

CLARKE UNIVERSITY INSTITUTIONAL REVIEW BOARD INCENTIVES POLICY

The HHS regulations require IRBs to be vigilant about minimizing the possibility for coercion and undue influence. The purpose of this document is to describe the Clarke University Institutional Review Board policy and procedures for review of research incentives to determine whether any aspect of the proposed incentive presents coercion or undue influence, thus interfering with the potential subjects' ability to give voluntary informed consent for participation or continued participation.

DEFINITIONS

Coercion: the practice of persuading someone to do something by using force or threats.

Incentive: a form of payment offered to an individual in exchange for time and effort or to offset costs of participation (e.g., travel to study site). Payment can be in any form, including but not limited to, gift cards, check, cash, and course credit/extra credit.

Undue Influence: influence by which a person is induced to act otherwise than by their own free will or without adequate attention to the consequences.

POLICY

Clarke University IRB discourages the use of incentives for research participation. However, in situations where incentives need to be used, proposed incentives should be just and fair. The funds to be used for incentives cannot come from your personal funding but rather should be grant-based or come from Clarke University through professional development funds or other approved department funds. Each researcher using grant funding must follow the requirements of the grant including reporting on the use of funds if applicable. This can be done through the Clarke University's grants officer. Course credit/extra credit can also be considered incentives and can ONLY be given if an alternative assignment is available. In order to avoid coercion and undue influence, incentives provided should be reasonable based on the time and complexities of the study.

For Faculty only:

Faculty Driven Research: Requirement if using Clarke University Faculty Professional Fund for Research

- Unless payments are being made from a grant, the funds must be dispersed through a third-party vendor (e.g., MTurk). That is, Clarke will not be issuing payments directly to participants.
- Unless grant funded, funding for payment to participants should come from operational departmental accounts or departmental temporarily restricted accounts (21-accounts). Faculty may use professional development funds for incentives and if more funds are needed, they must come from temporarily restricted accounts (21-accounts).
- Payments through a third-party vendor to an individual participant should not exceed \$50 in one session and cannot exceed \$600 over the course of a year.
- In line with other institutions policies as well as United States tax laws, only citizens of the United States would be allowed to participate in studies involving incentives. Non-resident aliens (NRAs) would be excluded, as any payments of any amount to NRAs must be reported to the IRS. To ensure this policy is met, please include a screening procedure to exclude non-citizens.