

Compensation (Incentives) of Research Subjects



Sponsored Projects Administration
UNIVERSITY OF GEORGIA

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Owner:	Jill Frazier Tincher
Area:	Sponsored Projects Admin
Applicability:	UGA System-Wide

POLICY AND PROCEDURE

PURPOSE:

The purpose of this policy is to ensure compliance with the standards set forth in the Federal Office of Management and Budget 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200), Federal and State regulations, and sponsor-specific requirements. This policy provides guidance which will assist University of Georgia (UGA) personnel proposing, performing and managing sponsored activities. Direct costs on sponsored projects must be allowable, allocable, and reasonable.

Failure to comply with UGA policies and procedures may result in audit findings, suspension of sponsored activities, closer monitoring by the sponsor, delays in final payments, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded activities.

SCOPE:

All UGA personnel must be aware of the complex and detailed rules provided under Federal, State regulations, as well as terms and conditions of individual sponsored activities.

POLICY:

Sponsored projects will comply with all applicable Federal, State and/or sponsor-specific subject recruitment and compensation policies. This is applicable to building proposal budgets, negotiating sponsored projects, setting up sponsored projects, as well as initiating, approving, invoicing and reporting costs.

Sponsors may authorize compensation (incentives) of research subjects for their time and, in some instances, for the inconvenience of a procedure. Compensation can be monetary or non-monetary - Monetary comes in the form of cash, debit/gift card, or check; and Non-monetary comes in the form of free health services, educational materials, tokens of appreciation (t-shirts, mugs, calendars, books, stuffed animal, tote bag, etc.). Compensation must not be so large as to induce potential research subjects to consent to participate in the research against their better judgement (undue inducement).

Compensation of research subjects, the method, timing of distribution, the form (monetary/non-monetary), and the amount of compensation or type of non-monetary compensation must be detailed in the sponsor-approved budget, if they are paid from a sponsored project.

Compensation of research subjects must also be addressed within the protocol/informed consent reviewed and approved by the UGA Human Subjects Office (HSO), pursuant with the HSO policies and procedures.

All payments are subject to tax laws. The University is required by Internal Revenue Service (IRS) regulations to submit 1099 Forms for all research subjects paid \$600 or more per calendar year and must also adhere to the Uniform Guidance. The Principal Investigator (PI)/unit is responsible for obtaining any tax identification numbers of research subjects required by the University's tax reporting department.

DEFINITIONS:

A Research Subject is an individual who is or becomes a participant in research, either as a recipient of the test article or as a control. A subject may be either a healthy human or a patient. A research subject is also defined as a living individual about whom an investigator conducting research obtains: data through intervention or interaction with the individual; or identifiable private information. Research subjects may include individuals from the community, UGA employees, students, retirees, non-resident aliens, etc.

Department Administrator has responsibility for assisting PIs in discharging their monitoring responsibilities, for reviewing invoices from subrecipients, and seeking clarification on questionable expenditures, if/when necessary, and for maintaining appropriate documentation.

Informed Consent is the agreement by a subject to participate, or continue participation, in human subjects' research. Informed consents may be written or oral. It includes the ongoing process of information exchange that takes place between the subject and the investigator throughout research participation.

Principal Investigator/Contact Principal Investigator (PI) – A qualified person designated by an applicant institution to direct a sponsored project or program. The PI oversees all scientific and technical aspects of a sponsored project and provides the day-to-day management of the project.

Sponsored Projects are externally funded activities that must be separately budgeted and accounted for according to terms of the sponsoring organization, State regulation, and UGA policy. Sponsored Activities are provided through grants, contracts, and agreements with any Federal Agency, State Agency, or non-Governmental Organization that supports research, training, instruction, public service and other activities.

Sponsor-specific Requirements include requirements stated within the sponsor rules/regulations, funding opportunity announcement, award/grant or contract/agreement and amendments.

PROCEDURE:

When preparing a proposal, negotiating and setting up a sponsored project, incurring and approving expenses, and invoicing and reporting; UGA personnel must be aware of and conform to the complex and detailed rules surrounding allowability of direct and indirect costs, as well as the rules surrounding the allowability of compensation of research subjects according to petty cash & change fund procedures and IRS tax laws

1. PI/unit should prepare proposal budgets after thoroughly reviewing 2 CFR 200, state regulations, and sponsor-specific requirements based upon a best faith estimate of costs needed to perform the scope of work.
2. Prior to initiating a cost, PI/unit should ensure the expense is allowable (pursuant to this policy).

3. Direct costs should be initiated timely and meet all of the criteria outlined within this policy.
4. Any costs that do not meet all of these criteria cannot be included within a proposal budget and/or charged to sponsored projects.
5. All expenses related to compensation (incentives) must be documented by the PI/unit according to the Petty Cash & Change Fund policy.
6. If there are any questions regarding conflicting regulations/requirements, please contact Sponsored Projects Administration for clarification on which regulation/requirement applies.

RESOURCES:

2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards



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