

SEATTLE UNIVERSITY



Human Subjects Incentive Payments on Grant-funded Projects

Policy and Procedures Manual

Controller's Office

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I. Policy Overview

Incentive payments may be offered to human subjects in surveys or research studies conducted by Seattle University faculty, staff, and students. Payments to human subjects using external grant funds are regulated by this policy. As described herein, these payments may be offered in a variety of forms, and records of the payments must be maintained for the University.

A payment to an individual who participates in a research study is recognized as a legitimate incentive to join the study. The use and protection of human subjects in research studies is governed by the Department of Health and Human Services, Code of Federal Regulations, Title 45, Part 46 (45CFR46). Research with human subjects at SU is monitored by the SU Institutional Review Board, which works with researchers to protect their research subjects and comply with Federal Regulation 45CFR46 (<http://www.seattleu.edu/irb>).

II. Policy and Procedures

1. Human subject incentive payments that are funded through external grants will be recorded on a Human Subjects Incentive Payment Log* that is maintained by the Principal Investigator.
2. One or more incentive payments that total(s) more than \$50.00 in a calendar year will require the human subject(s) to complete an IRS Form W-9 for tax purposes. An Investigator may assure a human subject that his/her confidentiality will be maintained if he/she receives \$50.00 or less in incentive payments from the study in a calendar year.
3. Any grant-related records of incentive payments, including Human Subjects Incentive Payment Logs,* will be retained by the Principal Investigator for seven years after the close-out of the grant. In the event the Principal Investigator departs from the University, the documents must be transferred to the College or Department to be maintained for retention. The responsible party must be prepared to present any of these records to ORSSP, Controller, funding agency representatives, or auditors upon request.

* For Human Subjects Incentive Payment Log, see Appendix A.

For information regarding human subjects protections, please contact the IRB at irb@seattleu.edu (<http://www.seattleu.edu/irb>).

For questions on grants administration, please contact ORSSP at orssp@seattleu.edu (<http://www.seattleu.edu/orssp>).

III. Appendix A: Human Subjects Incentive Payment Log

The log is on the next page.



HUMAN SUBJECTS INCENTIVE PAYMENT LOG

*Please complete this log from **BOTTOM** to **TOP**.
This approach enables the use of a cover sheet
over completed entries/rows in order to
maintain confidentiality among participants.*

Investigator: _____

College/School: _____

Project Title: _____

Department: _____

Method of payment (circle one): **Gift Card** **Cash** **Other (describe)** _____

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H
Date of payment	Amount of payment **	Has the participant received multiple payments from this study?	If Column C is YES: Total of payments from this study**	Participant Name	Participant Signature	Participant ID Number	IRS W-9? (check if done)
	\$	YES NO	\$	Complete EITHER Columns E+F --OR-- only Column G (if the confidentiality of the participant is part of the research study).			
	\$	YES NO	\$				
	\$	YES NO	\$				
	\$	YES NO	\$				
	\$	YES NO	\$				
	\$	YES NO	\$				
	\$	YES NO	\$				
	\$	YES NO	\$				
	\$	YES NO	\$				
	\$	YES NO	\$				

**** If the amount in either Column B or D is greater than \$50.00,** each of these participants will complete an IRS W-9 form that will be submitted to the Controller's Office as required documentation for the reimbursement process of the gift cards, cash, etc.

The Investigator will maintain this log as payments from SU grant funds are distributed. If payments are part of a research grant, the Investigator, Office, or the School/College will retain any grant-related records of payments, such as Human Subject Incentive Payment Logs, for seven years after the close-out of the grant. The responsible party must be prepared to present any of these records to ORSSP, Controller, funding agency representatives, or auditors upon request. As such, the responsible party must sign below to accept this responsibility:

Signature and Date

Printed Name

Title