

## **Guidance: Expanded Forms of Payment for Human Subject Research Participants During the COVID 19 Pandemic**

As a result of the national health emergency declaration and the emergency declaration by the State of Maryland caused by the COVID 19 pandemic, JHU finance offices have approved the below interim guidelines and procedures to permit participant payments in approved human subject research protocols to utilize Venmo and Amazon Mechanical Turk for payments under the following conditions.

1. Payments must be for actual study visits, where the mode of intervention has been moved to virtual means, and the principal investigator has determined that the study population in general does not have a stable address to send payment by check or gift card.
2. The total payments to study subjects must not exceed two hundred dollars (\$200) in the calendar year. These options are temporary additions to the menu of options available when participants are paid \$200 or less during the year (e.g. petty cash, gift cards and certain Visa cards)

This approval is only for the duration of the state of emergency at the location for the research study that limits in person research interactions.

### **Approval Procedures**

Researchers must first submit a change in research to the responsible IRB describing the change in participant payment, and must update the risk section of the protocol to address the privacy risks to state that the vendor (i.e. Venmo, Amazon Mechanical Turk), the researchers may collect and use personal information (first and last name, email addresses, phone numbers, banking information) provided by participants, and must propose a supplemental consent to disclose these risks to subjects.

In addition to obtaining approval from the IRB, researchers must also obtain the approval of the business office submitting the Business Office Approval form to their DBO, who must approve and send to the email on the form.

### **Documentation Procedures**

Study teams must keep detailed records for all Venmo and Mechanical Turk charges by IO or grant number, and must maintain the Venmo and Mechanical Turk receipts if needed for audit purposes.

## Payment Set Up Procedures

### *Venmo*

PI must create a separate Venmo account, using their JHU JHED and JHU address. Personal employee Venmo accounts may not be used. The dedicated Venmo account must have account privacy settings set to **Private**, and the PI must confirm that the study participant has their own personal Venmo account. **Funds may not be sent to the Venmo account of anyone except the study participant.**

The School must commit to pay the Venmo fees (3% Venmo transaction fee plus a cash advance fee from the PCard being used). These fees may not be charged to grants. Departments are responsible for covering the costs if funds are sent to a Venmo account that is later determined to be fraudulent. Pcards may be linked to cover the Venmo charges but departments will be responsible for the cash advance fees associated with the use of the Pcard.

*Mechanical Turk* PI must create a separate Mechanical Turk account, using their JHU JHED and JHU address. Personal employee Mechanical Turk accounts may not be used. **Funds (Rewards) may not be paid to anyone except the study participant performing the requested task/survey.**

The School must commit to pay the Amazon Mechanical Turk fees (20% of the total Rewards fee plus any bonus fee). These fees may not be charged to grants. Departments are responsible for covering the costs if funds/rewards are paid to a Mechanical Turk study participant that is later determined to be fraudulent. Pcards may be linked to cover the Mechanical Turk charges up to their established Pcard limits.