



Participant Incentives: Gift Cards - Grants

Guideline: SP10
Responsible Executive: Vice
President for Research
Responsible Office: Office of
Research and Sponsored Programs
Approved by:
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Definitions

Participant Incentives	Incentive payments to volunteers or patients participating in a grant-supported project or program are allowable. Participant Incentives are payments made to individuals to motivate them to take advantage of grant-supported health care or other services. They are only allowable if within the scope of an approved project.
Participant Support	Participant support costs means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects.

Guidelines

Gifts are an unallowable cost on federally funded awards, however gift cards utilized as incentive payments for human subjects (IRB, clinical trials) are an allowable expense. Because gift cards are purchased in advance of their actual use and often in bulk, the timing of the allocation of the cost to the grant award is also a critical component of allowability. The charging of gift cards used for human subject incentive payments to federal or federal pass-through sponsored awards must follow the same guidelines for allocability, allowability, reasonableness, and consistency as other items of cost, but additional guidelines are required.

When gift cards are being purchased with grant funds, the following criteria must be met: (1) the gift card is for research participant incentive payments or is approved by the sponsor, and (2) costs for such incentives are included in the grant's budget and are allowable by the terms and conditions of the specific grant.

Gift cards normally cannot be distributed to employees for participant incentives. According to Uniform Guidance 200.445, the cost of goods or services for personal use by employees is unallowable. Payments to employees must be made via a supplemental payroll process. Gift cards/gift certificates must be treated like cash and administered with a high level of security. The maximum value allowed for a single gift card cannot exceed \$100.

The purchase of gift cards, gift certificates, incentives, and/or prizes must have prior approval via a completed Authorization for the Purchase of Gift Cards/Gift Certificates, Incentives, or Prizes form.

Procedure

Gift card purchases which will not be distributed to study participants within a month of the date of purchase must be purchased on a college or department account. If the gift cards are distributed within a month of purchase, the cost may be directly allocated to the grant account. Expenses may be moved from the department account to the grant account

after the gift cards are distributed to subjects. The cost transfer will be completed by grants accounting. A gift card log (see below) must be available to document the gift card allocation.

Gift Card Logs

Regardless of how the Gift Cards are purchased, the staff member or faculty PI must retain a gift card log with the following information:

- Gift Card purchase date
- Sponsored project account
- Unique Gift Card Number
- Date Gift Card is given to participants
- Gift Card Amount
- Recipient name (or de-identified identifier, if necessary)

Participant Incentives

Entices participant
Employees and non-employees
Directly or indirectly allocated
(direct payment or group dinner/raffle)
Incurs IDC

Participant Support

Benefits participant (training)
Non-employees
Directly allocable
(direct payment or reimbursement)
Incurs no IDC

Contact

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