

Institutional Review Board

Research Participant Payments and Tax Reporting Requirement Update and FAQ

(Effective January 1, 2026)

The IRS reporting threshold for research participant payments has increased from \$600 to \$2,000 per calendar year effective January 1, 2026. Payments to non-employees of Duke University totaling \$2,000 or more will be reported via Form 1099 (Miscellaneous Income), and all research payments remain taxable income. New or amended consent forms must include the templated language explaining the new threshold. For ongoing studies with previously approved consent forms, study teams must either provide participants with the information sheet or provide participants verbal notification and update consent forms at the next IRB modification or continuing review.

1. What changed on January 1, 2026?

Starting January 1, 2026, Duke University will issue a Form 1099 (Miscellaneous Income) to non-employees who receive \$2,000 or more in research participant payments during a calendar year. This replaces the prior \$600 reporting threshold.

This change is the result of federal tax legislation commonly referred to as the “One Big Beautiful Bill,” which amended IRS information reporting thresholds.

2. What is the new templated consent language for projects on or after January 1, 2026?

For studies starting on or after January 1, 2026, or for studies updating their consent forms, study teams should use the following standard templated language in the “Payment,” “Compensation,” or “Costs and Payments” section of the consent form:

“Payment received as compensation for participation in research is considered taxable income to the research participant. Research participant payments to a non-employee of Duke University adding up to \$2,000 or more during any calendar year will result in a Form 1099 (Miscellaneous Income) being issued to the payment recipient and a copy sent to the Internal Revenue Service (IRS).”

Study teams should not reference prior reporting thresholds (e.g., \$600) in consent forms used on or after January 1, 2026.

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3. Does this mean payments under \$2,000 are not taxable?

No. All payments for research participation continue to be considered taxable income, regardless of amount. The \$2,000 threshold only determines when Duke University is required to issue a Form 1099.

Duke University employees will continue to receive a 1099 (Miscellaneous Income) form regardless of the total amount paid.

4. What should study teams do if a currently approved consent form still lists the old \$600 reporting threshold?

If a consent form approved before January 1, 2026 still references the former \$600 IRS reporting threshold, study teams do not need to immediately halt enrollment or re-consent participants solely for this reason. Study teams should revise the language at the time of their next planned modification or continuing review

Until the consent form is updated and IRB approved, study teams should:

- Provide participants with the Tax Requirement Update Information Sheet, or
- Verbally inform participants that the federal reporting threshold has changed to \$2,000, effective January 1, 2026

Regardless of whether the information sheet is provided or participants are verbally informed, the participant's consent record should be updated to reflect receipt of the tax reporting requirements change. The information sheet provided by the DUHS IRB does not need to be reviewed and approved on a study-by-study basis and can be used starting January 1, 2026, provided the only customization is the inclusion of the study title as identified in the information sheet.

5. Is reconsent necessary when the sole revision is the inclusion of threshold language and participants have already been notified?

No. Either providing participants with the information sheet or verbal notification as described in #3 is sufficient notification for the updated tax reporting threshold. Because this revision does not require a standalone modification submission, whether reconsent using a revised consent form is required will depend on any additional changes requested at the time of review.