INTRODUCTION:

The Greenphire ClinCard is a reloadable prepaid card available to research coordinators as a payment option for human subjects. The card offers a faster and safer method of paying your study participants and will provide an excellent alternative to AP checks, gift cards, and petty cash. In addition, Greenphire supplies a convenient administrative tool for loading, tracking, and reporting your studies’ payments. You will have the option to select generic or Penn-branded cards. As of October 2016, the Division of Finance is absorbing all fees associated with the ClinCard program.

BENEFITS:

- Direct, on-site disbursement to study subjects
- Reduced payment administration
- Improved funds workflow security/approval
- Enhanced processing/tracking/reporting
- Increased participant retention
- Central accounting and tax reporting support
POLICY:

The Greenphire ClinCard program has been established to provide an efficient alternative for study teams to provide compensation and reimbursements to study subjects participating in Penn’s IRB-approved studies. Financial policy 2319.1 has been updated to incorporate this new form of payment. Any research subject who receives $600 or more in compensation in a calendar year will receive a 1099 for tax reporting purposes.

PURPOSE:

The purpose of this policy is to describe the requirements and procedures for the establishment and use of the Greenphire ClinCard.

SCOPE:

This document applies to all research studies using the Greenphire ClinCard for research subjects. Any exceptions must be approved by the Director of Disbursements.
### PROCESS:

**Penn Greenphire Process**

<table>
<thead>
<tr>
<th>Treasury</th>
<th>Disbursements</th>
<th>School/Center/Study</th>
<th>Subject</th>
<th>IRB</th>
<th>Sponsor Fed/Industry</th>
</tr>
</thead>
<tbody>
<tr>
<td>Funding</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Balance added through Central Fund</td>
<td>Card Inventory</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Card Request**

|          |               |                     |         |     |                      |
|          |               |                     |         |     |                      |
|          | Research Coordinator Submits Online Request | For Approval |         |     |                      |
|          | Request Rec’d and Reviewed | For Approval |         |     |                      |

**Distribution**

|          |               |                     |         |     |                      |
|          |               |                     |         |     |                      |
|          | Cards/Welcome Packet Picked Up | W-9’s Collected/ Uploaded to Box |         |     |                      |
|          |                     | Cards/Payments Disbursed |         |     |                      |

**Reporting/Reconciliation**

|          |               |                     |         |     |                      |
|          |               |                     |         |     |                      |
|          | Reconcile |                      |         |     |                      |
|          | Reporting | Sponsor Reporting |         |     |                      |

**Accounting**

|          |               |                     |         |     |                      |
|          |               |                     |         |     |                      |
|          | Reimbursement/Accounting |                      |         |     |                      |

**Year End 1099**

|          |               |                     |         |     |                      |
|          |               |                     |         |     |                      |
|          | Post into Tax1099 | 1099 Received |         |     |                      |
1) **ClinCard Request**
   - You will be asked for the following information:
     - Requestor information
     - Request details (IRB protocol number, Study Nickname, # and type of cards, budget, duration of study)
     - Payment Schedule
     - Accounting String (COA)
     - Approving Business Administrator

2) **Request Review/ Approval**
   - Disbursements reviews Approving Business Administrator and confirms
     - Business Administrator TAC/PO authority is above or equal to study budget

3) **ClinCards**
   - Disbursements will manage the ClinCard tracking log
     - Branded/Generic, Card Number, Date Received – cards have three-year expirations
   - ClinCards will be stored in the Disbursements office in a locked location with limited access.
   - Disbursements will notify Research Coordinator when cards are available for pick-up
     - Cards will be picked up from the Disbursements Office:
       - **3451 Walnut St: 3rd Floor Franklin Building- Room 310**
       - Research Coordinator will sign acknowledgment form with last 4 digits of cards picked up
       - Disbursements will email pertinent ClinCard documents to Research Coordinator

4) **Greenphire ClinCard System Access**
   - Disbursements creates the study in the Greenphire ClinCard system.
   - Disbursements creates username for Research Coordinator in ClinCard and assigns appropriate access level.
   - Email sent to Research Coordinator containing username and website information.
5) **W-9 Retention – Application/Database**

W-9’s will be stored securely in an application portal created by the Division of Finance information technology group.

- Research Coordinator collects Human Subject’s W-9
  - Sends the W-9 to the Accounts Payable Office located at **3451 Walnut St, on the 4th floor of the Franklin Building, Room 440. MUST BE MARKED “GREENPHIRE W-9’s.”**
  - AP scans and uploads W-9 form into application
    - File name: Human Subject’s Last Name, First Name, and Last Four Digits of SSN. For example: “Smith, John 4321”
  - Destroys actual W-9 form
  - Once form is uploaded Research Coordinator cannot view the W-9.
    - Disbursements will have access to W-9 form if needed
- If Human Subject already completed a W-9
  - Research Coordinator can search for file by Human Subject’s Last Name, First Name, and Last Four Digits of SSN.
    - The link is on Greenphire’s ClinCard Process tab on the accounts payable website, about halfway down the page.
  - If there is a file that matches, then Human Subject does not need to complete another W-9 form.
  - If there is no match, Research Coordinator should collect Human Subject’s W-9 and follow appropriate steps.

6) **Reporting/Accounting**

A list of Greenphire reports used to reconcile and track study activity is provided on the AP website. Monthly journals will be booked centrally (see below) one month in arrears. May/June are booked in June.

<table>
<thead>
<tr>
<th>Human Subject Payment Accounting</th>
<th>Db</th>
<th>Cr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cards/Loading Fees (Central)</td>
<td>1000</td>
<td></td>
</tr>
<tr>
<td>AP/Cash</td>
<td></td>
<td>1000</td>
</tr>
<tr>
<td>Human Subject Payments (Dept)</td>
<td>1800</td>
<td></td>
</tr>
<tr>
<td>Reimbursements (Dept)</td>
<td>200</td>
<td></td>
</tr>
<tr>
<td>Greenphire Cash (Central)</td>
<td></td>
<td>2000</td>
</tr>
</tbody>
</table>
7.) Year End 1099

All payments made through the Greenphire ClinCard will be exported to Penn’s Tax1099 account at the end of the calendar year. If an individual’s cumulative payments are $600 or more, they will be issued a 1099.
The following model displays the setup and subject registration for the University of Pennsylvania ClinCard Program.

**Structure**

In this model, the studies, rather than sites, will act as the identifier for subject location and define user access. This setup model will be easier to manage centrally, and decrease the opportunity for duplicate subject profiles and multiple cards for one person (which is more cost-effective, due to less card inventory being used). Though the reports will say “UPenn” for all payments, the study name and ID fields will display where the study is taking place, what department should be billed, and etc.

**Study Format**

The study name will serve as the identifier for subject location and defining user access. This will be accomplished using the naming convention method as follows:

**Study Name:** CNAC#-Org#-IRB#-Study Nickname

**Study ID:** CNAC#-Org#-IRB#-Study Nickname

*The Study ID is not visible when assigning coordinators to the studies, therefore the Penn IRB# should be used as the study Name rather than the name.*
Responsibilities

**Administrators** Disbursements will upload the studies into the ClinCard portal and upload the payment schedules. Upon loading the studies into the portal, the administrators will assign the studies to the designated Research Coordinators. By keeping the Administrator permission limited, other users will not be able to edit the study and/or the study budget.

**Approvers** may be designated at the study level to approve payments. Manual payments or travel reimbursements more than $100 will go into a pending status until Approved. The team for each study will determine who they want to have Approver access. The Coordinator that schedules the payment can be the same person that approves the payment. The lead coordinator is given total access to the study: Approver, Coordinator, and Reports.

**Coordinators** will have access to the “ALL” study along with their designated studies. They will be responsible for registering subjects into the ClinCard system, assigning ClinCards, as well as submitting payments to the subjects. Prior to registering a subject, they should search the “ALL” study to ensure the subject is not already set up. (Coordinators working on studies that take place at a site other than Penn’s campus will not have access to the “ALL” study.)

**Reporting** accessibility will be available at a Program (University) level, or it may be limited to a Study-Specific level, in which case multiple studies may be listed if need be. When reporting is provided at a study level, users will only receive data that pertains to their designated studies; therefore, they will be unable to view certain reports that contain data solely at the University level (i.e., Program Balance Report, Program Balance Detail Report, and Travel Funding).
Subject Registration

A Coordinator will register subjects under their study in the Greenphire ClinCard program. The Administrators will then enroll the subject into the “ALL” study so the subject is able to enroll in other studies and continue to use the same ClinCard. Under this model, coordinators would undergo the subject registration process as follows:

1) Coordinator will check the "ALL" study to see if the subject has already been registered into the system.

1A) If the subject is already enrolled into the "ALL" study, the Coordinator will enroll the subject into the actual UPenn study.

1B) If the subject is not already registered in the "ALL" study, the coordinator will register the subject into the actual study.

2) Disbursements will monitor new subjects and enroll them into the "ALL" study for future reference.

Using this model to register subjects, coordinators with access to studies taking place on Penn’s campus will be able to view all subjects within the system that are enrolled in the “ALL” study.

Subjects enrolled in studies that take place at a site other than Penn’s campus will not be enrolled in the “ALL” study.

Studies taking place on Penn’s campus have the option to “opt-out” of the “ALL” study.
CARD SECURITY AND RECORDKEEPING REQUIREMENTS:

- Keep the cards in a secure location.
- Limit authority to issue the cards to the minimum number of people possible; one person per study is strongly recommended.
- Exercise caution in sharing account information.
- Maintain complete records to demonstrate the receipt and issuance of cards.
- Do not photocopy the ClinCards.

LOST OR STOLEN CARDS:

If a participant loses their card or has their card stolen, and they are still an active member of a Penn study, they should contact the Penn coordinator immediately. The coordinator will be able to cancel the original card and reissue them a new one; but it is up to the discretion of the department or study team. Any funds on the original card that were fraudulently removed/spent cannot be replaced. If the participant calls Greenphire/the bank directly, they will pay a $7 replacement fee which is deducted from the available balance.

QUALITY ASSURANCE:

All studies using the Greenphire ClinCard will be subject to review and audit. Any study or department not using the program according to these procedures, may be subject to removal.

RELATED POLICIES AND PROCEDURES:

**VERSION/REVISION HISTORY:**

<table>
<thead>
<tr>
<th>Approval Date</th>
<th>Version</th>
<th>Version/Revision Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>07/31/15</td>
<td>V1.0</td>
<td>Initial documentation</td>
</tr>
<tr>
<td>08/18/17</td>
<td>V2.0</td>
<td>Revision</td>
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