


FINANCIAL MEMORANDUM

Memorandum No. 184	MOUNT SINAI SCHOOL OF MEDICINE	Page 1 of 1
Approved by  S. Harvey		Date Issued/Amended 10/31/13
RESEARCH SUBJECT PAYMENTS		

Research Subject Payments are those payments made to individuals to compensate them for participation in research projects. The School pays the participants an amount as approved in the Protocol by the Institutional Review Board (IRB) to participate in the project. The amount paid may be subject to the income reporting requirements of the Internal Revenue Service (IRS) through Form 1099 Miscellaneous.

This policy covers all payments to participants used in Human Subject research at the School.

Subject payments may be made in the following methods:

1. Cash - Research participants may be allowed to pick up their payment from the Main Cashier's Office by presenting an approved petty cash voucher and a valid identification at the cashier window. Petty cash voucher can't exceed \$25 at a time. Please refer to Petty Cash Policy under School Accounting on this website.
2. Checks - Checks may be requested through the Sinai Central from Accounts Payable. The required supporting documentation includes the participant's tax reporting information, including the Social Security Number. If the accumulated payments to an individual reach \$600 or more for the calendar year a Form 1099-MISC will be issued. When checks can't be used to pay a subject for reasons such as privacy and confidentiality, the department administrator and the PI may request a waiver to use the check request. The waiver policy and request form are in the SPA Alerts section of this website.
3. Gifts cards - The monetary value of these payments should be considered as equal to cash payment. Gift cards should have a reasonable expiration date, and be redeemable for a variety of goods and services, or at a variety of locations. There should be a dated, chronological record of the original entry for each individual payment.
4. Non-monetary items (T-shirts, books, etc.) - are considered payments and must be tracked. Reasonable measures must be in place to safeguard and secure the non-monetary items. There should be a dated, chronological record of the original entry for each individual payment of a non-monetary item.

The participant is required to provide his/her social security number except when participating in a study where the IRB has approved a waiver of a signed consent according to 45CFR 46.117(c)(1)(i.e. that the consent form is the only record linking the subject to the research and the principle risk would be potential harm resulting from a breach of confidentiality). Refer to: <http://www.hhs.gov/ohrp/humansubjects/guidance/45cfr46.htm#46.117>