

Guidance for Human Subject Research (HSR) Payment for Remote Research Operations

Human Subject Payment Options:

- Pay human subjects directly via ACH - **Required for all payments over \$250**, but can be used for lesser amounts
 - Please see the [Human Subjects Payment Guidelines](#) for additional information
 - U.S. Tax Residents (Including Employees)
 - A completed [Human Subjects Request for Payment Form](#) for each subject along with a W-9 (for amounts over \$250) and a Certification of IRB Approval letter must be submitted to AP for processing and payment.
 - Ensure that the name of the study or any sensitive/confidential study information is redacted prior to submitting to AP
 - Foreign Nationals (Including Employees)
 - A completed [Human Subjects Request for Payment Form](#) for the subject along with a [Foreign National Information Form](#), W-8, and a Certification of IRB Approval letter must be submitted to AP for processing.
 - Ensure that the name of the study or any sensitive/confidential study information is redacted prior to submitting to AP

NOTE: Individuals working on a human subjects study may request an exception to receive the funds for human subject payments directly verses using a university purchasing card (Pcard), for example, as long as their department head approves in writing and the individual will be responsible for including the approval in the request, reconciling the payments, documentation, etc. The individual should ensure that the funds received for the human subject study are kept separately, documented/reconciled, and any unused funds will be returned to the university.

- Pay human subjects through Amazon Mechanical Turk (AMT)
 - Please see the [Human Subjects Payment Guidelines](#) for additional information
 - AMT payments may be processed with a PCard, through direct reimbursement via employee expense report (ER), or via AP through a [Human Subjects Request for Payment Form](#).
- Pay human subjects via online gift cards (e.g. amazon)
 - Obtain Pcard exception by completing the [Card Exception Form](#)
 - Please see the [Human Subjects Payment Guidelines](#) for additional information
 - Gift certificates/cards may be purchased using the university's PCard or reimbursed through an expense report.
- Pay human subjects via Venmo
 - Obtain Pcard exception by completing the Card Exception Form. This option is in place during this time and a new exception must be submitted every 60 days.
 - As this is on behalf of CMU, create an account using your CMU email and address. Do not associate any personal information with the account.

- Account Privacy settings **must** be set to Private
- Human Subject must have a Venmo account to claim the money
- If PCard is not available, this may be reimbursed through an expense report.

NOTE: If payment is sent to a fraudulent account, Venmo suggests that a request is sent to the individual to obtain the funds back. If the individual does not provide the money back, Venmo support should be contacted for help. Realistically the money is gone.

NOTE: There are fees associated (3% plus cash advance fee) with this option that are not able to be charged to a grant that need to be covered by the applicable department.

- Pay human subjects via PayPal
 - Obtain Pcard exception by completing the [Card Exception Form](#). This option is in place during this time and a new exception must be submitted every 60 days.
 - As this is on behalf of CMU, create an account using your CMU email and address. Do not associate any personal information with the account.
 - Must be a resident of the US
 - Human Subject must have a PayPal account to claim the money
 - If PCard is not available, this may be reimbursed through an expense report.

NOTE: There is no information about sending money to the wrong person because PayPal assumes you are transacting payments between family and friends.

NOTE: There are fees associated (2.9% fee plus \$0.30) with this option that are not able to be charged to a grant that need to be covered by the applicable department.

IRB considerations:

If you need to make changes to your research that include changes to the method of payments because of the move of interactions with participants from in-person to online, check your CMU IRB-approved protocol. If you need to make changes to the protocol to accommodate these types of changes, please submit a modification through SPARCS IRB. We recommend adding in alternate options, and not removing any of the existing payment methods, to accommodate this change. This way the protocol still addresses payments done previously and will allow you to revert back to previous payment methods at a later date without submitting another modification. When reading through your currently approved protocol to see where modifications are needed, remember to check all sections as modifications may be needed in more than the compensation section.

Also remember to check your consent forms, consent scripts, recruitment materials, etc. Thoroughly checking all of your submission materials and making modifications to all applicable

sections will allow the IRB to process the review quicker. Delays occur when incomplete modification requests are submitted and the IRB has to send them back for corrections.

With different types of payment methods, especially those with third party vendors, such as Venmo, the researchers and the vendor may collect and use personal information (first and last name, email addresses, phone numbers, banking information) provided by participants. Because of this the consent(s) under “Confidentiality” need to inform participants of this.

The IRB will prioritize these reviews. Once you have submitted the modification in SPARCS IRB email the IRB mailbox at irb-review@andrew.cmu.edu to alert the IRB that you are requesting that we prioritize the review of your modification. Please use this email if you have any questions or would like assistance.