

GIFT CARD and GIFT CERTIFICATE Purchasing Procedures

(Updated 3.22.2021)

<u>REQUEST</u> Review Purchasing Procedures. Submit Gift Card Purchase Request Form PRIOR to Purchasing Receive appropriate division/college approvals and submit to Foundation. DO NOT Purchase until Foundation notifies you of approval

APPROVALS

PURCHASING If approved requester may purchase cards on a personal card, Foundation P-Card, PO or request that Foundation place the expense on a Foundation Office card. TRACKING Complete the distribution log and email to foundationaccounting@csudh.edu within 10 days of distribution. Keep log and approval as a reconciliation packet.

The use of gift cards must comply with the mission of CSUDH Foundation and CSUDH and adhere to all CSUDH Foundation policies and procedures. The use of gift cards/gift vouchers or electronic gift codes herein referred to as "gift cards" should only be considered when no other option is viable, should be infrequent, and conservative in value. Only one gift card can be awarded to a recipient per event/activity. Gift cards are governed by tax rules and internal control requirements. These rules and requirements must be followed and communicated to those involved before the purchase or distribution of any gift cards. Any requests for an exemption to this Purchasing Procedure will be evaluated on a case-by-case basis and will require Executive Director approval.

<u>A Gift Card/Gift Certificate Purchase Request Form must be completed and approved prior to the purchase of gift cards.</u> The Gift Card/Gift Certificate Purchase Request Form can be found here. Click Here.

Gift cards for a retail store or online vendor are not considered cash equivalents. As of the implementation of this procedure, 1.25.2021, cash equivalent cards such as Visa, Master, American Express, Discover, etc., are not allowable at this time. Foundation reserves the right to amend this policy at a future date if a need is adequately identified.

Failure to follow these procedures and applicable policies listed below may lead to suspension of Foundation procurement card, spending authority, up to and including disciplinary action and/or dismissal of Foundation employees.

Departments should consider purchasing gift cards from CSUDH Foundation partners (ex. Follett [Bookstore]). Bookstore branded gift cards can be used at the Bookstore for all merchandise and are also redeemable on the bookstore website. Link to gift card purchasing page: <u>California State University, Dominguez Hills Gift Cards</u> (<u>bkstr.com</u>) Link to the Bookstore home page: <u>California State University Bookstore - Dominguez Hills Apparel,</u> <u>Merchandise, & Gifts (bkstr.com</u>) The bookstore gift cards can be purchased in amounts beginning at \$10 in the store and beginning at \$25 on the Bookstore website.

The Bookstore also offers several retail type cards displayed in the Bookstore on a spinning fixture and are only available for in-person purchase. They are not available on the bookstore website.

Gift Cards may only be purchased, received, and distributed per the guidelines below:

- 1. <u>Employee Awards</u>: The use of a gift card will be treated as compensation to the employee, and applicable state and federal taxes will have to be paid by the employee and the program. Employee recipients must sign the <u>Employee Gift & Award Reporting Form</u>.
- 2. <u>Student Awards</u>: Gift cards presented as awards to students must comply with CSUDH Foundation Policies and CSUDH policies related to both compensation and scholarships. When providing gift cards to students, please forward a list that includes the students CSUDH ID and the amount of the gift card to Rosa Ornelas, Scholarship Coordinator at <u>rornelas@csudh.edu</u>.
- 3. <u>Payments to Research Subjects</u>: Gift cards are an allowable form of payment for research subject incentives. The payment must be allowable from the funding source. Proof of Institutional Review Board/Human

Subjects (IRB) approval must be submitted with the check request.

- 4. <u>Awards and Prizes</u>: Gift cards can be utilized as awards and prizes provided CSUDH Foundation policies are followed.
- 5. Meal Cards: Gift Cards or Gift Certificates for Meals

Gift cards may NOT be purchased for the following:

- 1. To pay/compensate employees, student employees, independent contractors, volunteers, or other individuals for services/work performed
- 2. Holiday or other celebratory gifts (including gifts for graduating students)
- 3. To pay vendors for goods and/or services received

PROJECT LEAD, PRINCIPAL INVESTIGATOR (PI), ACCOUNT DIRECTORS AND PURCHASER RESPONSIBILITIES

POLICIES

Must comply with the following policies and procedures:

CSUDH Foundation Hospitality Policy CSUDH Foundation Community Relations Funds Policy CSUDH Foundation Conflict of Interest Policy CSUDH Foundation Procurement Policy CSUDH Foundation Cash Handling Policy CSUDH Independent Contractor Policy

PURCHASING AND DISTRIBUTING CARDS

Prior to distribution, keep gift cards in a secure location in accordance with the CSUDH Foundation Cash Handling Policy.

Physical gift cards should be placed in a secure location in accordance with the CSUDH Foundation Cash Handling Policy.

Maintain a <u>gift card distribution log</u> and reconciliation for hard copy and electronic gift cards (log template can be found<u>here</u>), which is used to track gift cards and manage the amounts given to recipients. Acknowledgement that the recipient received the gift card is required to be maintained by requesting department.

When a non-employee How do we define non-employee? We already exclude vendors above. is paid \$600 or more in a calendar year, A Vendor Data Form must be submitted to CSUDH Foundation so a 1099 Misc. form can be issued. Per the CSUDH Foundation Hospitality Policy, if Foundation funds are used it is the responsibility of the department conferring the award or prize to notify Payroll of cash and cash equivalent awards given to employees, as well as non-cash awards or prizes that do not meet the IRS definition of de minimis.

Purchase cards only from the vendors and for the amounts which were approved on the Gift Card Request.

STORING ELECTRONIC GIFT CARDS

All electronic gift cards purchased for staff and faculty gifts should be distributed immediately upon purchase to the recipient's email address. Gift cards purchased as prizes or meal cards must be distributed within thirty days of the grant workshop or campus event. The gift card distribution log tracker for electronic and physical gift cards should be stored in a secured Dropbox. For access to a secured shared Dropbox, please contact <u>Mpayne@csudh.edu</u>

AUDITING

Retain and make available to CSUDH Foundation all related documents in accordance with CSUDH Foundation Records Retention Policy and governing laws and regulations for auditing purposes. The gift card log should be

maintained by the department requesting gift cards. CSUDH Foundation in partnership with the University retains the right to audit these files and contact listed recipients at any time within the retention period.

MISSING OR MISUSED CARDS

If gift cards are discovered missing, the requester/PI/AD must notify CSUDH Foundation immediately by emailing <u>foundationaccounting@csudh.edu</u>. The CSUDH Foundation Executive Director or designee will consult with appropriate representatives to determine appropriate next steps. Requestors may be required to return or pay back the CSUDH Foundation for the cost of any missing, unissued, or misused cards.

REQUEST PROCEDURE

- The requestor will submit the <u>Gift Card Request Form</u> to ¹CSUDH Foundation Accounts Payable at least ten (10) days prior to the purchase of the cards. Once the request is approved, the purchasing process can take more time than expected, especially for larger quantities of gift cards. Start the process early to avoid delays in approval or purchasing.
- 2. Once the request has been approved or denied, the requester and all approvers will receive notification.

PURCHASING PROCEDURE

- 1. Purchasing Gift Cards:
 - a. All gift card purchases must be made on a PO, CSUDH Foundation PCard, a personal card only after the gift card purchase form is approved, or request the use of the Foundation Office card. Purchasers must follow all P-Card guidelines and check request reconciliation procedures, including submitting the itemized receipt and purchase approval for the gift cards.
 - b. For Grants and Contracts 5XXX: If the cards were purchased on behalf of a Principal Investigator, the PI will be responsible for tracking and reporting the disbursement of gift cards.
 - c. Approvals All gift card purchases must be approved by a VP, Dean, Division Head, Grant expenditures require Post-Award analysts signature. Per item gift card at \$500 and above must be approved by the Foundation CFO. All gift card **total requests** of \$5000 or more must be approved by the Foundation Executive Director.
- 2. Gift cards must be distributed <u>within 30 days</u> of approval unless an extension is approved by the CSUDH Foundation's Executive Director or designee.
 - a. Once all cards have been distributed and the gift card distribution log is complete, the requestor must submit receipt(s), Gift Card/Gift Certificate Purchase Request Form, and Gift Card Distribution Log (must include a Microsoft Excel version) to CSUDH Foundation
 - If payment is needed, submit to CSUDH Foundation Accounts Payable within 10 days
 - If purchased using a Foundation Office card or Foundation procurement card, submit to <u>foundationaccounting@csudh.edu</u> **within 10 days**

¹ <u>CSUDH Foundation Accounts Payable Contacts</u>

Fernando Rodriguez - <u>fernandor@csudh.edu</u> Patty Young - pyoung@csudh.edu

- 3. If an employee received a gift card, a signed acknowledgement_must be attached to the distribution log.
- 4. CSUDH Foundation reserves the right to audit any gift card activities at any time and share the results of audit with Office of Sponsored Research and Programs (OSRP) and CSUDH. Requester is required to maintain the original log as well as provide a copy to Foundation accounting.
- 5. New gift card requests for the same project will not be reviewed until recipient logs from previous requests have been submitted to CSUDH Foundation, unless approved by the CSUDH Foundation Executive Director or designee.

ADDITIONAL PROCEDURES FOR SPONSORED PROJECTS / GRANT FUNDS (PROJECT 5XXX)

Sponsored projects may provide research incentive payments to individuals or human subjects that are participating in research. Such payments must be allowable and specified in the sponsor approved budget and should not exceed \$50.00 per card (unless approved by the sponsor in advance). In the event of a conflict between sponsor and CSUDH policy, the stricter of the two policies shall apply.

CSUDH IRB is required to approve, in advance, the method and incentive amounts to all human or research subjects. PI's may not deviate from the IRB approved amount, type, or timing of the incentive payment without first obtaining a modification to the approved protocol.

- 1. Gift cards purchased for one sponsored project must not be distributed on another sponsored project as the tracking for the gift card serial numbers will be jeopardized. As such, gift card requests cannot be submitted with multiple sponsored project numbers and must be separately accounted for.
- 2. The balance of gift cards remaining plus the amount distributed to recipients must equal the authorized gift card purchase amount. Discrepancies must immediately be reported to the Dean of OSRP.
 - a. *Confidential studies* When completing the distribution log, recipient names and other confidential information including relationship to CSUDH may be redacted. Recipients may be assigned an enrollment identification number and/or code, such as Participant A, B, C, etc. PIs must create a key document, such as a study log, that cross-references the name of the subject and their enrollment identification number/code. This must be maintained in a secure location, and available for audit.
 - b. Anonymous studies When completing the distribution log, recipient names and other confidential information including relationship to CSUDH may be left blank. The PI must provide proof that incentive payments made to human subjects or participants equal/reconcile to the number of cards requested and purchased. This proof must be from an original source of record, i.e. a report generated by a third party survey company, or document that is signed by another individual, other than the requestor, involved in the distribution of incentive payments.
- OSRP and CSUDH Foundation reserve the right to audit departmental gift card records at any time. The Principal Investigator is ultimately responsible for ensuring compliance with these procedures, including the requirement of providing an adequate log to the purchaser at the time of expense packet reconciliation.