



Policy Statement

This policy establishes the options for research study participant payment, including advances and replenishment of research funds, to facilitate human subject research.

Roles and Responsibilities

Principal Investigator (PI) – is responsible (either directly or via an appointed study coordinator or other designee) for:

- Maintaining Institutional Review Board (IRB) approval for duration of study;
- Safeguarding the research funds prior to distribution;
- Issuing individual payments to study participants as either checks, cash or gift cards/certificates;
- Securing appropriate documentation for each study participant payment acknowledging financial distribution;
- Reconciling advanced and replenishment funds at least annually.

Sponsored Program Accounting (SPA) – is responsible for the oversight of study participant payments from research funds and maintaining study participant confidentiality during research-related financial transactions. If study participant payments are issued to the PI as an advance, SPA prepares monthly reconciliations of all advances paid from sponsored programs.

Policy

1. IRS Regulations - The Internal Revenue Service (IRS) requires study participant payments aggregating \$600 or more paid to an individual during a calendar year to be reported on Form 1099-MISC, Miscellaneous Income. A W-9 Tax Identification Form should be completed by designee for payments in a calendar year aggregating \$600 or more.
2. There are two methods of paying study participants. The Principal Investigator may select the method most appropriate for each human subject study.
 - Preferred Payment Method: The preferred method is to request that Loyola University Chicago send a check directly to the study participant. A payment requisition should be submitted along with a W-9, if not already on file. This method allows financial verification that the participant has received the check, using the signature on the cashed check.
 - Alternative Method: The alternative method allows a Principal Investigator, or authorized signatory, to request an advance of research funds equal to an estimated

amount of participant payments for a period up to three months. This one-time advance is to be used exclusively for cash or cash equivalents, such as gift cards, to be distributed to study participants.

The next portions of this policy relate ONLY to the Alternative Method of participant payment.

3. Methods of Participant Payment – The research team may use the research funds to pay study participants using cash or gift cards/certificates. Regardless of the specific mechanism of payment, the research team must supply to SPA adequate documentation of payment receipt by the study participant. The method of payment to the subject must be consistent with the financial information as recorded on the IRB Informed Consent Form. Using negotiable items, such as gift cards/certificates, requires very strict accountability as they are cash equivalents which must be treated like cash.
4. Documentation of Payment Distribution – Adequate documentation of financial distribution consists of the participant name or unique participant study number, amount of payment, payment date and proof of study participant payment by:
 - Research study participant signature OR
 - Research team member (PI, coordinator or appropriate designee) signature witnessing participant payment for studies where participant confidentiality needs are extreme. Only the PI and designated research staff should be able to link the study subject number to the individual study participants.
5. Request for Replenishment Funds – After SPA receives complete documentation of financial disbursements, replenishment funds will be released. Complete documentation consists of the Fund Replenishment Documentation Form, or alternative documentation meeting the criteria defined above in section 4. A payment requisition is required to replenish the advance for an additional period up to three months.
6. Reconciliation of Advance and Replenishment Funds – Upon receipt of complete documentation for replenishment, disbursements will be charged to grants as expenses. Advances on an accounting unit must be reconciled monthly. Unused funds at the close of the study must be returned for re-deposit into the grant accounting unit. Failure to provide adequate documentation of payment distribution will require a refund from the PI.
7. Periodic Review – Advance and replenishment funds made payable to the PI are subject to higher scrutiny by award sponsors and as such, may be reviewed periodically by SPA to ensure the general ledger contains updated and accurate information.

Applicable Forms:

Advance Fund Establishment Form (AFE)
Fund Replenishment Documentation



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Advance Fund Establishment Form (AFE)

Principal Investigator: _____

IRB Number: _____

Accounting Unit: _____

Program Title: _____

Project Start Date: _____

Budget Start Date: _____

Project End Date: _____

Budget End Date: _____

Approx # of Monthly Subjects: _____

Cost Per Visit: _____

Anticipated Monthly Amount: _____

Initial Advance Request: _____ (Maximum advance for three month period)

Personnel Authorized to Handle Advance Funds:

Printed Name

Signature

Printed Name

Signature

Printed Name

Signature

I hereby certify that the above information is correct to the best of my knowledge and have read and understand my responsibilities as Principal Investigator as outlined in the Advance for Payment to Study Subject Policy.

PI Signature

Date

Additional Information:

- 1) AFE Form must be attached to a check requisition
- 2) AFE Form must be completely filled out to be processed



Fund Replenishment Documentation

Principal Investigator: _____

IRB Number: _____

Accounting Unit: _____

Program Title: _____

<u>Study Subject Number</u>	<u>Date of Visit</u>	<u>Amount</u>	<u>Witness Signature</u>
1)	_____	_____	_____
2)	_____	_____	_____
3)	_____	_____	_____
4)	_____	_____	_____
5)	_____	_____	_____
6)	_____	_____	_____
7)	_____	_____	_____
8)	_____	_____	_____
9)	_____	_____	_____
10)	_____	_____	_____
11)	_____	_____	_____
12)	_____	_____	_____
13)	_____	_____	_____
14)	_____	_____	_____
15)	_____	_____	_____
16)	_____	_____	_____
17)	_____	_____	_____
18)	_____	_____	_____
19)	_____	_____	_____
20)	_____	_____	_____

PI Signature _____