

#### Making Payments to Research Study Participants Part 1: Foundational Knowledge

Presenters: Lynell Griffin, Director - Disbursements Cindy Lyons, Deputy Controller Kenyatta Woolridge, Senior Disbursements Specialist

April 1, 2021



#### Agenda

- 1. Introduction Lynell Griffin
- 2. Overview and Fundamentals Cindy Lyons
- 3. Processing Funding Requests Kenyatta Woolridge
- 4. Quantum Financials Lynell Griffin
- 5. Questions/Discussion
- 6. Wrap up Lynell Griffin



## 1. Introduction



#### About Disbursements

- The Office of the Controller-Disbursements oversees and processes payments to individuals and organizations engaged in business with UMB
- Disbursements includes accounts payable, working fund, and travel
- Office located on the 13<sup>th</sup> floor of the Saratoga Building



#### About Disbursements (cont')

- Our goal is to provide excellent customer service while ensuring timely and appropriate payments
- Currently there are 13 staff members

https://www.umaryland.edu/financialservices/d isbursements/contact/



## Overview of Study Participant Payments: Definitions and Structure



# 2a. What is a Research Study Participant?



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.



## 2b. UMB Offices with Responsibilities in Research Study Participants



#### Partial List of UMB Constituents

**Office of Research and Development:** 

- <u>Clinical Trials and Corporate Contracts</u>
- <u>Sponsored Programs Administration</u>

#### **Office of Accountability and Compliance:**

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

#### Administration and Finance:

- <u>Office of the Controller</u> (Formerly known as Financial Services)
- <u>Change Management and Advisory Services</u>
- <u>Sponsored Projects Accounting and Compliance</u>



## 2c. The Office of the Controller (OOTC) is under Administration and Finance



#### Navigation to Webpages

Disbursements:

UMB homepage>About UMB>Administration and Finance>Finance and Auxiliary Services>Financial Services>Disbursements

Or: umaryland.edu/financialservices/

Quantum Financials:

UMB homepage>About UMB>Administration and Finance>Finance and Auxiliary Services>Financial Systems>Quantum

Or: umaryland.edu/quantum/



#### Finance

#### For Finance, "Research Study" refers to

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

and

Recorded as Restricted Funds

 (e.g. Source C30 series: 315, 335, etc.)



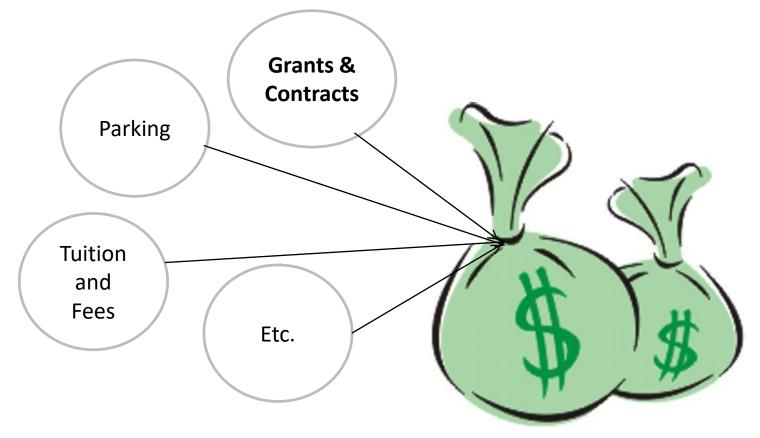
#### UMB is a hybrid model:

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

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



#### <u>All</u> funds are deposited into the State bank account.





Two ways to access the funds:

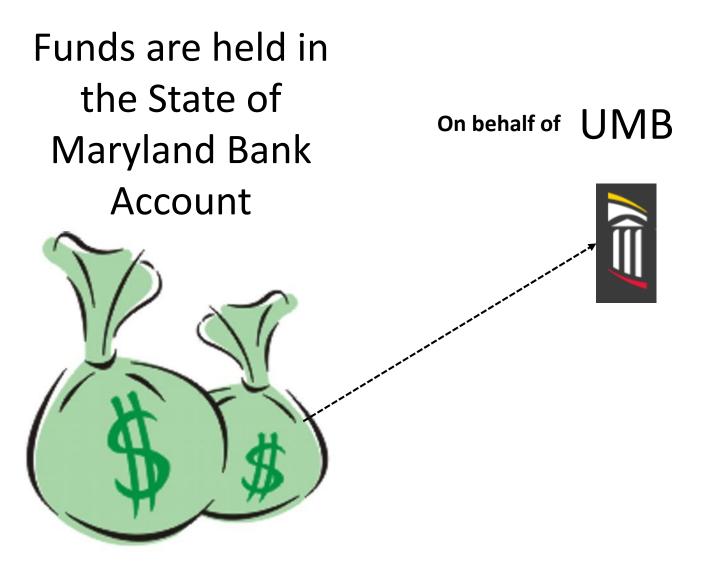
- 1. Invoice request to pay a third party supplier
- 2. Reimbursement request to reimburse a supplier for funds spent on behalf of UMB

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



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.







## 2d. How Research Study Participant Payments Work



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



- 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.



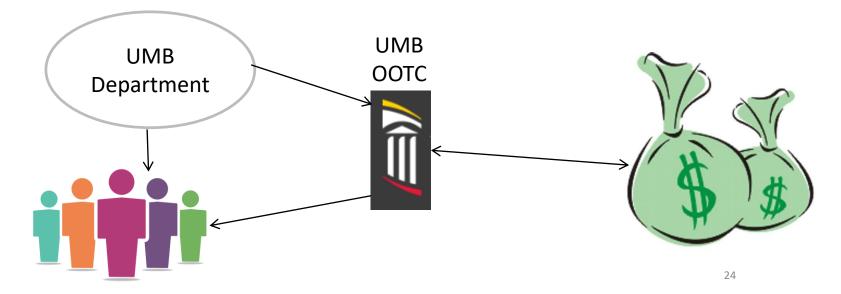
- A check issued by the State can take up to 3 weeks after the payment is sent to the State by UMB.
- UMB has been approved by the State of Maryland to issue payments to RSPs through the UMB Working Fund so that UMB can pay RSPs timely.
- The UMB Working Fund is an "advance" from the State to pay RSPs.



- Most RSP payments are processed through the UMB Working Fund.
- The UMB Working Fund is a special M&T Bank account.
- UMB Working Fund checks are processed and printed by Disbursements in the Office of the Controller (OOTC-D).

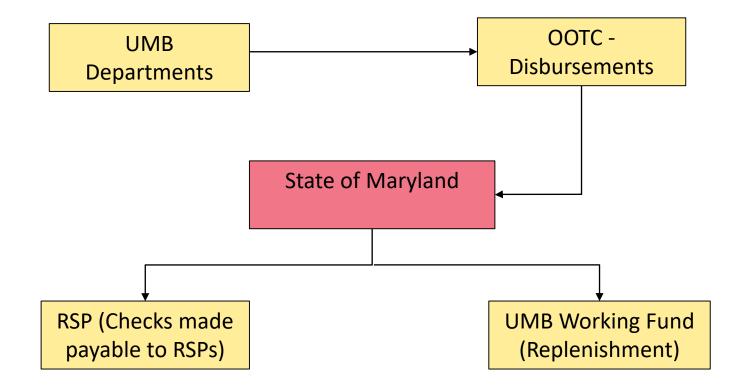


Payments to RSPs out of the UMB Working Fund M&T Bank Account are replenished from the State Bank Account on a regular basis. Therefore, State requirements apply.





#### Summary of the Workflow









Accounting principles require that expenses are recorded when incurred.

RSP expenses are not incurred until the payment is actually made to the RSP.

 Checks made payable to RSPs: The expenses are considered incurred when the check to an individual is processed, whether the request is for a Working Fund check or a State check. Recorded in expense object 3130 Participant Study Pay - Individual. <sup>27</sup>





- For RSPs who receive cash or gift cards, the expenses are incurred when the RSP receives the cash or gift card.
- When cash or gift cards are used, object 7062 is used to "hold" the funds until disbursed to the RSP.

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





Object 7062 – Study Participant Pay

When cash or gift cards are distributed, a debit memo is required to move the funds from 7062 to expense object 3125 – Study Participant Group.



Object 7062 – Study Participant Pay

- It is critical that funds do not linger in object 7062. Debit memos should be processed timely.
- Subsequent payment requests can be denied by Disbursements.
- Negative consequences on audits.
- The State closely monitors the Working Fund activity due to the nature and volume of transactions.



## 2f. Policy and Procedure



Authority: The State requires all agencies to assign fiscal responsibilities.

UMB Office of the Controller is charged with developing policies and procedures that govern university financial transactions.



#### **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.
- Navigation: UMB Homepage>About UMB>Policies and Procedures>Index>Type Research Study into the Filter by keyword(s) box



UMB Legal Counsel created the following definition of UMB Funds:

All funds administered by UMB, regardless of fund source. UMB funds include Stateappropriated 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.



#### **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
- Navigation: UMB Homepage>About UMB>Policies and Procedures>Index>Type Research Study into the Filter by keyword(s) box



## 2g. Policy and Procedure: Reconciliations

Note: Part 2 of this workshop will step through the reconciliations.



Reconcile Payments with the Study Funds Received

A reconciliation is a formal document that summarizes the funds received, distributed and remaining. Interim reconciliations should be signed and dated by the preparer. Final reconciliations should be reviewed, signed and dated by the preparer, department administrator (or designee), and Principal Investigator.



- Notes:
- 1. The study participant log (or other record showing recipient payments) is required.
- 2. Count cash and gift cards at least once per month.
- 3. Reconcile count and activity with the original fund request at least once per month.
- 4. Compare activity on the reconciliation worksheet with the general ledger activity.



## Reconciliations

## 1. Count cash and gift cards on hand

– Complete the <u>Cash/Gift Card Count Sheet</u>:

SAMPLE

University of Maryland Baltimore

Cash/Gift Card Count Sheet

#### Instructions: Please fill in the fields shaded blue below.

Department	Working F Check #/G Order #		Date of Count	
Cash/Gift Card Custodian	Working F Check Amt Order Amt	/GC	Time of Count	
Administrator	Project	ID	Name of Counter	



#### RECONCILIATION





### **Reconciliations Continued**

# 2. Reconcile count and activity to the original funding

– You will need the <u>Study Participant Log</u>:



SAMPLE

### <u>Study Participant Log</u>

### **IRB/Protocol #62507322**

### Project ID 12345678

### WF Request - November 1, 2012

November 22, 2012	Signature or Participant ID Number	Cash	Gift Card	Check
Michael Smith		\$50		
Keith Smith		\$50		
Charles Smith		\$50		
Brian Smith		\$50		
William Smith		\$50		
	Total	\$250		
November 23, 2012				
Robert Johnson		\$50		
James Johnson		\$50		
	Total	\$100		
<u>November 24, 2012</u>				
Paul Hewson			\$50	
David Evans			\$50	
	Total		\$100	

Dr. Bruce Clemons PI Name 11/30/2012 Verification Date

PI Signature



### **Reconciliations Continued**

## 3. Complete the <u>Reconciliation Worksheet</u>:



#### **Study Participant Reconciliation Template**

### **IRB/Protocol #62507322**

### Project ID 12345678

### Instructions: Please fill in the fields shaded blue below.

SUMMARY OF ACTIVITY				
	Date	Cash	Gift Cards	Total
Amount Distributed to Participants *	11/22/2012	250		250
* Detail on Study Participant Log	11/23/2012	100		100
	11/24/2012		100	100
				-
				-
Total Distributed		\$350	\$100	\$450
Remaining In Department (per cash/card count)	11/30/2012	525	25	550
Total Distributed and Remaining		\$875	\$125	\$1,000

#### RECONCILIATION

RECONCIEIATION			
		Check	Distribution
		Amount	(autofills from above)
WF Request - Check # <u>15875</u>	11/1/2012	1,000	Cash 350
			Gift Card: 100
			\$450
	Check request amount	\$1,000	
	Less: Distribution	(450)	
	Amt. Remaining	550	
	Cash/card count	550	
	Difference	\$0	

#### **General Ledger Reconciliation**

Amount Distributed from Above	\$450
Amount Charged to Project General Ledger Account 3125	\$450
Difference	\$0

-----Note: Any difference not equal to zero requires investigation and corrective action------

Nate Reuss - Study Coordinator Name & Title of Preparer

Signature of Preparer and Date

Noel Mitchell - Research Administrator Name & Title of Reviewer

Signature of Reviewer and Date

Dr. Bruce Clemons Name of Principal Investigator

Signature of Principal Investigator and Date



## What to Do When the Study Ends

Note: If the part of the study involving compensation to participants ends significantly earlier than the end of the study project then the best practice is to settle undistributed cash, gift cards, and checks as soon as possible.

- Perform final cash, gift card count
- Reconcile final count and activity with the initial funding
- Process any remaining debit memos needed to clear object code 7062
- Return all unused funds within 30 days
- Details on how to return unused funds will be provided in Part 2.



## 2g. The IRS





- What is a 1099-MISC?
  - An IRS form used to report income to the IRS
  - Required when all taxable payments to an individual equal or exceed \$600 in a calendar year
  - All payments includes stipends, study participant payments, etc.
  - Be aware that payments processed through Disbursements are combined by tax ID number (be sure to use the correct object code when entering a NONPO Invoice)



In order to comply with IRS tax reporting requirements:

- <u>State</u> checks payable directly to the RSP require the RSP's SSN regardless of the amount of the check.
- <u>UMB Working Fund</u> 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 also required to provide their SSN.
- When departments are aware that their RSPs receive a total of \$600.00 or more per calendar year, RSP information should be sent to Disbursements.



# 2h. Questions?





## 2i. Change Management and Advisory Services



# Change Management and Advisory Services (CMAS)

 (CMAS) provides assistance and oversight to campus departments with any audit, compliance, and general fiscal or operational matters. They support the University by advising, assisting, and educating the campus community on accountability and compliance effectiveness.

> Saratoga Building Ground Floor Level



## CMAS Review Requirements

- Conduct periodic reviews of a sample of payments to ensure departments are reconciling logs and reclassifying appropriate amounts
- Ensure departments are following policy and procedures (i.e. all requirements)
- Report results to the department selected, OOTC, and SPAC



## **Compliance Trends**

- Funds not adequately secured and accounted for (offsite locations, personal bank accounts)
- Initial and monthly counts are not done, not done by independent person, not documented
- Funds are not tracked properly (no log, only receipts) or separately by working fund request
- Study participant logs don't have all necessary information (no participant signature)



## Compliance Trends (Cont.)

- Debit memos to reclassify disbursement amounts are not performed or amount transferred is not proper
- PI not verifying study participant logs by signing and dating log
- Undistributed funds not deposited back timely (unused cash or gift cards)



- Policy and Procedure controls and requirements apply to:
  - All types of compensation (e.g. checks, cash, GCs)
  - All sources of compensation (e.g. Working Fund, State, and GCS)
  - All types of physical and electronic delivery methods (e.g. Face-to-face, U.S. mail, email)
  - All study/department locations (e.g. on campus, off campus, remote)



- Use caution to ensure that the SPP process is used for the purpose intended
  - People
    - Compensate Study Participants (see definition)
  - Funds
    - Used to pay Study Participants for participating in a study as allowed/described in the study documents



- Validity of the participants Required by the PI
  - The process for providing reasonable assurance that payments are only made to individuals who are enrolled in the research study. The Study Participant Log must be compared to the research study records to validate that people listed on the log are valid study participants. The method that is used to test the validity should be documented.
  - Referred to under each form of compensation in the Procedure



- Proper segregation of duties:
  - Person A acquires funds and Person B counts and verifies the funds
  - A person not directly associated with the study performs the monthly reconciliations
  - Funds are stored in a safe or locked drawer



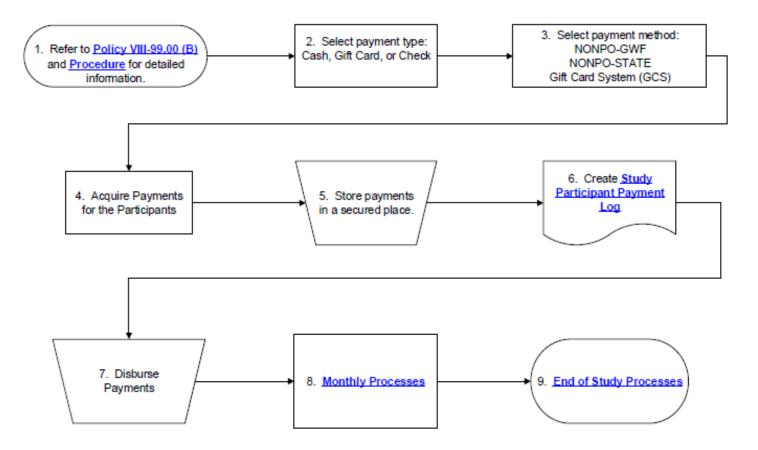
## 3. Requesting RSP Payments



### How to Compensate Research Study Participants: Overview

### Important Note:

The purpose of this diagram is to provide a brief outline of how to pay research study participants. All departments are responsible for adhering to <u>Policy VIII-99.00 (B)</u>: <u>Research Study Participant Payments</u> and to follow the instructions and guidelines described in the <u>Procedure on Research Study Participant Payments</u>.





## Step 1: Select Type of Compensation

- Individual check payable to the participant
  - State Payment
  - Working Fund (GWF)

		Sources of compensation		
Cash	Type of Compensation	Working Fund	State	Gift Card System
<ul> <li>Working Fund</li> </ul>	Cash	$\checkmark$		
check	Gift Card	$\checkmark$	$\checkmark$	$\checkmark$
	Individual Check	$\checkmark$	$\checkmark$	

- Gift Cards
  - Gift Card System/Tango Card Inc.
  - Working Fund check
  - State Payment



- Check Payments
  - Made payable to participant never made payable to "Cash"
  - NONPO-GWF Invoices ≥ \$100.00 and all NONPO-State invoices must include the social security number in the supplier registration request
  - Participants who receive checks totaling ≥ \$600.00 during the calendar year will receive a 1099-MISC Form



• Check Payment-State

Allow 3 weeks for payee to receive check

- Requests for checks to purchase Gift Cards:
  - The original receipt from the vendor where the gift cards were purchased should be retained in the department.
- Email all NONPO State Payment request to <u>rs-bf-nonPO@umaryland.edu</u> Subject: Invoice# XXX



- Check Payment-GWF
  - Hours of operation: 9am 4pm M-Th. (Social Distancing Rules apply)
  - Department will be notified when the check is ready to be picked up.
  - Request for checks to purchase Gift Cards:
     Departments should include supporting documentation from grant/consent that outlines gift card type.
  - Email all NONPO GWF Payment request to <u>rs-bf-nonpo@umaryland.edu</u> Subject: Invoice# XXX



- Cash
  - Requests for cash can be made through the Working Fund via a NONPO invoice request
  - Department must maintain a "Study Participant Log" (slide 41) for lump sum cash request
  - When cash is distributed, a debit memo is required to move the funds from 7062 to expense object 3125 – Study Participant Group



Department must submit the Study Participant Log within 30 days of receipt of check to

fs-workingfund@umaryland.edu

Subject: Cash Log for Check# XXX

- Study Participant Log must include the study number, check number, amount, signature/participant ID#, and total amount distributed
- Departments are required to properly secure the study participant's name, address, and social security number. Review <u>UMB Policy X99.16(A)</u>
   <u>UMB protection of Confidential Information</u> for guidance on safeguarding personal information



## **Gift Card System**

- Will be retired in 2021. Only cards in inventory may be requested. We will not purchase new cards or process special orders.
- We will honor buybacks for cards purchased prior to 2021 only.
- Cashier's Office Information:

-Open Tuesday and Thursday from 9:00 AM – 3:00 PM by appointment only.

-Click this link to schedule an appointment: <u>https://outlook.office365.com/owa/calendar/UMBUniversity</u> <u>Cashier@umbcits.onmicrosoft.com/bookings/</u>

-Cashier's Office Webpage:

https://www.umaryland.edu/student-financial-services/



## Step 3: Documentation

- Invoice Header Page from Quantum Financials
  - -Must be printed in portrait format and display the entire supplier address (Manage Inv.>Actions>Edit>Show More, then expand Lines)
- <u>Principal Investigator Expenditure Authorization</u> form
- Consent Form
- Quantum Analytics SPP 7062 Activity printout
   <u>Study Participant Payments Gift Card Request Form</u>



- Consent Form:
  - Reflect the PI's name, study number, and consent approval date

-Revisions to Federal Regulations January 21, 2019. No expiration date, but not to FDA Regulated Research "ex. ICDs must include expiration date"

- Outlines of the Purpose sheet(s), the payment to participant sheet(s) or other compensation and procedure (ex. check, cash, gift card/certificate, transportation)
- If no compensation is to be offered, then state that participants will not be paid



- Consent Form:
  - If the study includes compensation to participants
     ≥ \$600 in a calendar year, include a statement to inform participants that the income will be reported to the IRS.
  - Income can be a combination of cash, checks, or gift cards
  - An outdated Consent Form may not be used



- <u>UMB</u>IRB Documentation -
  - If a study is shared with another institution, the documentation submitted with the payment request must include the UMB IRB document authorizing the payment.
- All signatures must be original signatures.
   Stamped, script font, or photocopied signatures are not allowed.



# Questions?





## 4. Quantum Financials



- FY21: Over \$1.5 million in payments processed for research study participants
- System Tutorials
  - Training materials can be found on the portal home page
  - Trainings cover supplier registration, creating NONPO invoice request, checking payment status, and other topics related to NONPO invoices

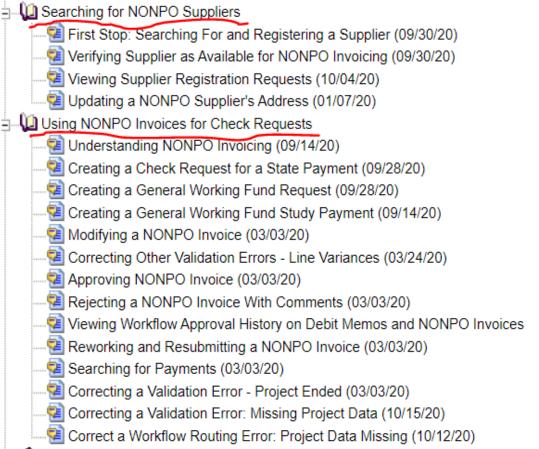


• Once you log onto the portal page, the Quantum System Tutorials can be found on the left hand side of the page:

My Page	My UMB	Employee Self Serv	rice <u>My UME</u>	3 TBE Self Service
Persor	alize	<u>Content</u>	<u>Layout</u>	
Enterprise	Menu			0 0 -
Manage G Worklist Reporting Effort Rep Kuali Res UMBiz Corp Clini eUMB HR eTravel/B eUMB Fin RAVEN Quantum Quantum Enroll In t Quantum UMB Syst UMB Syst UMB Cor	orting Syst earch cal Trial Tri MS usiness Ex ancials Financials Financials Analytics MB System System Tu oms Tutori munity Sys Staff Links	<u>acking</u> <u>pense</u> <u>ns Training</u> torials <u>als Browser</u> <u>als HTML</u> <u>stem</u>		



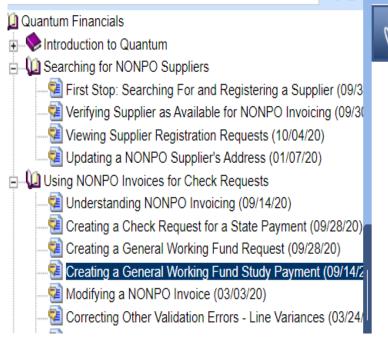
• After you click on the link for the tutorials, a menu will appear. If you open up the menu, you will see multiple trainings available





• If you select a topic, additional options become available. Printing the module allows you to add notes to assist with understanding. The printed version can be a great resource that is readily available

Trv It!



For General Working Fund Study Participant Payments:

Do It!

-- The Object used should be 3130 for a regular Study Participant payment.

🕮 Print It!

- -- If you need to use 7062 or 7072, these Objects must be requested individually fo
- -- To do this, send an email to DL-BFFinSys@umaryland.edu and include the entire
- -- In general, 7062 and 7072 are only added for Account Combos with a Function c
- -- When using Objects 3130, 7062 or 7072, a Revolving Fund should be used or a







## **Future Availability**

- Supplier registration spreadsheet upload
- Access to state payment information for various types of payments in Quantum Financials and Quantum Analytics
- Dedicated research study participant payment webpage



## Disbursements

Accounts Payable

Quantum Financials	-
Disbursements	

Employee Reimbursements

Travel

Working Fund

Gift Cards

Workshops

Disbursements Staff Directory

### CONTACT

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   fs-workingfund@umaryland.edu
  - Working Fund 220 Arch Street 13th Floor

### **Research Study Participant Payments**

A research study participant is a living individual about whom a Principal Investigator (PI) conducting research obtains: 1) data through intervention or interaction with the individual or 2) identifiable private information.

Some research studies may provide for compensation payments to study participants as evidenced in the contract between the research sponsor and the research institution. Compensation may be in the form of a check payable to the participant, cash, or gift cards. The research study documents identify which method of payment is allowed for the study.

### QUICK LINKS Policy Procedure Forms Gift Cards

HEADER





HEADER





## FY21 Year End Deadlines

- **NONPO Supplier Registrations** new suppliers that are needed for FY21 invoices must be submitted with complete and accurate information by Wednesday, June 2nd.
- NONPO invoices with "State Payment" payment method- the invoice must be initiated and approved by the department and supporting documentation must be emailed to <u>rs-bf-</u> <u>nonpo@umaryland.edu</u> via <u>Accellion</u> by Wednesday, June 16th.
- NONPO invoices with "General Working Fund" payment methodthe invoice must be initiated and approved by the department and supporting documentation emailed to <u>rs-bf-</u> <u>nonpo@umaryland.edu</u> via <u>Accellion</u> by Wednesday, June 16th.



## Contacts

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3. FS-Workingfund@umaryland.edu



# Questions?





## Next Workshop: Thursday, April 22, 2021 10:00am -12:00pm by web seminar

Part 2: Viewing study participant payment transactions in Quantum Financials and Quantum Analytics, and Tango Card purchases and refunds.

Guest Speaker: Tamira McCord from Tango, Inc.