RESEARCH PARTICIPANTS REIMBURSEMENT PROCEDURES

Objective:
Describe the procedures for processing reimbursements to research participants.

1. Responsibilities:
   a) Principal Investigators planning to reimburse research participants for study participation are responsible for:
      I. Disclosing the terms and conditions of participants reimbursement in the research protocol.
      II. Indicating the amount, schedule, and type (cash, check, gift card, etc.) of reimbursement in the Informed Consent Form (ICF).
      III. Ensuring that reimbursements are appropriately prorated, and they do not constitute or appear as undue pressure and/or coercion on the subject to volunteer for, or to continue participating in the research study.
   b) The Investigator and/or designee are responsible for managing money received from the Agent Cashier or other sources.
   c) The IRB and the R&D are responsible for reviewing all research proposals containing reimbursements to study participants and for ensuring conformity with VA payment policies.

2. AREF Payment Procedures
   a) The Principal Investigator (PI) or designee/research coordinator should meet with the AREF Controller to discuss payment procedures prior to starting study enrollment.
   b) The PI may authorize, in writing, a member(s) of the research team to manage a petty cash account.
   c) The research protocol and informed consent must be IRB and R&D approved, and a research agreement with the study sponsor must have been executed with funds already in place before payments are processed.
   d) Payments to research participants can be made either by check, petty cash, or debit card. Payment is to cover per diem expenses (i.e. lunch, car fare).

1. Check:
   i. If research participant payments are to be made by check, the research coordinator is required to complete and submit a “Study Subject Payment Request Form” for each payment made to research participants. This form is available at www.atlaref.org under AREF Forms. This form is used when checks are to be mailed directly to a research participant or if the research coordinator requests a check in advance so that it can be hand delivered to the research participant on the day of their study visit. If advance checks are
requested, the research coordinator must submit request(s) 1 week in advance of the study visit.

2. Petty Cash:
   i. Depending on the needs of the study and with proper justification from the Principal Investigator, AREF also has the ability to set up a petty cash account for the Investigator or designee. The amounts of the payments are to be discussed with the AREF Controller.

   ii. The PI or the research coordinator will need to open a “Holiday” account with the Atlanta VA credit union located in the hospital main floor. Note that this is a personal credit union account. This account will be merged with your other account(s) if you already have an Associated Credit Union account. The account cannot overlap with existing accounts.

   iii. Once the account has been opened, the PI or the research coordinator must provide the banking information to the AREF Controller in order for direct deposit to be set up.

   iv. Before funds are made via direct deposit to the Holiday account, a Security SOP Agreement must be signed by the research coordinator and AREF Controller. A lock box with a unique code will be issued for use by the AREF Controller.

   v. If research participant payments are made by cash, the research coordinator is required to complete and submit a “Study Subject Cash Payment Form”. This form is used if cash payment is made at the time of the visit to the research participant. The research coordinator must have the research participant sign the “Study Subject Cash Payment Form” before a cash payment is made. This form is available at www.atlaref.org under AREF Forms.

   vi. When additional petty cash funds are needed, please email the AREF Controller as AREF tracks balances and will deposit additional funds as needed, usually the next business day.

   vii. Petty Cash Reconciliation is completed semi-annually. Bank statements and “Study Subject Cash Payment Forms” will be used during the reconciliation process.

3. Debit Card:
   i. At AREF’s discretion, research participant payments for some studies will be administered using a debit card.

   ii. Greenphire is the debit card provider and the debit card is called a “ClinCard”. Please refer to the Clincard Reference guide provided by AREF for information.

   iii. At study initiation AREF will inform the PI and research coordinator
that the ClinCard system will be used to manage research participant payments for a specific study.

iv. AREF will be responsible for distributing ClinCard debit cards to the PI and/or research coordinator and to also provide training to the study team.

v. Before the debit cards and lockbox are issued to the study team, the study team must complete the following steps:

   a) A Greenphire Debit Card Security SOP Agreement must be signed by the research coordinator and AREF Controller. A lock box with a unique code will be issued for use by the AREF Controller.

   b) Include Greenphire in the “Confidentiality” section of the VA Informed Consent Form.

   c) Include the following language in the VA Informed Consent Form in the “Compensation” section:

   "COMPENSATION:

   You will get compensated for time and travel. You will get $XX.XX for research clinic visits and $XX.XX for research phone visits. (If the subjects will be paid for unscheduled clinic visits, include that information here). It will be on a ClinCard, which works like a debit card. It is provided by Greenphire. When visits are completed, funds will be loaded onto your card. You will be able to use the funds in approximately 1 business day. You will have up to XX clinic visits over the period of the study (total that you can receive is $XXXX.XX).

   Greenphire and its Customer Support members will not have access to your name or contact information. Instead they will have your study ID number that will be provided to you by the study coordinator. You will be able to use this study ID number to check the balance on your Greenphire debit card.”

   d) The PI and research coordinator must include Greenphire in the HIPAA form because the date of the study visit will be entered into the Greenphire/ClinCard system.

vi. Once the steps outlined in bullet 3.v. above have been completed, provide copies of the IRB approved Informed Consent form and HIPAA form to AREF.

vii. When registering a subject in the ClinCard system, do not enter any protected health information (PHI) such as the participant’s name, social security number, phone number, email or home address. However, you are allowed to enter the date the study visit occurred.
3. VA Payment Procedures
   a) Reimbursements to research participants made with VA funds can be made by Direct Express Card, direct deposit, check, or in extenuating circumstances, cash.

   b) The Direct Express Card is the preferred method of payment. Cash will be allowed on a case by case basis and must be approved by the Research Office and Fiscal.

   c) Reimbursement procedures should be discussed with the AVAMC research budget analyst or Director of Research Operations (DRO) prior to starting study enrollment. During the discussion, provide a copy of the signed & dated approved Informed Consent Form clearly stating the reimbursement amount(s) and payment schedule.

   d) ICF and HIPAA
      I. If using Direct Express Card or direct deposit, list “US Dept. of Treasury and Comerica Bank” in the compensation section of the ICF and on page 2 of the HIPAA form in the “other” section.

   e) Direct Express Card:
      I. For participants WITHOUT a Direct Express Card, complete the “Direct Express with NO Comerica Card Form” located below. This is required only once per research participant. If the participant is not sure if they have a Direct Express Card, complete the form. This is the process to get a card.
         - Without any existing Card

      II. For participants WITH a Direct Express Card, complete the Direct Express Card Form below
         - With Comerica Card

   f) Payment with Direct Express Card
      I. Submit the Check/Direct Deposit Reimbursement Form to the Research Office (Budget Assistant or DRO) using encrypted email to: roderick.tuttle@va.gov or bring to room 5A104.

      http://www.atlanta.va.gov/Docs/VA_Research_Participant_Check_Payment_Form.pdf

      II. Email the appropriate Direct Express Card Form using encryption and without changing the name of the file to VHAATGAccounting@va.gov. You can do this for single or multiple individuals.

      III. The Research Office will submit payment requests weekly to Fiscal.

      IV. The Direct Express card will be loaded with the payment for those participants who already have the Direct Express Card. The Direct Express Card will be mailed to those participants who do not already have one.
g) **Direct Deposit**
   I. First payment:
      g) Have participant complete the “FMS Vendor File Request Form”
      h) Bring form to agent cashier located on the main floor
      i) Submit the “Check/Direct Deposit Reimbursement Form” to the Research Office (Budget Assistant or DRO) via **encrypted** email to: roderick.tuttle@va.gov or bring to room 5A104.

   http://www.atlanta.va.gov/Docs/VA_Research_Participant_Check_Payment_Form.pdf

   II. Subsequent payments: complete the “Check/Direct Deposit Reimbursement Form” and submit to the Research Office (Budget Assistant or DRO) via **encrypted** email to: roderick.tuttle@va.gov or bring to room 5A104.

   III. The Direct Deposit payment will be made to the registered bank account.

   h) For more information visit: [https://fiscal.treasury.gov/GoDirect/index.html](https://fiscal.treasury.gov/GoDirect/index.html)

i) **Payment with Cash**
   I. Complete and sign the “Cash Reimbursement Form” (AVAMC Research 151 Payment Form). The form is available on the AVAMC research website in the Clinical Study Center section. Include the obligation number provided to you by the Research Office. Obligation numbers tend to change with the new Fiscal Year (October 1). It is critical that you keep up to date with the obligation number.

   II. Complete a request form for each participant for each visit and deliver the form to the Director Research Operations or the budget analyst for signature and obligation number. This must be done before the participant can be paid.

   III. The study coordinator should call the participant to confirm the study appointment or wait for them to arrive before having the Reimbursement Form signed.

   IV. A study staff member must accompany the participant to the Agent Cashier with the form to receive cash payment.

   V. Participants are required to sign the request form when receiving cash payment. Ensure to request a photocopy of the signed and dated form for your records.

   VI. Business hours for the Agent Cashier are 8:00 AM to 4:00 PM, Monday through Friday excluding holidays.
j) **Payment by Check**  
I. Complete the “Check/Direct Deposit Reimbursement Form” after the completion of the study visit and email using encryption to: roderick.tuttle@va.gov or bring to room 5A104. This form is available on the AVAMC research website in the Clinical Study Center Section. Research participants can expect delivery of the check in about 4-6 weeks.

k) **Alternate Method of Payment**  
I. VA Finance has allowed an alternate method of reimbursement for studies in which the participant cannot be tested during normal working hours or when study tests are done off-site.

II. Discuss this method with the budget analyst ahead of time. A memo must be sent to the CFO for approval prior to processing.

III. The budget analyst will provide a different request form, which requires additional signatures.

IV. Once approved, cash can be picked up from the Agent Cashier ahead of time and handed to the participant after study procedures have been completed.

V. The participant will be required to sign the form acknowledging receipt of payment.

VI. After completion of the study visit, the signed form must be provided to the Agent Cashier.

VII. If for some reason the visit did not take place, the money must be returned to the cashier on the following working day.

l) **Documentation**  
I. The research team must maintain clear documentation of any subject’s reimbursement in the team’s locked files.

II. Documentation is subject to review by the Inspector General, Compliance Officer, Business Integrity Officer, the Comptroller General and any other compliance entity.