



## **POLICY & PROCEDURE DOCUMENT**

NUMBER: 2.7212

SECTION: Research

TITLE: Policy on Payments to Human Research Participants

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### **I. Purpose and Scope**

1. This policy establishes guidelines and processes for paying human participants who are involved in University research studies, complying with the legal obligation to maintain their confidentiality and the tax reporting requirements associated with these payments. Departments must have an Institutional Review Board (IRB) approval on file prior to engaging and paying human participants.
2. This Policy applies to all payments made to participants in all research and related activities covered under policy 2.720V.
3. This Policy applies all parts of WKU including satellite facilities, regional campuses, and other properties.
4. Western Kentucky University (WKU) strongly encourages any and all affiliated organizations to adopt a similar approach, and to do so in a manner that integrates seamlessly with this WKU policy, in order to make obvious our *bona fide* efforts to follow Internal Revenue Service (IRS) rules.

### **II. Policy**

1. WKU is committed to fostering a research-friendly environment, where research, including research on human participants, is encouraged by faculty, students, and staff.
2. WKU is committed to following all principles of ethical remuneration of human participants in research studies; specifically that payment should be appropriate, fair, and not so large as to be coercive. All decisions about the appropriate level of payment for a particular study is under the jurisdiction of the WKU IRB (see Policy 2.720V).

3. WKU will comply with IRS regulations concerning payments made to individuals. In particular, the requirement to issue federal Forms 1099 for all persons to whom \$600 or more is paid in a single calendar year.

### III. Procedure

WKU has established an Institutional Review Board (IRB) in order to regulate research involving human subjects at WKU in line with all applicable federal, state and local regulations. The formation and operation of the IRB is covered under Policy 2.720V.

1. The appropriate level of payment to participants in research studies shall be determined by the Principal Investigator (PI), either directly or via an appointed designee for oversight and approval of the IRB, in order to ensure that the level of compensation is neither exploitative (by being too low), nor coercive (by being excessive).
2. Remuneration shall be defined as modest, moderate, or substantial. These definitions relate only to record-keeping with respect to IRS regulations, and shall not affect the workings or deliberations of the IRB.
3. **Modest** remuneration shall be up to \$60 per study; **moderate** shall be greater than \$60 per study and up to \$300 per study; **substantial** shall be above \$300 per study. These amounts may be amended, but any amount above 50% of the IRS threshold for income reporting shall be considered **substantial**.
4. All PIs shall remind all research participants that any remuneration received from a research study is considered taxable income, and that this income should be reported by the participant in tax filings to the IRS.
5. The PI of a study with **modest** remuneration shall collect the names and signatures of participants. The PI does not need to collect social security numbers or taxpayer identification numbers of participants unless they have reason to believe that a participant may have participated in studies, or have been employed or otherwise paid by WKU, for a total remuneration that will exceed the total amount defined as moderate remuneration (Section III.3.) in a calendar year, in which case the PI should proceed as if for moderate remuneration (Section III.7.).
6. In the case of **modest** remuneration studies in which the IRB has determined that a compelling need to protect the anonymity of participants precludes recording the identity of participants, the PI shall distribute cash or other remuneration and shall themselves certify the disbursement of funds.
7. The PI of a study with **moderate** remuneration shall collect the names and signatures of participants, and from each participant shall collect:
  - either:** A signed declaration that the participant will not collect aggregate remuneration (from all research studies and employment at WKU) across the calendar year to exceed the amount defined as the maximum for moderate remuneration in Section III.3.
  - or:** A completed and signed IRS form W-9.

8. The PI of a study with **substantial** remuneration shall collect from each participant a completed and signed IRS form W-9.

#### **IV. Reason for Revision**

May 2016

Policy revised to reflect name change of the Office of Research; new organizational structure and correct policy/section numeration.

May, 2021

Non-substantive changes resulting from fifth-year review in accordance with Policy 0.000V.

#### **V. Related Policies**

Policy 2.720V: Research studies involving human participants.