Research Incentive Guidelines

Ferris State University (FSU) recognizes the importance of encouraging individuals to participate in research as human subjects and the value of the time, effort and risk subjects contribute to university research efforts. As such, payment may be made, or other consideration provided, to subjects to compensate them for these contributions as long as the following criteria are met:

- Payment arrangements are specifically approved in advance by the FSU IRB;
- Payments or other consideration provided to subjects in return for their participation are not so significant as to be coercive or unduly influential (i.e., inducing subjects to accept unreasonable risks);
- Payments are prorated when appropriate to avoid inducing subjects to continue participation in a study when they otherwise would withdraw;
- Arrangements are made by the PI to assure proper accounting of payments made to subjects, and required reporting to tax authorities, as required by University policy, with due consideration of privacy concerns.

In accordance with the application review process, the FSU IRB will review any payment arrangements offered to subjects. Their review will ensure the following:

- The amount of payment and the proposed method and timing of disbursement neither is coercive nor presents undue influence;
- Where appropriate, credit for payment accrues as the study progresses and may/not be contingent upon the subject completing the entire study;
- Any amount paid as a bonus for completion is reasonable and not so large as to unduly induce subjects to stay in the study when they would otherwise have withdrawn; and
- All information concerning payment, including the amount and schedule of payments, is included in the consent document or process.
- Where academic credit is offered as an incentive for participation, the IRB will ensure that students are offered an alternative option for extra credit if they choose not to participate in research.

Ferris State University considers all gift cards as cash compensation. See the Ferris State Business and Special Expenses Policy for details.

- For any non-employee (including non-employee students) that receives cash compensation, if the total compensation for the year is > $600, FSU will issue a 1099.
- For any student or staff that is an employee of FSU: if total compensation is > $75 for the year, FSU will issue a W2.

If FSU researchers wish to conduct a lottery, raffle, or sweepstakes as a form of incentive payment, or as a part of research with human subjects, they must comply with federal policy and State of Michigan Act 382 of 1972.

Research Lottery/Raffle

A research lottery or raffle (interchangeable terms) is one in which participants are offered a chance to win a prize or something of value in return for their participation in a research activity, such as a survey or experiment. Per SOM Act 382, Section 432.105d Ferris State University is a “Qualified Organization” and is excused from obtaining a license under specific criteria, which the FSU IRB will check for upon review of the proposed study and incentive activity.
As stated in the State of Michigan Charitable Gaming Division Raffle Guide, “If you are charging people or requiring them to donate or provide something of value to participate in a drawing where a prize will be awarded, then you are conducting a raffle”.

**IRB Review Criteria**

1. Total cash value of prizes (cash, gift certificates/cards, merchandise) awarded on any day cannot exceed $100.
2. There are no second chance drawings, meaning that individuals cannot be entered into a pool for a prize more than one time. This limit meets State of Michigan “single gathering” criteria.
3. There is no pre-sale of raffle/lottery tickets.
4. The informed consent document must include a description of the lottery/raffle process.

**Example**

A study team has $300 to offer as incentives and plans to hold three drawings for $100 total distribution on three days, awarding four $25 prizes on each day. The team’s plan meets IRB criteria if:

- They do not exceed the $100/day limit
- They enter three distinct pools of research participants for each drawing (e.g., Subjects 1-25 on day 1; Subjects 26-50 on day 2; Subjects 51-75 on day 3).

If a researcher wishes to offer something valued over $100, there are two options for the researcher:

- 1. A license to conduct a small or large raffle must be obtained from the State of Michigan Charitable Gaming website; OR
- 2. The prize must be given away through a sweepstakes.

**Research Sweepstakes**

It is permissible to offer a chance for a prize valued at more than $100 but the activity must meet the State of Michigan requirements for a sweepstakes or gaming promotions under the Michigan Penal Code Act 328 of 1931.

**IRB Review Criteria**

1. Subjects are not required to offer something of value (their participation in the research) in order to be entered into the drawing. This means everyone invited to participate in the research is entered into the drawing.
2. The informed consent document must disclose:
   - The date and location that the drawing will take place
   - The odds of winning
   - How winners will be notified

**Example consent language**

You will be entered into a sweepstakes to be conducted on July 23, 2016 for an iPad valued at $599. The drawing will be conducted by the Ferris State University Michigan College of Optometry in Big Rapids, MI. The chance of winning a prize is approximately 1 in 300. The winner will be notified immediately by email and provided with information on where to pick up the prize.