

Department: UAMS Institutional Review Board
Policy Number: 14.2
Section: Recruitment Practices
Effective Date: July 31, 2002
Revision Dates: February 8, 2005; June 24, 2004; October 10, 2002

SUBJECT: Subject Compensation

Compensation or payment to research subjects for participation in studies is not considered a benefit. Rather, it should be considered compensation for time and inconvenience. The amount and schedule of all payments should be presented to the IRB at the time of initial review.

1. **Timing of Payments.** Credit for payment should accrue as the study progresses and not be contingent upon the subject completing the entire study. The subject should be paid in proportion to their time and inconvenience as a result of participation in the research study. Unless it creates undue inconvenience or a coercive practice, payment to subjects who withdraw from the study may be paid at the time they would have completed the study (or completed a phase of the study) had they not withdrawn. For example, in a study lasting only a few days, an IRB may find it permissible to allow a single payment date at the end of the study, even to subjects who had withdrawn before that date.
2. **Completion Bonus.** While the entire payment should not be contingent upon completion of the entire study, payment of a small proportion as an incentive for completion of the study is acceptable, providing that such incentive is not coercive. The IRB will determine whether the amount paid as a bonus for completion is reasonable and not so large as to unduly induce subjects to stay in the study when they would otherwise have withdrawn.
3. **Disclosure of Payments.** All information concerning payment, including the amount and schedule of payment(s) should be set forth in the informed consent document.
4. **Advertisement of Payments.** Advertisements may state that subjects will be paid or compensated, but should not emphasize the payment or the amount to be paid, by such means as larger or bold type.

Alterations in Payments. Any alterations in human research subject payment or liberalization of the payment schedule must be reported to the IRB prior to implementation as an amendment.

VA Research Participants: VA policy prohibits paying human subjects to participate in research when the research is integrated with a patient's medical care and when it makes no special demands on the patient beyond those of usual medical care. Payment may be permitted, with IRB approval, in the following circumstances:

(1) **No Direct Subject Benefit.** When the study to be performed is not directly intended to enhance the diagnosis or treatment of the medical condition for which the volunteer subject is being treated, and when the standard of practice in affiliated non-VA institutions is to pay subjects in this situation.

(2) **Others Being Paid.** In multi-institutional studies, when human subjects at a collaborating non-VA institution are to be paid for the same participation in the same study at the same rate proposed.

(3) **Comparable Situations.** In other comparable situations in which, in the opinion of the IRB, payment of subjects is appropriate.

(4) **Transportation Expenses.** When transportation expenses are incurred by the subject that would not be incurred in the normal course of receiving treatment and which are not reimbursed by any other mechanism.

VA Investigators who wish to pay research subjects must in their proposal:

(1) Substantiate that proposed payments are reasonable and commensurate with the expected contributions of the subject;

(2) State the terms of the subject participation agreement and the amount of payment in the informed consent form; and

(3) Substantiate that subject payments are fair and appropriate, and that they do not constitute (or appear to constitute) undue pressure or influence on the perspective research subjects to volunteer for, or to continue to participate in, the research study; and that the payments do not constitute (or appear to constitute) coercion to participate in, or continue to participate in, the research study.

The IRB will review both the amount of payment and the proposed method and timing of disbursement to assure that neither are coercive nor present undue influence.

Each institution (ex. UAMS, CAVHS and ACH/ACHRI) has its own policies regarding the appropriate handling of payments to research subjects. The PI is responsible for following the appropriate policies.