Department: UAMS Institutional Review Board

Policy Number: 14.4

Section: Recruitment Practices

Effective Date: July 31, 2002

Revision Date: June 24, 2004; January 24, 2011; February 15, 2016; July 21, 2020;

October 15, 2024

SUBJECT: Compensation to Investigators & Health Care Workers for Enrolling Subjects

POLICY

The use of special enrollment incentives in human subject research creates an unacceptable potential for conflicts of interest that may influence the equitable selection of subjects. This does not refer to subject compensation or payment to Institutions or Investigators for the actual costs associated with performing the research or participating in recruitment or enrollment practices. 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. These incentives 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, including its investigators and research personnel, may not accept enrollment incentives for human subject research. Payments to the institution that compensate for staff time spent recruiting, enrolling and/or referring subjects are allowed under this policy.

PROCEDURE

- A. The following are examples of incentives or payments that are not permitted in human subject research under this policy. This list is not exhaustive.
 - 1. Entering into a research agreement that contains a provision to provide incentives for enrolling human subjects.
 - 2. Accepting or requesting an enrollment incentive for enrolling human subjects.
 - 3. Fees that significantly exceed the actual costs of recruiting human subjects.
 - 4. Bonuses, milestones, or similar forms of additional payments for over-enrollment or accelerated enrollment of human subjects or for retention of human subjects.
 - 5. Bonuses, milestones, or similar forms of additional payments for early IRB approval.
 - 6. Use of per subject payment rates that vary based only upon the number of human subjects enrolled, including increased per subject payments for over-enrollment of subjects.
 - 7. 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.
 - 8. Finder's fees or other payments for referral of subjects.
 - 9. Obtaining human subjects through recruitment firms or persons whose practices are not consistent with this policy.

REFERENCES

AAHRPP Elements II.3.C and III.1.E UAMS Human Research Protection Program Plan