WE ARE LINK BETWEEN WHAT YOUR PI NEEDS/WANTS TO DO AND WHAT CAN BE DONE

- Sponsor requirements, university and department policies
- Study Coordinators
- Ethical and scientific considerations
WHAT KINDS OF STUDIES USE PARTICIPANT PAYMENTS?

- Clinical
- Clinical trials
- Basic science
- Social sciences
- Behavioral sciences
- Marketing
- Education research

If the research involves humans who are not working for the project, you may well have participant payments.
AGENDA

- Ethical Considerations
  What are the challenges in deciding appropriate compensation?

- Practical Considerations
  What do you need to consider before paying participants at Ohio State?
Designing a fair payment model

- Amount
- Participants
- Mode
- Participant burden

https://www.sciencenews.org/article/culture-shapes-sense-fairness
WHY DO WE PAY PARTICIPANTS?

When possible, we want to acknowledge the time spent and trouble experienced by participants.

- Compensation for time
- Reimbursement for out-of-pocket expenses (parking, travel)
- Compensation for taking on risks by participating in research
- Compensation for following the protocol – making extra efforts, performing actions that they wouldn’t otherwise do
- Participant compensation may help with recruitment
- Enhance compliance with the research protocol
HOW MUCH IS FAIR?

- Reimbursement
- Hourly wage
- Market rate (higher pay for high risk or low benefit studies)
- Fair share (fixed proportion of the per-subject reimbursement to the investigators)
- Are some parts of the study harder than others?
The trick is this:
To balance paying your participants reasonable compensation against unduly influencing them.
WHAT PAYMENT SCHEDULE IS FAIR?

• How often do you see your participants?
• How often do they submit something, like a survey?
• Is the study over in a week? A year? Four years?
CASE STUDIES

You determine what’s fair!
## CASE STUDY A

What is the impact of social network and home environment on behavior and immune function?

<table>
<thead>
<tr>
<th>Visit #</th>
<th>Week</th>
<th>What happens</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>Eligibility and informed consent, saliva and hair samples for biomarkers, and baseline questionnaires/interview if eligible, 1.5 hour (in person at subject’s home)</td>
</tr>
<tr>
<td>2-7</td>
<td>2-7</td>
<td>Smart phone survey 1x/week for 6 weeks, 3 minutes per survey</td>
</tr>
<tr>
<td>8</td>
<td>14</td>
<td>fMRI session, 1.5 hrs (at OSU) (no injections required for fMRI)</td>
</tr>
<tr>
<td>9</td>
<td>24</td>
<td>In-person visit with questionnaires, 1 hour (at home)</td>
</tr>
<tr>
<td>10</td>
<td>48</td>
<td>In-person visit with blood draw and questionnaires, 1.25 hours (at home)</td>
</tr>
</tbody>
</table>
Adults ages 21-45 with diagnosed anxiety have decreased stress levels as measured by a cortisol test involving a blood draw after 8 weeks of participation in a novel yoga program.

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<th>What happens</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>Eligibility and informed consent, blood draw and questionnaire if eligible, 1.5 hour (at OSU)</td>
</tr>
<tr>
<td>2-9</td>
<td>2-9</td>
<td>Yoga 1x/week for 8 weeks, 1 hour each week (at OSU)</td>
</tr>
<tr>
<td>10</td>
<td>13</td>
<td>Phone call follow-up with questionnaire (15 min)</td>
</tr>
<tr>
<td>11</td>
<td>17</td>
<td>In-person visit with questionnaire, 1 hour (at OSU)</td>
</tr>
<tr>
<td>12</td>
<td>21</td>
<td>In-person visit with blood draw and questionnaire, 1.25 hours (at OSU)</td>
</tr>
</tbody>
</table>

https://www.seattlenorthcountry.com/blog/goat-yoga-at-wobbly-ranch/
STUDY POPULATION CHARACTERISTICS

- Culture
- Financial status
- Educational attainment
- Age
- Disability status
- Citizenship status
- Developmental status
- Housing status
- Pregnancy
- Prisoners
- Students
- Employees
- Legal issues
- Family members
REGARDLESS OF AMOUNT...

- Pay participants comparable rates/amounts
- Compensation should not entice people to accept risk that they wouldn’t ordinarily accept
- Prorate payments to match participation, even for drop outs
- Pay within a reasonable time frame relative to participation
INCENTIVES THAT ARE OFTEN ACCEPTABLE

- Cash, checks
- Gift cards, money on BuckID
- Merchandise
- Class credit
- Community service points
- Drawings, so long as all participants (including withdrawals) are eligible
INFORMED CONSENT

- People have the right to know about planned study compensation
- Compensation and participant burden must be clearly explained in the informed consent process (e.g., script, document)
OUR RESPONSIBILITY TO NON-CITIZENS

Payments to non-resident aliens (NRAs) can lead to problems for the participant

- *Any payment* is taxable income
- If you are paying >$100 to a participant for one protocol during one calendar year, special rules for non-resident aliens (NRAs) apply
- There are forms that both the study team and the participant complete for payments >$100
OUR RESPONSIBILITY TO VULNERABLE PARTICIPANTS

- Protect the dignity of vulnerable participants (e.g., due to age, housing status, disability)
- To the extent possible:
  - Specify to whom payments will be made
  - Design payments so that they are made to the actual participant
  - Obtain participant’s signature on receipt
  - Transparency
BANKING STATUS MATTERS

What can we do for those who don’t use a bank, or are financially insecure?
SCENARIO: ROLL 'EM!

Your fate with the cast of a die
<table>
<thead>
<tr>
<th></th>
<th>1/4</th>
<th>2/5</th>
<th>3/6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Participants</td>
<td>&lt;18</td>
<td>Non-resident aliens likely to participate</td>
<td>Adults only</td>
</tr>
<tr>
<td>Amount per year</td>
<td>$50</td>
<td>$500</td>
<td>40” TV valued at $300</td>
</tr>
<tr>
<td>Mode of interaction</td>
<td>In their home</td>
<td>Text</td>
<td>In person at OSU</td>
</tr>
<tr>
<td>Burden</td>
<td>2x week for 2 months</td>
<td>5x day for 1 week</td>
<td>One 4 hour visit</td>
</tr>
</tbody>
</table>
PRACTICALITIES

- Your Procedures
- Source of Funds
- Taxes and Citizenship
- Documentation and Monitoring
CONSIDERATION 1: YOUR PROCEDURES

- Who is allowed to get and handle petty cash?
- How do you ensure that all forms of payment are used for the study for which they are intended (monitoring)?
- Do you have separation of duties (custodians and monitors)?
- Do you have secure storage?
- How do you ensure similar forms of payment for multiple studies are not co-mingled?
- What do you do when a custodian leaves Ohio State?
Office of Sponsored Programs (OSP) funds
- More leeway on payment amount permitted per year
- Sponsor requirements may dictate options
- No leeway in what study you can use the payments for
- Petty cash monitoring provided
CONSIDERATION 2: SOURCE OF FUNDING

University funds

- Start-up funding, internal grants, other internal accounts
- Department responsible for monitoring program
- Department expectations vary
CONSIDERATION 3: TAXES AND CITIZENSHIP

- All payments in cash or in kind are **taxable income**
- OSU funding: >$100/protocol/year -> payments reported to IRS (A/P)
- OSP funding: >$500/protocol/year -> payments reported to IRS

**Participants’ legal status matters**
- Citizens and permanent residents: taxation is the main consideration
- Non-resident aliens: does their visa allow them to be paid?
  - >$100/protocol/year: OSU/OSP needs to verify that the participant is allowed to be paid that much **BEFORE THEY ARE ENROLLED IN THE STUDY**
- NRAs who are student workers: only allowed to be paid for 20 hr/week of work, including any payments for research participation.
  - Penalty: not allowed to enter US, possibly for years
PAYING NON-RESIDENT ALIENS
>$100/YEAR

Before enrolling a non-resident alien participant, determine if they can be paid. A/P makes the determination after reviewing:

1. Obtain paper copy of passport and visa.

2. Complete the Nonresident Alien Payment Request form, a W-8 (see Foreign Entity W-8 form), and, if applicable, Compliance Form for Payments to B or W Visa Holders to request payment
   1. NRA will need to complete GLACIER forms, or Ohio State will withhold 30% of the payment for taxes

3. If A/P assigns a vendor ID, you can proceed

Note: this is required for EACH PAYMENT
CONSIDERATION 3: CHOOSING THE BEST PAYMENT TYPE

- Ethical concerns
- Security concerns (for person and for funds)
- Anonymity of participant
- Amount of payment per participant per protocol per calendar year
- Citizenship status
- Is funding source OSP or OSU?
- Does your department allow payment method?
PAYMENT OPTIONS

- Petty cash
- Check from Accounts Payable
- OSP project checking account
- Gift cards
- ClinCard
- Parking passes
- Non-cash compensation
- Others

Do you know your department’s expectations?
PETTY CASH OVERVIEW

- Remember: the money is not expensed until it is paid to a participant and that person signs a receipt
- Keep receipts with study records
- Provide a log (de-identified) to OSP (or your department, if not OSP) to prove appropriate expenditure
- Return any unspent funds at end of study
THE ADVENTURES OF CHRIS MCSTUDY
OR GETTING PETTY CASH

PR-HS1: PI, chair sign

You may only have cash on hand equaling the amount on this form

Attach to eRequest

Cash check

Need more $?

Pay HS & get receipts

Need more cash on hand? Do another PR-HS1 to increase

Create log of participants paid. Attach to eRequest. Request $ value reported on log.

This is called a replenishment
ACCOUNTS PAYABLE

- A/P required in some cases
  - Non-resident aliens >$100/protocol/year
  - OSP funds: >$500/protocol/year
  - Ohio State funds: >$100/protocol/year
- Need a Vendor Setup form for each individual
  - (Except non-resident aliens)
- Get the vendor ID before doing your eRequest so that you can keep participant’s name out of eRequest
- No receipt needed!
- This is a slow payment method
CHECKS FROM OSP PROJECT FUNDS

- Work through the Treasurer
- Complete PR-HS1 form
- Cost of checks is charged to account
- OSP transfers money to the checking account
- Limits to non-citizen/non-permanent residents pertain – not a replacement for A/P checks
- No receipt needed
- Not allowable for university funds
GIFT CARDS

- Cash equivalents
- Purchase like any other item
  - OSP: limited to $100/participant/protocol/year
- Keep receipts with study records
- Department must buy unused cards purchased on OSP project at end of project
- Sponsor-provided cards
- Best practice: department monitors usage
CLINCARD

- Reloadable gift cards
- Charge for each new card and to reload
- Contact Jeff Kemper at OSP to set up
  - OSP only
- Vendor Setup form needed for each participant
  - <$500/participant/year? Partially completed form only
- Participants sign receipt when receiving new card
- Internal Audit requires departmental monitoring
  - Compare usage log to PI Portal
OTHER NON-CASH COMPENSATION

- T-shirts, key chains, stuffed animals...
- Advertising or participant compensation?
- OSP will likely need justification
- Receipts
- How much monitoring do you need?
- What do you do with any items left over at study’s end?
Principle: You need evidence that the payment went to the study participant

- Best: receipt signed by the participant receiving the payment
- Acceptable, if necessary: two study personnel sign for payments distributed, with senior fiscal officer (SFO) signature on log
- Exceptions: Checks cut by A/P, ClinCard reloads, merchandise of minimal value, class credit
- Chain of custody: keep a log if multiple people are handling payments
Principle: The person you pay should have participated in the study

- What if the participant
  - Reports a lost check/eCard, gets a replacement and uses both?
  - Said s/he completed the protocol but didn’t?
  - Is not the same person as the one screening?
  - Lied at screening to get into the study?

- Strategies for reducing cheating
MONITORING TO PREVENT DIVERSION AND LOSS

- Catch problems early with regular monitoring
- Who is the monitor?
  - Not custodian
  - Department vs. OSP
- Amount requested = amount unspent + amount properly documented as given to participants
RECORD RETENTION

- Keep receipts with study documentation
- Check your sponsored research agreement for record retention requirements. Normal requirement: active plus 10 years.
- If it is not OSP funded, unclear (4 or 5 years?)