

	HARTFORD HEALTHCARE POLICY Research Participant Compensation	
Issuing Department: Research Administration	Original Policy Date: June 23, 2021	Approved By: DocuSigned by:  <small>August 12, 2021</small>
	Revised Date(s):	<small>3BDBE73C6004420</small> Elizabeth Roper, MHS Research Administration

Purpose

The purpose of this policy is to establish guidelines for obtaining compensation for human subjects participating in research projects at Hartford Healthcare while ensuring the necessary tracking mechanisms are in place for account reconciliation and tax reporting purposes. Investigator is the individual ultimately responsible for the handling and disbursement of research project funds, and must follow the procedures described in this policy.

Scope

These guidelines and procedures are limited to Research Projects conducted at Hartford Healthcare.

Policy

Subjects participating in research projects may be compensated for their time and expenses due to travel, meals, and parking. The method of payments are in the form of a Check Voucher, ClinCard or Gift Card and may be taxable income to the research subject. The investigator should make research subjects aware that they may potentially be taxed when receiving payment for participation.

Method of Subject Payments

Check Voucher Request Form – Subject is paid with an institutional check.

Gift Card – Gift Cards can be from Amazon, Stop & Shop or other Gift Cards available on Amazon.

ClinCard – A ClinCard is like a debit card. It can be used anywhere debit cards are accepted. (ClinCard fees will apply).

Procedures

The following are specific procedures for each payment method.

Checks

1. A Check Voucher Request Form must be submitted through PeopleSoft and routed for Grants and Contract review and approval.
2. A copy of request form must be filed with subject folder or main project binder.

ClinCards

1. Requests for ClinCards must be submitted to Grants and Contracts using the ClinCard Request form. [ClinCard Request Form](#)
2. Request form must be signed by the Investigator.
3. Grants and Contracts will review and approve form, and submit request to Accounting for funding.
4. ClinCard requests may be equal to one month's worth of participant reimbursements, but may not exceed \$2,000.
 - a) Designee(s) must request system access and authorization to pick-up ClinCards.
 - b) A single designee is not allowed to register participants and approve payments within the ClinCard System.

Gift Cards

1. Requests must be submitted via e-mail gcresearch@hhchealth.org to Grants and Contracts in Research.
2. The research grant number, name of vendor, e.g. Amazon, the number of Gift Cards, total value of Gift Cards and the denomination of each Gift Card must be clearly stated in the e-mail.
3. Grants and Contracts will review and approve, and submit to Supply Chain Management for processing through Peoplesoft.
4. Requests may be equal to one month's worth of participant reimbursements, but may not exceed \$1,000.
3. Research will determine the project-specific Gift Card limit.
4. Additional Gift Cards may be requested only when available Gift Cards remaining are less than \$500 in value.
5. It is important to avoid over-purchasing Gift Cards as they cannot be returned.
6. The investigator is responsible for their safekeeping and appropriate documentation of their distribution to subjects.
7. Designee(s) must request system access and authorization to pick-up Gift Cards.
8. Cards must be kept in a secure location maintained by study team.

Receipt of Gift Cards and ClinCards

1. Principal Investigator/Project Designee will be notified when the Gift Cards or ClinCards have been received in Grants and Contracts and must schedule a pick-up time.
2. Project Designee will be given the cards. Gift Cards will be sequentially numbered by Grants and Contracts. ClinCards will have an established number on back of card.
 - a. Receipt is given to the Project Designee.
 - b. A copy of receipt will be kept in Grants and Contracts.

Reimbursements

1. Participants must have a signed consent form on file for the project for which he/she is receiving reimbursement.
2. Participant must complete a W-9 form and must be informed that this information will be shared for tax reporting purposes.
3. Participant must sign receipt acknowledging that he/she received payment. The receipt must clearly state the cash value of the Gift Card(s) and ClinCard(s) received.
 - a. Receipt is given to the participant.
 - b. Copy to be kept on file in project or subject folder.
4. Project Designee must enter the card value and the participant's W-9 information into the Research ClinCard and/or Gift Card reimbursement database.

Responsibilities

Principal Investigator

1. The Principal Investigator (PI) and/or Designee(s) must read and agree to the Participant Compensation Policy and Procedures prior to being granted ClinCard and/or Gift Card system access.
2. The Principal Investigator may assign a designee(s) who will be allowed to register participants in the systems, pick-up Cards and distribute payments on his/her behalf.
3. The Principal Investigator must ensure receipts of all participant W-9 forms and receipts are in file with project.
4. The Principal Investigator or Study Coordinator must input each Gift Card distribution to the study participants into the Research cash reimbursement system.

Grants and Contracts

1. Review and Process ClinCard, Gift Card requests received from PI or Authorized Project Designee.
2. Disburses to PI or designee.
3. Enter all payouts of Gift Cards and ClinCards in the database.
4. Order cards for the projects.
5. Disburses cards to Principal Investigator or Authorized Project Designee.
6. Ensure that additional cards are not disbursed until the previous allotment has been accounted for.
7. Principal Investigator and Project Designee(s) will be granted restricted access to the database to enter participants' W-9 information and card reimbursement transactions.
8. Ensuring that W-9 forms and receipts are recorded for every disbursement entered in the database for the project.

Social Security Numbers

1. The Principal Investigator must ensure that all participant W-9 forms and card receipts are kept in a secure location. It is the responsibility of the PI to ensure that potentially sensitive data is protected.
2. Participants' Social Security numbers should NOT be kept on a local desktop, laptop or other computing devices.
3. In the event that an employee leaves Hartford Healthcare, Grants and Contracts must be notified immediately to de-activate the user's account.

Annual Tax Reporting

1. Grants and Contracts will send annual reports in a secure and confidential e-mail to Accounting for tax reporting purposes.
 - a. The report will include all individuals receiving ClinCard, or Gift Card reimbursements including individuals receiving \$600 or more in total reimbursements.
 - b. This report will be submitted electronically to accounting no later January 10th. This is to ensure the proper processing of 1099 forms if they are required.

Research Administration

Internal Monitoring/Auditing

1. The audit of Systems will be conducted by Grants and Contracts.
2. Grants and Contract completes monthly reconciliations between the two databases and payment requests.

3. The cards will be tracked using the existing Research Reimbursement central database and Greenphire system maintained in Grants and Contracts. Each database will contain participants' W-9 information, project information, as well as total value of cards requested; cards disbursed transactions and payouts.
4. If deficiencies or discrepancies are discovered in the course of an audit, the Principal Investigator will be sent a written request to clarify the concerns.
5. Research Department reserves the right to suspend or terminate the Principal Investigator's use of the Research Gift Card/ClinCard Reimbursement System if the concerns are not addressed in writing in a timely or satisfactory manner.
6. If use of the card system is suspended or terminated, participants will be paid by institutional check.
7. Any allegations of misconduct involving the Research Gift Card and ClinCard Reimbursement System will be investigated and resolved using the same policies and procedures used to handle other cases of research financial mismanagement.

Attachment

- A. ClinCard Request Form

Related Policies

Account Management Policy

Finance – Funds, Establishment, Maintenance and Disbursement Policy