



SAINT LOUIS UNIVERSITY

Policy on Participant Payments within Research and/or Sponsored Activities

Policy Number: RA-022

Version: 1.0

Classification: Research Administration

Effective Date: 10 February 2016

Responsible University Official: Vice President for Research

1.0 INTRODUCTION

Saint Louis University (hereinafter the “University”) will seek and accept sponsored awards to support its mission in research, instruction, and public service. We will develop the research enterprise by identifying barriers to research participation and applying innovative strategies to make our participation more available and applicable to the broader society.

The general purpose of a Research Participant payment is to manage the financial burden a Research Participant may feel related to their participation in research, without exerting undue influence on the potential Research Participant.

This policy will be adopted for all new research studies or sponsored activities beginning on after the effective date of this policy.

2.0 PURPOSE

The purpose of this policy is to outline the payment mechanisms that can be used to make payments to human subjects participating in research studies and sponsored programs in accordance with government regulations.

3.0 PERSONNEL AFFECTED

This policy applies to all regular full-time and part-time faculty and staff and volunteers within all divisions of the University, including employees, professional staff members, residents, students, agents, representatives and consultants, involved in conducting research or sponsored activities.

4.0 DEFINITIONS

Definitions applicable to terms used in this policy can be found on the Division of Research Administration’s website in University Policy titled, “Definitions Relating to Sponsored Projects at Saint Louis University.”

5.0 POLICY

5.1 Issuance of Payments to Research Participants

Payments issued by the University to Research Participants will be delivered by one of the following four payment methods. Payment method is determined by Participant Payment amount, University employment status, and citizenship.

- *Gift Card*: A Participant Payment amount of \$25 or less may be made by Gift Card as long as the aggregate does not exceed \$100 in a calendar year.
- *ClinCard*: A secure reloadable debit card should be used for all Participant Payments greater than \$25, and when the aggregate amount of Participant Payments exceeds \$100 in a calendar year (e.g., 5 payments of \$25 per payment). A completed IRS Federal Form W-9, Request for Taxpayer Identification Number and Certification, must be submitted before a ClinCard will be issued. The IRS Federal Form 1099-MISC will be issued to Research Participants who receive \$600 or more from all University research studies and/or sponsored activities during a single calendar year.
- *University's Payroll System*: In cases where the Research Participant is also an on-going recipient of any form of compensation through the University's Payroll System (e.g., full-time employee, graduate student, etc.) the Research Participant may receive their Participant Payments through ClinCard or Payroll, dependent upon the amount of individual payments. Student Workers, however, must receive their Participant Payments through Payroll.
- *Direct Payment to Nonresident Aliens*: Regardless of dollar amount, all Nonresident Aliens will receive their Participant Payment through the eSeePay Direct Payment System due to the immigration and taxation documentation associated with payments to Nonresident Aliens as imposed by Homeland Security and the Internal Revenue Service.

PAYMENT ELIGIBILITY BY CATEGORY				
PARTICIPANT TYPE	Gift Card	ClinCard	Payroll	eSeeDPV
Research Participant not employed by SLU in calendar year		✓		
SLU Employees paid wages by SLU in calendar year*		✓	✓	
Student Worker paid wages by SLU in calendar year*			✓	
SLU Students not employed by SLU	✓	✓		
Nonresident Aliens				✓

* Note that participant payment will be reported on W-2 regardless of payment type.

5.2 Reporting of Payments to Research Participants

The purpose, nature and dollar amount of all payments made by the University to Research Participants will be accounted for within the Clinical Trial Agreement, Award Budget, and/or IRB Protocol and Participant Informed Consent Form prior to payment issuance. Payments to Research Participants will generate additional reporting obligations on the Department and the University's administration.

6.0 EXCEPTIONS

A researcher may request an exception to aspects of this policy from the Vice President of Research. Exceptions may be granted, on a case-by-case basis, based on the facts and circumstances of the individual research study or sponsored activity.

7.0 PROCEDURES

Procedures will be maintained internally by the Division of Research Administration and the Division of Business and Finance.

8.0 NON-COMPLIANCE

Individuals who fail to comply with this policy and procedures associated with it will be subject to disciplinary actions. Non-compliance can result in a notification of suspected misconduct and/or violation reported to government regulatory agencies. Disciplinary action will be guided by the University's Faculty Manual, Staff Handbook, or student guidelines as appropriate.

This Policy does not limit the University's ability to impose greater sanctions or impose immediate action against serious violations. Disciplinary actions appropriate to the severity of the infraction will be carried out as needed.

9.0 CHANGES TO THIS POLICY

Changes to this policy may be necessary from time to time, particularly in response to changes in federal statutory requirements.

10.0 RELATED POLICIES & DOCUMENTS

Saint Louis University Policy for Externally Sponsored Programs: Grants, Contracts, and Agreements.

APPROVAL SIGNATURES

This policy was prepared through a collaboration of the Division of Research Administration and the Division of Business and Finance. The President's Coordinating Committee reviewed and affirmed their support for the establishment of this policy.

This policy was approved by:

x/ Signed Copy on File

Raymond Tait, PhD
Vice President of Research
Saint Louis University

Date: 10FEB2016

VERSION HISTORY		
EFFECTIVE DATE	VERSION NUMBER	MODIFICATION
10 February 2016	1.0	New Policy