

## Sponsored Programs Human Subject Research Incentive Payment Policy

### **Purpose:**

To establish policy and procedures for the processing and payment of incentives to human subject research participants.

### **Definition:**

Incentive is a financial or otherwise reward to encourage participation in a human subject research study.

### **Policy:**

CSUF, Auxiliary Services Corporation, (CSUF ASC) may provide human subject/incentive payments to individuals participating in research funded by sponsored projects, should such payments be specified in the approved project budget. CSUF Institutional Review Board (IRB) is required to approve, in advance, the method and amount of compensation to any human research participant. Investigators may not deviate from the amount, type or timing of the payment without first obtaining a modification to their approved human subjects protocol. An individual payment should be less than \$50 unless prior approval from sponsor and IRB has been obtained.

If the amount paid to an individual participant during a calendar year is \$600 or more, CSUF ASC is required to report such payments to the Internal Revenue Service. In such cases, anonymity of participants cannot be maintained. Project Principal Investigator (PI) is required to track annual human subject/incentive payments and notify CSUF ASC when the individual has received \$600 or more in a calendar year. In such cases the recipient is required submit W-9 form and to sign a [privacy waiver form](#).

### **Procedures:**

Participants may be compensated by cash, checks or gift cards. The method used determines the process in which to purchase or reimburse the incentive.

### **I. Cash Payments:**

Cash used to pay participants must be physically protected from loss at all times and reconciled periodically.

All fund transactions must be recorded in a "[Cash Log](#)" that includes:

- Date of the transaction
- Signature of participant acknowledging receipt of payment
- Subject ID code (alpha/numeric code assigned by researchers to protect the identity of participants)
- IRB protocol number
- Amount of payment
- Name of the person making the payment

The name of the participant cannot be disclosed unless the participant signed a privacy waiver (see above).

- 1) Cash Advances are issued to an Investigator upon receiving a completed [Check Request \(CK\) form](#) indicating on the form "IRB APPROVED CONFIDENTIAL DATA".
- 2) Each cash advance must be cleared upon completion of the research or by the date specified on the cash advance, whichever comes first. When warranted, due dates may be extended by the Director of OSP.
- 3) To clear a cash advance, an Investigator must turn in the "cash log" and a copy of the cash Advance Check to the Office of Sponsored Programs CP-275.

**II. Gift Card Payments:**

Principal Investigators may purchase gift cards for distribution to human subject research participants.. It is extremely important for PIs to avoid purchasing of excessive number of gift cards as the costs of undistributed gift cards/certificates will not be reimbursed. All gift cards must be locked up and secured to prevent theft.

All gift card transactions must be recorded in a "[Gift Card Log](#)" that includes:

- Date of the transaction
- Signature of participant acknowledging receipt of the gift card
- Subject ID code (alpha/numeric code assigned by researchers to protect the identity of participants)
- IRB protocol number
- Gift Card dollar value
- The person making the payment

The name of the participant cannot be disclosed unless the participant signed a privacy waiver (see above).

- 1) Purchase Order or Cash Advance (see I.1) may be provided for the purchase of gift cards
- 2) In order to clear the advance or seek reimbursement, copies of the back of the gift card (indicating gift card number) must accompany the Gift Card log and the original purchase receipt.

**III. Check Payments to Participants:**

Upon request from the PI, ASC may issue a check to a participant who submitted W-9 form and a signed privacy waiver form (see above).

- 1) PI completes a Check Request (CK)
- 2) Participant completes and signs a privacy waiver form and W-9 form.
- 3) PI submits CK and the privacy waiver form signed by the participant to OSP

Any payments given to participants in medical research studies are subject to HIPPA laws. This law requires all information pertaining to those individuals remain confidential. It will be the responsibility of the Principal Investigator to insure that these records are adequately secured.