Oklahoma State University Policy and Procedures

COMPENSATION TO HUMAN SUBJECTS	4-0401 RESEARCH July 2026

POLICY

1.01 A principal investigator (PI) may engage participants ***(with Institutional Review Board Approval)*** as part of a research protocol. In these cases, it may be necessary to compensate these individuals for their time and/or expenses incurred during the program. It is Oklahoma State University's responsibility to:

A. Ensure the confidentiality of the participants
B. Compensate the participant in a timely and convenient manner
C. Facilitate the research process
D. Maintain adequate financial information to meet the cash management and recordkeeping and reporting requirements of the university, State of Oklahoma, and the Internal Revenue Services.

1.02 Compensation may be in the form of checks or gift cards. Any other form of payment must be approved in advance by the University Controller. As such, it is necessary for records of such payments to be maintained for fiscal and IRS reporting purposes. If, however, a principal investigator decides to give small items which may be considered promotional in nature, these items are outside the scope of this policy/procedure.

1.03 Not all research projects compensate participants, and participants in projects offering compensation may decline payment if the person chooses.

SCOPE

2.01 This policy is to be used for the payment of check or gift card, and the scope shall pertain to all research participants to include, but not limited to, Oklahoma State University (OSU) faculty and staff, students, and non-university employees.

Privacy and Protection of Confidential Information of Participants

3.01 OSU strives to protect the confidentiality of participants and will not disclose specific research information to unaffiliated parties. However, certain Federal, State of Oklahoma, and university reporting requirements and fiduciary responsibilities must be followed in the course of university business processes.

3.02 The university will not include the title of the research program or nature of study on any documentation used to issue payment to the research participant.

Fiscal Reporting Considerations

4.01 The Internal Revenue Service requires compensation paid to an individual during a calendar year be reported on Form 1099 if the aggregate amount exceeds the reporting threshold.

Anyone participating as a human subject will be considered an independent contractor for purposes of compensation. OSU employees choosing to participate as a human subject will be doing so outside the role of their employment and will likewise be considered an "independent contractor" for the purposes of compensation as a human subject.

Compensation "Gift Card vs. Check"

5.01 A research participant may be paid with a gift card if the compensation is less than or equal to $100 at any one time during the research project. Some research projects may make multiple disbursements to participants, creating an aggregate sum greater than $100.

5.02 If a person participating as a human subject is to receive a single compensation greater than $100, the person must be paid through the university's requisition/accounts payable system.

5.03 In very limited circumstances, a research subject may be paid with cash or other form of payment not listed in this policy if approval is obtained in advance from the University Controller.

Disbursement Records:

6.01 If paid by check, the records generated for the issuance of the check will serve as appropriate disbursement records. If the participant is paid with a gift card (and cash in limited circumstances), the principal investigator or designee must use the "Roster of Disbursement" to record the name, date, amount paid, and signature of the participant. This roster will be submitted to the College Fiscal Officer to support the funds disbursed.

6.02 In those cases where complete confidentiality precludes a disbursement list containing names and signatures, the principal investigator must maintain a list of the disbursements of funds. This documentation will support the need for extensive confidentiality. However, the PI may recognize the need to maintain additional records. In these cases, a PI may support the release of funding to participants by creating a "Roster of Disbursement" using pseudonyms for the participants and allowing the participants to initial and date the roster.

Participants in Research Projects

7.01 All participants in a research project do so at their discretion.

A. University Employees Participating in Research Projects

1. An OSU employee chooses to participate in a research program at their discretion. Participation as a research participant is not a requirement of the person's employment.

2. The participant shall be treated and paid as an independent contractor.

B. University Students Participating in Research Projects

1. An OSU student chooses to participate in a research program at their discretion. Participation as a research participant is not a requirement of the person's enrollment.

2. The participant shall be treated and paid as an independent contractor.

C. Non-University Employees and Non-Students:

1. Participants who choose to take part in a research project and are not currently classified as employees of the university will not be recognized nor receive employment benefits as an OSU employee while participating in a research project.

2. Likewise, a person not classified as a student at OSU will not achieve student status while participating as a research participant.

3. Individuals without employment or student status at OSU will be treated and paid as independent contractors for purposes of compensation.

Principal Investigator Fiscal Responsibilities

8.01 The principal investigator must keep a log identifying the subject and amounts in order to ensure calendar year payments do not exceed the IRS reporting threshold. The principal investigator must ensure any payments to research participants exceeding the IRS reporting threshold will cause the issuance of an IRS form 1099 to the participant.

8.02 The PI accepts fiduciary responsibility for gift cards (and cash in limited circumstances) entrusted during a research project. The PI must maintain the cash and gift cards in secure locations, maintain appropriate supporting documentation, and take proper precautions in accepting, disbursing, and reconciliation of funds.

Questions may be directed to:

College Fiscal Officer
IRB Office
University Accounting
GCFA