

# Paying Human Subjects for Participation in Research Studies

## Remuneration Guidelines

### General

1. Participants in research projects (human subjects) are sometimes compensated for their time, effort and expenses related to their participation. Compensation can be in the form of money, certificates, products, or other incentives. In some cases, payments are made to the parents or legal guardians of the participants. The Wright State University 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 subject protocol. Remunerations for participants in clinical trials are managed by the Clinical Trials Research Alliance.
2. Payments should not be so large as to induce prospective subjects to consent to participate in the research against their better judgment ("undue inducement").
3. Credits for payments to subjects should accrue as the study progresses and not be contingent upon the subject completing the entire study. Prorated payment should be made regardless of whether withdrawal is voluntary or involuntary.
4. If the amount paid to an individual during a calendar year is \$600 or more, the University is required to report such payments to the Internal Revenue Service. Therefore, anonymity of such participants cannot be maintained.
5. Consistent with IRS Private Letter Ruling 9106004 (August 2, 1990), human subjects participating in research projects are not paid, if they are paid at all, to provide a service to the university as an employee. Payment to subjects for participation in studies is not considered a benefit; it is a recruitment incentive.

### Methods of Payment to Participants

1. **University Check.** Payment by university check is preferred, but may be used only when participants are not anonymous regardless of the amount of the check. The check request must refer to an approved human subject protocol (by HSP, SC, IAA, or InfoEd number) in which payment by check is described.
2. **Payment by Gift Card.**
  - a. All payments by gift card must be documented using, at a minimum, the following:
    - i. Date of the transaction
    - ii. Subject ID code (alpha/numeric code assigned by researchers to protect the identity of participants)
    - iii. Protocol approval (HSP, SC, or IAA) number
    - iv. Amount of payment
    - v. Name of the person making the payment
    - vi. Total amount expected to be received this calendar year by this subject from all University sources
  - b. Fees for gift cards may not be charged to federally sponsored projects.
  - c. Gift cards on hand should be reconciled periodically to the total amount purchased. An individual who is not involved in other study procedures should perform a supervisory review not less frequently than quarterly and upon termination of any award.

- d. If any participant will likely be paid a total of \$600 or more during any calendar year, each payment to that subject must be made by university check (see paragraph 1 above).
3. **Products, Course Credits, or Other Non-Cash Remuneration.** For information on payment alternatives, contact the [IRB Coordinator](#) in Research and Sponsored Programs.
4. **Reimbursement of Expenses to Participants.** If a participant's expenses will be paid for by the study, payments may be made using one of the methods described above, as appropriate. In addition, receipts are required to document the expense. The principal investigator or other responsible party must ensure that such receipts do not contain participant identifying information.
5. **Accounting for Payments to Research Subjects.** Banner account 717305 should be used for any payments made to human subjects related to research by Wright State University, regardless of the source of the funds (restricted or unrestricted).