

**Procedure: Compensation to Research Trial Participants**  
**Effective: July 1, 2007**  
**Latest Revision: March 9, 2020**  
**Owner: Vice President for Research**

**Scope**

This procedure describes the process for the compensation of participants in research trials. It will be administered for all research trials that have requested human subject compensation payments and posted on relevant websites.

**Definition**

Compensation is “payment” to a research participant for items such as time, discomfort or inconvenience. Total compensation should reflect the true value of the total possible dollar amount per participant for the full involvement in the research trial, whether it is via check, cash, gift card, goods, etc. or a combination of these items.

**Methods of Research Participant Payments**

- 1) Check issued to participant via University system (standard/preferred method of compensation).
- 2) Petty cash account\*: Per [UVA Policy](#), petty cash payments by check or cash are limited to a maximum of \$100 per payment and \$599 per calendar year per individual.
- 3) Gift\* or debit\* card
- 4) Other compensation methods\*

\*=*alternative method of compensation*

**Compensation Scenarios**

- 1) Standard (preferred) method of compensation via University check payment.
- 2) Alternative method of compensation where participant’s personal information is attainable for IRS reporting.
- 3) Alternative method of compensation where participant’s personal information is unattainable for IRS reporting.

**Institutional Review Board Responsibility and Team (i.e., the named Principal Investigator and Research Coordinator) Procedure**

- 1) Standard Method of Compensation
  - a. During the protocol review and approval process, the assigned Institutional Review Board (IRB) will review the dollar value of the compensation to determine that it is adequate for the type of trial participation.
  - b. Once IRB approval is obtained, the Team will enter the IRB protocol number in the Oracle Payment Voucher description field to facilitate processing by UVA’s Office of Procurement and Supplier Diversity Services (PSDS) and use the expenditure type “Svcs, Human Subject Pymts” to have a check issued to the individual participating in the research trial.
- 2) Alternative Method with IRS information
  - a. During the protocol review and approval process the assigned IRB must review the dollar value of the compensation to determine that it is adequate for the type of trial participation.

- b. Second, the IRB must review and approve the use of an alternate payment method. The preferred payment method for research trial participants is via a University check distributed by PSDS. The IRB will determine if the alternative payment method is justified based on the research requirements.
    - i. If the justification for an alternative method of payment is not approved or deemed inadequate by the IRB, the Team must use the standard payment method or resubmit to the board with an amended justification for re-review.
    - ii. If the IRB approves the use of an alternative payment method, the Team will enter the IRB protocol number in the Oracle Payment Voucher description field to facilitate PSDS processing. PSDS will contact the Office of the Vice President for Research (VPR) on an individual basis if confirmation of protocol approval is needed. The required information to be collected by the Team on each alternative payment recipient is as follows: Name (First and Last), Amount of Compensation, Street Address, City, State, Zip Code, and Social Security Number or Tax Identification Number. This information is to be securely stored by the Team following Information Security's [University Use of Highly Sensitive Data standard](#) until the close of each calendar year, when the Office of the Vice President for Research will contact the Team with instructions to transfer the collected/securely stored information via a secure online form to PSDS by a set deadline.
- 3) Alternative Method without IRS information
- a. During the protocol review and approval process, the assigned IRB must approve the dollar value of the compensation to determine that it is adequate for the type of trial participation.
  - b. Second, the IRB must approve the use of an alternative payment method. The preferred payment method for research trial participants is via a University check distributed by PSDS. The IRB will determine if the alternative payment method is justified based on the research protocol requirements.
  - c. Third, the IRB must approve the non-collection of IRS information.
  - d. If the justification for an alternative method of payment and/or the non-collection of IRS information is not approved or deemed inadequate by the IRB, the Team must use the standard payment method or resubmit the research trial to the board with amended justification(s) for re-review.
  - e. If the IRB approves the use of an alternative payment method without the collection of IRS information, the Team will enter the IRB protocol number in the Oracle Payment Voucher description field to facilitate processing by PSDS. PSDS will contact the Office of the Vice President for Research (VPR) on an individual basis if confirmation of protocol approval is needed. A payment to individuals participating in research where IRS information is not being collected is limited to a total payment of \$50 or less per individual from all such research studies during the calendar year.

## Options

Once all IRB study approvals have been obtained, there are several options available, all being driven by whether or not IRS information can be collected. These options are:

### **CAN THE TAX INFORMATION BE OBTAINED? If, YES:**

\*\*\*All options in this section will require the IRB number to be added to the Description field on the Payment Voucher. (Example: IRB 123456). Never include the name of the research trial.\*\*\*

#### ***Option 1 --Preferred Method***

##### ***PAYMENT MADE DIRECTLY TO THE INDIVIDUAL (who IS NOT a UVA employee)***

- The Team is responsible for collecting the required information from the research participant, ensuring compliance with Information Security's [University Use of Highly Sensitive Data standard](#):  
Name (First and Last), Amount of Compensation, Street Address, City, State, Zip Code, and Social Security Number or Tax Identification Number.
- Once this information is obtained, the Team can complete the PSDS Non-supplier Add form in Marketplace. See the UVA Marketplace Registration Portal: <http://www.procurement.virginia.edu/pagevendorregistration>.
- Once the participant has been added to the Oracle vendor file, the Team will prepare a Payment Voucher.
- The amount should be what the IRB has approved; however, there are no additional restrictions.

##### ***PAYMENT MADE DIRECTLY TO THE INDIVIDUAL (who IS a UVA employee)***

- The Team is responsible for collecting the required information from the research participant, ensuring compliance with Information Security's [University Use of Highly Sensitive Data standard](#):  
Name (First and Last), Amount of Compensation, Street Address, City, State, Zip Code, and Social Security Number or Tax Identification Number.
- The employee is required to self-register per the UVA Marketplace Registration Portal information for non-suppliers: <http://www.procurement.virginia.edu/pagevendorregistration>.
- Once the participant has been added to the Oracle vendor file, the Team will prepare a Payment Voucher.
- The amount should be what the IRB has approved; however, there are no additional restrictions.

#### ***Option 2***

##### ***PAYMENT USING GIFT CARD OR CASH***

- Ensuring compliance with Information Security's [University Use of Highly Sensitive Data standard](#), the Team is responsible for collecting the required information from the research participant: Name (First and Last), Amount of Compensation, Street

Address, City, State, Zip Code, and Social Security Number or Tax Identification Number, and supplying such information to PSDS when requested by the VPR.

- A Payment Voucher should be prepared, payable to the gift card vendor. The Payment Voucher should be made 'Hold for Pick-up'. If the vendor is not in the vendor file, the department must follow standard procedure for adding the new vendor: <http://www.procurement.virginia.edu/pagevendorregistration>.
- Alternatively, PSDS maintains vendor contract/s for placement of gift card orders via the UVA online punch-out catalog. Search for gift card options on the PSDS contract summary page by vendor: <http://www.procurement.virginia.edu/pagecontracts>.
- If cash is requested, the Payment Voucher should be payable to 'Bank of America' and should be made as 'Hold for Pick-up'.
- The amount should be what the IRB has approved; however, there are no additional restrictions.

### ***Option 3***

#### ***PAYMENT USING PETTY CASH OR PETTY CASH CHECK***

- Ensuring compliance with Information Security's [University Use of Highly Sensitive Data standard](#), the Team is responsible for collecting the required information from the research participants: Name (First and Last), Amount of Compensation, Street Address, City, State, Zip Code, and Social Security Number or Tax Identification Number, and supplying such information to PSDS when requested by the VPR.

### **CAN THE TAX INFORMATION BE OBTAINED? If,**

**NO:**

### ***Option 1***

#### ***PAYMENT USING GIFT CARD OR CASH***

- All payments of this nature are limited to a total payment of \$50.00 or less from all such research studies per individual per calendar year.
- A Payment Voucher should be prepared, payable to the gift card vendor. The Payment Voucher should be made 'Hold for Pick-up'. If the vendor is not in the vendor file, the department must follow standard procedure for adding the new vendor: <http://www.procurement.virginia.edu/pagevendorregistration>.
- Alternatively, PSDS maintains vendor contract/s for placement of gift card orders via the UVA online punchout catalog. Search for gift card options on the PSDS contract summary page by vendor: <http://www.procurement.virginia.edu/pagecontracts>.
- If cash is requested, the Payment Voucher should be payable to 'Bank of America' and should be made as 'Hold for Pick-up'.

### **General Payment Voucher Guidelines:**

- A) When processing a payment voucher for the purchase of gift cards or cash with which to compensate research trial participants, the approved IRB protocol number must be entered first in the payment voucher description field.
- B) The expenditure type to be used is "Svcs, Human Subject Pymts".

- C) The check is to be made out to the vendor that the gift cards are to be purchased from or in the case of cash, to Bank of America.
- D) The check should be held for pick-up and picked up by an authorized representative of the research trial to be used to purchase the gift cards from the chosen vendor.
- E) Gift cards are considered to be equivalent to cash and must be treated as such. If gift cards purchased for a trial are not completely used, then it is the Team's responsibility to have a procedure in place to secure the gift cards for use on future studies using gift cards as a payment method. In this case, gift cards purchased for one trial but used on another must still have IRS information collected on the recipients.

**Petty Cash Guidelines:**

When using Petty Cash, the team is responsible for following University established policies and procedures:

- A) Preparation of Request for Petty Cash, Petty Cash Checking, or Change Fund - [Financial and Administrative Procedure 2-5](#)
- B) Preparing Payment Vouchers - [Financial and Administrative Procedure 6-101](#)

**Requisition Guidelines:**

When submitting a requisition for the purchase of gift cards, the UVA study team is responsible for following University established policies and procedures:

- A) Preparing Requisitions- [FIN-030 Purchases of Goods and Services](#)
- B) The approved IRB protocol number must be added to the Description field on the Purchase Requisition. (Example: IRB 123456). Never include the name of the trial. See screen shot on the following page for an example.

**Contact Information**

VPR:	434-924-3606
IRB-HSR:	434-924-2620
IRB-SBS:	434-924-5999
PSDS:	434-924-4212

[Requisition example, continued from page 5]

UVA Integrated System iProcurement

Requisitions/Orders Shop Receiving

### Edit and Submit Requisition

Check Funds Save Printable Page Submit

\* Indicates required field

Requisition 1269448

Total 70.00 USD

\* Description IRB#123 2 PEOPLE  
Justification IRB#123 2 PEOPLE

Select Lines: Update Copy Delete

Select All | Select None

Select Details	Description	Quantity	Unit	Price	Amount (USD)	Deliver-To Location	Reference Number	Update Line	Delete
<input type="checkbox"/>	▶ AMC THEATRES \$10	2	Each	10 USD	20.00	MMCAR	TEST ORDER		
<input type="checkbox"/>	▶ AMC THEATRES \$25	2	Each	25 USD	50.00	MMCAR	TEST ORDER		
<b>Total</b>					70.00				

Based on your approval authority, this requisition does not require approval by others.

#### Approvals

TIP Please click on "Refresh Approvers" to view the updated approver(s).

Refresh Approvers Manage Approvals

No Approvals Required

#### Notes And Attachments

Notes

Note To Buyer