

### **5.3.9 Compensation for research -- Updated May 2024**

The NYC DOE has specific policies pertaining to study subject compensation.

#### **DOE Personnel Compensation**

- NYC Conflicts of Interest Rules prohibit teachers and other NYC DOE staff from receiving compensation in exchange for participation in research studies. Compensation/gifts that benefit the entire school may be donated directly to the school.
- Researchers may no longer contribute to a specific teacher or classroom. Contributions must be made to the school.
- Compensation can be in the form of gift cards given to the school or funds deposited into the school's bank account. Compensation for research must be used in alignment with the school's standard operating procedures. Any compensation of \$10,000 or more must go through the NYC Fund for Public Schools.
- Anything purchased by the school using funds received through research compensation belongs to the school. Individual school staff who participated in the research activities cannot be directly compensated, and items purchased using research compensation funds do not belong to any individual staff members.
- Exceptions to this policy are extremely rare and securing a waiver can be a lengthy process requiring a thorough review by the DOE Ethics Officer, the NYC Conflicts of Interest Board and, ultimately, the Office of the Schools Chancellor.
- Some DOE programs, especially Universal Pre-K programs, are located in Community-Based Organizations (CBOs). CBO staff are not members of the United Federation of Teachers and are not salaried DOE employees. Researchers conducting studies in CBOs should check with the CBO's leadership to determine whether staff in their facility can be compensated for participating in research.

#### **Quid Pro Quo Compensation**

- Compensation cannot be offered to schools on a quid pro quo basis, meaning the amount of compensation cannot be tied to the amount of research participation by the school. Quid pro quo compensation has the potential to compromise the voluntariness of the schools or individual research subjects' participation in the study.
- The following examples would be considered quid pro quo compensation and would not be allowed:
  - Basing the amount of a school donation on the number of teachers who agree to participate in the research.
  - Donating more to a school if teachers complete more data collection surveys.

## **Student Compensation**

- Gifts may be given to students for their participation. For elementary school students, stickers, pens, or gift cards not to exceed \$15 is allowed. For middle and high school students, the value of the incentive should not exceed \$25. Amounts beyond this could be coercive. Requests to compensate more than these amounts are reviewed on a case-by-case basis.

## **Parent Compensation**

- Compensation for parents/guardians can be based on the number of hours required for their participation in the research (for interviews, and focus groups) or per completed research activity (e.g., survey, interview) where the amount of time involved might vary depending on the type and number of research activities requested of parents. Compensation should not involve a sum of money that would be perceived as coercive (as determined during IRB review).

## **Other notes on compensation**

- Compensation may be monetary or non-monetary in nature. Reimbursement for out-of-pocket expenses is not considered compensation and, if applicable, should be described separately in the protocol and consent document.
- Research proposals will need to describe when and where study subjects will be compensated and detail the mechanisms that will be in place to ensure study subject privacy when distributing compensation.
- Research proposals may need to describe how participants will be compensated if they withdraw from the research.
- For example, explain if study subjects will be compensated for completing half of the proposed research procedures and specify how much they will receive for partial or incomplete participation.
- Raffles are not appropriate methods of compensation.

## **How the Board reviews compensation procedures**

The NYC DOE IRB considers the following when reviewing plans for compensating individual participants who are not DOE employees:

- Compensation must be fair, given the amount of time and effort participants must give to the research activities. Submissions may provide justification for the proposed amount of compensation.
- If the amount of compensation varies, the method for calculating the amount of compensation must be explained in the protocol and explained to participants.
- The timeframe and amount of compensation must be made clear to participants. If compensation is connected to completion of research activities, or distributed in phases, this must be clearly explained.

**The NYC DOE IRB considers the following when reviewing plans for compensating schools:**

- Compensation is distributed directly to the school.
- Compensation is not based on the amount of research participation in the school (such as, compensation based on the number of teachers who fill out a survey).
- Compensation may be based on the number of potential participants.
- The amount of school compensation must be clearly explained in the Principal Permission letter.
- If the amount of compensation varies, the method for calculating the amount of compensation must be explained in the protocol and explained to school principals.

**Compensation Procedures**

In the submission to the NYC DOE IRB, the researcher must clearly explain how any compensation will be distributed. If compensation will be distributed in person, this process must be explained. If compensation will be distributed electronically, this process must be explained, and the researcher must explain how they will collect any participant contact information, if that contact information will be connected with any research data, how the researcher will keep contact information collected for research separate from any research data (if applicable), and if they will keep the contact information for any other purposes.