FINANCIAL ADMINISTRATION OF RESEARCH PARTICIPANT FEES

Monthly Lunch & Learn Series presented by the FAST Team
August 2023
PRESENTER

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SENIOR BUSINESS ANALYST (TRAINING)
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AGENDA

• Defining participant fees/compensation
• Relevant policy considerations
• Confidential vs Non-Confidential Participants
• General Principles for Back-up documentation
• Electronic distribution of fees (e.g., e-gift cards)

NOTE: We will not be addressing the broader topic of honoraria in this presentation. Honoraria, as defined by CRA is a voluntary payment made to a person for services for which fees are not legally or traditionally required. Participant fees would be considered one form of honoraria.
The objective of the session is to highlight existing guidelines, business processes, best practices and documentation requirements when coordinating research participation fees.

**NOTE:** If participant fees are being paid from a research grant, review the granting agency guidelines to determine what the prevailing policy and administrative guidelines are (i.e. restrictive sponsor policies, or university guidelines).

**Example:** See Tri-Agency Guidelines
Participant fees are intended to be compensation for voluntary participating in research activities.

Two forms of participant fees:

<table>
<thead>
<tr>
<th>Reimbursement</th>
<th>Money given to the research participant that reflects out of pocket expenses associated with participating in a research study (e.g. transportation or parking).</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compensation</td>
<td>Money or item given to the research participant that acknowledges the time they incurred for study participation, irrespective of study type or risk. It should be appropriate, contextual and should not unduly influence the participant’s involvement in the research activity.</td>
</tr>
</tbody>
</table>

Click here to learn more about VPRI’s guidelines governing Compensation & Reimbursement of Research Participants.
CHARACTERISTICS OF RESEARCH PARTICIPANT FEES

Reimbursements:
• Reimbursements to participants may vary depending on out of pockets costs and follows the GTFM/granting agency policy requirements for expense reimbursements.

Compensation:
• Payment is tied to research participant’s time
• Compensation could be cash OR in-kind (i.e. gift card/certificate, toys, books, food)
• Compensation should not be at levels that unduly influences a participant to take part in a study. Conversely, it should not be at a level that is disrespectful of their time.
• Participants should be notified whether they will be receiving some form of compensation during the Informed Consent process
GENERAL CONSIDERATIONS FOR BACK-UP DOCUMENTATION

Documentation requirements for participant fees are not consistent across the university, or funding sources.

It is important to balance the requirement for “traceability” of the payment/reimbursement/gift card to the participant with expectations/requirements for privacy/confidentiality.

Departments can reach out to their FAST Team representatives if they need guidance when making the judgement call.
WHEN determining what supporting documentation is required, it is important to start by identifying whether participants are **confidential or not**.

When participant information is deemed to be confidential, **it should be protected** from:

- loss
- destruction
- unauthorized access

Using **non-identifiable participant codes** instead of personally identifiable information is common practice with confidential participants.

Visit the VPRI’s guidelines/principles on Data Security Standards for Personally Identifiable & Other Confidential Data in Research site to learn more.
CONFIDENTIALITY CONSIDERATION WITH PARTICIPANT FEES

With confidential participants:

• Work with **de-identified data (e.g., participant codes) at all times** unless this is not possible for your work and you have explicit Research Ethics Board (REB) or other official University approval to work with identifiable data.

• **keep the participant code separate from the identifiable data.**

• Avoid using hard copy media for storing identifiable/confidential data (if possible)

• If collecting identifiable data in the field, maintain the minimum amount possible securely on your person until you return to a secure location.
CONFIDENTIALITY WITH ELECTRONIC DATA

When working with electronic data:

• Keep data in a secure server environment

• Keep any identifiable data which are outside a secure server environment encrypted at all times except to the extent that you need to decrypt them during use.
Participant fees can be in the form of either cash or in-kind compensation, such as gift cards (physical or e-gift card).

**Cash**
Departments are recommended to request an Accountable Advance through Financial Services, by submitting the Accountable Advance request form.

**NOTE:** To be eligible for an Accountable Advance, the advance must be recorded against an active employee and their HR personnel #.

**In-Kind/Gift Cards**
Researchers can purchase the gift cards then claim an expense reimbursement with the:
- proof of payment
- expense report form
- documentation supporting they distributed it to the participants (confidential/non-confidential).

**NOTE:** Departments should have an inventory of gift cards they have purchased and distributed for audit purposes.
## RECOMMENDED DOCUMENTATION FOR CASH/GIFT CARD

*For confidential participants, it is recommended that two lists be maintained:*
- one confidential list with full names and amounts paid out as subject payments to individuals and authorized by the approver. This list should be locked in a secure location.
- a second list of vouchers with numbers identifying subjects (i.e. participant code)

<table>
<thead>
<tr>
<th>Confidential Participants</th>
<th>Non-Confidential Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subject’s initial voucher to confirm receipt of cash/gift card</td>
<td>Subject signs full name on list to confirm the amount/gift card received.</td>
</tr>
<tr>
<td>Vouchers signed by person paying out participant fees (person needs to be different than the participant)</td>
<td>List of participant full names and signatures attached to account advance settlement/expense claim form.</td>
</tr>
<tr>
<td>Vouchers attached to accountable advance settlement or expense claim form.</td>
<td></td>
</tr>
</tbody>
</table>
ELECTRONIC PAYMENTS AND GIFT CARDS

Regardless of whether compensation (i.e., cash/gift cards) are physical or electronic (i.e., email transfer, PayPal, wire transfer), supporting documentation should still trace the payment from the university to the participant.

Recommended process:
• Have a detailed email list tied to each participant
• Send e-gift cards from a university email address
• Request confirmation from the participant that they have received the gift card

When conducting international research, be aware of ethical considerations (e.g., currency conversion and undue influence) when compensation participants, particularly those in developing countries.

For more guidance, review the VPRI’s page on Compensation & Reimbursement of Research Participants >> International Research.
WHO DO I CONTACT?

For question regarding VP – Research & Innovation’s guidelines on Compensation & Reimbursement of Research Participants, contact:

Rachel Zand
Director, Human Research Ethics – Research Oversight and Compliance (ROCO)
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Rachel.zand@utoronto.ca

For questions/clarification regarding documentation, contact your FAST Team representative.
THANK YOU!