



New College of Florida Human Subjects Compensation Procedures

Section 1: Business Rule

This procedure provides guidance and direction for the compensation of human subjects for research purposes. Prior to conducting the research and offering participant incentives the research must be approved by the New College of Florida Institutional Review Board (IRB).¹

This document outlines two methods of compensating human subjects:

- 1) The use of an NCF approved vendor to recruit and compensate subjects for responding to a survey. These vendors include Prolific and CloudResearch. The use of either of these vendors requires a requisition and purchase order. If the research is grant-funded, the Office of Research Programs and Services (ORPS) will assist with the requisition and purchase order preparation. If the research is not grant-funded, the Principal Investigator (PI) will work with the appropriate fiscal liaison for their division, with technical support available from ORPS and Procurement.
- 2) The use of the NCF approved vendor Tango to distribute gift cards to compensate subjects for participating in research.

The procedures are developed to meet the needs of the research community, minimize the administrative burden, and comply with federal and tax reporting requirements.

Section 2: Stakeholders & Business Units

Principal Investigators; Division Fiscal Liaisons; and the Offices of Institutional Research and Assessment, Research Programs and Services, Internal Audit and Compliance, the Provost, Procurement, and Finance and Accounting.

Section 3: Purpose and Use of Compensation and Gift Cards

The College often conducts research where there is a requirement to obtain participation and/or collect information from participants. PIs frequently find it necessary to offer incentives in order to obtain sufficient participation. Compensation or gift cards may be used within the established guidelines to facilitate making payments to participants in research studies. These incentives are subject to Internal Revenue tax laws and there are specific rules that must be followed in order for the College to remain in compliance.

Gift Cards are for the sole purpose of research participant payments and cannot be used to pay trade suppliers for goods and/or services received and/or rendered or pay any type of wages for services rendered.

¹ An exception is made for institutional research conducted by the Office of Institutional Research and Assessment, which is exempted from IRB review.



Section 4: Who Can Receive Payments, Payment Limitations, and Required Documentation

New College of Florida is responsible for maintaining compliance with both the letter and intent of all federal, state and local laws. The Internal Revenue Service (IRS) considers gift cards as “cash or cash equivalents” and therefore the receipt of a gift card by a participant is treated the same as the receipt of cash. The participant’s U.S. residency status and relationship with the College will determine the tax reporting and documentation requirements needed.

US Person (US Citizen or US Resident)

The College is responsible for compliance with Internal Revenue Service (IRS) requirements for information reporting. Current IRS regulations require that cumulative annual payments greater than \$2,000 to an individual must be reported on form 1099-MISC by the entity that pays the subjects. Other special reporting rules apply to employees or nonresident aliens (NRAs). In complying with this reporting requirement, the College has established a threshold for compensation for a single study subject for non-College employees and non-NRAs. A single study may not exceed \$75 for a subject. The maximum cumulative payment to any individual in one calendar year cannot exceed \$200.

If the payments are made through a third-party vendor, such as Prolific, the PI is responsible for retaining participant logs and the system-generated report from the vendor. If participants are compensated with gift cards through Tango, recipients will be tracked through the Office of the Provost. PIs must provide a list of the gift card recipients and the amount of the gift card based on their anonymous unique ID to the gift card custodian (GCC). This unique ID will allow for the distribution of gift cards while protecting the anonymity of survey respondents. The unique ID consists of the **last two letters of the participant’s last name** followed by the **last four digits of their phone number** (e.g., NE4321).

Consent

Each individual research participant must sign a consent form describing how they will be compensated and what identifying information, if any, will be collected.

Restricted / Not Allowed

Because awarding gift cards or other compensation to the following individuals requires collecting private personnel information, they are **strictly prohibited**. All research participants will need to affirm on the survey that they do not belong to any of these restricted classes of individuals:

- Students of New College of Florida
- Employees of New College of Florida
- Non-Resident Aliens (NRAs)



Additional Compliance Notes

This procedural guide is intended only to be used for compensating human subjects in research studies. Gift cards may not be used as compensation for services.

Section 5: Process to Purchase Gift Cards

A. Completing a Purchase Order for Gift Cards

1. PI or designee will complete the [Human Subjects Payment Request Form](#).
2. If the total amount of compensation for the study is \$2,500 or less, the PI or designee will contact the GCC in the Office of the Provost (or ORPS if the study is grant-funded) who will use their Pcard on the Tango site. If the total study compensation exceeds \$2,500, then the usual NCF procurement process for generating a requisition and purchase order must be followed.
3. In either case, the backup documentation must include a Tango Invoice (Section 5B), the IRB approval notice, and the completed [Human Subjects Payment Request Form](#).
4. Procurement will process the purchase order.
5. Once a purchase order is received, send the purchase order and invoice to Accounts Payable for the payment to be processed. Include the invoice.
6. Once payment has cleared, the GCC will load amount into the PI's Tango account and the research may begin.

B. Generating a Tango Invoice

1. If you are not set up in Tango, contact the GCC in the Office of the Provost.
2. Once your account is activated, generate an invoice in Tango by following these steps:
 - a. Sign in to your Tango portal account
 - b. Navigate to Funding → Wallet
 - c. Click "Request an invoice"
 - d. Click "Generate an invoice"

Section 6: Tango Gift Card Administration

Gift cards are issued electronically via the Tango system. This system is compatible with Qualtrics. Access must be limited to authorized personnel only. PIs and their Divisions must maintain:

- Records of all gift card orders
- Distribution records
- Tango/Blackhawk system reports for reconciliation and audit purposes

Section 7: Distribution of Gift Cards

All distributions must be documented. Reports (downloaded from Tango) must be sent to the



GCC by the PI (or designee) by the first of each month and include:

- PI and Name of Study
- Date of gift card distribution
- Recipient Unique Identifier
- Recipient Email Address
- Gift card amount

Section 8: Reconciliation and Monitoring

Gift cards must be reconciled, at a minimum, monthly and at the end of the study. Reconciliation must verify:

- Gift cards issued
- Gift cards distributed
- Remaining balance (if applicable)
- Tango transaction reports must be used to support reconciliation.

Any discrepancies must be documented and reported to the Finance and the Provost's Offices immediately.

A. Records Retention

PIs and their divisions must maintain:

- Purchase requisitions and approvals
- IRB approvals
- Gift card distribution logs
- Reconciliation records
- Tango/Blackhawk system reports
- Records must be retained in accordance with College and sponsor requirements.

B. Compliance and Audit

Gift card processes are subject to internal and external audit. Failure to comply with this procedure may result in:

- Loss of purchasing privileges
- Required corrective actions

C. Forms & Related Policies

The Human Subjects Payment Request Form, a Dynamic Form, may be accessed on the NCF Institutional Review Board site under <https://www.ncf.edu/departments/research-programs-services/>