

Making Payments to Research Study Participants

April 24, 2019

1. Introduction

Purpose

- Understand Research and Finance Elements of Research Study Participants
- How to address deviations
 - Consent form deviations
 - Forms of payments, timing, etc.

A Research Study Participant (RSP) is

A living individual (aka human subject) about whom a Principal Investigator conducting research obtains:

- 1) Data through intervention or interaction with the individual or
- 2) Identifiable private information.

Whenever a research study includes human subjects, there are certain requirements and processes that must be completed prior to engaging human subjects and throughout the study. We have invited the experts here today to discuss those requirements.

Sometimes RSPs may be offered payment (e.g. cash, check, gift cards) for their participation in a research study.

Partial List of UMB Constituents

Office of Research and Development:

- Clinical Trials and Corporate Contracts
- Sponsored Programs Administration

Office of Accountability and Compliance:

- Human Research Protections (HRP) Office
- Institutional Review Board

Administration and Finance:

- Financial Services
- Management Advisory Services
- Sponsored Projects Accounting and Compliance

Finance

For Finance, “Research Study” refers to

- A study that has been approved by the UMB Institutional Review Board (IRB)

and

- Recorded as Restricted Funds
(e.g. PCBU 00180 series: 00184, 00185, etc.)

How Finance Works

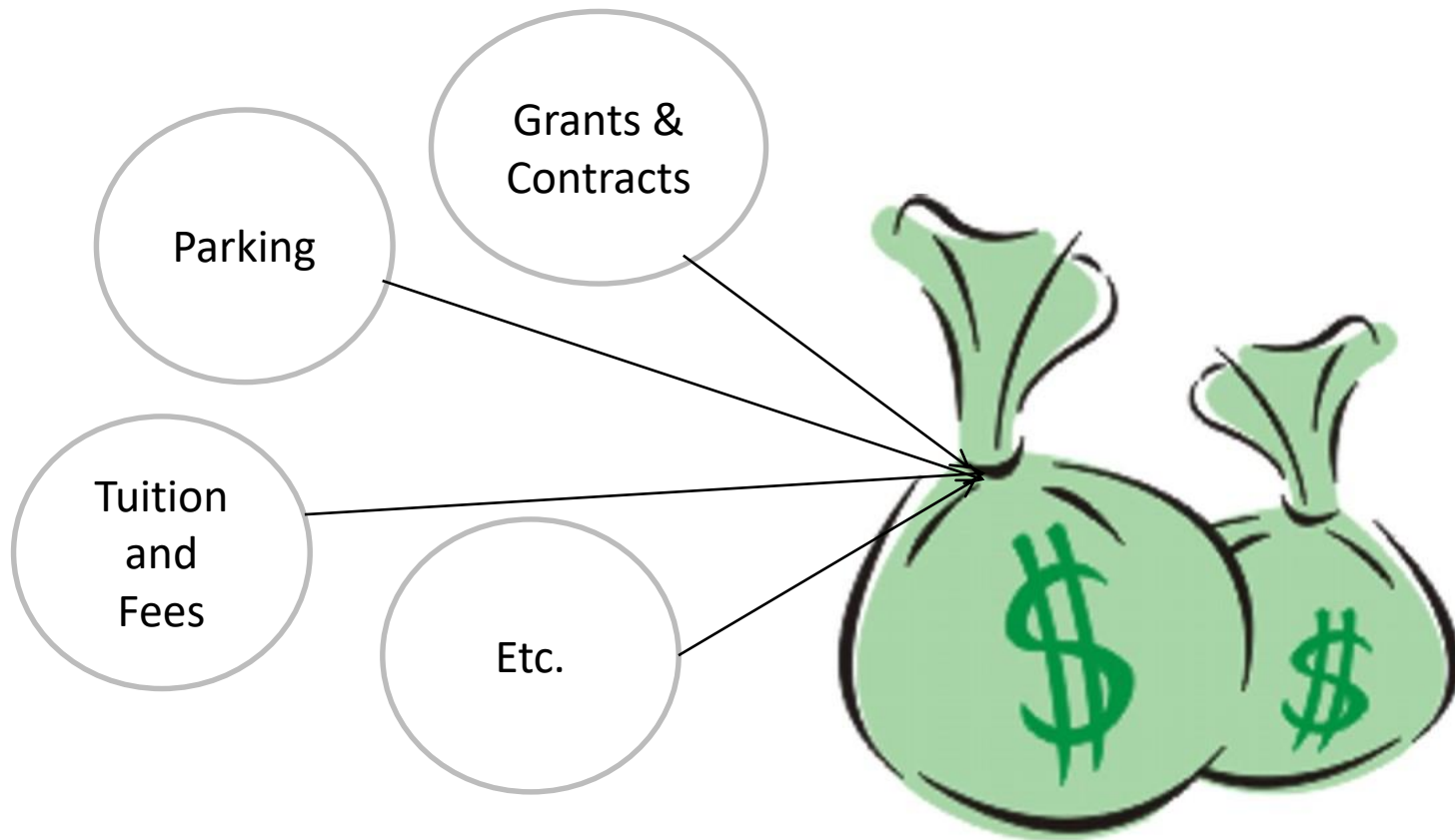
UMB is a hybrid model:

- State institution funded with State funds
- Research-intensive funded with sponsored funds

Therefore, UMB must comply with State regulations and with research requirements.

How Finance Works

All funds are deposited into the State bank account.



How Finance Works

Two ways to access the funds:

1. Invoice
2. Reimbursement

Upon submission of acceptable documentation to the State, the State will issue a check to the recipient.

How Finance Works

The State requires sufficient documentation that supports the goods or services provided to UMB. Certain charges (e.g. taxes) and certain expenses (e.g. gifts, personal) are unallowable.

In addition, reimbursements require detailed original receipts.

How RSP Payments Work

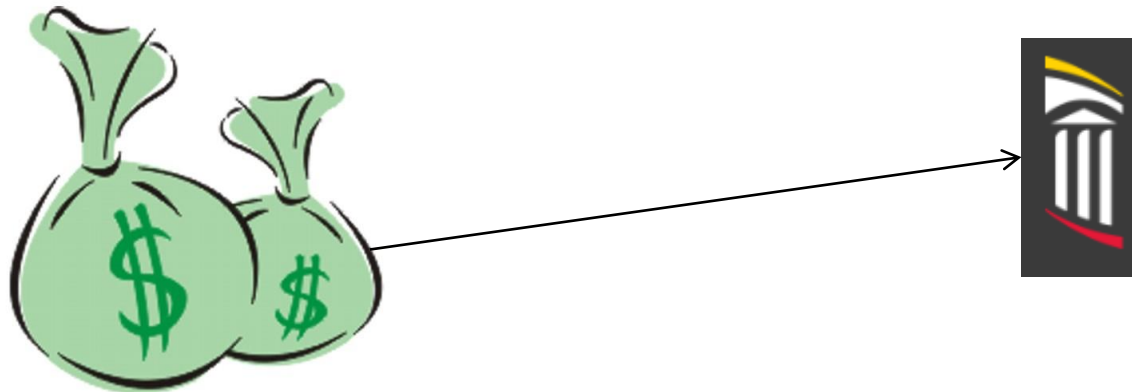
Research study participants are unique in that they are not typically reimbursements and they do not invoice UMB for their “services.”

A check issued by the State can take up to 3 weeks after the payment is sent to the State by UMB.

How RSP Payments Work

UMB has been approved by the State of Maryland to issue payments to RSPs through the Working Fund so that UMB can pay RSPs timely.

The Working Fund is an “advance” from the State to pay RSPs.



How RSP Payments Work

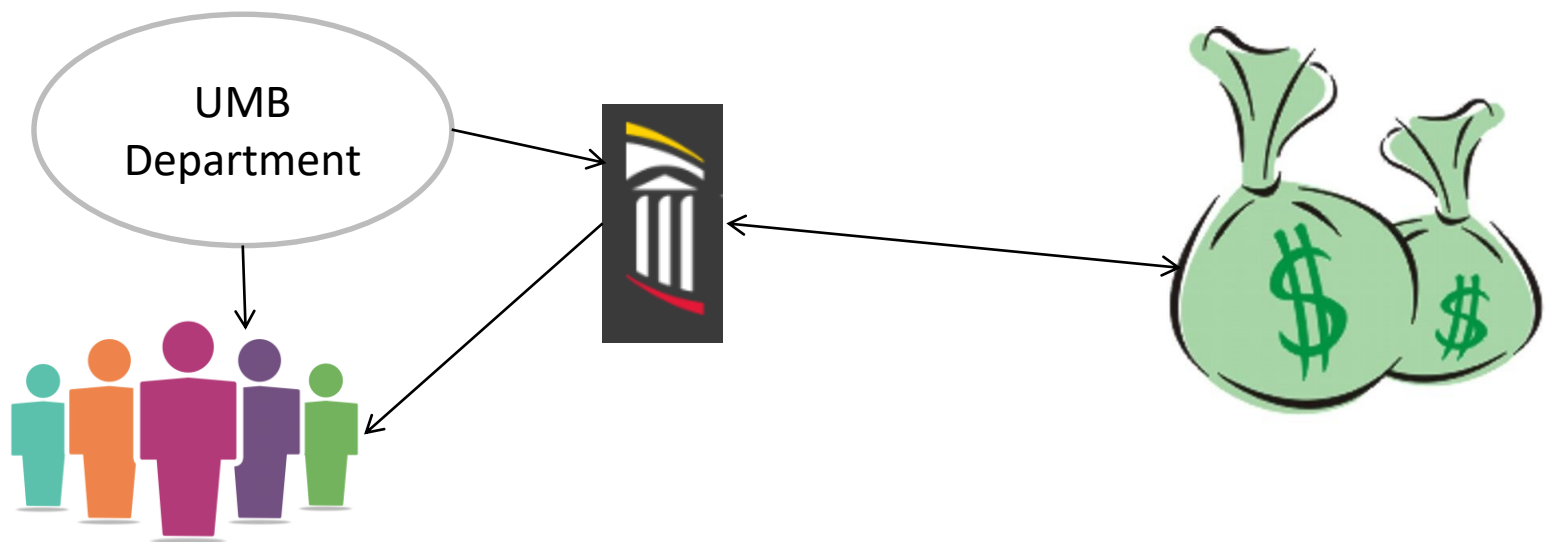
Most RSP payments are processed through the Working Fund.

The Working Fund is a special bank account.

Checks are processed in Financial Services.

How RSP Payments Work

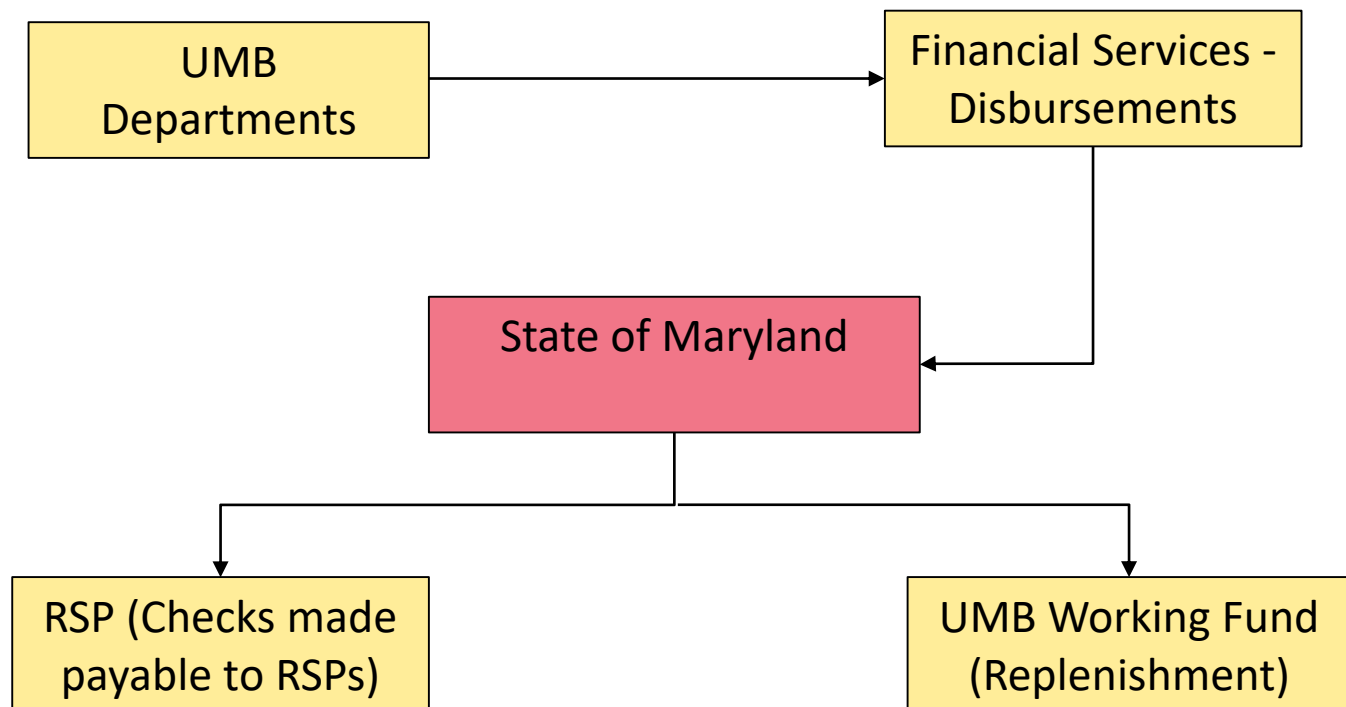
Payments to RSPs out of the Working Fund are replenished from the State on a daily basis. Therefore, State requirements apply.



How RSP Payments Work

- Payments must comply with State regulations concerning invoice payments (i.e. purpose, expenses must be allowable, etc.).
- This is why the documentation accompanying RSP requests must be complete and accurate.
 - For example, the payment request must be within the timeframe stated on the accompanying grant documents, amounts and payment schedule must match the consent form, etc.

Summary of the Workflow



The State requires all agencies to assign fiscal responsibilities:

UMB Financial Services is charged with developing policies and procedures that govern university financial transactions.

UMB Legal Counsel created the following definition of UMB Funds:

All funds administered by UMB, regardless of fund source. UMB funds include State-appropriated general funds, tuition, fees, and other income, as well as auxiliary funds, revolving/discretionary funds, Designated Research Initiative Funds, gifts, contract or grant revenues, and other restricted funds.

Alert!

- All payment requests submitted to the State of Maryland require a Social Security Number (SSN)
 - Checks payable directly to the RSP require the RSP's SSN
- In order to comply with IRS tax reporting requirements:
 - Working Fund checks payable directly to the RSP require the RSP's SSN if the check is equal to or greater than \$100.00
 - An RSP who receives a gift card of \$100 or more is required to provide their SSN

Accounting Principles



Accounting principles require that expenses are recorded when incurred.

When cash or gift cards are used, account 4862 is used to “hold” the funds until disbursed to the RSP.

Also, UMB cannot invoice for F&A until expense is incurred.

Accounting Principles



Account 4862 – Study Participant Pay – Imprest

When cash or gift cards are distributed, a journal entry is required to move the funds from 4862 to expense account 3130 – Study Participant Individual.

Accounting Principles

Account 4862 – Study Participant Pay – Imprest

It is critical that funds do not linger in account 4862. Journal entries should be processed timely.

Subsequent payment requests can be denied by Financial Services.

Negative consequences on audits.

The State closely monitors the Working Fund activity due to the nature and volume of transactions.

2. Policy and Procedure

Policy

- Policy applies to UMB Operational Units (schools, departments, divisions) requesting payments in the form of cash, checks, or gift cards as compensation to research study participants.

Procedure

- Describes process for making payments to study participants
- Assigns responsibilities to individuals and departments
- Defines requirements and controls needed to meet sponsor, UMB, state, and federal regulations

5. Questions?



Brief Overview of Payment Process

Details are described in the [Procedure](#)

- Submit payment request via appropriate form:
Check/Cash or Gift Cards
 - Include page from the grant/contract that authorizes the payment amount
 - Consent Form
 - RAVEN printout showing activity in account 4862

Note: The form includes a checklist of required attachments.

Resources

1. [Working Fund Webpage](#)
2. [Gift Card System Webpage](#)
3. [Workshops](#)
4. [Financial Services Forms](#)

Contacts

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Disbursements

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Contacts

2. Damon West, Working Fund

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Contacts

- Questions about using the Gift Card System or the policy and procedures:
 - Send an email to FS-WF-Giftcards@umaryland.edu
- Questions about picking up gift cards at the Cashier's Office:
 - Call the Cashier's Office at 410-706-7393

Upcoming Events

- May Disbursements Workshop
Research Study Participant Payment Process
Wednesday, May 22, 2019
Pharmacy Hall, Room N111
10:00 – 12:00
- Second Quarter Travel Professionals Group Meeting
Wednesday, May 29, 2019
School of Nursing, Room 130
10:00 – 12:00