Research Community Meeting

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Office Of Research

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BC 10.155 PARTICIPANT PAYMENTS FOR SPONSORED AWARDS

Policy goal:

To ensure that all payments are

- conducted ethically,
- in compliance with legal requirements, and
- in alignment with institutional policies

This policy covers payments related to all sponsored awards, including but not limited to:

- Research involving human subjects, subject to Institutional Review Board (IRB) oversight.
- Sponsored non-research activities, such as:
  - community service programs,
  - educational outreach, and
  - program evaluations

This policy applies to all grants and contracts that involve participant payments funded through sponsored awards, regardless of funding source or study location.

PARTICIPANT PAYMENTS FOR SPONSORED AWARDS

Payment Options

The available options to departments for participant payments are outlined below. Please contact the Office of Research for additional details.

- Greenphire ClinCards - A reloadable prepaid debit card used to compensate participants. Payments are loaded onto the card and can be tracked electronically.
- Gift Cards – Orders are available through approved vendors.
  - Orders are limited to:
    - Generic Grocery or Gas Cards: accounts.payable@baystatehealth.org
    - Visa/Vendor Specific Gift Cards: purchasing@baystatehealth.org

PARTICIPANT PAYMENTS FOR SPONSORED AWARDS

- Taxability and Tracking of Payments – U.S. Citizens and Resident Aliens

Payment to Individual Subject(s)	Tracking of Taxability Threshold
$100 or less	None– Payment is considered de minimis.
$100.01-$599.99	Informal tracking at department level – If subject participates in more than one study, annual cumulative total may reach $600 and meet the requirements below.
$600 or greater	Accounts Payable will review the 1099 report via Greenphire and initiate communication with Participants noted to have met the taxable income threshold..

- Taxability and Tracking of Payments – Non-Resident Aliens

Payment to Individual Subject(s)	Tracking of Taxability Threshold
$100 or less	None– Payment is considered de minimis.
$100.01 or greater	Contact Baystate Finance Accounts Payable for additional paperwork and processes.

- Regardless of the taxability of payments, a list/log of payment recipients must be maintained for audit purposes, in order to show that funds were disbursed to participants. But we do not need personally identifying data for those participants.

BC 10.125 - Translations and Use of Interpreters in Research

To ensure that:

- Non-English speaking,
- limited English proficiency,
- deaf,
- hard of hearing, or
- deaf-blind

individuals have an equal opportunity to obtain any potential direct benefits that may only be available within the context of the research.

Based on Baystate's patient population:

- most informed consent forms and subject research materials be fully translated into Spanish.
- researchers should have an interpreter available as needed for the consent process and ongoing interactions with the subject.
- unless a provider has established their fluency through the Interpreter and Translations Services office, an interpreter must be arranged for by contacting Baystate Interpreter and Translation Services.

*Single IRB studies should follow the directions of their agreements with the external IRB (including the use of a pre-approved translated short form, followed by required re-consent with long form for WCG studies); or translation services provided by and approved by the NCI-CIRB, for example).

Criteria

The criterion for requiring translations of consent forms and other research materials:

- study population has a greater than 5% native language other than English

This criterion maybe waived if:

- a pilot study of less than 10 patients with no expectation of benefit
- expected enrollment period of less than 42 days.

If someone who does not speak English becomes available for a study that fits the above description, then the short form of the ICF can be used.

POLICY REFERENCES:

- BC 1.650 - Interpreter & Translation Services for Persons with Limited English Proficiency
- BC 1.900 - Accommodating Persons who are Deaf or Hard of Hearing
- BC 10.190 - Research Consent Process and Documentation

Requesting Translators & Document Fees

Requesting Translators for non-English speaking, limited English proficiency, deaf, hard of hearing, or deaf-blind individuals:

- Contact Interpreter and Translation Services at:
  1. Inpatient Studies: Extension 4-5419
  2. Outpatient Studies: If the department that the study team is working with schedules medical interpreters through Access Services, the study team must call the Access Services number for that area to book an interpreter. If the department does not book patient appointments through Access, call Interpreter and Translation Services directly at 4-5419.

Industry funded studies will be assessed a $975 fee for consent form translations when required per IRB guidelines.

- This fee should be included in project budgets and will be billed directly to the sponsor through the Grants Management Accounting System.
- The costs associated with providing translated documents for investigator-initiated and internally funded projects should be included in project budgets to be allocated to the Baystate Interpreter and Translation Services Department.

Education Opportunities

- Research Community Meetings will now offer education credits!
- Each month your attendance and completion of a short survey will allow you to earn 1 CME/CEU.
- Keep an eye on our newsletter and your email for more details.

Research Community Meeting – Monthly Education

March 19, 2025

- The history of human subjects research and foundations for regulations (Helsinki, Tuskegee, Nuremburg, etc.)

April 16, 2025

- Non-human subjects research (HSRD determinations)—What qualifies?

May 21, 2025

- Human Subjects Research-Exempt, Expedited, and Greater than Minimal Risk Studies—Understanding the regulations.

June 18, 2025

- Single IRB-internal and external IRBs; use of commercial IRBs (CIRB, Advarra, WCG).

July 16, 2025

- Ethics training, CITI, and discussing the nature of ethics requirements vs. moral judgments in protection human research participants.

August 20, 2025

- Conducting participant-centered informed consent processes.