I. **PURPOSE**

To establish controls and procedures for requesting, tracking, safeguarding, and distributing payments to Human Research Participants and the collection of confidential information to ensure compliance with University, Internal Revenue Services (IRS), Institutional Review Board (IRB) requirements and any other regulations.

II. **REFERENCES**

**ACCOUNTS PAYABLE:**
- Guidance for Limited Purchase Checks and Payment to Human Subjects: [http://fbs.admin.utah.edu/accountspayable/payment/#lpc](http://fbs.admin.utah.edu/accountspayable/payment/#lpc)

**INSTITUTIONAL REVIEW BOARD:**
- Payment Process Exception Form (University of Utah) via the IRB Forms Webpage: [http://www.research.utah.edu/irb/forms/index.html](http://www.research.utah.edu/irb/forms/index.html)

III. **DEFINITIONS**

**HUMAN RESEARCH PARTICIPANT:** A volunteer participant in a research study, “participant(s)”.

**PAYMENT:** Any kind of compensation to the participant including cash, checks, gift certificates, gift cards, or other items of monetary value.

**STUDY:** Generally a sponsored project approved by the IRB that is conducted under the direction of a Principal Investigator.

**TAX INFORMATION:** Collected on IRS Form W-9. Includes the participant’s full name, social security number, and mailing address.

IV. **POLICY**

In addition to adhering to established University policies, the department provides supplemental directions to reduce administrative burdens while maintaining defined separation of duties and limiting the exposure of confidential information, determining when researchers must collect confidential information in certain situations, and specifying how participants would receive payment for their study participation. A proper separation of duties ensures that one individual cannot approve, purchase, secure, and reconcile items with monetary value.

V. **PROCEDURES**

i. **METHOD OF PAYMENT:**

Payment method must be disclosed in the informed consent document approved by the IRB. The recommended method for payment to participants is gift card, if it is equal to or less than $100 per occurrence and the total compensation for study participation during the calendar year will not exceed $600.
Other methods of payment may be acceptable but requires department approval. Following is a list of other eligible methods:

*Eligible methods for payments equal to or less than $100*
- Cash
- Limited Purchase Check (LPC)
- Check via Payment Request
- Tangible personal property*

*Eligible methods for payments more than $100*
- LPC
- Check via Payment Request
- Tangible Personal Property*

* Personal property is given as a form of compensation for services in the study; therefore, it cannot be considered a gift and it subject to tax requirements. Examples of tangible personal property are movie theater tickets/gift certificates, toys, CDs, books, etc.

**ii. Tax Information:**

The University of Utah is obligated to report payments to the IRS for individuals in amounts greater than $600 in one calendar year. The department will collect tax information for all study participants via the IRS Form W-9, unless studies qualify for payment process exemption. Required tax information must be disclosed in the informed consent document approved by the IRB.

Requirements for collecting and forwarding tax information to Accounts Payable or Tax Services are as follows:

*Payments equal to or less than $100 per occurrence and less than or equal to $600 per calendar year*
- Collection of tax information is not required when payment is made via **cash, gift cards/certificates, or tangible personal property**.
  - A W-9 may be required for this form of reimbursement for reporting purposes in the event payments to the study participant exceed $600.
- Collect and forward tax information to Accounts Payable when payment is made via **LPC or Payment Request**.

*Payments equal to or less than $100 per occurrence but over $600 per calendar year*
- Collect and forward tax information to Accounts Payable when payment is made via **LPC or Payment Request**.
- Collect and forward IRS Form W-9 to Tax Services when payment is made via **cash, gift card/certificate or tangible personal property**.
- If the study does not qualify for a payment process exception and the participant does not want to disclose their tax information (or they don’t have tax information) then the participant can forfeit the payment.

*Payments greater than $100 and/or over $600 per calendar year*
- **Payment by LPC or Payment Request:** Collect tax information via the IRS Form W-9 and forward to Accounts Payable.
- Payments of tangible personal property valued above $600 per year per participant must be reported to Tax Services along with the participant's Form W-9.
• If the study does not qualify for a payment process exception and the participant does not want to disclose their tax information (or they don’t have tax information) then the participant can forfeit the payment.

iii. REQUESTING PAYMENT:

The principal investigator or designee must verify that all information required for the study is provided before giving compensation. Compensation process should allow for separation of duties that limits the risk of improper use of funds.

• Principal investigator or an authorized designee should approve the best method to process compensation to study participants, which should be done at the initial stage of the study.
  ▪ Refer to section V i. for compliance

• Once the method is approved, requests must be submitted to a division authorized purchaser to obtain gift card, checks, etc. along with the proper forms/documentation, chartfield, and study name. Study coordinators cannot be assigned as an authorized purchaser.

• Employees who have signature authority on a chartfield cannot be an authorized purchaser or LPC custodian.

• Gift cards should be purchased through the Clinical Trials Office. The employee purchasing the gift cards must document the card type, value, and number on the Gift Card Tracking Sheet, and keep a copy of the record with the original receipts and purchasing card statement.

• The approved division preparer will complete payment requests and obtain the proper signatures/documents and send the information to accounts payable.

• Only in special circumstances the department will approve use of Limit Purchase checks. Compensation through a Limited Purchase Check should follow University’s guidelines. Custodians are responsible for the check stock they are assigned and must comply with “positive pay” procedures. Custodians may not have the authority to sign LPCs.

• Only in special circumstances will cash compensation will be permitted. If department approval is received to use cash, the study coordinator must work with the department’s central financial team to obtain cash.

iv. TRACKING PAYMENT

Investigators must maintain payment logs for all studies that provide payments to participants. In the event of an audit, it will be the responsibility of the investigator to supply all required supporting documentation for human subject payments made from the investigator’s accounts.

A process must be in place to track payments given to all study participants. The minimum information that must be collected includes:

• Participant full name
• Participant full address
• Participation Date
• Method of compensation; gift card type and number, check number, etc.
• Compensation Amount
• Date compensation was received by participant
• Participant signature

v. DISTRIBUTING PAYMENT

In most instances, study coordinators will be responsible for distributing payments to study participants.

• Study coordinators will prepare for distributing payments to study participants one week prior to their visits.
• Study coordinators will obtain only the necessary number of gift cards/checks from the authorized custodian and will sign the “Gift Tracking Sheet” when gift cards are checked out or LPCs are received.
• When compensation is given during the study visit, the coordinator must complete the “Patient Payment Reimbursement Request Form”.
• Study participant must sign “Patient Payment Reimbursement Request Form” when receiving payment.
• When gift cards need to be mailed to study participants the study coordinator and the custodian will certify that it was mailed. Both will complete the “Gift Card Mail-Out Tracking sheet”

vi. SAFEGUARDING PAYMENT AND CONFIDENTIAL INFORMATION

Any compensation records maintained by a department that contain restricted information (including protected health information) shall be managed with reasonable and appropriate safeguards that are necessary to prevent the unauthorized use or disclosure of the information. The necessary safeguards must meet the standards articulated in University policy and contractual obligations.

• Gift card, gift certificates, or LPCs must be placed in a secured place, preferably a locked petty cash box. This box will be locked in a drawer, safe or filing cabinet.
• Only the purchaser of gift cards and a manager will have access to the box.
• Only the custodian of the LPCs will have access to the box.
• Audits of the gift card box will be conducted on a monthly basis by a division staff member to ensure all gift cards are accounted for.
• All other forms of documentation pertaining to study participant payments should be locked up in a file cabinet or drawer.

EXCEPTIONS FROM THIS PAYMENT PROCESS

A study may qualify for a payment process exception if the study requires total anonymity. Studies that qualify for a payment process exception are not required to collect personal, identifiable information as per this written procedure in order to pay research participants. All determinations regarding payment process exceptions are made by the IRB. Refer to IRB policy for procedures to obtain an exception.