Payments to Research Participants

Purpose: To provide guidance to NIU faculty, staff, and students on the appropriate methods for handling payments to individuals for their participation in a university sponsored research study.

Reason for Policy: Research programs involving human subjects often provide an appropriate level of incentive or compensation for the individual’s participation in the study. This policy will aid Principal Investigators (PI) in understanding how to manage these financial payments while preserving NIU’s responsibilities under Internal Revenue Service (IRS) reporting rules and university regulations.

Policy:
Individual payments to research participants of amounts of $100 or less are considered by NIU to be de minimis in nature and do not require a Taxpayer Identification Number (TIN) or Social Security Number (SSN) from the participants. De minimis payments exceeding $600 in a calendar year require a TIN or SSN and completion of a W-9 by the participant.

De minimis payments of $100 or less apply only to research participants and not to any other payments made to an individual by NIU. For payments other than de minimis payments to research participants, a TIN and W-9 must be obtained from the individual.

De minimis payments are available for citizens and permanent residents but not Nonresident Aliens (NRA) under any circumstances.

Procedures:

Research payments of $100 or less:
Payments to research participants of $100 or less may be provided as cash from a working fund. Contact the Sponsored Programs Administration (SPA) Post-Award Associate Director for guidance on how to establish a working fund.

Investigators are not required to obtain a Taxpayer Identification Number (TIN) from the research participant. The investigator shall obtain signed receipts from the individual that indicate the participant’s name and the amount received to document the payments from the working fund.
**Payments to Research Participants of $100 or more:**

All payments over $100 must be processed as a check request unless an exception is granted (see exceptions below). A check is issued directly to the research participant and a TIN or SSN must be collected.

**Cases of anonymity for payments of $100 or less**

In studies where participant anonymity is important, the investigator does not record identifiable information, and does not obtain signature on the informed consent. The investigator may use a working fund and collect receipts without participants’ names or other identifiers. The receipts will serve to document payment from the working fund.

**Cash payments**

If participants are to be paid in cash, investigators must ask:

1. If they have already participated in other research studies at NIU for which they received compensation; and
2. If they are members of a State Retirement System (SURS).

If the participant has already participated in other NIU research studies, the investigator should verify that the participant’s total compensation per calendar year from NIU will not exceed $600. If the investigator is aware that the participant will be receiving multiple *de minimis* payments that may exceed the IRS limit of $600, then it is the investigator’s responsibility to obtain the TIN and a W-9 form from the participant.

If the participant is a member of a SURS, the investigator must obtain the TIN and W-9 form from the participant.

**Exceptions:**

An investigator may request an exception to this policy from the Assistant Vice President for Research and Sponsored Programs Administration (AVP). The AVP will consult with the Vice President of Research and Innovation Partnerships. If approved, an exception would allow the investigator to pay a research participant an amount greater than the *de minimis* payment amount without collecting a TIN or SSN for individual research studies.

An exception cannot be made in cases where the participant is a member of SURS.

Exceptions will be determined, on a case-by-case basis, based on the facts and circumstances of the individual study.

To request an exception, complete the “Request for Exception for Participant Compensation” form and submit it to the Assistant Vice President for Research and Sponsored Programs. The Division of Research and Innovation Partnerships will make every effort to provide a decision within five business days of receiving the request.
Eligible and non-Eligible Research Participants

U.S. Persons (Citizens, Permanent Residents - Both Employees and Non-Employees): This policy and payment procedure applies to all U.S. citizens and resident aliens.

Nonresident Alien (NRA) – The de minimis payment policy does not apply to NRAs. Payment methods for NRAs are restricted to payment by a check request due to immigration and taxation documentation required by Homeland Security and the Internal Revenue Service for NRAs. All payments to NRAs must be processed through a payment by check request regardless of the dollar amount.