	UNIVERSITY RESEARCH POLICY: Use of Lotteries, Raffles, and/or Drawings in Research			
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Policy Statement

This policy describes the policy and procedures for Institutional Review Board (IRB) review of research involving the use of lotteries, raffles and/or drawings in research.

Reason for Policy

The Commonwealth of Pennsylvania considers all forms of gambling to be illegal unless specifically accepted by law. Lotteries or raffles used in the context of providing incentives to research participants may be permitted under some circumstances. The IRB will determine, on a case-by-case basis, whether lotteries or raffles may be used to recruit research participants.

Entities Affected By This Policy

This policy applies to all faculty, staff, and students of the university conducting human subjects research involving the use of lotteries, raffles and/or drawings; the IRB committee members and chairs; Research Integrity office staff.

Who Should Read This Policy


- Faculty, staff, and students of the university engaged in human subjects research subject to IRB review and oversight
- New and re-appointed IRB committee members
- New and re-appointed IRB committee co-chairs
- Research Integrity office staff

Responsibilities

Responsible Party	List of Responsibilities
Designated reviewers	Apply this policy when conducting reviews of IRB applications involving the use of lotteries, raffles, and/or drawings.
Lehigh University faculty, staff, and students submitting human subjects research for IRB review	Read, understand, and follow this policy when preparing applications involving the use of lotteries, raffles, and/or drawings for submission to the IRB. Read, understand, and follow this policy when conducting human subjects research involving the use of lotteries, raffles, and/or drawings.
Research Integrity office staff	Process IRB reviews and apply this policy when reviewing research involving the use of lotteries, raffles, and/or drawings.

Principles

Subject compensation should be equitable across all participants who are experiencing the same level of risk and/or inconvenience. In the case of lotteries or raffles, all participants may have an equal chance of receiving an incentive, but the resulting compensation for research participation is arbitrarily different. Researchers should explore all other options for distributing incentives equitably among research participants before proposing the use of lotteries or raffles. The IRB will always give preference to incentive structures providing small incentives to all participants over those providing one or several larger incentives to fewer than all participants. There is also concern that most people overvalue their likelihood of winning, and therefore, offering a large prize may present undue influence or coercion,

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undermining the process of informed consent. For these reasons, the use of lotteries and raffles in research is discouraged.

Procedures

Initial Screening

Upon acceptance of a complete package, the Research Integrity office staff makes a preliminary determination as to whether this policy applies to the study.

Review


Designated reviewers will first refer to the [Lehigh IRB Payments to Research Participants Worksheet](#) to determine whether the research compensation plan is in compliance with Lehigh IRB policies.

In order for the IRB to consider the use of lotteries or raffles the following must be addressed:

1. The study is no more than minimal risk.
2. Only participants who are eighteen (18) years of age or older are eligible to participate.
3. Incentive amounts and proposed method and timing of disbursement cannot be coercive or present undue influence. Incentive values should not be so high as to unduly induce subjects to participate in or stay enrolled in the study when they would have otherwise withdrawn. The dollar value of incentives must be low (i.e. no more than \$50).
4. Compensation must be appropriate to the study population and commensurate to the level of effort and amount of time spend on the research tasks. For example, it is not appropriate to provide a chance of receiving a \$1,000 bookstore credit to an undergraduate student in return for completing a 10-minute survey.
5. Cash cannot be distributed.
6. The study protocol, the informed consent, and all advertisements/recruitment materials must clearly define the incentives, the timing of distribution, the process for selecting recipients, and the definitive odds for receiving an incentive (e.g. "There will be 100 participants recruited for this study. There will be 20 thank-you gifts randomly distributed. Each individual has a one-in-five chance of being randomly selected to receive a thank-you gift.").
7. Eligibility for receipt of an incentive must not be contingent upon completing the study. This means that the entire recruitment pool, not just those who enroll and/or complete the study, must be eligible for the incentives.
8. Recipients cannot be selected by drawings, and there can be no discussion of "having your name entered into a drawing" in the informed consent or advertisements. Recipients must be selected on a truly random basis.
9. The process for distributing incentives must not compromise the privacy of participants or the confidentiality of their data.

Additionally, researchers approved by the IRB to use raffles or lotteries in research are responsible for securing all other required institutional approvals, including, but not limited to, the Office of the Controller.

Web Address For This Policy

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[Lehigh University IRB website](#) (IRB Standard Operating Procedures and Policies)

Related Resources

University Policies and Documents
Lehigh University IRB Glossary Lehigh IRB Payments to Research Participants Worksheet

Contacts

Subject Matter	Office Name	Telephone Number	E-mail/Web Address
Policy Clarification and Interpretation	Senior Research Integrity Specialist	610-758-2871	https://research.cc.lehigh.edu/contact-us-0