Incentive Payments to Research Participants

NOTE: The website URL for Workday reference guides that are referenced in this section is:
https://confluence.esg.wsu.edu/display/WKB/Workday

OVERVIEW

WSU often conducts research that includes small payments of incentives or compensation for time, effort, or expenses for research participant recruitment. The WSU Institutional Review Board (IRB) determines the appropriateness of payments to research participants and the related protocols before a study is conducted.

The grant proposal and approved budget must specifically allow payment of incentives. (See also BPPM 40.02.)

Once approval is obtained from the IRB, a department may process incentive payments using one of the following methods. In all cases, the department is responsible for maintaining a payment log, as well as collecting and submitting tax reporting information to Accounts Payable where required.

DEFINITIONS

The following definitions apply to this section.

Appropriated Funds

Appropriated funds are funds delegated to WSU by the state for a specific purpose. Appropriated funds may not be used for any purpose other than that for which the funds are designated.

Crowdsourcing

Crowdsourcing is an arrangement in which a separate third-party entity (such as Prolific or Amazon Mechanical Turk (MTurk)) pays a large, normally anonymous, group of people to perform a task or provide information online. Crowdsourcing does not include cases where the participant is known and compensated directly by the researcher, even when the compensation is distributed as an electronic gift card.

Departmental Research Account

A departmental research account is defined as state allocated funds and dedicated local funds used to support departmental research in the form of start-up or seed funds. To identify such funds as allocated to research, the department must move the funds to functions FN013-FN015 and FN025 accounts.

Gift Card or Certificate

A gift card or certificate is a card or certificate entitling the recipient to receive goods or services of a specified value from the issuer.

Incentive Payment

An incentive payment is defined as a payment of instruments and/or goods given to an individual to encourage their participation in a research study.
Incentive Payments to Research Participants

**Research Advance**
A research advance is a cash advance of funds to a researcher for payment of authorized research expenses. A research advance includes a requirement of after-the-fact reporting on the final distribution and use of the funds (see *BPPM* 40.21).

**PAYMENT PROCESSING METHODS**

**Gift Cards and Cash Equivalents**
See *BPPM* 70.44 for the policy regarding gift cards and other cash equivalents. Gift cards issued directly to participants by electronic means are also subject to the gift card policy.

Departments may purchase gift cards by University procurement card (see *BPPM* 70.08) or from research advance funds (see *BPPM* 40.21) only.

**Gift Card Supplier**
WSU has authorized use of a supplier that supports purchase and distribution of a wide variety of gift cards online. There is no service fee. Departments may directly establish an account with the supplier. See the Accounts Payable website for details at:

```
acctspay.wsu.edu/awards-prizes-cashequivalents/
```

See also *BPPM* 70.44.

Departments may purchase gift cards from the supplier with procurement cards (see *BPPM* 70.08) on a pay-as-you-go basis, which prevents excess inventory of gift cards.

**Cash Payments From a Research Cash Advance**
WSU faculty and staff may pay research participation incentives in cash from research cash advances issued against accounts in allowable functions only, in accordance with *BPPM* 40.21.

Employees are to follow the processes in the Workday Request and Create Non-Travel Cash Advance reference guides.

**Payments by Checks Issued by Accounts Payable**
Departments may make payments directly to research participants by checks issued through Accounts Payable. It is recommended that departments process payments through Accounts Payable that are in excess of $250 only.

To request a check payment, the department:

- Submits a Create Supplier Invoice Request business transaction in Workday.
Incentive Payments to Research Participants

Payments by Checks (cont.)

See BPPM 30.45 and the Workday Create Supplier Invoice Request reference guide for instructions.

- Attaches a completed Record of Distribution and Request for Taxpayer Number and Certification (Substitute W-9) for each payment to an individual of more than $200.

Payments Through Online Crowdsourcing Services

Crowdsourcing services such as Prolific and Amazon MTurk are approved crowdsourcing services and may be paid for using the University procurement card. Use of other crowdsourcing services must undergo an ITS security review (see BPPM 70.24).

Researchers must obtain e-mail authorization from SPS and ITS to request use of crowdsourcing services not specifically identified in this section (BPPM 45.53).

Payment to Participants

Research participation payments must be limited to an amount equivalent to no more than $60 per hour when prorated to account for actual time of participation (i.e., a 10-minute online survey should be limited to $10 compensation per participant). The IRB may require lower limits based on local context to minimize the possibility of undue influence on participants.

Reimbursement Request

To request reimbursement, researchers submit a completed Expense Report in Workday to Accounts Payable. (See BPPM 70.20 and the Workday Expense Report reference guide for instructions.) Researchers must attach documentation to the expense reports itemizing the payments to each participant. Accounts Payable completes reimbursement to researchers after the funds are fully disbursed to the participants.

Tangible Personal Property

Departments may present gifts of tangible personal property, such as WSU logo items, to participants. Tax reporting using a Substitute W-9 is required for items valued at more than $200.

ALLOWED FUNDING SOURCES

The following funding sources may be used for research participant incentive payments.

Grants (Function FN017)

Awards under Workday function FN017 are allowable funding sources for incentive payments if:

- Human study subjects are an integral part of the research,
- Incentive payments are included in the project proposal and approved budget; and
- Project has IRB approval to include research participants.
Incentive Payments to Research Participants

| Grants (cont.) | See BPPM 40.02. |
| Gifts (Function FN057) | Gift accounts (gift function FN057) are allowable funding sources for incentive payments if such use is in accordance with the organizational mission and donor intent. |
| Appropriated Funds for Departmental Research (Functions FN013-FN015; FN025) | Appropriated funds in conjunction with departmental research accounts (functions FN013-FN015 and FN025) only are allowable funding sources for incentive payments. Researchers receiving departmental seed money should establish research accounts under functions FN013-FN015 and FN025. Contact General Accounting; telephone 509-335-2013. |

DEPARTMENTAL RESPONSIBILITIES

Incentive payments to a research participant totaling $600 or more annually are tax reportable. Single payments may also require tax reporting. See Tax Reporting for more information.

In all cases, the department must maintain a log of incentive payments.

Reporting Forms

To facilitate reporting, departments are encouraged to use the following PDF forms to collect essential information:

- Distribution Log for Payments of Cash, Gift Cards and Other Cash Equivalents, and Tangible Property
- Record of Distribution and Request for Taxpayer Number and Certification (Substitute W-9)

Substitute Forms

The forms listed above are available to assist fund custodians in adhering to policy. However, fund custodians may use substitute forms. Such substitute forms must collect, at a minimum, the following information:

- Full legal name of the participant
- Participant's social security number
- Participant's full home street address
- Amount distributed to the participant
- Payment date
- Participant's signature showing receipt of any cash payment
- Department contact name
- Department contact telephone
- Department contact email address

Payments to Minor

When the study participant is a minor, the fund custodian may collect information for tax reporting purposes from either the minor or the minor's legal guardian.
Incentive Payments to Research Participants

Tax Reporting

<table>
<thead>
<tr>
<th>Description</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>One-Time Payment of Less Than $200</td>
<td>If a one-time research participant incentive payment is less than $200, the requirement to obtain a social security number is waived. However, the University strongly encourages researchers to request social security numbers for all research participant payments.</td>
</tr>
<tr>
<td>Payments Totaling $600 or More in Calendar Year</td>
<td>If payments to a single recipient total $600 or more in a calendar year, the departmental custodian of the funds is responsible for reporting the payments. The fund custodian must submit a completed Substitute W-9 to Accounts Payable by January 5 of the following year for inclusion in the University's 1099MISC reporting. The report must include all of the information listed under Substitute Forms.</td>
</tr>
<tr>
<td>Payments to WSU Employee</td>
<td>Research participant incentives paid to a WSU employee, when completely unrelated to work performed in their capacity as a WSU employee, may be treated as a payment to any other participant. If the payment is in any way related to the employee's work for WSU, contact Payroll Services for instructions.</td>
</tr>
<tr>
<td>Payments to Nonresident Aliens</td>
<td>Due to tax withholding requirements, research participant incentive payments to nonresident aliens may be paid only by check through Accounts Payable. Such payments are subject to 30 percent tax withholding and are reported on IRS Form 1042-S. A completed IRS Form W-8BEN is required.</td>
</tr>
</tbody>
</table>

Safeguarding Information

Departments are to collect and maintain taxpayer information with a high level of security. Departments are to make such information available for review by state or internal auditors and provide the information to Accounts Payable if required for tax reporting purposes.