

Institutional Review Board Guidancefor Researcherson CSULB Gift Card Policy

I. Background:

In December 2021, the CSULB Financial Aid Office announced that effective January 1, 2022, the Accounting Office would implement changes to the CSULB gift card policy for students. This policy has been applied to research incentives for student human subjects on our campus. Among the changes is the directive to the bursement logs will now require that the student's name and CSULB ID be typed. The change was likely prompted by 34 CFR 668.16(f), which states that if a student receives an academic scholars inpugh one school office, that office must notify the aid administrator of these benefits to ensure that the amounts are correctly reported on the student's aid application and are counted as estimated financial assistance for the Campusbased and Directoan programs.

On September 13, 2022, members of the CSULB Institutional Review Board (IRB) for the Protection of Human Subjects unanimously objected, raising issues that impact both research on

There are two ways incentives present unintended risks to subjects, one old and one new. The first has been in practice for many years and pertains to the \$600 federal tax limit, without regard to student status; the second (and primary focus of this guidance document) is **thic** created policy targeting students. Hese are outlined below.

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This is not a new policyCSULB Financial Services will sequersonally identifying information for tax reporting urposes (reporting to the S)

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