

June 27, 2014

MEMORANDUM
Notice: SRS 14-008

TO: Members, CROI Committee

SUBJECT: Paying Human Subjects and Survey Participants

In an ongoing effort to comply with the Health Insurance Portability and Accountability Act (HIPAA) privacy rules and to reduce administrative burden, Sponsored Research Services (SRS) is implementing the following procedure for paying human subject and survey participants. The procedure and referenced forms have been vetted by the Research Compliance Office and are in compliance with current requirements of HIPAA. The new forms are available on the SRS website <https://srs.tamus.edu/forms/srs-forms/>.

The Payment Certification Form and the Human Subjects Payment Log are to be used when the department is paying the human subjects or survey participants with cash or gift cards obtained with working funds. Only the Human Subject Payment Log is to be submitted to SRS for charging the project account. No human names are to be submitted to SRS that will tie the human subject to the actual research project account. The Principal Investigator (PI) is to keep the Payment Certification form with their confidential files.

The form for paying human subjects by check is the Research Participation Payment Request form. In order for this form to be compliant, the following procedure must be followed:

- The department will pay the human subject from a departmental clearing account. When ready to reimburse the clearing account from the actual research project account, the Human Subjects Payment Log will be submitted to SRS.
- The form will only contain the ID number the PI has assigned to the human subjects; no human subject names are to be submitted to SRS. This process keeps the human subjects' names from being tied to the actual research project account for which the individual has participated, making it compliant with HIPAA privacy rules.

This procedure is effective July 1, 2014. A frequently asked questions document is attached to assist with your implementation efforts.



Leo J. Paterra
Executive Director

cc: Dr. Jon Mogford