

RECRUITMENT METHODS AND COMPENSATION

Unit: Human Research Protections Program (HRPP), Office of Research

Applies to: Faculty and Staff involved in human research

PURPOSE:

Recruitment methods and materials used to recruit potential research subjects along with methods and amounts of compensation must undergo IRB review and receive approval prior to use of the material.

It is the policy of the Medical College of Wisconsin (MCW) Institutional Review Board (IRB) to review and approve all recruitment methods, materials and compensation for subjects in research conducted under its jurisdiction.

DEFINITIONS:

Recruitment: Seeking individuals to enroll or participate in a research project.

Advertisements: forms or pieces of recruitment material used to inform potential subjects about a project. Advertisements can be in many forms and encompass many modes, such as flyers, posters, billboards, bus ads, etc.

Coercion: the use of force or intimidation to persuade someone to do something that they are unwilling to do

Undue Influence: (as a term in jurisprudence) is an equitable doctrine that involves one person taking advantage of a position of power over another person. It is where free will to bargain is not possible.

Projects which will include or target vulnerable populations must include the appropriate

following compensation methods may be permitted and compensation should be distributed in accordance with *MCW Corporate Policy: Business Purchases, Payments and Reimbursement (BF.PA.010)* and *Office of Research Policy: Subject Payments for Research Participation*:

- i. Monetary compensation. This includes check, cash, gift certificates, and prepaid debit cards.
 - ii. Parking reimbursement
 - iii. Meal coupons
 - iv. Items such as bags, blankets, pens, coolers, calendars, magnets, etc.
 - v. Medical Equipment – if provided to the subjects during the course of the project, and allowed to keep it after participation has ended. Examples include, but are not limited to:
 - f Blood Pressure Cuffs
 - f Glucose meters
 - f Portable or wearable Electronic Devices
- b. The IRB reviews and evaluates all compensation plans proposed on a project by project basis. In their review the IRB will evaluate the following components:
- If compensation has been pro-rated on a per project visit basis
 - If there is a “completion bonus” offered for the final visit, completion bonuses are often an amount which totals greater than 40% of the total compensation for the project
 - If the total compensation being offered in the project to subjects is not unduly influential.

Compensation methods not allowed for Investigators or subjects:

The following methods are not allowed by MCW IRB as compensation:

- Investigators may not receive payment for referrals of potential subjects, or offer recruitment bonus to other physicians who refer individuals to a project, or offer to provide additional compensation for submitting data or addressing queries. See Finder’s Fee and Bonus Payments section in this procedure.
- Subjects may not receive escalated payments for the purposes of accelerating recruitment or to encourage participation multiple times.

Finder’s Fees and Bonus Payments

Sponsors may offer to pay Investigators or project personnel an additional fee to encourage subject recruitment efforts and the timely or accelerated opening of projects. In most situations, these payments are prohibited. Each situation should be reviewed to be sure that it complies with Federal regulations, ethical opinions, and MCW HRPP policy.

It is not permissible to pay or accept “finder’s fees”. Additionally, it is impermissible for faculty, employees or students to accept personal payments from sponsors or other researchers in exchange for accelerated recruitment or referrals of patients.

It is impermissible to accept bonus payments.

It is acceptable to receive compensation for recruitment and screening related activities that are unrelated to whether the subject ultimately enrolls in or completes the project (such as advertising, administrative and personnel costs).

Investigators should be sure to determine a reasonable budget amount that is directly related to the value of the services provided to the project, and to document how that amount was determined. For example, individuals could be paid on a flat hourly basis for the time spent recruiting and screening potential subjects (regardless of whether they are successful in recruiting those subjects) and time sheets should be kept documenting

