

ADVERTISEMENTS, RECRUITMENT METHODS AND COMPENSATION

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Unit: Human Research Protections Program (HRPP), Office of Research

Applies to: Institutional Review Board Committees

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PURPOSE:

potential subject and their privacy and confidentiality, it will be noted in the IRB C2's review checklist.

3. Upon assignment of a submission which indicates the use of recruitment materials and methods of compensation; IRB Committee members should review the application to determine if the following guidelines are met and document their findings using the *IRB Member Form: Advertisements and Recruitment Materials Checklist*

## Recruitment Methods

### Record Reviews

1. Potential subjects may be identified by Investigators using medical records, clinical databases or research databases. This process is often identified as "a record review".

- and the protocol. This is especially critical when a project may involve subjects who are likely to be vulnerable to undue influence.
3. Federal regulations require IRBs to review television, radio, videotape or print advertisements, e-mail solicitations, websites, social media postings, and other recruitment methods and materials intended to be used for the recruitment of prospective subjects.
  4. Advertisements used to recruit subjects include, but are not limited to:
    - a. Newspaper
    - b. Radio
    - c. Television
    - d. Bulletin boards
    - e. Posters
    - f. Social Media posts
    - g. Flyers that are intended for potential subjects
  5. IRB review is necessary to ensure that the information is not misleading to subjects, especially when the project may involve subjects considered vulnerable.

#### Internet, Online or Social Media Recruitment

1. IRB Committee members will review the use of the internet (online or social media) for recruitment. This review will include the method and content of the proposed recruitment.
2. Investigators must describe in their eBridge submission where and what listing is being used. Investigators must assure that the information shared for online recruitment is in accordance with their signed clinical trial agreement or grant.
  - a. If the proposed recruitment website or social media post includes risks and/or potential benefits or compensation information, the material must be reviewed and receive IRB approval prior to posting.
  - b. If the proposed online recruitment process (platform, website, or app) will collect any personal identifiable information from potential

- x *IRB Member SOP: Research with Subjects Likely to Manifest or Develop Decreased Decisional Ability*
- x *IRB SOP: Research Involving Economically or Educationally Disadvantaged Person*
- x *IRB SOP: Research Involving Native American or Alaskan Native Tribes*
- x *MCW Corporate Policy: Participation as Research Subjects (RS.HS.030)*

Other Federal Agency Requirements:

Several Federal Agencies have additional requirements to ensure the protection of human subjects for projects being funded or conducted under their oversight.

For projects receiving funding from the Department of Defense (DoD) or a component of the DoD, the following elements must be addressed in the eBridge submission:

1. When research involves U.S. military personnel additional protections for military research subjects to minimize undue influence include:
2. Officers are not permitted to influence the decision of their subordinates.
3. Officers and senior non-commissioned officers may not be present at the time of recruitment.
4. Officers and senior non-commissioned officers have a separate opportunity to participate.
5. When recruitment involves a percentage of a unit, an independent ombudsman is present.
6. When research involves U.S. military personnel, limitations on dual compensation:
7. Prohibit an individual from receiving pay of compensation for research during duty hours.
8. US military personnel may be compensated for research if the subject is involved in the research when not on duty.

For projects who are subject to the Department of Justice regulations and guidance:

1. For research conducted within the Bureau of Prisons:
  - a. The selection of subjects within any one organization must be equitable.
  - b. Incentives may not be offered to help persuade inmate subjects to participate. However, soft drinks and snacks to be consumed at the test setting may be offered.
  - c. Reasonable accommodations such as nominal monetary recompense for time and effort may be offered to non-confined research subjects who are both:
    - i. No longer in Bureau of Prisons custody.
    - ii. Participating in authorized research being conducted by Bureau employees or contractors

Compensation:

For Subjects:

1. Investigators may choose to provide compensation to subjects participating in their project. Compensation is not a requirement for a project and should be evaluated by both the Investigator and IRB to determine if appropriate for each specific project and subject population. The following compensation methods are permitted, and compensation should be distributed in accordance with *MCW Corporate Policy: Business Purchases, Payments and Reimbursements (BF.PA.010)* and *Office of Research Policy: Subject Payments for Research Participation*:
  - a. Monetary compensation. This includes check, cash, gift certificates, and prepaid debit cards.
  - b. Parking or travel reimbursement
  - c. Meal coupons
  - d. Items such as bags, blankets, pens, coolers, calendars, magnets, etc.

- e. Wearable Electronics
  - f. Medical Equipment – if provided to the subjects during the project and allowed to keep it after participation has ended. Examples include, but are not limited to:
    - i. Blood Pressure Cuffs
    - ii. Glucose meters
    - iii. Portable Electronic Devices
2. The IRB reviews and evaluates all compensation plans proposed on a project-by-project basis. In their review, IRB Committee members will evaluate the following components:

This policy is not intended to prohibit renegotiati