

Department: UAMS Institutional Review Board
Policy Number: 14.4
Section: Recruitment Practices
Effective Date: July 31, 2002
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Subject: Compensation to Investigators & Health Care Workers for Enrolling Subjects

The use of special enrollment incentives in research involving human subjects creates an unacceptable potential for conflicts of interest. This does not refer to reasonable payments made to subjects for their participation in research or to the actual costs researchers incur when enrolling subjects. Rather, this refers to the use of special incentives, bonuses or other similar forms of compensation provided to institutions or investigators as a mechanism for enrolling subjects in research, including clinical trials. Such incentives create conflicts of interest. They may have an adverse effect on human subjects because they may erode the informed consent process and increase the likelihood that ineligible persons are enrolled as subjects in the research.

UAMS policy is that in research in living human subjects, neither the University, its investigators, its collaborators, its intermediaries, nor its subcontractors shall accept enrollment incentives in connection with human subjects research.

The following is a non-exclusive list of examples that are not permitted in human subject research under the foregoing policy:

1. Entering into a human subject research agreement that contains an enrollment incentive provision.
2. Acceptance of or a request for an enrollment incentive by the University, its investigators, or subcontractors.
3. Fees that exceed the actual costs of recruiting human subjects.
4. Bonuses, milestones, or similar forms of additional payments for timely, early, or over-enrollment of human subjects, for retention of human subjects, or for timely or early IRB approval.
5. Use of *per* subject payment rates that vary based only upon the number of human subjects enrolled, including increased *per* subject rates paid for over-enrollment of subjects.
6. Extra-contractual benefits such as unrestricted research gifts, medical or office equipment, authorship rights, journal subscriptions, educational stipends, payment of conference fees, software, personal gifts, favors, or similar inducements provided in exchange for enrolling human subjects.
7. Payment of referral or finder's fees in exchange for the referral by a professional of the professional's patients or clients as potential subjects in human subjects research.
8. Obtaining human subjects through recruitment firms or persons whose practices are not consistent with this policy.
9. Finders fees – finder's fees are generally not approved. Use of a third party that will receive remuneration to recruit patients for a study will require the PI to

provide ample justification to the IRB and will be granted only in situations where no viable alternative is feasible AND only if the fee is equitable with respect to effort. Finder's fees should be considered in light of the target population's economic condition, cognitive ability and educational abilities. Human subject recruitment efforts should not be tainted by providing a reason to exert undue influence over vulnerable populations in order to meet accrual goals and receive extra pay. The use of exorbitant fees could be considered coercive and the IRB and the Institution must monitor the use of extra remuneration for human subject recruitment to assess the reasonableness of the fee. The PI must also show the IRB documentation that the Office of Research and Sponsored Programs (ORSP) has reviewed the fee and approved it in accordance with agency guidelines and standards.