

Department of Obstetrics and Gynecology Research Participant Payment Policy

PURPOSE

This document describes how human research participants taking part in an Institutional Research Board (IRB) approved study are compensated for participating in research supported by/being conducted by investigators in the Department of Obstetrics and Gynecology (Ob-Gyn). This policy provides guidance regarding issuing and controlling payments to research study participants and is necessary to ensure the proper handling of Protected Health Information (PHI). The appropriate payment procedures should be re followed/established prior to the onset of IRB submission and study initiation to ensure compliance with reporting requirements associated with compensating research study participants.

POLICY STATEMENT

All payments to human participants are treated with utmost confidentiality. Participants may be compensated for their participation in research studies. Compensation procedures must follow all necessary steps:

- Ensure the confidentiality of research participants.
- Provide timely, convenient compensation to participants to facilitate, not hinder, the study.
- Record compensation in the campus accounting system for both financial records and IRS Form 1099 purposes.
- Document in financial system that compensation was for participation in a study.
- Ensure appropriate internal controls and adequate safeguards exist for items of value used to compensate, whether cash, checks or other.
- **NOTE:** UW-Madison employees and non-US residents may only be paid with a University issued check (PIR). See payment option chart below.
- **EXPECTED TIMELINE:** all payment options require 10-15 business days for processing.

The types of payments to participants and set-up timeframe may include:

- Reimbursement to a participant, such as mileage; 10 business days to process.
- Paying expenses associated with research study participation, such as taxi/parking – must be pre-approved and arranged by the Sponsored Projects and Finance core; set up time varies.
- Compensation payment direct to participant via:
 - Check
 - Cash
 - Gift Card – must be pre-approved and arranged by the Sponsored Projects and Finance core
 - Merchandise – must be pre-approved and arranged by the Sponsored Projects and Finance core

ACCOUNTABILITIES

Principal Investigator (PI):

- Obtain approval for selected compensation from Sponsored Projects and Finance Core prior to approved Institutional Research Board (IRB) submission.
- Ensure confidentiality and proper protocol procedures are followed.

Human Subject Core (HSC):

- Ensure PI receives IRB approval for human research study.
- Assist in determining most appropriate method of compensation.
- Update electronic gift card logs.
- Collect tax-related information from eligible recipients.

Sponsored Projects and Finance Core (SPFC):

- Ensure payment and method are feasible and allowable in the terms and conditions of the award and University policy.

- Authorize requests for gift cards as a compensation method.
- Process tax-related information for eligible recipients.
- Work with Campus Accounting to determine method of compensation.
- Obtain prior approval from Campus Accounting (required by Gift Card Policy) when using gift cards as compensation method.
- Establish a purchase, documentation, and distribution process.
- Initiate transactions, maintain records, reconcile, and complete related reports.
- Record and submit required tax-related information for eligible recipients.

PAYMENT OPTION CHART

Payment Type	Allowable Amount	Taxpayer ID# required (SSN, EIN, ITIN)	Permanent Address required	Payment Mechanism	Other considerations	Who to contact
Payment to Individual (PIR) (Department preferred method)	Any amount but required for total payments of \$250 or more per calendar year.	Yes	Yes	University issued check	*UW-Madison employees and non-US residents must be paid with a PIR.	obgyn_spcf@obgyn.wisc.edu
Gift Card (emailed) (Department preferred method)	One or multiple payments of under \$250 (\$249 or less) per calendar year – each card cannot exceed \$50	Encouraged as best practice, but not required.	No, but email address is required	Dept Research P-card	Must be pre-approved and arranged by SPFC staff	obgyn_spcf@obgyn.wisc.edu
Cash	One or multiple payments of under \$250 (\$249 or less) per calendar year.	Encouraged as best practice, but not required.	No	Custodian account	High risk to PI/custodian holder, as this is a personal liability	obgyn_spcf@obgyn.wisc.edu
Gift Card (given in person)	One or multiple payments of under \$250 (\$249 or less)	Encouraged as best practice, but not required.	No	Custodian account	High risk to PI/custodian holder, as this is a personal liability	obgyn_spcf@obgyn.wisc.edu
Bank account check	One or multiple payments of under \$250 (\$249 or less) per calendar year.	Encouraged as best practice, but not required.	No	Custodian account	High risk to PI/custodian holder, as this is a personal liability . *for long-term awarded projects (4-5 years)	obgyn_spcf@obgyn.wisc.edu
Reimbursement	Per IRB allowance	Yes	Yes	University issued check	Must be pre-approved and arranged by SPFC staff	obgyn_spcf@obgyn.wisc.edu
Merchandise	Per IRB allowance, not to exceed \$600 per calendar year.	No	Yes, if mailed	Custodian account	Must be pre-approved and arranged by SPFC staff. *High risk to PI/custodian holder, as this is a personal liability .	obgyn_spcf@obgyn.wisc.edu

RELATED POLICIES

UW-Madison Payments to Individuals: <https://policy.wisc.edu/library/UW-3003>

UW-Madison Gift Card policy: <https://policy.wisc.edu/library/UW-3027>

UW-Madison Payments to Research Participants policy: <https://policy.wisc.edu/library/UW-3005>

SMPH gift card purchase on p-card policy: TBD