

**Chapter 9**

**Subject Payments**

Subject payments and reimbursements to patients and volunteers for their participation in a study must be issued in accordance with the Human Subjects Committee and the R&D Committee approvals for the project.

For all such participation payments or reimbursements, appropriate language must be in the human subjects consent form or Health Insurance Portability and Accountability Act (HIPAA) addendum to notify the participant that the individual's Protected Health Information (PHI) will be released to SIBCR in order to process such payments. If the study will require release of PHI to SIBCR in order to pay for diagnostic tests not available at VAPSHCS and obtained from outside vendors for the participant, the consent form should also include this information.

Subject participation payments of \$600 or more in a given calendar year are taxable income and SIBCR is required to report the payment to the IRS and send an IRS 1099-MISC form to each such recipient. SIBCR therefore requires the Social Security Number and permanent mailing address of each individual to whom subject payments are made if it is possible this \$600 threshold will be reached.

NOTE: The \$600 threshold does not include reimbursement of costs (e.g., travel) incurred by study participants.