

Procedure: Compensation to Research Study Participants

Effective: July 1, 2007

Latest Revision: March 6, 2024

Owner: Vice President for Research

Scope

This procedure describes the process for the compensation of participants in research studies. It will be administered for all research studies 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, whether it is via check, cash, gift card, goods, etc. or a combination of these items.

Methods of Research Participant Payments

- 1) Direct Deposit (ACH) to the participant’s bank account via University system, upon participant registering in UVA’s registration portal for UVA suppliers, PaymentWorks. (standard/preferred method of compensation)
- 2) Check issued to participant via University system, upon participant registering in UVA’s registration portal for UVA suppliers, PaymentWorks. (standard/preferred method of compensation)
- 3) Gift* or debit* card
- 4) Petty cash *: Per UVA Policy FIN-040, petty cash payments by check or cash are limited to a maximum of \$100 per transaction and \$599.99 per calendar year per individual.
- 5) Other compensation methods*

**=alternative method of compensation*

Compensation Scenarios

- 1) Standard (preferred) method of compensation via University-issued check or direct deposit.
- 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 Study 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) must approve the dollar value of the compensation that is adequate for the type of study participation.
 - b. Once IRB approval is obtained, the Study Team will enter the IRB protocol number in the Supplier’s Invoice Number field on the Supplier Invoice Request to facilitate processing by UVA’s Office of Procurement and Supplier Diversity Services (PSDS). Use the spend category “Services Human Subject Payments (SC0210)” to have payment (direct deposit or check) issued to the individual participating in the

research study.

- c. Participants will be invited by the Study Team's UVA department to register in the University's UVA suppliers registration portal, PaymentWorks, before direct deposit or check can be issued.

2) Alternative Method with IRS information

- a. During the protocol review and approval process the assigned IRB must approve the dollar value of the compensation that is adequate for the type of study participation.
- b. Second, the IRB must approve the use of an alternative payment method. The preferred payment method for research study participants is via a University check or direct deposit distributed or done 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 Study Team must use one of the standard payment methods or resubmit to the IRB with an amended justification for re-review.
 - ii. If the IRB approves the use of an alternative payment method, 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 Study 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 submitted to PSDS by the Study Team via the [Secure Online Form](#). The Study Team is required to comply with UVA Information Security's [University Use of Highly Sensitive Data Standard](#) in maintaining the privacy and security of this highly sensitive information it collects on alternative payment recipients.

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 that is adequate for the type of study participation.
- b. Second, the IRB must approve the use of an alternative payment method. The preferred payment method for research study participants is via a University check or direct deposit distributed or done 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 Study Team must use one of the standard payment methods or resubmit the research study to the IRB 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, 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 \$100.00 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:

Option 1 --Preferred Method

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

- The Study Team can research in PaymentWorks to determine if an individual payee is already registered.
 - If the individual payee is not registered, an invitation to register should be sent to the payee via PaymentWorks.
 - The individual payee will then receive an email invitation with a link to complete the registration through PaymentWorks.
- If the individual payee is already registered through PaymentWorks or once the PaymentWorks registration is completed by the payee, the Study Team will prepare a Supplier Invoice Request in Workday.
- The Study Team will enter the IRB protocol number in the Supplier's Invoice Number field on the Supplier Invoice Request. (Example: IRB 123456). Never include the name of the study.
- The amount should be that which the IRB has approved; however, there are no additional restrictions.

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

- The Study Team can research in PaymentWorks to determine if an individual payee is already registered.
 - If the individual payee is not registered, an invitation needs to be sent to the payee via PaymentWorks.
 - The individual payee will then receive an email invitation with a link to complete the registration through PaymentWorks.
- If the individual payee is already registered through PaymentWorks or once the PaymentWorks registration is complete, the Study Team will prepare a Supplier Invoice Request in Workday to pay the research study participant.
- The Study Team will enter the IRB protocol number in the Supplier's Invoice Number field on the Supplier Invoice Request. (Example: IRB 123456). Never include the name of the study.
- The amount should be that which the IRB has approved; there are no additional restrictions.

Option 2

PAYMENT USING GIFT CARD OR CASH

- Ensuring compliance with UVA Information Security's [University Use of Highly Sensitive Data Standard](#), the Study Team is responsible for collecting and submitting to PSDS via the [Secure Online Form](#) the required information on the research study participant: Name (First and Last), Amount of Compensation, Street Address, City, State, Zip Code, and Social Security Number or Tax Identification

Number.

- Gift cards (physical or electronic) should be procured via University issued T&E Card. University employees cannot be reimbursed for the procurement of gift cards. Gift cards should not be procured via Requisition Events/Purchase Order Requests.
- If cash is requested, the Supplier Invoice Request should be payable to “Bank of America” and should use payment handling code “Hold for Pick-up”. The Study Team will enter the IRB protocol number in the Supplier’s Invoice Number field on the Supplier Invoice Request. (Example: IRB 123456). Never include the name of the study.
- The amount should be that which the IRB has approved; however, there are no additional restrictions.

Option 3

PAYMENT USING PETTY CASH OR PETTY CASH CHECK

- When using Petty Cash, the Study Team is responsible for following University established policies and procedures:
 - Preparation of Request for Petty Cash, Petty Cash Checking, or Change Fund - [UVAFIN- 040: Managing Petty Cash Funds](#).
- Ensuring compliance with UVA Information Security’s [University Use of Highly Sensitive Data Standard](#), the Study Team is responsible for collecting and submitting to PSDS via the [Secure Online Form](#) the required information from the research study participants: Name (First and Last), Amount of Compensation, Street Address, City, State, Zip Code, and Social Security Number or Tax Identification Number.

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 \$100.00 or less from all such research studies per individual per calendar year.
- Gift cards (physical or electronic) should be procured via University issued T&E Card. Please note that individuals cannot be reimbursed for the procurement of gift cards. Gift cards should not be procured via Requisition Events/Purchase Order Requests.
- Gift cards are considered to be equivalent to cash and must be treated as such. If gift cards purchased for a study are not completely used, then it is the Study 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 study but used on another must still have the required IRS information collected on the recipients.
- If cash is requested, the Supplier Invoice Request should be payable to “Bank of America” and should use payment handling code “Hold for Pick-up”. The Study Team will enter the IRB protocol number in the Supplier’s Invoice Number field on the Supplier Invoice Request. (Example: IRB 123456). Never include the name of the study. The spend category to be used is “Services Human Subject Payments (SC0210)”. The check should be held for pick-up and picked up by an authorized representative of the Study Team.

Supplier Invoice Request (empty) Status (empty) Requester (empty)

Primary Information

Invoice Date	*	12/20/2022	📅
Invoice Received Date	*	MM/DD/YYYY	📅 ?
Company	*	✕ The Rector & Visitors of the ...	☰
Supplier	*	Search	☰ ?
Remit-To Connection		Search	☰
Currency	*	✕ USD	☰
Control Total Amount		0.00	?
Supplier's Invoice Number	*		?

Additional Information

Ship-To Address	✕ 1001 Emmet Street N. Charlottesville, VA 22903 United States of America	☰
Payment Terms		☰
Default Due Date	(empty)	
Reference Type		☰
Handling Code		☰ ?
Statutory Invoice Type		☰
Freight Amount	0.00	
Tax Amount	0.00	
Memo		

Contact Information

VPR:	434-924-3606
IRB-HSR:	434-924-2620
IRB-SBS:	434-924-5999
PSDS:	434-924-3400