

Tax changes affecting payments to research participants

On January 1, 2026, the IRS reporting threshold for paying people to participate in research (e.g., stipends) increased from \$600 to \$2,000 per calendar year. This means IRS Form 1099s will be issued for research participants who are paid \$2000 or more in 2026. The reporting threshold will be adjusted for inflation annually.

As before, all compensation for participating in research is taxable income. Most participants will need to provide a social security number or taxpayer ID at the start of the study to receive compensation.

As before, reimbursements for expenses related to research participation are not taxable. Participants will need to provide receipts to receive reimbursement.

COMIRB has updated our biomedical consent template and our standard language options resource document with the following language:

Will I be paid for being in the study?

[Choose and edit the most appropriate statement. If participants will be paid, explain how they will be paid (e.g., debit card), the payment schedule, and how payments will be prorated if the participant does not complete the entire study.]

[Option 1]

You will not be paid to be in the study.

[Option 2]

You will be paid [\$] for each visit in this study. This will add up to a total of [\$] if you complete all of the visits. If you leave the study early, you will be paid only for the visits you have completed. You will receive these payments by [debit card].

These payments are taxable under Internal Revenue Service (IRS) rules. For this reason, you may be asked to complete a W-9 and/or provide your social security number or taxpayer identification number. We cannot pay you for being in this study without this information. As of 2026, if we pay you a total of \$2,000 or more for participation in this and/or other studies during the calendar year, we are required to issue a 1099 form to the IRS. The reporting threshold (\$2000 in 2026) will adjust each year thereafter for inflation thereafter.

Do active participants need to re-consent?

Active participants should to be notified about the change. Since the new threshold has been raised, COMIRB will not require re-consent as long as study teams document that their participants have been notified about the change. However, check with your sponsor to see if they require re-consent.

Study teams can notify active participants using one of the methods below. Consent forms should be amended for new participants as soon as possible. When you submit an amendment for an updated consent form, check the box on the change form to let us know whether you intend to re-consent active participants.

The following notification options have been pre-approved by COMIRB and do not require study specific amendments:

1. Notify participants verbally the next time you speak with them. Use the template language below as a script.
2. Provide participants an information sheet at their next visit. Use the template language below for the information sheet.
3. Notify participants by email if you are already approved to use email for study communications. Use the template language below for the email message.

In each of the cases above, include this guidance document in your study records, and record the date and time you notified each participant.

If a payment vendor, involved health system, or sponsor has independently notified participants of this tax change, the study team does not need to re-notify their participants. Record in your study records how participants were notified and by whom.

Template language for participant notification (minor editorial changes are acceptable):

Thank you for participating in our study. We appreciate your time and effort.

We want to let you know about a change in the tax law that may affect you. For 2026, the IRS reporting threshold for paying research participants increased from \$600 to \$2,000. This means an IRS Form 1099 will be issued for you if you receive a total of \$2000 or more in 2026 for participating in research. The reporting threshold will be adjusted annually for inflation in 2027 and beyond.

As before, any payments you receive for participating in research are taxable income. This change only affects when a Form 1099 needs to be issued. If you have any questions we are happy to answer those for you.

Again, thank you for being part of our study.

Situations where notification is not required:

If your participants are recruited from the general community and are paid through university systems and are paid less than \$100, notification is not required.