



The Police Commission

CITY AND COUNTY OF SAN FRANCISCO

July 20, 2023

Honorable Board of Supervisors
City Hall, Room 244
#1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Dear Honorable Supervisors:

At the meeting of the Police Commission on Wednesday, July 19, 2023, the following resolution was adopted:

RESOLUTION NO. 23-71

APPROVAL OF VIOLENCE REDUCTION INITIATIVE (VRI) GIFT CARD INCENTIVE POLICY;

RESOLVED, that the Police Commission approves the Violence Reduction Initiative (VRI) gift card incentive policy (also known as CalVIP Gift Card Policy).

AYES: Commissioners Walker, Byrne, Yanez, Benedicto, Yee, President Elias
EXCUSED: Vice President Carter-Oberstone

Very truly yours,

Sergeant Stacy Youngblood
Secretary
THE POLICE COMMISSION

CINDY ELIAS
President

MAX CARTER-OBERSTONE
Vice President

LARRY YEE
Commissioner

JAMES BYRNE
Commissioner

JESUS YÁÑEZ
Commissioner

KEVIN BENEDICTO
Commissioner

DEBRA WALKER
Commissioner

Sergeant Stacy Youngblood
Secretary

1211/ks

cc: CFO Patrick Leung/Fiscal
Grants Manager Katie Lee/Fiscal



LONDON N. BREED
MAYOR

CITY AND COUNTY OF SAN FRANCISCO
POLICE DEPARTMENT
HEADQUARTERS
1245 3RD Street
San Francisco, California 94158



WILLIAM SCOTT
CHIEF OF POLICE

CalVIP Gift Card Policy

The purpose of this policy and procedure is to establish the guidelines for the procurement and use of gift cards for the California Violence Intervention Program (CalVIP) participants. Gift card purchases outside the scope of the CalVIP program is strictly prohibited.

City employees may not be recipients of gift cards.

Gift cards are considered equivalent to cash and petty cash funds. Therefore, policies governing the use of gift cards must be carefully controlled and strong oversight of gift card use through written policies and internal controls are developed and implemented to:

- a) maintain accountability for all gift cards purchased and distributed, and
- b) avoid mishandling, misuse, abuse, and theft of gift cards.

The CalVIP grant is administered by the Board of State and Community Corrections (BSCC). The goal of the program is to improve public health and safety by supporting effective violence reduction initiatives in communities that are disproportionately impacted by violence, particularly group-member involved homicides, shootings, and aggravated assaults. The BSCC recognizes that offering incentives can help maximize participation among clients and justice-involved clients. Participant support items and program incentives can be used to encourage program participation, to reward participants who meet certain documented milestones, and to celebrate program completion. CalVIP funds may be used to purchase items used as participant support items and program incentives for program participation and/or program completion. Participant support items and program incentives must be reasonable and clearly linked to grant-funded activities.

For purposes of the CalVIP Intensive Case Management (ICM)/Violence Reduction Initiative (VRI), an incentive is identified as a method of compensation in the form of gift card provided to eligible individuals who are enrolled and actively participating in set program. Incentives will be awarded to program enrolled participant for reaching set goals/benchmarks.

BSCC Approval

Explicit prior approval from BSCC is required for the purchase of program incentives (i.e. gift cards), even if the items were included or budgeted in the grant application approved for funding by the Board. Grantees seeking approval to purchase participant support items and program incentives must submit a memo to the BSCC Field Representative (see "Appendix A - Using Grant Items for Participant Support Costs and Incentives justification form"). (Note: It is not necessary to submit a memo for each individual purchase; the memo may contain a list of purchases for the entire grant period.) Purchases should not be made until BSCC approves the written request.

Authorization to Purchase

The purchase of gift cards for the CalVIP program must be approved by Community Initiatives and Policy Manager and the Chief Financial Officer.

Funding Source

The gift cards for this program is funded through State grant funds administered by the BSCC. The accounting chartfield string for gift card purchases is:

Chart Field	Value
Fund Code	13720
Department Code	232092
Authority Code	10001
Project Code	10038399
Activity Code	0001

Actual Purchase of Gift Cards

- Gift cards will be purchased by the Accounting Unit within the Fiscal Division upon manager approval by the requesting program manager.
- A gift card log corresponding to the office location and vendor of the card will be created. The log will list each card number and denomination and will show the date of purchase and name of purchaser. See Appendix E, *VRI Gift Card (GC) Release Log*
- The Physical Custodian will sign the disbursement form and return it via scan and/or email to the Purchaser or Independent Reviewer.
- Handling of the gift cards from the Community Initiatives and Policy Manager to program analyst charged with disbursement of gift cards will be logged to document chain of custody. See Appendix F, *VRI Gift Card (GC) Team Disbursement Log*
- The value of each reload of a gift card purchased for a program must not exceed the maximum amount per card established by the department for that program. The maximum amount per card reload for CalVIP is \$1,000.
- The number of gift cards purchased for a program must not exceed the maximum quantity per period established by the department for that program. The annual maximum amount per individual participant is \$10,500. Total program participants is not expected to exceed 75 participants for the duration of the grant (unless additional funds are allocated).
- Any prepaid cards that value \$600 or more will be required to provide a completed W-9 form before receiving the prepaid card. The individual's information will be forwarded to the Controller's Office for 1099 filing purposes.
- Gift cards may not be purchased using departmental procurement cards (P-Cards).
- Employees may not purchase gift cards as a reimbursable expense.

Ordering Process

1. The SFPD Grants Manager will complete Reloadable Card Order Request form and Shipping Information
2. The SFPD Grants Accountant will create direct payment voucher in PeopleSoft, entering the following information:
 - a. Invoice Line Description: To begin with "POL-GC"

- b. Amount: total card amount and number of card recipients
- c. Under payment information, Remit to 0000008865, Location: WIRE-21, Address: 1.
- d. Under payment options, Bank: BOA, Account: 0806, Method: WIR. Under Payment Information, Scheduled Due: same date to be entered on ACH request (see step 3 below)

Add AOSD Fund Accountant as final approver.

3. After voucher is approved, department staff submits ACH request on TTX banking portal: ACH Request (<https://sftreasurer.org/banking-investments/banking-services-city-departments>) and attaches a signed copy of the Order Request form.
 - a. For Payment Request Type: ACH Request
 - b. For the “DATE PAYMENT IS DUE (SETTLEMENT DATE)*”, enter 2 business days from date of submission. For example, submitting the ACH request on 7/8/19, enter 7/10/19 as date payment is due.
 - c. For ACH or Fedwire ABA Routing Number: 322285846
 - d. For Beneficiary Bank and Name: US Bank
 - e. For Beneficiary’s Full Address: 200 South Sixth St, Minneapolis, MN 55402
 - f. For Beneficiary’s Account Number: 6014052128735
4. The SFPD Grants Accountant forwards the completed Shipping Information as Excel spreadsheet to TTX via email: ttx.bankingtreasuryaccounting@sfgov.org
5. TTX reviews documents for completeness, processes order and will send confirmation to department staff with expected delivery date.

Inventory Receipt

- Documentation of inventory receipt and distribution must include the name and signature of the receiving staff and corresponding date.
- Staff must verify the gift card types and quantities by type and in total from the gift card shipments against the packing slips of the shipments.
- Staff must review, sign, and date packing slips of the gift card shipments.
- Staff must promptly record the received gift card shipments and returns, if any, in the inventory records

Separation of Duties

Stages of Handling and Transfer of Gift Cards

1. Departments must have a different person responsible at each stage in the handling and transfer of gift cards:
 - a. Request the order of gift cards
 - i. Violence Reduction Initiative VRI Analyst #1
 - b. Approve the order of gift cards
 - i. Community Initiatives and Policy Manager and
 - ii. Chief Financial Officer
 - c. Purchase the gift cards
 - i. Accounting Unit staff member will submit to TTX for approval
 - d. Receive the gift cards
 - i. VRI Analyst #1
 - e. Distribute the gift cards internally within program team

- i. Community Initiatives and Policy Manager to
 - ii. VRI Analyst #1
 - f. Distribute the gift cards to program participants
 - i. VRI Analyst #1
 - g. Monitor usage of the gift cards
 - i. Community Initiatives and Policy Manager
 - h. Periodically inventory the gift cards
 - i. Grant Unit staff
- 2. Under no circumstances may a City employee involved in any stage of handling or transferring gift cards issue or use a gift card for his or herself or family member.

Gift Card Inventory

- A. Inventory Records. Offices that store gift cards must use the following internal controls
 - 1. Maintain complete and accurate inventory records by gift card, gift card type, and in total, including the gift card vendor and serial number, the beginning balance, gift cards received and distributed and corresponding dates, and the ending balance.
 - 2. Restrict access to gift card inventory records to authorized employees. Ensure access rights are immediately terminated once the employees no longer need access.
 - 3. Conduct periodic (weekly, monthly, or quarterly), as determined by the department for the subject program, physical inventory counts, and match results to inventory records.
 - 4. Report to management any discrepancies in the quantities and amounts between the physical inventory counts and inventory records.
 - 5. Inventory Records. Offices that store gift cards must use the following internal controls
- B. Inventory Storage and Security
 - 1. Store all gift card inventories in a locked cabinet or safe and restrict access to its key or combination.
 - 2. Keep the locked cabinet or safe in a room with restricted lock access. The room should, if possible, have cameras to monitor the handling of gift card inventories.
 - 3. Maintain a log or install electronic keys documenting who has had access to the room and when (each entry and exit).
 - 4. Exercise dual custody controls at all times during each stage of handling and transferring gift cards.
 - 5. Using performance measurement systems, hold appropriate personnel accountable for accomplishing consistent, accurate physical inventory counts.
 - 6. Hold no more gift cards than will be needed for the program during a reasonable timeframe, which the department must establish in writing.

Transfer to the Fiscal Division any gift card inventory in excess of the number needed during the established timeframe.

Gift Card Distribution to Participant

- 1. A log documenting the receipt and distribution of the gift card must include the following information:

- a. the type of incentive or participant support item that was distributed;
 - b. the date it was distributed;
 - c. the name and signature of the individual who received it;
 - d. the name and signature of the staff person who distributed it; and
 - e. the name and signature of a supervisor.
2. Review and approve all eligibility documentation from SVIP for each client upon each round of gift card distribution that the client has satisfied the program criteria to receive the incentive. This should be done by the program manager and/or VRI analyst. See Appendix C, *ICM GC Request Form*; Appendix D, *VIR GC Monthly Request Log*
 3. Maintain complete and accurate distribution records by gift card, gift card type, and in total, including the gift card vendor and serial number, client name(s), and date on which the gift card was distributed. The program manager and/or VRI analyst and fiscal office must review and approve such records before each round of gift card distribution.
 4. Maintain a log for eligible clients to sign upon receiving their gift cards in person.
 5. Return to the fiscal office any gift card not distributed to a client and properly record the card in the inventory records

Disbursement Process to Participant

1. The grant partner Intensive Case Manager (ICM) will turn in the "ICM GC Request Form" (Appendix C) to the SFPD VRI Analyst #1 on a monthly basis.
2. SFPD VRI Analyst #1 will verify goals via SVIP participant documentation.
3. The "ICM GC Request Form" includes the following.
 - a. Date of request
 - b. Participant full name
 - c. Confirmation of met goals.
 - d. ICM name/Signature
 - e. SVIP/VRI Program Manager
4. "ICM GC Request Form" will be filed in the "Participant Incentives Request Forms" binder. The binder will be kept in a locked cabinet by SFPD VRI team, in the Policy & Public Affairs Unit, with the San Francisco Police Department.
5. The SFPD VRI Analyst #1, will complete the "VRI GC Monthly Request Log" (Appendix D) with the following information and email/scan to the SFPD Community Initiatives and Policy Manager for approval.
 - a. Type of incentive
 - b. Participant full name
 - c. Confirmation of completes/met goal.
 - d. ICM name
 - e. Date of request
6. The SFPD Chief Financial Officer (CFO) of the SFPD will also approve request on the "VRI GC Monthly Request Log"

Pay Schedule

1. Following chain of custody policies, the SFPD VRI Analyst #1 will schedule a time for participants to pick up their gift cards weekly at the SVIP office.

2. Release of gift cards will be logged in the "VRI Participant Payment Log" (Appendix G).
3. Gift cards will be available for pick up one week from the date of the ICM request.
 - a. Participants must provide valid identification.
 - b. For participants that cannot attend the pickup at site due to safety concerns, ICM and VRI Analyst #1 will schedule a different day to drop off gift card to participant.

Gift Card Usage by Recipients

1. Gift cards must be provided only to clients and only as incentives for participating in the program.
2. Gift cards must be used only for the purposes stated for the CalVIP program. Gift cards provide incentives to help maximize participation among clients and can be used to reward participants who meet certain documented milestones, and to celebrate program completion.
3. The value of gift cards distributed to each client must not exceed the per-person limit determined by the department for the program.
4. Gift cards cannot be used to purchase prohibited items, including program materials, as specified by the program.
5. Any instance of loss, theft, fraudulent use, or abuse of gift cards must be immediately reported to the Fiscal Division's Grant Unit. The Grant Unit will investigate instances of reported loss, theft, fraudulent use, or abuse of gift cards, as it deems necessary.
6. The Grant Unit will monitor and audit the usage of distributed gift cards no less frequently than annually.

Gift Card Compliance and Record Retention

1. For audit purposes, all documentation shall be retained for no less than five years.
2. SFPD is required to follow the City's gift card policy and any subsequent updates, where applicable.
3. This CalVIP Gift Card Policy is subject to Controller's Office Internal Audits
4. SFPD is responsible for tracking and informing the Controller's Office on aggregated 1099 reportable income for gift card recipients, where applicable.
5. SFPD will securely transmit a project inventory log with the names, dates of birth, confirmed mailing addresses, of recipients of card amount to Controller's Office for audit documentation purposes.

Appendix A
BSCC Instructions
Using Grant Funds for Participant Support Costs and Incentives

Instructions:

Participant support items and incentives purchased with grant funds must be reasonable and clearly linked to grant-funded activities. At a minimum, the grantee must retain all receipts and supporting documentation related to a purchase. Supporting documentation could also include program schedules, lists of attendees, class rosters, etc.

In addition to the guidance provided here, grantees should follow any internal policies and procedures governing the purchase and use of participant support costs and incentives.

Grantees that propose the purchase of participant support items and incentives with grant funds, must provide the following information, using the format on the next page.

- A description of the activity or program component for which the participant support items or incentives will be purchased.
- A list of the type of incentive(s) (e.g. stipends, gift cards, etc.) or participant support items (e.g. educational materials, work supplies, etc.) to be purchased, with the corresponding per unit costs.
- The approximate number of grant-funded participants that would benefit from each purchase.
- The total budget for each line item.
- A detailed justification describing the need for the purchases.

Note: Field trips or overnight excursions require a separate, detailed line-item budget. Work with the Field Representative to determine the level of detail that is required.

Date:
Grantee Name:
Name of Grant Program:
Grant Period:
Total Amount of Grant-Funded Incentive(s):

Justification for the Purchase of Participant Support Items and Incentives

Describe in detail the activity or program component for which the participant support items and incentives will be purchased:

Describe the need for the participant support items and incentives, explaining the benefit to the program:

Types of Incentives and Participant Support Items	Cost	Approximate # of Participants	Budget
Example: Target gift cards	\$25 each	20 per month x 24 months	\$12,000
TOTAL BUDGET:			

Grantee Supervisor Signature and Title

Appendix B

List of personnel authorized to sign and approve requests for reloadable cards and reload of funds.

Manager Name	Program/Project	Role and duties
Lili Gamero	Community Initiatives and Policy Manager, SFPD	Approve the purchase of reloadable cards
Patrick Leung	CFO, SFPD	Approve the purchase of reloadable cards
Katie Lee	Grants Manager, SFPD	Serve as an approver backup when necessary for the CFO
Fannie Yeung	Senior Analyst, SFPD	Process the wire form after the voucher payment is fully approved.
Li Wu	Accountant, SFPD	Serve as a back up processor for the wire form after the voucher payment is fully approved.

List of personnel authorized to monitor the reloadable card inventory and the requestor or receiver will require dual signatures from a manager listed above.

	Name	Role	Duties
1.	a) Jason Hecker	Program Staff	Requests the order of the Visa gift cards. Updates inventory form.
2.	Program Approval: Lili Gamero, Program Back-up: Delia Montiel Fiscal Approval: Patrick Leung Fiscal Back-up: Katie Lee	Program & Department Leadership	Approves the purchase of the Visa gift cards.
3.	a) Accounts Payable	Accounts Payable	Submits voucher via FSP
4.	b) Banking	Banking staff	Orders cards from US Bank
5.	a) Fannie Yeung b) Katie Lee c) Li Wu	Fiscal Staff	Receives the Visa gift cards and provides to Cashiering to lock in lock box. Verifies Visa gift cards received are listed on inventory form. Stores the Visa gift cards in lock box.
6.	a) Julia Orellana b) Jason Hecker c) Delia Montiel	Program Staff	When requested for distribution, delivers Visa gift cards from Cashiering lock box to individual. Updates inventory form. Distribute the Visa gift cards and complete distribution log.
7.	a) Fannie Yeung b) Katie Lee c) Li Wu	Fiscal Staff	Inventories the Visa gift cards monthly.

Violence Reduction Initiative (VRI)

Policy & Public Affairs, San Francisco Police Department

Appendix C

REQUESTED BY:

DATE:

VRI- INCENTIVE REQUEST

PARTICIPANT FULL NAME :

AMOUNT:

CRITERIA

- Maintained required communication/engagement
- Actively working on his/her agreement
- _____

I hereby confirm that the person named above has met said goals and is applicable to receive gift card incentive as per our agreement.

SVIP ICM STAFF SIGNATURE

DATE:

SVIP PROGRAM MANAGER SIGNATURE

DATE:

Violence Reduction Initiative (VRI)

Policy & Public Affairs, San Francisco Police Department



Appendix D

DATE: _____

REQUESTED BY: _____

VRI GIFT CARD- MONTHLY REQUEST LOG

Gift cards distributed for the Violence Reduction Initiative (VRI) program participants will be logged in this document and retained with the SFPD VRI team, in the Policy & Public Affairs Unit.

#	Participants Name	Participant SSN	Incentive Amount	VRI/ICM Staff Name	Goal Verified
1	EX: Bobby Joe	805-27-2983	\$250.	Prince Dean	X
2					
3					
4					
5					
6					
7					
8					
9					
10					

SFPD VRI-Analyst _____

_____ Date

SFPD Community Initiatives Policy Manager

Approved Denied

_____ Date

Patrick Leung/Fiscal CFO

Approved Denied

_____ Date

Violence Reduction Initiative (VRI)

Policy & Public Affairs, San Francisco Police Department

Appendix E



VRI GIFT CARD (GC) RELEASE LOG

Gift cards purchased and distributed for the Violence Reduction Initiative (VRI) will be logged in this document and retained with the SFPD Fiscal team, with the Grants Manager.

GC #	GC Purchase Date	GC Purchaser (Print Name)	GC Serial Number	GC Amount/Denomination	VRI Custodian Receiving GC (Print Name)
1					
2					
3					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					

Violence Reduction Initiative (VRI)

Policy & Public Affairs, San Francisco Police Department

Appendix F



VRI GIFT CARD (GC) TEAM DISBURSEMENT LOG

Gift cards distributed for the Violence Reduction Initiative (VRI) will be logged in this document and retained with the SFPD VRI team, in the Policy & Public Affairs Unit. The Community Initiatives & Policy Manager will retain the log.

GC #	GC Serial Number	GC Amount/ Denomination	GC Release Date	VRI GC Custodian (Print Name)	VRI GC Custodian (Signature)	VRI Team Member Receiving GC (Print Name)	VRI Team Member Receiving GC (Signature)
1							
2							
3							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							

