



Albert Einstein College of Medicine

Subject Compensation Guidelines

I. Purpose

These Guidelines provide guidance on subject compensation for human research that is conducted under the auspices of the Einstein Institutional Review Board (“IRB”).

II. Scope

These Guidelines apply to human subject research conducted under the auspices of the Einstein IRB.

III. Definitions

None.

IV. Guidelines

The IRB is responsible for reviewing the rates, forms and schedules of remunerations to subjects participating in research under its jurisdiction. It is the IRB’s charge to ensure that the amount of remuneration and the proposed method and timing of disbursement do not present undue influence to subjects.

In order to prevent the undue influence to subjects, the IRB offers the following guidance:

- There are no hard and fast rules about how much subjects should or should not be paid. Subjects should be paid enough to make up for their time and trouble, but not so much that their decision to volunteer or continue in a study is influenced by the amount being offered. Payment should be comparable to other studies involving equivalent time, effort, and inconvenience.
- The current minimum wage in NYC is a reasonable amount for studies involving lengthy or periodic visits to the lab or clinic and fairly low risk procedures that are routine in clinical practice, such as venipuncture, physical exams, MRI or x-ray, ECG, interviews, or questionnaires.
- For greater than minimal risk procedures (e.g. biopsies, lumbar puncture, or other invasive procedures), an hourly range may not be appropriate. Such studies require case-by-case consideration. The amount should not be so great as to alter a subject’s decision-making process such that she or he may not appropriately consider the risks of participating in the research.
- Remuneration should not be contingent upon the subject completing the entire study. Payment of a small proportion as an incentive for completion of the study has been stated as acceptable to FDA, providing that such incentive is not so large as to unduly induce subjects to stay in the study when they would otherwise have withdrawn. For short studies involving one visit, depending on the nature of the study, it may be acceptable to provide payment contingent upon

completion, provided that if subjects are disqualified through no fault of their own, they receive appropriate payment for their time and effort prior to their exclusion.

- Payment to subjects who withdraw should be prorated to reflect the time, effort and inconvenience to the subject's participation to the point of withdrawal.
- The amount, method, schedule, form and prorating of remuneration should be described clearly in the informed consent form.
- Non-monetary forms of remuneration such as gift cards/certificates are acceptable forms of payment. The monetary value of these forms should be considered as equal to cash payment. The form of payment should be clearly described in the consent form.
- All information regarding remuneration to subjects should be detailed in the appropriate field of the IRB application for each submitted protocol.

V. Effective Date

Effective as of: 20 February 2020

VI. Document Management and Responsibilities

Einstein's Office of Human Research Affairs is the Responsible Office under this document. Einstein's Executive Dean is the Responsible Executive for this document. Einstein's OHRA Director is the Responsible Officer for the management of this document.