

Compensation and Incentives for Research Subjects

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RESEARCH COMPENSATION

- Ethical Considerations in Compensation
- Overview Compensation Matrix
- Specifics for Federal Employees
- Medical Student and Graduate Student Issues
- Q&A

Ethical Considerations in Compensation

- Compensation vs. Reimbursement
- Compensation
 - Undue Influence violates principle of respect for person
 - Improper inducements can affect voluntariness
 - Vulnerable groups (children, poor, and mentally impaired)
 - Violation of principle of Justice
 - lotteries

RESEARCH COMPENSATION		
POPULATION	FEDERAL FUNDS	NON-FEDERAL FUNDS*
Federal Personnel		
Active Duty	<ul style="list-style-type: none"> • May only be compensated for blood draw (up to \$50).¹ • Must receive supervisor permission prior to participation.² • Prior approval must be in accordance with Command and Component policies.² • USU Active Duty may only participate in an off-duty status.² 	<ul style="list-style-type: none"> • May be compensated for blood draw (up to \$50).¹ • May be compensated for participation in a reasonable amount as approved by the IRB while off-duty.¹ • Must receive supervisor permission prior to participation.² • Prior approval must be in accordance with Command and Component policies.² • USU Active Duty may only participate in off-duty status.²
Active Duty Healthcare Practitioners enrolled in graduate training programs	<ul style="list-style-type: none"> • Prohibited from receiving compensation.³ 	<ul style="list-style-type: none"> • Prohibited from receiving compensation.³
Civilian	<ul style="list-style-type: none"> • May only be compensated for blood draws while on or off-duty (up to \$50).¹ • Must receive supervisor permission prior to participation.² • USU Civilians may only participate in off-duty status.² 	<ul style="list-style-type: none"> • May be compensated for blood draws (up to \$50).¹ • May be compensated for participation in a reasonable amount as approved by the IRB while off-duty.¹ • Must receive supervisor permission prior to participation.² • USU Civilians may only participate in off-duty status.²
Non-Federal Personnel	<ul style="list-style-type: none"> • May be compensated for participation in a reasonable amount as approved by the IRB.¹ 	<ul style="list-style-type: none"> • May be compensated for participation in a reasonable amount as approved by the IRB.¹

Note, research protocols intending to recruit GSN and SOM students must receive approvals from the Deans and Commandants of GSN and SOM prior to recruitment. SOM students must also receive approval from the Office of Student Affairs prior to participation. Forms to obtain such approvals must be routed after IRB approval has been secured.

* Includes payments from a Federal Contractor/Grantee

¹ See DoDI 3216.02

² See USU Instruction 3201

³ See DoD 6025.13-R

Compensation Factors



- There are 3 KEY factors for determining whether subjects may be compensated for participating in research:
 - 1) Federal or non-federal employee?
 - 2) If Federal, on-duty or off-duty?
 - 3) Source of funds, fed or non-fed money?

Compensation to Federal Employees

- When subjects are federal personnel (active duty and civilian)

On Duty:

- Limited to \$50 blood draws
- Supervisor approval
- Note: USU Instruction 3201, Enclosure 3, para 16: No compensation during duty hours for USU active duty or civilian fed. employees

Off Duty:

- Federal source: only \$50 for blood draw
- Non-Federal source: No restrictions other than IRB approval as reasonable
- Supervisor approval as outside activity (off-duty employment)

Contractor sourced funds: “payment from a Federal contractor or other non-Federal source is permissible” DODI 3216.02, Enclosure 3

- look for conditions on compensation from the original source of funds



Medical Student vs. Graduate Student

- USU Medical Student:
 - Considered a vulnerable population
 - Approval by Command and SOM Dean required
 - Can receive compensation
- DOD Graduate Medical Student:
 - Also considered a vulnerable population
 - Approval by Command and Deans required for GSN and GEO participation
 - No Compensation:
 - DOD policy prohibits engaging in off-duty employment
 - At USUHS this prohibition includes \$50 blood draws

Questions?

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