether Gift Cards will be purchased and issued by the County or by a County contractor;~~

~~3. State the maximum budget and funding source for purchasing gift cards, including any local match funds for outside grants; and~~

~~4. Identify the number, dollar amount, and type of incentives to be purchased by the County or its contractor.~~

~~The County Administrator's Office will review the Agenda Item Request and, if appropriate, and forward the item Agenda Item Request to the Board of Supervisors with a recommendation.~~

## **VI. VI. PROCEDURES FOR PURCHASING, PAYING, AND**

~~only by order or resolution of the Board of~~



**DISTRIBUTING INCENTIVES WHEN COUNTY DIRECTLY PURCHASES AND DISTRIBUTES GIFT CARDS.**

1. ~~The Purchasing Agent may purchase, on behalf of a County Department, gift cards, vouchers, or other Supervisors' incentives~~
2. ~~Reimbursement for gift cards or vouchers may not be made on an~~ The Purchasing Agent may only purchase Gift Cards with an order or resolution from the Board of Supervisors. Purchase of Gift Cards cannot be reimbursed after the fact, including, but not limited to, reimbursement via an Employee Demand, Procurement Card, or from Petty Cash.
3. ~~A certified board order or grant document that specifies the number, amount and type of incentive must be attached to the accounts payable voucher in order for the expenditure to be paid.~~ A certified board order or grant document that specifies the number, amount and type of incentive must be attached to the accounts payable voucher in order for the expenditure to be paid. No expenditure will be paid that exceeds the limit specified on the board order or grant document.
4. ~~Gift cards shall not be distributed to County employees or members of County Advisory Boards or Commissions.~~
5. ~~Only gift cards or vouchers for Gift Card purchases are restricted to those from department stores and other retail cards outlets (e.g., Starbucks, Jamba Juice, etc.) qualify as non-cash awards. Such gift certificates,~~

1. vouchers or cards must confer only the right to receive.)). Gift Cards may only be redeemable for tangible personal property, not or public transportation services. Gift Cards may not be redeemable for cash or the ability to reduce the balance due on the recipient's account with the merchant.

Visa, MasterCard, or American Express Gift Cards purchases are prohibited. Such gift cards closely resemble cash and could be "gifts of public funds."

7. The purchase of gift certificates for services is prohibited.

6.

The value of the gift card, voucher, or incentive must be reasonable in relation to the actual or expected County benefit.

8.

9. Departments must have procedures in place on the secure handling and
2. distribution of gift cards, vouchers and other incentives purchases are prohibited.

Such gift cards closely resemble cash and could be construed as "gifts of public funds."

3. Gift card distribution shall be limited to one per client per year for each programmatic goal at the discretion of the County program administrator.
4. The purchase of Gift Cards for services other than public transportation is prohibited.
5. The value of a Gift Card must be commensurate with the expected benefit to the County. County staff responsible for issuing gift cards must determine that the client has achieved or taken substantive steps toward program goals or otherwise verify participation in County programs prior to issuing a Gift Card to the client.
6. Gift Cards cannot be distributed to County employees or members of County Advisory Boards or Commissions.
7. The Department must include the Board of Supervisors' authorizing order and approved purchase order listing the remaining budget with its request to the Auditor for payment of an invoice. The Auditor shall not make payments in excess of the remaining budget.
8. Departments must put written procedures that detail and require secure handling and distribution of Gift Cards in their possession. Procedures shall include, but not be limited to, the following:

~~Procedures shall~~

~~a. Paying~~ Gift cards may be purchased by purchase order or by warrant request.

~~a.b. Making payments~~ against a purchase order ~~allows~~assists the Department to track the amount paid so as not to exceed the tracking expenditures and ensuring compliance with authorized limit. ~~Should a department choose to make~~limits. If payment ~~on~~is made via warrant requests, ~~then some other method of an alternative tracking would need to~~method will be developed, e.g., ~~insert~~necessary, such as including the grant ~~number~~ or board resolution number ~~into~~in the description field.

~~b. Gift cards, vouchers, and other incentives are a form of cash and should be treated as such. Departments that purchase gift cards, vouchers and other incentives, must have a written procedure on how to distribute, safeguard, and document their use that will provide sufficient oversight and security against any misuse or loss. The Department will appoint a custodian to oversee the safeguarding and tracking of these items. Gift cards, vouchers, and other incentives shall be kept in a locked and secure~~

~~location with access limited to authorized personnel only. Gift Card Log (sample attached) shall be maintained documenting the following~~

- ~~• Date received into inventory~~
- ~~• Serial number of each item~~
- ~~• Date issued~~
- ~~• Client name or identification number~~
- ~~• Reason for issuance~~
- ~~• Monetary value~~
- ~~• Client initials upon receipt~~
- ~~• Custodian initials verifying client receipt~~

~~Management should conduct periodic, unannounced audits of the log and gift cards, vouchers, and other incentives to ensure that the undistributed items listed on the log correspond to the inventory on hand. Shortages must be reported when discovered in accordance with the procedures in~~

~~Administrative Bulletin 207. The Auditor will include a review of the~~

c. ~~Department~~ Departments must establish and maintain written procedures detailing how Gift Cards are recorded, securely stored and distributed to prevent misuse or loss. Each Department must designate a custodian who shall be responsible for securing and tracking inventory of Gift Cards. All Gift Cards must be stored in a locked and secure location with access limited to authorized personnel.

d. The Department shall keep a Gift Card Log (sample attached) that contains the following information:

- Date received into inventory
- Serial number of each Gift Card
- Monetary value
- Description of Gift Card

Once a Gift Card is issued to a client, the log should be updated to include:

- Date issued
- Client name or identification number
- Reason for issuance
- Custodian initials verifying Client receipt

The Department should periodically perform audits to verify that the log entries match purchase orders and gift card inventory. The Department must immediately report any shortages pursuant to the procedures set forth in Administrative Bulletin 207. The Auditor will conduct a review of the Department's Gift Card procedures and compliance with those procedures during its routine departmental audit.

## **VII. PROCEDURES AND POLICIES WHEN COUNTY CONTRACTORS PURCHASE AND DISTRIBUTE GIFT CARDS**

1. Board of Supervisors approval is required before any contract authorizing a contractor to buy and distribute Gift Cards to promote a County program or service can be executed. A Board of Supervisors order or resolution that specifies the funding source, budget, quantity, amount, and type of Gift Cards must be attached to a request for payment for a contractor to be reimbursed for the purchase of Gift Cards.
2. The Service Plan for any County contract allowing the purchase and distribution of gift cards or monetary incentives must specify the maximum amount to be spent, the maximum value of each incentive, and reference any grant funding restrictions.
3. Special Conditions governing program incentives shall be incorporated into any such contract, substantially in the form provided on the County's Contract Forms Intranet site <<INSERT LINK HERE>> and as approved by County

Counsel.

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Monica Nino  
County Administrator

*Originating Department: County Administrator*

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Page 4  
of 5

## INCENTIVE CARD LOG

Department: \_\_\_\_\_

Program Name: \_\_\_\_\_

Purchase Date	Type of Incentive (i.e., Incentive (e.g., Target, etc.))	Giftcard Number	Issue Date	Client Name/ID	Reason for Issuance	Amount	Client Initial	Staff Initial
6/1/2009		5001-0000-0000- <del>0001</del> 0001	6/15/2009	***SAMPLE***	***SAMPLE***	10.00		
I I			I I					
I I			I I					
I I			I I					
I I			I I					
I I			I I					
I I			I I					
I I			I I					
I I			I I					
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I I			I I					
I I			I I					
Notes:								


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**CONTRA COSTA COUNTY**  
**Office of the County Administrator**  
**ADMINISTRATIVE BULLETIN**

**Number:** 615

**Date:** <<ENTER>>, 2025

**Section:** Purchasing

**SUBJECT:** Issuance of Incentives, such as Gift Cards and Vouchers, for Program Participation

**I. APPLICABILITY.** This bulletin applies to all County departments and special districts using incentives like gift cards and vouchers to promote County programs and services, directly or through a contractor.

**II. AUTHORITY.** In accordance with the provisions of County Ordinance Code Section 24-4.008, the County Administrator has the authority and responsibility to establish and enforce purchasing policies in County departments and agencies, including the purchasing of incentives for certain County programs and services.

Article XVI, Section 6 of the California Constitution prohibits the County from spending state or local, public funds to purchase gifts for private persons unless doing so serves a legitimate, public purpose within a public agency's mission.

**III. PURPOSE.** This bulletin outlines the policies and procedures for County Departments to follow when issuing gift cards or similar incentives to promote participation in County programs and services.

**IV. DEFINITIONS.**

Following are definitions for terms used in this bulletin:

1. Gift Card: A prepaid, stored-value card or electronic record that can be used as an alternative to cash for purchasing goods or public transportation from a specific retailer or group of affiliated merchants. The recipient is entitled to items or public transportation of a specific value from the issuer, and the card's value is decreased with each use.
2. Agenda Item Request: A request for the Board of Supervisors to consider a staff recommendation in a staff report along with any related resolution or ordinance. The County Administrator's Office reviews and presents the report to the Board with a recommendation. See County Code 24-4.009(b).
3. Purchase Order: A formal document issued by the County Purchasing Agent to buy materials, supplies, or equipment. It details the goods, quantity, price,



payment terms, shipment date, and other conditions. When accepted by the seller, it becomes a binding contract for both parties.

4. Warrant Request: An allowable method to purchase goods and one-time services under \$5,000, and certain items over \$5,000. County Ordinance Code section 1108-2.222 and Resolution No. 2023/260 allow departments to buy, with limitations, directly from vendors without using the Purchasing Agent. Administrative Bulletin No. 600 lists eligible purchases.

**V. AUTHORIZATION FOR PURCHASE OF GIFT CARDS.** The Board of Supervisors' authorization must be obtained prior to purchasing Gift Cards, whether directly or through a contractor, for any County program or service. This can be included in the Board's approval when accepting funding from an outside entity, such as a grant, if the Board Order also authorizes the purchase of incentives as outlined below. If not, separate Board approval must be obtained by the Department Head or designee.

Prior to seeking authorization from the Board of Supervisors, Department Heads must submit an Agenda Item Request to the County Administrator for review. The Request must:

1. Explain how issuance of Gift Cards will advance or promote a County program or service;
2. Indicate whether Gift Cards will be purchased and issued by the County or by a County contractor;
3. State the maximum budget and funding source for purchasing gift cards, including any local match funds for outside grants; and
4. Identify the number, dollar amount, and type of incentives to be purchased by the County or its contractor.

The County Administrator's Office will review and forward the Agenda Item Request to the Board of Supervisors with a recommendation.

**VI. PROCEDURES WHEN COUNTY DIRECTLY PURCHASES AND DISTRIBUTES GIFT CARDS.**

The Purchasing Agent may only purchase Gift Cards with an order or resolution from the Board of Supervisors. Purchase of Gift Cards cannot be reimbursed after the fact, including, but not limited to, reimbursement via an Employee Demand, Procurement Card, or from Petty Cash. A certified board order or grant document that specifies the number, amount and type of incentive must be attached to the accounts payable voucher in order for the expenditure to be paid. No expenditure will be paid that exceeds the limit specified on the board order or grant document.

1. Gift Card purchases are restricted to those from department stores and other retail outlets (e.g., Starbucks, Jamba Juice, etc.). Gift Cards may only be redeemable for tangible personal property or public transportation services. Gift Cards may not be redeemable for cash or to reduce the balance due on the recipient's account with the merchant.
2. Visa, MasterCard, or American Express Gift Cards purchases are prohibited. Such gift cards closely resemble cash and could be construed as "gifts of public funds."
3. Gift card distribution shall be limited to one per client per year for each programmatic goal at the discretion of the County program administrator.
4. The purchase of Gift Cards for services other than public transportation is prohibited.
5. The value of a Gift Card must be commensurate with the expected benefit to the County. County staff responsible for issuing gift cards must determine that the client has achieved or taken substantive steps toward program goals or otherwise verify participation in County programs prior to issuing a Gift Card to the client.
6. Gift Cards cannot be distributed to County employees or members of County Advisory Boards or Commissions.
7. The Department must include the Board of Supervisors' authorizing order and approved purchase order listing the remaining budget with its request to the Auditor for payment of an invoice. The Auditor shall not make payments in excess of the remaining budget.
8. Departments must put written procedures that detail and require secure handling and distribution of Gift Cards in their possession. Procedures shall include, but not be limited to, the following:
  - a. Gift cards may be purchased by purchase order or by warrant request.
  - b. Making payments against a purchase order assists the Department in tracking expenditures and ensuring compliance with authorized limits. If payment is made via warrant requests, an alternative tracking method will be necessary, such as including the grant or board resolution number in the description field.
  - c. Departments must establish and maintain written procedures detailing how Gift Cards are recorded, securely stored and distributed to prevent misuse or loss. Each Department must designate a custodian who shall be responsible for securing and tracking inventory of Gift Cards. All Gift Cards must be stored in a locked and secure location with access limited to authorized personnel.
  - d. The Department shall keep a Gift Card Log (sample attached) that

contains the following information:

- Date received into inventory
- Serial number of each Gift Card
- Monetary value
- Description of Gift Card

Once a Gift Card is issued to a client, the log should be updated to include:

- Date issued
- Client name or identification number
- Reason for issuance
- Custodian initials verifying Client receipt

The Department should periodically perform audits to verify that the log entries match purchase orders and gift card inventory. The Department must immediately report any shortages pursuant to the procedures set forth in [Administrative Bulletin 207](#). The Auditor will conduct a review of the Department's Gift Card procedures and compliance with those procedures during its routine departmental audit.

## **VII. PROCEDURES AND POLICIES WHEN COUNTY CONTRACTORS PURCHASE AND DISTRIBUTE GIFT CARDS**

1. Board of Supervisors approval is required before any contract authorizing a contractor to buy and distribute Gift Cards to promote a County program or service can be executed. A Board of Supervisors order or resolution that specifies the funding source, budget, quantity, amount, and type of Gift Cards must be attached to a request for payment for a contractor to be reimbursed for the purchase of Gift Cards.
2. The Service Plan for any County contract allowing the purchase and distribution of gift cards or monetary incentives must specify the maximum amount to be spent, the maximum value of each incentive, and reference any grant funding restrictions.
3. Special Conditions governing program incentives shall be incorporated into any such contract, substantially in the form provided on the County's Contract Forms Intranet site <<INSERT LINK HERE>> and as approved by County Counsel.

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Monica Nino  
County Administrator

*Originating Department: County Administrator*

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## INCENTIVE CARD LOG

Department:

Program Name:

[illegible]

~~That a set of Special Conditions\* be incorporated with all future~~ Required for Contracts That Permit Issuance of Gift Cards as Incentives to Promote County service contracts under which Programmatic Goals Pursuant to County funding will be used to purchase Administrative Bulletin No. 615, "Issuance of Incentives, such as Gift Cards and distribute gift cards or other monetary program incentives, substantially in the following form and as approved by County Counsel: Vouchers, for Program Participation"

1. **Gift Cards.** Contractor shall comply with the following with respect to gift cards, ~~gift certificates and any and all similar incentives of redeemable cash value (hereinafter "Gift Cards") purchased under this Contract: which are prepaid, stored-value card or electronic records that can be used as an alternative to cash for purchasing goods or public transportation from a specific retailer or group of affiliated merchants. The recipient is entitled to items or public transportation of a specific value from the issuer, and the card's value is decreased with each use.~~

- A. **Alignment with Programmatic Goals.** Contractor shall only issue Gift Cards to recipients (hereinafter "Client(s)") to advance the programmatic goal(s) set forth in the Service Plan. In furtherance of these goals, Contractor shall do the following prior to issuing a Gift Card to a Client:
  - i. Communicate one or more tasks for Client to attain within a specified timeframe;
  - ii. Verify and document that Client has made a good faith effort to complete the task or tasks; ~~and~~
  - iii. Ensure the Gift Card value does not exceed the expected value of the Client's task(s) to advancement of the programmatic goal(s) set forth in the Service Plan ~~-, and;~~

- B. **Gift Card Log.** Contractor shall keep a log of Gift Cards distributed to Clients in order of identification number (usually 16 digits) that contains the following information:

- i. Purchase date
- ii. Company name
- iii. Gift Card identification number (e.g. 5001-000-000-0001)
- iv. Issue date
- v. Client name/ID

- vi. Reason for issuance/program goal
- vii. Description of client activity to advance program goal
- viii. Gift Card amount

The Gift Card log is subject to audit by the County. Contractor should also conduct its own quarterly internal audit to compare its Gift Card inventory with log entries to account for all purchased gift cards. Contractor shall promptly report any irregularities to the County.

C. **Reimbursement.** Gift Cards are not eligible for County reimbursement if Contractor fails to do the following:

- i. Satisfactorily log distribution of the Gift Card, as determined by the County;
- ii. Timely submit the gift card receipt to the County and otherwise comply with the Payment Provisions, and;
- iii. Distribute the Gift Card within the time frame set forth in the Service Plan or, if the Service Plan is silent on this point, before the end of the Contract term.

D. **Acceptable Gift Cards.** Generally acceptable Gift Cards include those that may be used to purchase goods such as merchandise and groceries, and local transportation services.

- i. Gift Cards shall not be redeemable for alcohol, tobacco, controlled substances, or services, including, but not limited to, movies, mini-golf, or concerts.
- ii. The purchase of a Visa, MasterCard, or American Express Gift Card is prohibited.

E. **Limitations on Distribution.** Contractor shall not distribute Gift Cards:

- i. To individuals or corporations with whom Contractor, its employees, agents or subcontractors have any financial, familial or personal relationship;
- ii. In exchange for participation in services for which Contractor or County may be reimbursed by a funding source other than the funding source used to purchase the Gift Cards. Contractor shall

also not seek more than one reimbursement for a single Gift Card, or;

*iii. In a quantity of more than one per client per year for each programmatic goal.*

*iii.iv. Through a subcontractor.*

F. **Gift Card Policy**- Contractor shall incorporate these special conditions into a written Gift Card Policy and distribute to its employees responsible for handling Gift Cards.

\*Other Special Conditions might also be required by the funding source, e.g., a State or Federal granting agency.



Special Conditions\* Required for Contracts That Permit Issuance of Gift Cards  
as Incentives to Promote County Programmatic Goals Pursuant to County  
Administrative Bulletin No. 615, “*Issuance of Incentives, such as Gift Cards and  
Vouchers, for Program Participation*”

1. **Gift Cards.** Contractor shall comply with the following with respect to gift cards, which are prepaid, stored-value card or electronic records that can be used as an alternative to cash for purchasing goods or public transportation from a specific retailer or group of affiliated merchants. The recipient is entitled to items or public transportation of a specific value from the issuer, and the card's value is decreased with each use.

A. **Alignment with Programmatic Goals.** Contractor shall only issue Gift Cards to recipients (hereinafter “Client(s)”) to advance the programmatic goal(s) set forth in the Service Plan. In furtherance of these goals, Contractor shall do the following prior to issuing a Gift Card to a Client:

- i. Communicate one or more tasks for Client to attain within a specified timeframe;
- ii. Verify and document that Client has made a good faith effort to complete the task or tasks;
- iii. Ensure the Gift Card value does not exceed the expected value of the Client’s task(s) to advancement of the programmatic goal(s) set forth in the Service Plan , and;

B. **Gift Card Log.** Contractor shall keep a log of Gift Cards distributed to Clients in order of identification number (usually 16 digits) that contains the following information:

- i. Purchase date
- ii. Company name
- iii. Gift Card identification number (e.g. 5001-000-000-0001)
- iv. Issue date
- v. Client name/ID
- vi. Reason for issuance/program goal
- vii. Description of client activity to advance program goal
- viii. Gift Card amount

*The Gift Card log is subject to audit by the County. Contractor should also conduct its own quarterly internal audit to compare its Gift Card inventory with log entries to account for all purchased gift cards. Contractor shall promptly report any irregularities to the County.*

C. **Reimbursement.** *Gift Cards are not eligible for County reimbursement if Contractor fails to do the following:*

- i. *Satisfactorily log distribution of the Gift Card, as determined by the County;*
- ii. *Timely submit the gift card receipt to the County and otherwise comply with the Payment Provisions, and;*
- iii. *Distribute the Gift Card within the time frame set forth in the Service Plan or, if the Service Plan is silent on this point, before the end of the Contract term.*

D. **Acceptable Gift Cards.** *Generally acceptable Gift Cards include those that may be used to purchase goods such as merchandise and groceries, and local transportation services.*

- i. *Gift Cards shall not be redeemable for alcohol, tobacco, controlled substances, or services, including, but not limited to, movies, mini-golf, or concerts.*
- ii. *The purchase of a Visa, MasterCard, or American Express Gift Card is prohibited.*

E. **Limitations on Distribution.** *Contractor shall not distribute Gift Cards:*

- i. *To individuals or corporations with whom Contractor, its employees, agents or subcontractors have any financial, familial or personal relationship;*
- ii. *In exchange for participation in services for which Contractor or County may be reimbursed by a funding source other than the funding source used to purchase the Gift Cards, Contractor shall also not seek more than one reimbursement for a single Gift Card, or;*
- iii. *In a quantity of more than one per client per year for each programmatic goal.*

*iv. Through a subcontractor.*

*F. **Gift Card Policy.** Contractor shall incorporate these special conditions into a written Gift Card Policy and distribute to its employees responsible for handling Gift Cards.*

\*Other Special Conditions might also be required by the funding source, e.g., a State or Federal granting agency.

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