Columbia University Institutional Review Board

Reimbursement and Compensation of Research Participants Payment Options

I. Background

Any plan to compensate subjects for their participation in a research study or to reimburse them for expenses that they may incur as a result of their participation (e.g., travel costs) requires prospective IRB approval. [IRB SOPs, section VI.C.4. Review of Payments to Participants]

II. Payment options

The method, amount and frequency of payment should be included in the "Subjects" page of the Rascal submission, which will be reflected in the Rascal datasheet, and in the <u>consent form</u>.

The following payment options, when the payment is made by CU, should be considered and have been endorsed by the University:

- For all campuses: U.S Bank PayCard, check, petty cash
- For CU Irving Medical Center (CUIMC): digital compensation (e.g., Gift Cards, Venmo, PayPal, direct bank account deposit, deposit to debit card) or physical debit card via TruCentive

1. U.S Bank PayCards [available to CUIMC and MS researchers]:

U.S. Bank has replaced Bank of America as the University's provider of pre-paid debit cards (PayCard), effective 9/1/2023. There are two types of cards:

- Focus Blue Card (registered card): this card is re-loadable and provides cash access. The study team provides the participant's name, address and phone number to the Bank so the card can be registered. This card can be used at an ATM machine or any bank full-service location for cash access or to pay for in-store and /or online purchases.
- Corporate Rewards Card (anonymous): a one-time-load card that also allows for recipient anonymity with the University; this card is for one-time funding and does not provide cash access (i.e., it can never be used at an ATM machine). This card can be used to pay for in-store purchases. No personal information is provided by the University to the bank; however, participants can choose to register the card directly with the bank after they receive it; registering the card can protect the recipient if the card is lost or stolen and will allow use for online purchases.

No information about the study in which the participant is enrolled will be provided to U.S. Bank.

Please note that all U.S. Bank Visa pre-paid cards, whether registered or anonymous, must be activated by the participant directly with the bank.

PayCards are set up by each Department and managed by the PayCard Team within CU Accounts Payable. Additional information about the University PayCards is available at: https://www.finance.columbia.edu/content/purchase-using-pay-card-human-subjects

You may reach out to the P-Card Team directly at paycardteam@columbia.edu, if you have any questions about this option.

2. Digital compensation via TruCentive [this option is only available to CUIMC researchers]

The various TruCentive options, including national gift card links, Visa, MasterCard, Venmo, PayPal, Deposit to Debit or Direct Deposit, are managed by the CUIMC Controller's Office. The participant's ID# and email and/or phone number are sent to TruCentive. Participants will need to consent to provide additional information to TruCentive.com to redeem cash options that may be offered.

For additional information:

Raquel Marin

Deputy Controller, CUIMC Office of the Controller

rm2698@cumc.columbia.edu or cumcinternalcontrols@cumc.columbia.edu.

A demo will be provided and instructions to set up the options offered by TruCentive.

Instructions (English and Spanish versions) for participants as to how to use TruCentive are available here

3. Check [available to CUIMC and MS researchers]:

When a participant in a human subject study will receive a single payment, and such payment will be in the form of a check, the single pay voucher in ARC should be used. Under these circumstances, the participant should not be set up as a vendor. This option is only available for U.S. participants with a valid tax U.S. identification number.

If a participant will receive multiple payments by check, or if the participant is in a foreign county, they must continue to be onboarded as a vendor through Payment Works to create a vendor record in order to process a payment.

Also, if a payment to a participant includes both compensation for participation and reimbursement for participation-related expenses, the vendor process must be followed. Likewise, if you need to pay individuals for other purposes or only to reimburse them for expenses they incurred, they will need to be set up as vendors.

4. Petty Cash [available to CUIMC and MS researchers]:

When the preferred options listed above are not feasible, e.g., due to technology challenges for subjects or cultural norms, and adequate justification is provided in the IRB submission for the use of cash compensation, administrators in the CU Human Research Protection Office (HRPO) will notify the CUIMC Controller's Office so they are aware and can assist with set up of the petty cash account. Multi-part receipt forms that are available in the HRPO office are expected to be used for all cash compensation to research participants. The CU Petty Cash Policy is available at: https://universitypolicies.columbia.edu/content/petty-cash-policy

Additional information about the above-listed methods of payment is available at: https://www.finance.columbia.edu/content/how-pay-human-subject-studies

III. Methods of payment proposed by external sponsors:

Other methods of direct payment for compensation to or reimbursement of participants enrolled in industry-sponsored studies that are proposed by the sponsor can generally be used. These payments are not managed centrally by the University as the funds do not pass through the University accounts. They must be described in the IRB protocol and consent form and approved by the IRB.