



Procedures for Processing
and
Distributing Participant Payments within
Research and/or Sponsored Activities

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1. INTRODUCTION

1.1. Overview

The Division of Research Administration, in collaboration with the Division of Business and Finance of Saint Louis University, instituted a policy to outline participant payments regardless of the source of funding. The policy is entitled “Policy on Participant Payments within Research and/or Sponsored Activities” (RA-022) referenced hereafter as the policy.

In support of the new policy, the University has created this Procedures Manual to offer guidance on the different avenues available to the University community with which to pay participants, as well as to outline the appropriate circumstances under which each payment mechanism should be employed in any sponsored activity program, including research studies.

As specified in the Policy, the various participant payment mechanisms include:

- Gift cards, see Section 2.2
- ClinCard, see Section 2.6
- University payroll, see Section 2.3
- eSeeDPV, see Section 2.4

Although the above payment mechanisms remain as alternative options available for use in circumstances outlined herein, the University strongly encourages the use of the ClinCard.

The ClinCard payment mechanism provides prompt and efficient payment to participants once approved by the research team (defined below in section 1.2.1). Approved payment can be immediately accessed by the Participant to be used as a pre-loaded MasterCard. By centralizing the Participant payment through the ClinCard, the University can streamline its processes in order to operate in compliance with Internal Revenue Service (IRS) reporting regulations. Furthermore, the ClinCard system will increase security and decrease liability to both University community and Participants by limiting the use of cash and gift cards for Participant payments.

If you are uncertain that the ClinCard will be the most useful tool available for your sponsored activity, please contact the Office of Sponsored Program Administration (OSPA) via email at slucard@slu.edu or by calling (314) 977-7742.

1.2. Responsibilities

1.2.1 Research Team

The research team will consist of the Principal Investigator (PI), co-Investigators and the research staff designated by the PI (hereinafter the Research Team). The Research Team is responsible for developing project budget and for assuring that Participant payments are issued in accordance with the policy RA-022 entitled “Policy on Participant Payments within Research and/or Sponsored Activities”.

The Research Team is responsible for the following items:

- 1) Identifying the purpose, nature, method and dollar amount of all payments made by the University to Participants;
- 2) Budgeting within their award/proposal the related costs associated with Participant payments, including any fees associated with the payment mechanism, and the payment amount associated with the study milestone. For example, ClinCard charges \$3.50 per card and \$1.00 to load the Participant payment. In cases where the Participant is also an employee of the University, the PI will also need to budget for the associated fringe and benefit expense related to these participant payments found in the link here <http://www.slu.edu/busfin/departments/financial-planning-and-budget/fringe-benefit-rate-schedules>.
- 3) Informing the Participant on usage and access of the ClinCard and its portal;
- 4) Collecting required Participant data prior to issuing the payment:
 - a) name
 - b) nine-digit social security number
 - c) mailing address
 - d) contact email address or phone number
 - e) signature;
- 5) The physical security of gift cards and/or unissued ClinCard stock;
- 6) Collecting required data for issuance of any other form of payment (Gift Card, University Payroll System, or Direct Payment);
- 7) Initiating payments;
- 8) Recording the study and participant visit information within the ClinCard portal or Department Card payment log;
- 9) Reconciling participant payments for accuracy; and
- 10) The accuracy of the data received.

1.2.2 Departments

Each department executive official (e.g. Chair, Division/Program Director or School Dean) is responsible for establishing and maintaining an environment for research that requires all members of the research team to be both knowledgeable of and compliant with all policies and regulations governing the conduct of research and sponsored activity. The approval of a protocol by the Executive Official acknowledges that the Research Team is both knowledgeable of and in compliance with the protocol's requirements. Departments may implement additional procedures to assist the Research Team and department in both fiscal and operational management of research studies and sponsored activities. An Executive Official may delegate responsibilities under this Policy; however, the Executive Official remains ultimately responsible for compliance with this policy.

1.2.3 Clinical Trial Office (CTO)

The CTO is responsible for the development and approval of industry sponsored budgets for clinical trials and will ensure the budget is sufficient to cover the cost of the ClinCard for stipend payments as applicable. The CTO will continue to enter clinical trial studies with their budgets in the Merge Clinical Trials Management System ("Merge") which will document any approved

stipend amount per visit; and will track payments from sponsors in this system. The CTO will collaborate with OSPA to reconcile Participant payments recorded within the ClinCard portal and in Merge. The CTO will collaborate with the IRB on the review of the payment section in the informed consent forms prior to approval to ensure they match any funded budgets.

1.2.4 Office of Sponsored Programs Administration (OSPA)

The OSPA is responsible for managing the ClinCard portal which will include managing the ClinCard system access and establishing all new studies within the ClinCard system. OSPA will also maintain, track, and safe-guard an inventory of ClinCards to be issued to requesting Research Teams. OSPA will provide trainings and support to the University community and management of the slucard@slu.edu email address.

1.2.5 Institutional Review Board (IRB)

The IRB is responsible for ensuring that the applicable guidelines for Participant payments are included within the informed consent documents and are incorporated in the IRB review process.

1.2.6 Payroll Office

The Payroll Office within the Human Resources Division is responsible for the issuance of IRS Form W-2 to Participants who also received a payment during the calendar year from the University's Payroll System. The Payroll Office is also responsible for the reporting requirements within the University's Additive Pay process and withholding taxes on payments as deemed appropriate.

1.2.7 Office of the Controller

The Central Processing Center (CPC) of the Office of the Controller of the Business and Finance Division is responsible for downloading the payment data from the ClinCard portal, creating corresponding ledger entries in Banner, and maintaining a sufficient balance within the ClinCard pre-paid balance sheet account to accommodate the collective outflow of Participant payments. The CPC is also responsible for the issuance of IRS Form 1099-MISC to Participants when their total compensation is \$600 or more per calendar year.

1.3 Definitions

See [Definitions Relating to Sponsored Projects at Saint Louis University](#)

2.0 STUDY SET UP

2.1 Determine method for Participant Payment

Payments issued by the University to participants will be delivered by one of the following four payment methods: Gift Card, ClinCard, University Payroll System, or Direct Payments to Nonresident Aliens. The appropriate payment method is determined by Participant payment amount, University employment status, and citizenship. The Research Team may use ClinCard regardless of the payment amount, except when the Research Participant is a Student Worker or Nonresident Alien.

- a) **Gift Card:** A Participant payment amount of \$25 or less may be made by gift card as long as the aggregate does not exceed \$100 in a calendar year. Participants, who are also employees, are not eligible to receive their Participant payment by gift card. Payment by gift card will not require the University to collect the Participant's name, nine-digit social security number, mailing address, or other contact information.
- b) **ClinCard:** A secure reloadable debit card will be used for all Participant payments greater than \$25, and when the aggregate amount of Participant payments exceeds \$100 in a calendar year (e.g., 5 payments of \$25 per payment). The ClinCard payment method will require the University to collect the Participant's name, nine-digit social security number, mailing address, email address and/or other contact information. A completed IRS Federal Form W-9, Request for Taxpayer Identification Number and Certification or approved intake form, will be submitted before a ClinCard will be issued. ClinCards have usage fees, currently \$3.50 for card issuance and \$1 for each payment that is loaded onto the card. These fees must be included in the project/proposal budget and/or within the Award paid for by the project sponsor or the Department or the PI. These fees are separate from the compensation being provided to the Participant for their participation.
- c) **University Payroll System:** In cases where the Participant is also an on-going recipient of any form of compensation through the University's Payroll System (e.g., full-time employee, graduate student, etc.), the Participant may receive their Participant payments through ClinCard or Payroll, dependent upon the employee's preference. Student Workers must receive their Participant Payments through Payroll. Regardless of payment method and payment amount, the University will withhold income taxes on Participant Payments in accordance with the IRS Federal Withholding Form W-4 (if paid by ClinCard, withholding will occur from a future paycheck).
- d) **Direct Payment to Nonresident Aliens:** Regardless of dollar amount, all nonresident aliens will receive their Participant payment through the eSeePay Direct Payment System due to the immigration and taxation documentation associated with payments to nonresident aliens as imposed by Homeland Security and the Internal Revenue Service.

PAYMENT ELIGIBILITY BY CATEGORY				
PARTICIPANT TYPE	Gift Card*	ClinCard	Payroll	eSeeDPV
Research Participant not employed by SLU in calendar year	✓	✓		
SLU Employees paid wages by SLU in calendar year <i>(Note that taxes will be withheld on the employee's W-2 regardless of payment type.)</i>		✓	✓	
Student Worker paid wages by SLU in calendar year			✓	
SLU Students not employed by SLU	✓	✓		
Nonresident Aliens				✓

*Based on description on article 2.1 a) above.

2.2 Recording of Payments to Research Participants via Gift Card

Payments issued by the University in the form of a gift card will be submitted for approval and recorded within the University's accounting system. Gift card purchases will be initiated by the Research Team's department through the eSeePay Direct Payment System as a Patient Study Advance. The Research Team is responsible for tracking the purchase, receipt and distribution of gift cards on a departmental [Department Card Study Log](#). Departments are also responsible for safe-guarding the gift cards until distribution.

- a) For Participant payments approved for a gift card, the Research Team may submit an eSeePay request by selecting the Patient Study Advance payment type.
- b) ESeePay can be payable to an employee (e.g., study coordinator, PI, or vendor from where cards will be obtained).
- c) Number of cards requested and amount of each card should be identified in the document text.
- d) If use of the gift card payment mechanism was approved via the exception process, the approved Participant Payment Exception Request Form should be uploaded to webxtender as backup to support the approved gift card request.
- e) All non-grant funds requested and approved for gift cards will be expensed at the time the eSeePay is processed and approved. A [Department Card Study Log](#) must be maintained that documents the purchase and issuance of the gift cards.
- f) All grant funds (ledger 3) requested and approved for gift cards will be deferred to 012200-168500. A reconciliation form (PSCAR) must be processed and approved in order for ledger 3 funds to be charged for subject payments, in addition to maintaining the department log. The PSCAR document needs to be completed identifying the recipient of the gift card and date of card issuance. In

cases of confidentiality whereas a name cannot be identified, a subject patient identifier can be used. The grant fund number to charge and the originating DPV number need to be included on the form. The receipt from the purchase of the cards needs to be attached to the PSCAR. PSCARs need to be submitted monthly, and include the number of cards on hand if an inventory remains from the initial purchase. PSCARs should not combine multiple DPVs. PSCARs must be reviewed and approved by Business and Finance or MC Finance.

Find out more at <https://www.slu.edu/Documents/busfin/PSCAR.pdf>.

- g) Expense allocation for Participant payments via gift card will be recorded in Account 741010 – Participant payment.

2.3 Recording of Payments to Research Participants via Payroll System (Additive Pay)

Payments issued by the University in the form of Additive Pay will be recorded within the University's accounting system via the Payroll Department, and the employee will find payment in their normal payroll.

2.4 Recording of Payments to Research Participants via Direct Payments

Payments issued by the University in the form of a Direct Payment will be recorded within the University's accounting system. Payments to research participants that are not processed through Merge follow the same procedure as a new vendor in Banner. DPV is the Direct Pay Voucher that is initiated by the department and routes through CPC (Central Processing Center) for review and approval. The department completes the master vendor form and forwards it to eseepay@list.slu.edu along with the W-9 for vendor set up. Checks are printed and mailed directly to the participant. ACH Direct Deposit is also an option for these payments. The recipient's banking information is on file. The funds are sent electronically to their bank and they receive an email notification when the funds are transferred. If the payee is an employee, Banner will not allow the payment to be used and then the department will process the additive pay.

2.5 Recording of Payments to Research Participants who are also Nonresident Aliens

Payments issued by the University to Nonresident Aliens will be recorded within the University's accounting system. The department completes the master vendor form and forwards it to eseepay@list.slu.edu along with the W8BEN form for vendor setup. The payments are generated by the department via DPV. If the payee is an employee, Banner will not allow the payment to be used and then the department will process the additive pay.

2.6 Recording of Payments to Research Participants via ClinCard

Payments issued by the University in the form of a ClinCard will be recorded within the University's accounting system. The Research Team will submit a [ClinCard Study Request Form](#) to the OSPA via slucard@slu.edu. Upon receipt of the request form, OSPA will send the Research Team a ClinCard Study Set Up Form. OSPA will enter the study onto the ClinCard portal according to the information provided on the [ClinCard Study Set Up Form](#). Once

obtained, ClinCards will be safe-guarded by the Research Team until distribution to the Research Participant. Upon distribution, ClinCards will be recorded within the corresponding study or sponsored activity's ClinCard portal by the Research Team. Departments can obtain reports on payments to participants via the ClinCard portal.

a) Recording expense types:

- Expense allocation for Participant payments to Participants not employed by the University, including the \$1.00 per transaction load fee, will be recorded in Account 741010 – Participant Payment.
- Expense allocation for the \$3.50 initial cost of the ClinCard will be recorded in Account 741010 – Participant Payment, Activity Code CLNCRD.
- Expense allocation for Participant Payments for reimbursing the Participant for expenses incurred (for example, Travel Costs) via ClinCard will be recorded in Account 784517 – Participant Support.
- In cases where the Participant also receives any form of compensation through the University's payroll system during the same calendar year, with the exception of student workers, the Research Team will need to account for the additional costs of the related Fringe Benefits and employer portion of FICA. The Participant payment amount, including the \$1.00 per transaction load fee, will be recorded as follows:
 - Account 618000 – Participant Payment, Employee
 - Account 668000 – Participant Payment, Student
 - Account 688000 – Participant Payment, Resident

2.7 ClinCard Study Set Up Form

The ClinCard Study Set Up Form is available on the SLU- Division of Research website under the ClinCard page at: <http://www.slu.edu/division-of-research-administration-home>.

The Research Team must complete the following five sections on the Setup Form:

- **Cards:** Enter the number of ClinCards anticipated to be used for the entire study and when the cards will be needed.
- **Sites:** Enter the location information for the study site(s).
- **Study:** Enter the appropriate information for the study.
- **Study Payment Schedule:** Enter the appropriate information for the schedule of Participant Payments.
- **Users:** Enter the appropriate information for the users for this study. Only request the number of users required to effectively administer the study, and be cognizant that each user represents a cost to the University. The minimum number of anticipated users for each study is three, the PI and two departmental personnel. Available roles within the ClinCard portal are:

Site Coordinator: User is a member of the Research Team authorized to register participants in the ClinCard portal, assign/replace ClinCards to Participants, request site visit payments, and opt-in participants for messaging or schedule appointment reminders. The user is restricted to viewing only the Participants

registered to their associated site and study. Under normal circumstances, the Site Coordinator will not have a dual role of Approver.

Approver: User is a member of the Research Team authorized to view pending Participant Payment requests for manual payments and reimbursement amounts in the Greenphire ClinCard portal and approve/decline them as necessary. Once approved, payments are loaded on the Participant's ClinCard. Note that pre-defined payments according to the sponsor's approved payment schedule will not require an Approver's authorization.

Report Reviewer: User is authorized to view "on demand" reports available on the ClinCard portal.

Admin User: User is authorized to add studies, edit current studies, maintain study payments, and maintain and grant access to users associated with each study in the ClinCard portal. This role is currently restricted to OSPA personnel.

The PI and Department/Division Business Manager must sign the ClinCard Study Request Form as evidence of their review and approval. The form will then be emailed to slucard@slu.edu. By emailing this form, the PI is formally authorizing the setup of the permissions in the ClinCard portal according to the information included on the form. It may take up to five (5) business days for a study to be setup in the ClinCard portal.

2.8 ClinCard Pickup and Tracking

The ClinCard Request Form can be accessed from the Division of Research website ClinCard menu at: <http://www.slu.edu/division-of-research-administration-home>.

The responsible department personnel must complete the top portion of the form. The PI must sign the ClinCard Request Form as evidence of their review and approval. The form will then be emailed to slucard@slu.edu.

The Office of Sponsored Programs Administration (OSPA) will schedule the pickup of the requested ClinCards with the responsible department personnel identified on the ClinCard Request Form. At ClinCard pickup, the remainder of the ClinCard Request Form will be completed. The original will be maintained by OSPA and a copy provided to the person picking up the batch of cards.

Having received the first batch of ClinCards for a study, the responsible department personnel must start the [Department Card Study Log](#), which can be accessed on the Division of Research Administration website <http://www.slu.edu/division-of-research-administration-home>.

2.9 Payment Method Exception Process

In rare instances, a PI may request an exception to the payment method policy by submitting the Participant Payment Exception Request Form. Requests will be carefully considered

assessing the risk or potential harm to the Participants (such as breach of confidentiality) or the study. This request will take into account the unique circumstances of the individual study, protocol, and sponsored activity. Completed forms can be emailed to slucard@slu.edu for consideration. The Vice President for Research or authorized designee can approve or deny the exception request. The form can be found here <http://www.slu.edu/division-of-research-administration-home>.

3.0 STUDY MANAGEMENT

3.1 IRS Federal Form W-9

A blank W-9 can be accessed from Business & Finance at <http://www.slu.edu/busfin/taxes/irs-form-w-9>. Compensation for participating in a research study or sponsored activity is taxable income. In order to participate in the study, the Site Coordinator must obtain a signed IRS Federal Form W-9 for each non-employee participant and store it securely and send a digital copy to slucard@slu.edu.

A **signed** In-Take Form remains an acceptable alternative to the Federal Form W-9, provided it includes the **same and all** of the following information; name, address, social security number, signature.

Note: The reimbursement of actual expenses incurred by the Participant is not taxable income.

3.2 ClinCard Participant Registration

Each participant being compensated using the ClinCard portal must be registered in the ClinCard system. The ClinCard Admin portal can be accessed at <https://clincard.com/login/>

If the Research Participant is new to the ClinCard system, the Site Coordinator will enroll the Research Participant in the ClinCard system and assign the Participant to the specific study. (Please see the ClinCard Reference Guide for all pertinent instructions on the ClinCard system. PDF documents are available by clicking support after the user signs into the system.)

If the Participant is already registered in the ClinCard system under a different Saint Louis University study, the Site Coordinator will assign the Participant to the new study.

3.3 ClinCard Participant Payments

After the study visit is complete, the Site Coordinator will request the payment according to the approved payment schedule in the ClinCard portal. For manual or unscheduled payments only, the approver will log into the ClinCard portal to review the manual payment and approve or deny the request. Once approved, the payment will be loaded to the Participant's assigned ClinCard and will be available for immediate use. The Participant can verify all transactions on their account, including the loading of site visit payments, by logging into their ClinCard Account.

3.4 Study Log

If a new ClinCard was issued to the Research Participant, the Site Coordinator must update the [Department Card Study Log](#) started in Section 2.8- ClinCard Pickup and Tracking. The Site Coordinator will also confirm the balance of cards on hand for the study.

If a gift card was issued to the Participant, the Site Coordinator must update the gift card Study Log started in Section 2.3 Recording of Payments to Participants via gift card. The Site Coordinator will also confirm the balance of cards on hand for the study.

The PI, or designee, will monitor their Study Logs, and reconcile on a monthly basis: the number of issued ClinCards or Gift Cards, the payments issued by the study on ClinCards or Gift Cards, and the number of completed study appointments.

3.5 Quarterly Reconciliations

For gift card payments funded by external sponsors, the Research Team must complete and submit a “PSCAR document” to the OSPA before the award end date. This quarterly reconciliation will account for all funds received and distributed on the specific award, including all Participant payments despite payment method. Any funds remaining will be returned to the appropriate fund. Any missing funds must be replaced by departmental funds. In addition, the following reconciliations will be performed for all studies that have study Participants:

	Reconciliation	Process	Purpose
1	Monthly or Quarterly Study Participants (Upstream)	Review study log against the individuals who received a payment from the study	To make sure all payments were made to participants enrolled in that specific study.
2	Monthly or Quarterly Study Participants (Downstream)	Review payments against the study log	Looking for missing subjects. To make sure that expected participants are in fact being paid on the proper study.
3	Monthly or Quarterly Study payments	Review total study payments verses YTD costs charged to award.	To make sure inappropriate costs have not been charged to the award.
4	Monthly or Quarterly Cards issued	Review number of ClinCards purchased verses cards issued, verses unissued cards remaining.	To account for all cards issued to the award.
5	End of award	Review total study payments against the award budget.	To ensure the charges to the award are what was expected and are proper.

6	End of award	Review total cards ordered, total cards issued, and total unissued cards, send unissued cards to OSPA for credit on award.	To ensure charges for the cards are appropriate and charged to the correct award.
7	Closeout	Review value of unissued cards sent back to OSPA against the credit for the return in Banner.	To remove unallowable costs and ensure costs for the cards are appropriate.

4.0 STUDY CLOSEOUT

4.1 Closeout Notification

When a study has been completed or coming to an end, the PI or designee must notify the OSPA that the study is complete and no additional ClinCards will be issued or payments requested and authorized. This notification will be sent by email to slucard@slu.edu and must indicate the balance of ClinCards on hand at the end of the study.

4.2 Returning Un-Issued ClinCards

If the Department Card Study Log shows a balance of ClinCards on hand at the conclusion of the study, the responsible department personnel will email a ClinCard Relinquishment Form to OSPA at slucard@slu.edu to schedule the return of the cards to OSPA, and initiate a journal entry to return the \$3.50 cost of the un-used card(s) to the appropriate fund.

5.0 ADMINISTRATIVE TASKS

When entering participant data into the ClinCard web portal all Research Team members or Users need to use the following consistent nomenclature or naming conventions for proper recording of such payments for reporting and accounting requirements.

1) For Study Set-Up:

Under Study Name you will find the Fund#/IRB#/Protocol#/eRS#

2) For Subject Registration:

SubjectID

➔ First four letters of the last name, following by date of birth (DOB)

Example: LEIV020290

➔ For University employees you will add a dash –E at the end (very important)

Example for University employee: LEIV020290-E

ANONY+DOB

Example: ANONY121260

- If there is already an anonymous participant with the same DOB then the next numbering will be added a dash1

Example: ANONY121260-1 (or 2 or three of the next available number) and so on...

Study

- ➔ Here you will select from the draw down listing the correct study to which you are trying to pay/enroll/screen the participant under

Subject Status

- ➔ Select whether the participant has been “enrolled” etc.

The rest of the form needs to be completed in its entirety such as Name, Address, DOB, Subject Email, Subject Cell Phone, Initials and Social Security Number (unless this is a study in which it has been pre-determined to not require it).

6.0 FORMS

ClinCard program related policy, procedural manual (this document) and related forms may be found by accessing the Saint Louis University, Division of Research website at:

<http://www.slu.edu/division-of-research-administration-home>.