IRB: Payment, Reimbursement, Compensation Guidelines

Policy number: 403 B
Date: 9/29/06

References:
45 CFR 46.116(6)
21 CFR 50.25(6),
FDA Info Sheet: Payment to Research Subjects, A Guide to Informed Consent
AAHRPP II.5.B

Revision
History:

Cross Reference: University of Minnesota Policy 3.9.2 Paying Human Subjects and Maintaining Confidentiality and 1099 Reporting
Procedure 3.9.2.1 Paying Human Subjects Directly
Procedure 3.9.2.2 Making Payments to a Third Party

Purpose of Policy:
Describe the IRB position on payment of subjects in research at the University of Minnesota.

Policy:
Payment/Reimbursement/Compensation Guidelines
Payment to research participants in studies is not considered a benefit. Rather, it should be considered compensation for time and inconvenience or a recruitment incentive. The amount and schedule of all payments should be presented to the IRB at the time of initial review but cannot be used to offset risk for the purposes of justifying the study. The IRB should review both the amount of payment as well as the proposed method and timing of disbursement to assure that neither are coercive nor present undue influence. No payment may include coupons for discounts of products being testing once they are approved for marketing. All payments must be consistent with Regents’ Policies.

Timing of Payments: Credit for payment should accrue as the study progresses and not be contingent upon the participant completing the entire study. The participants should be paid in proportion to their time and inconvenience as a result of participation in the research study.

Completion Bonus: While the entire payment should not be contingent upon completion of the entire study, payment of a proportion as an incentive for completion of the study is acceptable, providing that such incentive is not coercive. The IRB does not approve completion bonuses that exceed half (½) of the total compensation of the study.

Disclosure of Payments: All information concerning payment, including the amount and schedule of payments, should be described in the consent form.

Advertisement of Payments: Advertisements may state that participants will be paid or compensated, but may not emphasize the payment or the amount.