POLICY STATEMENT: The nature, amount, and method of payment or other remuneration should not constitute undue inducement to participate (i.e., the payment should not serve as sufficient inducement for the subject to volunteer). Payment to research subjects for participation in studies is not considered a benefit, it is a recruitment incentive. In addition to federal regulations, all research conducted at Mercy Health regional sites complies with the Trinity Health Mission, Core Values, and Catholic moral/ethical principles, as delineated in the "Ethical and Religious Directives for Catholic Health Care Services." In this regard, IRB review and decision making gives special consideration for research participants' cultural, racial, social, religious, and economic circumstances.

GENERAL PROVISIONS:
The IRB will consider the impact participation poses on the daily life of the potential subject. For example, the IRB will consider reimbursement of subjects for inconvenience posed by the research, such as: the time required to participate; travel involved and/or parking costs; lost time from work, babysitters, caregivers, transportation (such as ambucabs), etc. Investigators should include provisions in the protocol for addressing these concerns, especially for research that poses little or no direct benefit for the subjects.

Special precautions should be taken when payment is offered to a third party for the participation of someone else in the research. The IRB is concerned that such payments may constitute undue coercion from the third party to the actual research participant. For example, a parent may be offered remuneration for volunteering their child to participate in a research project. In these cases, precautions should be taken to clearly separate the payment to the third party from the consent/assent process with the actual research participant. Final approval for participation rests solely with the research participant and their consent/assent takes precedence over that of the person to whom payment is offered.

Since subjects reserve the right to withdraw their participation from the research without prejudice, payment to subjects should be prorated, i.e., partial participation in a research activity would obligate partial payment. The IRB will review both the amount of the payment, to whom it is offered, and the proposed method of disbursement to ensure that payment for participation does not constitute coercion or undue influence. Investigators should explain the payment schedule in the informed consent document and clearly define the amount of payment that will be made at the completion of each study visit.

REFERENCE:

ATTACHMENTS:
RR 410-A Checklist for Review of Payments to Research Participants
**PROCEDURE: All Mercy Health Campuses**

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| IRB Specialist/IRB Coordinator | 1. Review submission package and determine if a payment to participants is proposed.  
2. Prepare review packet as advised by the IRB Chairperson and include the RR 410-A Checklist for Review of Payment to Participants if a payment is proposed.  
3. Notify investigator of reviewer’s findings if requests for further information or changes are made by reviewer.  
4. Notify reviewer of approval or denial of the submission item or package using the applicable approval or denial of approval letter. |
| IRB Chairperson          | 1. Perform review of proposed payment to research participants or designate a reviewer.  
2. Inform the IRB Specialist of assigned reviewer. If the reviewer is a designee of the Chairperson, request the IRB Specialist notify the reviewer and provide the reviewer with the RR 410-A Checklist. |

**CONCURRENT CONSENTS:**

Institutional Official

[Signature]

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