

Grand Valley State University Human Research Review Committee	
Title: <i>Recruitment, selection and payments to research participants</i>	
Section: 750.	This policy and procedure supersedes those previously drafted
Approved by HRRC: 09/13/2011 Revised: 09/10/2013 Reviewed: 10/28/2014 Revised by HRRPPC: 04/24/2018	Approved by RIO/HRPA: 09/23/2011 Revisions Approved: 09/10/2013 Revisions approved by AIO/RIO: 05/23/2018
Effective Date: 05/23/2018	
Related documents: <i>120: Compliance with applicable laws and regulations</i> <i>720: Assessing risk to vulnerable participants</i> <i>730: Collection, management and security of research information</i> <i>OP-5: Business & Finance procedure 305 on payment to human participants</i>	

Policy

1. It is HRRC policy to evaluate for approval all planned protocol recruitment methods including appropriateness of materials, inclusion and exclusion criteria, and incentive and compensation components.
2. The GVSU commitment to diversity and inclusion includes the expectation that researchers will make reasonable efforts to assure open access to research opportunities. However, efforts to be broadly inclusive and representative *are required* if there is potential direct benefit to those participating in the research. Broad inclusivity is *not required* for research in which direct benefit to participants is not anticipated.
3. All recruitment activities involving an individual located within a country belonging to the European Union or Great Britain must comply with the General Data Protection Regulation (GDPR). See *HRRC Policy 120: Compliance with applicable laws and regulations* for more details.

Procedures

1. Equitable Recruitment and Selection
 - a. For protocols that hold the prospect of a potential benefit or risk of harm to research participants, the HRRC is required to evaluate the planned recruitment and selection procedures for fairness. Generally, both the risks and benefits of potentially beneficial research should be shared equitably by those most likely to benefit from the research.
 - b. For studies that do not hold the prospect of potential benefit or risk of harm to participants and for which the principal anticipated benefit is increased general knowledge, these considerations are not required except insofar as relevant for establishing the scientific validity of study results.

1. Participants targeted for enrollment should be appropriate for answering the research question;
2. Any inclusion or exclusion criteria should be intended to minimize potential risks and distribute potential benefits to participants by fair means (e.g. not intentionally excluding underrepresented groups or difficult to include groups for convenience); persons who are unable to comprehend English must not be excluded from research opportunities solely on that basis if there is the potential for direct benefit to the participants.
3. Recruiting and selection methods, including incentives and compensation components, should be free from the appearance and fact of coercion and undue influence, especially if a prior relationship with the researcher exists (e.g. employer, course instructor, social network, etc.);
4. If vulnerable persons are included in the research, additional protections from risks should be included as appropriate. *See HRRC Policy 720: Assessing risk to vulnerable participants.*

2. Advertising Materials

- a. All advertisements planned for the recruiting of research participants must be approved by the HRRC prior to use. Any changes made following approval must be re-approved prior to implementation.
- b. The key features evaluated include the following:
 1. Materials clearly state that *research participation* is being solicited.
 2. Materials do not contain misleading statements. Statements describing potential risks or benefits from participation in research, or from study results, are accurate and are consistent.
 3. Incentives or compensation for participation are not inappropriately emphasized.
 4. Communication materials and processes are culturally sensitive and appropriate.
 5. Reasonable efforts are made to be broadly inclusive such that risks and benefits are appropriately shared among those most likely to benefit from the results of the research.

3. Payments to Research Participants

- a. Payments to research participants are of two types: mild incentives involving

nominal value, and compensation that is calculated based on total time, effort, costs and inconvenience involved in participating. The HRRC will consider the amount and schedule of incentives and compensation, along with the characteristics of the participant population, in assessing the appearance or fact of undue influence or coercion.

b. Types of payment

1. **Incentives** may be cash (checks, money orders, gift cards) or gifts of nominal value (e.g., GVSU merchandise) that are not, in and of themselves, anticipated to influence an individual to participate in the research against his or her best interests. Incentives should be briefly mentioned in any recruiting materials for the study and clearly described in the consent document, if any.
2. **Compensation** typically is made in the form of cash or cash equivalent gifts (i.e. retail merchant gift cards). Compensation payments must be described in detail in the consent document, including pro-rated payment schedules if the participant withdraws before the completion of the study. Any researcher-initiated changes concerning payments, including changes to the payment schedule, must be approved by the HRRC prior to implementation.
3. In most cases, compensation payments (if any) should be made at a rate consistent with the time and expectations of the participant's research activities, including travel time. Payment may require each participant provide a Human Subjects Participant voucher form, and/or an I-9 employment eligibility form including the last four (4) digits of the social security number or a federal taxpayer identification number for reporting to the IRS in the case of an audit of university records. See: <http://www.uscis.gov/files/form/i-9.pdf>

c. According to the federal tax code, payment for purposes of research participation by cash, check, money order or gift card in the amount of \$600 or more per year is taxable income. As such, each participant receiving a total of \$50 or more to participate in a study is requested to sign the *Certification of Payment to Human Subject Participants* form, available on the GVSU Business and Finance website. The researcher is required to provide this information to the Accounting Office for retention in the event of an IRS audit of GVSU research payment records. Therefore, assurances to participants of confidentiality of the information provided should be carefully worded. All records of payments to participants must be securely kept for a minimum of seven (7) years after the close of the study.

1. Names of research participants will need to be disclosed to the GVSU department of procurement services for a check to be issued. This may reduce the privacy protections that may be assured to participants as a result. In these cases participants must be informed that their names will be released for purposes of

providing payment and recording state and federal tax information.

2. Identifying information is not required for participants who receive merchandise of nominal value.
3. Under special circumstances a petition to waive this documentation requirement may be made to the Provost office.