

## Responsibility Reminder

2010

### **FINDER'S FEES**

Here at Compass IRB, we frequently get asked questions about whether or not it would be appropriate to include "finder fees" to subjects in order to increase subject recruitment. Compass IRB has documented discussions with the FDA regarding these types of inquiries from both 2006 and 2009 and the answer has remained constant that ***"finder's fees" to anyone are considered unacceptable.***

The main rationale for our position is that subjects may know some but not all of the entrance criteria and they may refer friends for inclusion in the study who would otherwise be excluded. Those friends could feel obligated to answer questions in a manner to ensure inclusion, in order to ensure the referral fee is paid. Using a research subject to recruit other subjects seems to fall more in line with the purpose of the marketing efforts of a site. Our Board feels the potential for such scenarios produces undue coercion.

We hope this information is useful. If you need further information and/or have additional questions, please feel free to contact us or you may also email your specific questions regarding this matter to the FDA's resource for GCP questions at the official GCP mailbox: [gcp.questions@fda.hhs.gov](mailto:gcp.questions@fda.hhs.gov).

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### **For your reference ....**

You may also find it useful to access the set of redacted GCP e-mails found at <http://www.fda.gov/ScienceResearch/SpecialTopics/RunningClinicalTrials/RepliestoInquiriesToFDAonGoodClinicalPractice/default.htm>. This may prove to be a valuable resource as many questions tend to repeat themselves.

If you have additional questions, please visit our FAQ section at [www.compassirb.com](http://www.compassirb.com) or feel free to contact us directly.