
**2319: PAYMENT TO INDIVIDUALS FOR HUMAN SUBJECT FEES,
HONORARIA, LIMITED ENGAGEMENTS, AND
INDEPENDENT CONTRACTOR SERVICES**

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Responsible Office: Comptroller
Approval: Comptroller

PURPOSE

To describe the proper handling of payments to, and procurement from, non-employees performing services in support of the University's operations and to establish responsibility for the approval of such payments.

DEFINITIONS

Hiring Manager

The individual responsible for the hiring of a temporary employee or for procuring services of an independent contractor.

Human Subject Fee

A human subject fee is a payment that represents remuneration and/or reimbursement to individuals participating as subjects in a research project

Honoraria

An honorarium payment is a gratuitous payment of money or other thing of value to a person for the person's participation in a usual academic activity for which no fee is legally required. Honorarium payments are provided as a token of appreciation for participation in an activity or event, and not as a contractual obligation to pay for services rendered.

Limited Engagement

A Limited Engagement is a service provided by an individual who performs a one-time service, or one time per calendar year for the following service types only:

- Academic guest speaker, artist, presenter, or special lecturer
- Distinguished guest speakers at University functions

Independent Contractor

An independent contractor is a non-employee, as determined by the University according to applicable law and the procedures set forth below.

POLICY

1. It is the responsibility of the person initiating the payment request (hiring manager) to follow the guidance of the policies listed below for each category of payment being made to an individual.
2. Individuals who are currently employees of the University, University of Pennsylvania Health System (UPHS) or a subsidiary or individuals who have been employees of the University, UPHS or a subsidiary would be compensated through the University's payroll. Payments to the preceding must be made pursuant to [Policy #2320 – Extra Compensation for University Employees](#).
3. The payment of Human Subject Fees to non-employees must be made pursuant to [Policy #2319.1 - Payment of Human Subject Fees](#).
4. The payment of Honoraria to non-employees must be made pursuant to [Policy #2319.2 – Payments Made for Honoraria](#).
5. Payments to non-employees for Limited Engagements must be made pursuant to [Policy #2319.3 – Payments Made for Limited Engagements](#).
6. Payments to Independent Contractors must be made pursuant to [Policy #2319.4- Procurement – Procurement, Payment, and Reporting of Independent Contractors](#).

3. The [Office of the Comptroller](#) is responsible for ensuring that applicable governmental regulations regarding tax withholding and reporting are followed.
4. A university purchase order must be issued for consulting services from an external supplier. All supporting documentation, including formal agreement or contract must be forwarded to Purchasing Services for review and approval, prior to final purchase order approval by Purchasing Services.
5. Payments for honoraria, lecture fees and human subject fees that are made to non-employees (see Policy [#2319.2](#) - Payment to Individuals) must include appropriate documentation, e.g., lecture notice.
6. Any payment requests for non-employees must include the payee's valid tax payer identification number (W-9).