GIFT CARD MANAGEMENT

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PARTICIPANT GIFT CARD POLICY

- General Information
- Request for Gift Cards
- Restrictions/Limitations
- Purchase
- Maintenance
- Remaining Gift Cards
- IRS Reporting Requirements
- Compliance Reviews

GENERAL INFORMATION

- Gift cards are for the payment to participants to either incentivize participation and/or compensate the participant for their time, travel and inconvenience.
- Gift cards are expected to be a fair representation of the hardship to the participant.
- Over-compensation or inconsistent payments can put studies at risk.

REQUEST FOR GIFT CARDS

- The process starts with an email to Pcard Administration with the following information:
  - The chartfield to be charged
  - IRB number as well as the Patient Consent Form
  - Name, purpose and short description of the study
  - Number of cards requested, denomination of cards request, how the amount requested was arrived at and the projected timeline of the distribution period
  - Name of the purchaser and custodian
  - Internal Control Document (Participant Gift Card Request Form)

Participant Gift Card Request Form

Completion of the following form outlines the process that will be used to ensure proper stewardship of gift cards for participants.

Chartfield:

Fund	ORG	Function	Entity	Source	Purpose	Project

IRB # (if required):

Name, purpose and short description of study:

Number of, denomination, and vendor for gift cards being requested (please include methodology used to determine denomination) Also include expected timeline for dispensing gift cards:

REQUEST FOR GIFT CARDS

- Every purchase requires a new request to Pcard Administration
- Subsequent purchases require the submission of the reconciliation of the previous order of gift cards
- The request forms and reconciliation forms are available at the link below (GCA website – Forms and Tools)
- Reconciliation form requires signatures. Cannot be typed signature.

https://financialservices.ouhsc.edu/Forms/PID/57649/mcat/57653/acat/2/ev/1/nsw/t/EDNSearch/grants

	Department:	Science Institute			**Custodian:**	Susan Smith	
	Project:	20008215			**Gift Card Type:**	WalMart $75 Gift Card	
	Date Purchased	***Serial Number***	***Card Amount***	***Pcard Exception #***	***Date Disbursed***	***Payment Purpose***	***Recipient Name or ID #***
1	1/28/2021	6189 0457 0379	$ 75.00	6804	2/11/2021	Compensate CAB members	Cheryl Jones
2	1/28/2021	6189 0457 0380	$ 75.00	6804	2/11/2021	Compensate CAB members	Kevin Taylor
3	1/28/2021	6189 0457 0381	$ 75.00	6804	2/11/2021	Compensate CAB members	John Mitchell
4	1/28/2021	6189 0457 0382	$ 75.00	6804	2/11/2021	Compensate CAB members	Steve Carey
5	1/28/2021	6189 0457 0383	$ 75.00	6804	2/11/2021	Compensate CAB members	Mary White
6	1/28/2021	6189 0457 0384	$ 75.00	6804	2/11/2021	Compensate CAB members	Lois Lane
7	1/28/2021	6189 0457 0385	$ 75.00	6804	2/11/2021	Compensate CAB members	Rudy Thompson
8	1/28/2021	6189 0457 0386	$ 75.00	6804	2/11/2021	Compensate CAB members	Van Nguyen
9	1/28/2021	6189 0457 0387	$ 75.00	6804	2/11/2021	Compensate CAB members	Alexis Carter
10	1/28/2021	6189 0457 0388	$ 75.00	6804	2/11/2021	Compensate CAB members	Rosalind Stevens
11	1/28/2021	6189 0457 0389	$ 75.00	6804	2/11/2021	Compensate CAB members	Mark Stuart
12	1/28/2021	6189 0457 0390	$ 75.00	6804	2/11/2021	Compensate CAB members	Carol Burnett
13	1/28/2021	6189 0457 0391	$ 75.00	6804	2/11/2021	Compensate CAB members	Nicholas Banks
14	1/28/2021	6189 0433 9453	$ 75.00	6804		mpensate CAB members	
15	1/28/2021	6189 0433 9454	$ 75.00	6804		Compensate CAB members	
16	1/28/2021	6189 0433 9455	$ 75.00	6804		Compensate CAB members	
	Gift Card Reconciliation:						
	Cards Purchased:	16					
	Amount Disbursed:	13					
	Cards On-hand:	3					

Reconciliation Template

Gift Card Reconciliation:

Copy & Paste from Inventory Tracking Log

Cards Purchased:	40
Amount Disbursed:	32
Cards On-hand:	8

Serial Numbers On-Hand

List Serial Numbers On Hand

209023
209024
209025
209026
209027
209028
209029
209030

- Verify the number of cards on hand agree to the tracking (audit) log
- Verify the serial numbers on hand agree to the serial number not disbursed on the tracking (audit) log
- Verify the total value of card purchased per the tracking (audit) log agree to the amount recorded in PeopleSoft
- Verify all disbursements have a recipient signature/initials

CONTROLS

- **Custody** - For each purchase, a single individual must be the designated custodian of the gift cards. The custodian is responsible for ensuring that all purchasing, security, dispensing, tracking and replenishing procedures are followed.
- **Security** - Gift cards must be secured at all times, i.e., in a locked box inside a locked cabinet or drawer accessible only by the custodian.
- **Receipts (issuance)** - Gift card issuances should be documented in a log (spreadsheet) or pre-numbered receipt book.
- **Reconciliation** – A reconciliation of gift cards should be conducted whenever gift cards are purchased or at least monthly. This reconciliation should consist of verifying that the number of cards purchased minus the number of cards disbursed agrees with the number of cards on hand. In addition, the value of the cards purchased should agree with the amount recorded in the PeopleSoft Finance System.

RESTRICTIONS/LIMITATIONS

- Do not request the entire budget outlined in the proposal. Gift cards should be purchased in increments needed to issue over a 4-6 week period.
- Gift card purchasing limit is $1,500 at one time.
- Custodian must be an OU employee. **No exceptions**.
- Cannot be distributed to Resident Aliens, Nonresident aliens and Illegal immigrants.
- Distributed only for the purpose disclosed.
- Employees – research purposes only.
- Remaining gift card balances must be removed from a SPNSR/SP490 fund.

PURCHASING THE GIFT CARDS

- Pcard is the primary method of purchase.
- Must purchase only the amount and denominations approved.
- Note gift cards cannot be returned for credit.
- Visa gift cards have additional charges you need to consider.
- Correct gl code is 921200 - Participants
- Note your exception number in the pcard reconciliation.

MAINTENANCE

- Gift card must be kept in a secure location. A safe is the best option.
- Review of personal identification is required.
- The participant must sign for the gift card.
- Best practice is to cross check with patient schedule or follow-up call with participants to ensure logs are valid.
- **When a custodian leaves employment, ensure that all records and gift cards are accounted for prior to departure.** Appoint new custodian.
- Loss/theft of cards must be reported to Campus Police.

REMAINING GIFT CARDS

- At the end of the project period, a gift card reconciliation must be performed.
- Any remaining gift card balances must be removed from the grant.
- The cards can be transferred to departmental funds.
- The gift cards can be transferred to another project that has the need for like vendor and denominations.
- Gift cards can only be distributed to persons who have participated through the end date of the grant.

REPORTING REQUIREMENTS

- Any payments over $600 are required to be reported to the IRS. **No exceptions.**
- Individual payments of $100 or more or cumulative payments of $500 in a calendar year trigger the reporting requirement for OU. This requires that you collect the social security number at the time the gift card is distributed. **No exceptions.**
- Information must be reported to Accounts Payable on a quarterly basis.
- Quarter 4 information (October-December) must be reported by a TBD date in early January to be included in the 1099 reporting for that year.

PARTICIPANT LOG - EXAMPLE

Last Name[1]	First Name[1]	SSN/ITIN[2]	Address (street)[3]	Address (city)[3]	Address (state)[3]	Address (zip)[3]	Amount[4]	Residency Status[5]	Employee	Payment Type	Reporting Quarter
Sandra	Johnson	123-45-4578	1320 Acme Blvd	Oklahoma City	OK	73104	150.00	U.S. Citizen	No	Gift Card	Quarter 3
Chris	Brown	265-48-1258	1508 Perry St	Moore	OK	73160	300.00	Permenant Resident	No	Gift Card	Quarter 3
Lewis	Taylor	335-27-8745	456 28th St	Oklahoma City	OK	73135	150.00	U.S. Citizen	Yes	Gift Card	Quarter 3

COMPLIANCE REVIEWS

- Gift cards must be reconciled before additional cards are requested or no less than monthly.
- Someone external to the process should perform periodic spot checks.
- Financial Services and Internal Audit may show up at any time and perform an audit.

IMPORTANCE

- Why is it so important to have good controls?
  - To prevent the loss of funds
  - To protect the integrity of the study
  - To protect the reputation of University, faculty and staff

ELECTRONIC GIFT CARDS

- Controls may be different in nature, but you still must have them
  - One person should not have control of the entire process.
  - How are you confirming the identity and residency status of the participant?
  - How are you ensuring that the participant actually received the payment?
    - https://www.sciencedirect.com/science/article/pii/S2214782921000415
    - https://onlinelibrary.wiley.com/doi/10.1111/hex.13724

EXAMPLES

- IRB consent form stated participant would receive $50 for completion of the study. Records showed that participants were paid anywhere from $50-$125. What are the risks here? How could this have been prevented?
- PI is using survey data to use as support of their hypothesis. Staff member was filling out the surveys using fake names and then keeping the gift cards. What are the risks here? How could this have been prevented?
- Custodian left the gift cards on the desk when staff were sent home for the pandemic. When they returned 5 months later, the cards were gone. What steps need to be taken next?

Reporting Concerns: Fraud, Abuse, and False Claims

At OU, fostering an environment of integrity, respect, and the highest ethical standards is a top priority. Each member of the OU community shares the responsibility of ensuring these values are firmly upheld and concerns are promptly addressed.

The university's reporting hotline– OU Report It! – provides a simple and anonymous way for employees, students, and community members to report concerns or possible misconduct.

How to Submit a Report:

Violations or concerns may be submitted to the OU Report It! hotline 24 hours a day through the following methods:

- **Phone:** (844) 428-6531
- **Online:**
  To make a report, select the appropriate campus below:
  - **OU Norman Campus:** https://www.ou.ethicspoint.com
  - **OU Health Sciences Center:** https://ouhsc.ethicspoint.com
  - **OU-Tulsa:** https://outulsa.ethicspoint.com
  - **All campuses governed by the OU Board of Regents:** https://ouregents.ethicspoint.com
- **Mobile:**
  Reports can be made from a mobile device, allowing for easy reporting on-the-go or in private settings.

Questions?



CONTACT INFORMATION

- Questions:
  - Tamara Franklin – x46387 (T,W) or 325-1804 (M,Th,F)
  - Michelle Bremenkamp, Grants and Contracts Accounting Manager – x46383
  - Suzanne Cook, Accounts Payable Manager - x46560