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Responsible University Office:
Procurement and Payment Services

Responsible University Administrator:
Vice Chancellor of Business and Finance

Policy Contact:
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Gift Cards for Research

POLICY CONTENTS

Scope
Policy Statement
Reason for Policy
Procedures
Definitions
Additional Contacts
Forms
Related Information
History

Scope

Any faculty, staff, or student conducting research with human or animal subjects that require remuneration for participation (human subjects) or for the return of UNK property (animal subjects) for amounts up to \$75.

Policy Statement

This Gift Card for Research Subjects Policy is established to provide a mechanism for a University of Nebraska at Kearney (UNK) Principal Investigator (PI) to be able to provide participation incentives to research subjects for Institutional Review Board (IRB) approved research projects. The University recognizes that there are times when it is necessary to protect the identity of research subjects thus making it impossible to process a check request through Payment Services. Additionally, this policy provides PIs a mechanism to incentivize the return of UNK property from research projects approved by the Institutional Animal Care and Use Committee (IACUC).

As cash-equivalent instruments, gift cards are governed by IRS tax rules and internal control requirements. These rules and requirements must be followed and communicated to those involved before purchase or distribution of any gift cards. The office of

Procurement and Payment Services (P2P) will be responsible for the oversight and the administration of all gift cards. In addition, **purchasing gift cards with University funds, or grant funds on deposit with the University, is strictly limited for recipients who are research subjects participating in a University IRB or IACUC approved study.**

Reason for Policy

The purpose of the Gift Cards for Research Subjects Policy is to provide guidelines for appropriate use and accountability over the use of all gift cards used for research purposes.

Procedures

GIFT CARD USAGE

Gift cards must be requested through the office of Procurement and Payment Services. The requesting Department or PI agrees to provide a list of all recipients of a gift card, including the amount of the gift card, for IRS tracking purposes. Unless the IRB approved research project includes anonymous participation, recipient detail shall be provided for the following reasons:

1. For employees of the University (any campus), gift cards are considered by the IRS as a cash equivalent and thus are considered taxable income and subject to withholding, regardless of the amount. All gift cards distributed to employees will be reported to Human Resources and included on the employee's W-2 for the calendar year in which the gift card was distributed to the employee,
2. For non-employees, IRS regulations stipulate that the value of the gift card must be reported via a Form 1099, if it and all other eligible payments to the recipient add up to be \$600 or more in a calendar year.

GIFT CARD PURCHASE PROCEDURES

A Gift Card Request Form shall be completed by the Principal Investigator and the approval of the purchase shall be provided by the Cost Center Responsible Party (usually a Department Chair, College Dean or Director). Gift cards will be purchased by the office of Procurement and Payment Services upon receiving a completed and approved Gift Card Request Form.

Gift cards should be requested no sooner than one month before disbursement. Gift Cards will be released to the requesting Department or PI on the date of distribution (or the Friday before, if the distribution date is a Saturday or Sunday) as indicated on the Gift Card Request Form. Any exceptions will require the approval of the Payment Services Manager or the Director of Payment Services. If the gift cards are to be disbursed over a longer period of time, the gift cards should be purchased and tracked in appropriate increments.

For IRS tax reporting purposes, Payment Services is required to maintain a list of all gift cards distributed to individuals. Should the Department/PI not know the names of the recipients at the time the Gift Card Request Form is completed, the Department/PI must complete a Gift Card Log, which lists all individuals receiving a gift card from the University and turn it in to Procurement and Payment Services once all cards have been distributed.

All Gift Card forms and instructions are located in SAPPHIRE>Business Forms>UNK>Accounts Payable>Gift Cards for Research Subjects

Definitions

A Gift Card, for the purposes of this policy, is defined as a stored-value or similar instrument issued in lieu of cash or check. Gift Card(s) must be valued at \$50 or less per recipient unless the Director of Payment Services approves a special exception. In no case, shall the value of gift card(s) for a single recipient be more than \$75. Approval from an institutional research compliance committee (either Institutional Review Board [IRB] or the Institutional Animal Care and Use Committee [IACUC]) for the proposed research and, in turn, the use of the gift card, is required.

Additional Contacts

Subject	Contact	Phone	Email
Appropriate use	Travis Reynolds	308-865-8956	reynoldstj@unk.edu
Purchase procedures	Kim Christensen	308-865-8525	kim.christensen@nebraska.edu
Purchase procedures	Carrie Stithem	308-865-8865	carrie.stithem@nebraska.edu
Exceptions	Carrie Stithem	308-865-8865	carrie.stithem@nebraska.edu

Forms

Gift Card Request Form, including gift card log and participant disclosure are stored in SAPPHIRE [Business Forms>UNK>Accounts Payable>Gift Cards for Research Subjects.

Related Information

History

The original policy was published in February of 2015. This update includes language to expand gift card use to IACUC governed projects and places the policy on the universal policy form.

Policy was updated January 10, 2022 to clarify the limit on the value of gift cards are per recipient and not per gift card. Also, contact names and email addresses were updated.