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**University of Wisconsin- Milwaukee**

**Institutional Review Board**

**Incentive Guidance Document**

**A. Purpose**

Investigators often grapple with determining what is an appropriate reward to research participants and what is required by the IRB when it comes to offering an incentive. This guidance document will clarify areas where there is commonly confusion and give investigators information on what the IRB considers when review studies with incentives to participants.

**B. General hints**

1. Undue Influence- the main concern of the IRB when reviewing incentives is making sure the incentives are not unduly influential. Make sure that the incentive you are offering is appropriate to your target population and not large enough to exert extra influence on a participant to join a study they may normally have not considered.
  - a. For example: A \$100 incentive to physicians for a one hour focus group during the work day may be considered an appropriate incentive. A \$100 incentive to high school students to participate in the same focus group may not be appropriate.

**C. Specific issues by incentive type** (See chart for specific issues surrounding types of incentives)

Incentive	Regulatory requirements	Things to Consider
Extra Credit for courses	<p>*An alternative activity to participating in the research must be clearly defined and explained to the participant in the consent form and recruitment materials</p> <p>*If you are not the course instructor you cannot guarantee that extra credit will be provided unless you have an arrangement with the instructor. Acceptable language for the consent form would reflect this. "You may be able to earn extra credit for completing this research study but it is at the discretion of your course instructor and is not guaranteed."</p> <p>*For information from OHRP on extra credit incentives for students please see:  <a href="http://answers.hhs.gov/ohrp/questions/7253">http://answers.hhs.gov/ohrp/questions/7253</a></p>	<p>*If you are conducting an online survey how will you have students report their identifying information in order to offer extra credit? If you are asking sensitive questions and asking students to report their names on the survey is this increasing the risk to participants? Depending on the questions you are asking, a survey with identifiers may not qualify for exempt review.</p> <p>*Some investigators looking for exempt review status propose conducting anonymous online surveys with a link at the end to another survey which collects identifiers of the participant. The IRB may approve this in situations where the main survey is not collecting overly sensitive data, but will not approve it for sensitive data because there is the possibility of being able to link the time date stamps of completed main survey to start of identifying survey which makes this process not anonymous. If a linking survey is used for granting extra credit then the term anonymous should not be used in the consent form. The confidential language should be included along with the statement "While your name is not being collected on the main survey there is a small chance that the two surveys could be linked." Other investigators who want to offer extra credit for a truly anonymous survey may program their surveys to include a survey termination message that completers may print off to show instructors as proof that they completed the survey.</p>

Gift Cards	<p>*Please be aware of UWM's Payment to Research Subjects policy:  <a href="http://www4.uwm.edu/bfs/procedures/acctp/upload/2-46Research-Subjects.pdf">http://www4.uwm.edu/bfs/procedures/acctp/upload/2-46Research-Subjects.pdf</a></p>	<p>*If providing gift card incentives, UWM employees and non-resident aliens are not eligible for the incentive- this should be stated in the consent form</p> <p>*If you do not select level 3 confidentiality in the protocol form then you will be required to collect identifying information such as name and social security number - this should be stated in the consent form so that participants are aware of it before deciding to participate.</p>
Checks	<p>*Please be aware of UWM's Payment to Research Subjects policy:  <a href="http://www4.uwm.edu/bfs/procedures/acctp/upload/2-46Research-Subjects.pdf">http://www4.uwm.edu/bfs/procedures/acctp/upload/2-46Research-Subjects.pdf</a></p>	<p>*If you will be paying participants with a check then they will be required to complete an I-9 form - this should be noted on the consent form.</p> <p>*UWM Employees who receive an incentive from a study issuing checks will have the incentive amount added to their payroll.</p>
Cash	<p>*Please be aware of UWM's Payment to Research Subjects policy:  <a href="http://www4.uwm.edu/bfs/procedures/acctp/upload/2-46Research-Subjects.pdf">http://www4.uwm.edu/bfs/procedures/acctp/upload/2-46Research-Subjects.pdf</a></p>	<p>*You will need to include a statement in the protocol form that subjects "Must be paid in cash."</p> <p>*If you do not select level 3 confidentiality in the protocol form, then you will be required to collect identifying information such as name and social security number - this should be stated in the consent form so that participants are aware of it.</p>
Raffles or Prize Drawings	<p>*UWM's legal department has specific requirements that should be followed when considering offering a raffle drawing or prize drawing:  <a href="http://www4.uwm.edu/legal/resources/prizes_raffles.cfm">http://www4.uwm.edu/legal/resources/prizes_raffles.cfm</a></p>	<p>* It is the investigator's responsibility to be in compliance with Wisconsin state law and Legal Affairs' guidance when offering incentives through a drawing/raffle method.</p>