

Administration & Finance Policy

VCAF-001 – Collection of Personal Identifiers for Paid Clinical Trial Participants

Date: March 5, 2018

I. Purpose

University compliance with Subsection 6041 of the Internal Revenue Code

II. Definitions (if necessary)

- Participant identifiers- personal identifying information
 - May include: valid address, social security number and date of birth
- Form 1099-MISC- required by the IRS for income other than wages, salaries and tips
- ClinCard- Preloaded debit card sometimes issued to clinical trial participants
- Incentive - Payments to participants that are intended to support some of the costs (transportation and parking, for example) associated with their participation in a clinical trial.

III. Policy

In compliance with Subsection 6041 of the Internal Revenue Code, LSUHSC-NO Office of Supply Chain Management must issue a Form 1099-MISC annually to clinical trial participants who receive incentives for their participation via the ClinCard system.

In order to issue the Form 1099-MISC, certain participant identifiers must be collected, including full name, valid address and social security number at the time the clinical trial participant signs the Informed Consent Form. The LSUHSC-NO Institutional Review Board has determined that requesting this information is

appropriate and the LSUHSC-NO Office of Compliance believes sufficient privacy and access safeguards are in place to ensure the security of the information collected.

Clinical trial participants who do not wish to provide this information are not required to do so, but acknowledge that they will not be able to receive incentive payments or a preloaded ClinCard for their participation.

This policy is consistent with those both in the private sector and at other public universities.

IV. Procedures (if necessary)

None.