

Human Subject Payments: Greenphire ClinCard Procedures and Guidelines

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INTRODUCTION

The Greenphire ClinCard, a reloadable, prepaid card, is a faster, safer method to pay your study participants and is the preferred payment method over AP check requests (Non-PO Payment System) or petty cash. The ClinCard allows for direct, on-site disbursement which helps to increase participant retention. In addition, the Greenphire ClinCard system supplies a convenient administrative tool for loading, tracking, and reporting your studies' payments in real-time. As of October 2016, the Division of Finance pays all fees associated with the ClinCard program.

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 as well as participants in non-clinical projects. Financial policy 2319.1 has been updated to incorporate this new form of payment. Participants are responsible for reporting income to the IRS. University of Pennsylvania is required to send a 1099 to any participant who receives \$600 or more in compensation in a calendar year for tax-reporting purposes.

PURPOSE

The purpose of the ClinCard is to pay subjects for participation in clinical research as well as participants in non-clinical projects such as paying per diem to visitors, awards to current students, small payments, and supporting Penn athletic and student programs.

SCOPE

This document applies to all research studies using the Greenphire ClinCard for research subjects. Any non-clinical projects must be approved by the Director of Disbursements.



SUBMIT A REQUEST

Before submitting a request for your study be set up in Greenphire, please consider the following with your team and/or Business Administrator/Business Office:

- Who will be the main contact for the study?
- Who will submit the online request? (must have a Pennkey/password)
- Who will need access to Greenphire and what kind of access?
- Does the BA want access to Reports within Greenphire?

Please contact us at <u>dofclinreq@pobox.upenn.edu</u> if you have any questions.

We encourage each Business Office/Department to develop an internal approval process that a study/project is required to complete before submitting an online request.

It's important to list Greenphire ClinCard as a payment option in your IRB application or in a modification you submit to the IRB for an approved study.

To set up a study in the Greenphire ClinCard system, go to our webpage:

https://www.finance.upenn.edu/Disbursements-Accounts-Payable

Scroll down until you see tabs going across the page and click on Greenphire ClinCard.

Click on the link Submit your Greenphire ClinCard Request highlighted in maroon.

Pennkey and Password are required to log in. If the study is not yet in the Greenphire ClinCard system, click *Study not in Greenphire*.

In the *Comments/Notes* section at the bottom of the request form, please list other people that will need access to the study in the Greenphire system and what kind of access they need:

- Coordinator registers subjects in Greenphire and makes payments
- **Approver** Any Miscellaneous Payment or Reimbursement of \$100 or more must be approved before the money is issued to the subject on their ClinCard.
- **Reports** There are many reports in Greenphire such as *Payment Detail* and *Study Budget Report*.

A person can have one type of access, all three, or any combination.

The person submitting the request will be listed in our records as the main contact for the study and will automatically receive all 3 types of access unless otherwise stated.

(See Responsibilities on Page 6 in this document.)



You can choose either the Penn-Branded or generic ClinCard.





ClinCards are good for 3 years. The expiration date is found on the front of the card.

Budget Amount

The Budget Amount on the ClinCard Request Form is the total amount you expect to pay your participants. We enter this dollar amount into the Greenphire ClinCard system when we set up your study, and your spending is limited to this amount. You have the ability to keep track of your payments and budget using the *Study Budget Report* under the **Reports** tab in Greenphire. At any time, you can submit another request to increase your budget. You do not pay anything up front. We will enter a journal entry in BEN each month for Greenphire activity for the preceding month.

Business Administrator Approval

We must have an emailed approval from your Business Administrator/Finance staff/Business Office in order to set up your study in Greenphire and to issue ClinCards. They are responsible for approving your budget and your use of Greenphire as a payment method.

Fill in their name and email address in the request form, and they will receive an email when you submit the request. We do not process your request until we have an email from your BA/Finance person with approval. Their approval level is based on their PO authority or Approver Level in the Non-PO Payment system. Please let your BA know when you have submitted your request so they can respond with their approval.

Duration of Study

Please enter the period of time that your study team plans to process payments for the study, from your first payment to the first patient until the last payment to the last patient. We will never close a study until we confirm with the main contact. To prevent fraud, we want to make sure studies do not stay open longer than necessary, especially if they have money available in their budget.



Budget Codes

The Division of Finance funds Greenphire to pay participants. We charge each study/department (using the budget codes you supply us) via a journal entry in BEN one month in arrears for monthly activity. In Greenphire, one study is linked to one budget code. If you have multiple budget codes, you need to set up multiple studies, and use the study nickname to differentiate. You must submit a separate request for each study. You may change your budget code for a study whenever necessary; the study stays open based upon the purpose of the study. Please contact us at dofclinreg@pobox.upenn.edu or submit an online request.

Approval Process and Setup

Once you submit your Greenphire request, you receive an emailed copy of the request, the BA/Finance person you listed also receives a copy, and so do the Penn Administrators. The BA/Finance person can click *Reply All* right away and let us know they approve it. If they have any changes or additions they want to make, they can do so in this email. If a day goes by, and we have not yet received approval from the BA, we will reach out to them for approval. As soon as we get BA Approval, we set up your study in the Greenphire ClinCard system, get your ClinCards together, and then email you to let you know you can come pick them up in the Franklin Building. The naming convention for studies in Greenphire is CNAC#-ORG#-IRB# (or School/Center)-Study/Project Nickname. Once you pick up the ClinCards, you will be given access to your study in the Greenphire ClinCard system. If this is your first study in Greenphire, you will receive an email from Greenphire with your user ID and instructions how to log in. ** Our goal is that within 3 business days you will receive an email letting you know your ClinCards are ready to be

picked up. **

Changes to Existing Studies in Greenphire

If you are already working with a study in Greenphire, and you need to order more ClinCards, increase your budget, or other changes/additions, please fill out another request form and make sure to click the box for *Existing Study*. You do not need to fill out every space, just the identifying information (IRB, Study Nickname, and BA name/email) as well as the item(s) you're changing. Feel free to explain or add more information using the *Comments/Notes* section at the bottom of the form.

If you are increasing your budget, please include a note letting us know if the budget amount is what you want to increase by or the total amount your budget should be raised to.



Experiments should be conducted as usual and all the same paperwork should be collected, including Penn ID's and/or W-9's from participants. We have a W-9 repository for secure storage. Please send your W-9's to the University's Accounts Payable office in Room 440 of the Franklin Building. We encourage departments and Business Offices to develop and maintain their own approval process and system of checks and balances around the Greenphire ClinCard system.

USER RESPONSIBILITIES

Administrators Disbursements will create the studies/programs in the ClinCard portal and upload the milestone payments. Upon loading the studies into the portal, the administrators will assign the studies to the designated Coordinators or staff. 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. Miscellaneous 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.*

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 loading payments for 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**.)

Reports will be available at a study level. Users can see their available budget by looking at the *Study Budget Report*. There are several reports to see payments such as *Payment Detail* or *Payments by Study*.

The main contact is given total access to the study - Approver, Coordinator, and Reports - unless otherwise directed.



MANAGING PARTICIPANTS IN YOUR STUDY

- Ask the participant if they have been part of a Penn research study before or if they have a ClinCard. You can search for them in the LOOK UP SUBJECT screen to see if they already exist in the Greenphire ClinCard system.
 - On the LOOK UP SUBJECT screen, there are multiple ways to search for a participant.
 - If you find their record, click on their last name to pull up their profile and then click **EDIT SUBJECT**.
 - Click on **+ADD STUDY** and a new dropdown menu will appear.
 - Select the study and then scroll down and click on SAVE.
 - This person is now enrolled in your study, and you can load payments onto the ClinCard in their possession.
 - If they no longer have the ClinCard they were assigned, you can assign them a new one by clicking on
 REPLACE CLINCARD and entering the Token# found on the front of the ClinCard envelope.
 - Any available balance will be automatically transferred to the new ClinCard (it may take about 10 minutes to update).
 - You can also edit subject information and make any necessary updates when you click EDIT SUBJECT.

New Participant

- When you register a participant, their First and Last Name, present address, and DOB is required by Greenphire. This information is used to identify them as the owner of their ClinCard when they call the Customer Service number on the back of the ClinCard. The participant can also reach out to the Coordinator or study team if they have issues with the ClinCard.
 - See <u>Know Your Customer</u> on Penn's Greenphire webpage.
 - See <u>Cardholder FAQ</u> on Penn's Greenphire webpage.
- Click on REGISTER SUBJECT, choose your study, and enter the participant's information and click on REGISTER. The system will bring you into the participant's profile. Click on ASSIGN CLINCARD and enter the **Token#** on the front of the ClinCard envelope to assign a ClinCard to them.
 - The ClinCard becomes activated when the first payment is loaded. The participant does not have to do anything to activate the card.
 - If you mistype the **Token#** when assigning a ClinCard, please contact us at <u>dofclinreq@pobox.upenn.edu</u> or Greenphire Support (via the support tab or <u>support@greenphire.com</u>). Support can correct the number of the ClinCard to make sure the correct card is assigned to the participant.



- The Coordinator only needs to register the participant once. Then, you can assign them to any study/project to which you have access.
 - Pull up their profile and click on **Edit Subject**.
 - Click on **+ADD STUDY** and a new dropdown menu will appear.
 - Select the study and then scroll down and click on SAVE.

Please ask all participants to hold on to their ClinCards because they are good for 3 years. They can use them for multiple payments as well as another study also under the Penn site in Greenphire.

Messaging

- When you register participants, add their cell phone and/or email address. By clicking the box that says *Enable Email Alerts* or *Enable Text Messaging*, the participant will automatically receive a notification when a payment is loaded onto their ClinCard.
 - You can update this at any time by clicking on **EDIT SUBJECT** and scrolling to the bottom.
- You can set appointment reminders in the Greenphire ClinCard system, and the patient will be sent notifications 3 days and 1 day before the appointment.
 - Pull up the subject's profile and click on **SCHEDULE APPOINTMENT**.
 - See <u>Greenphire ClinCard Msg Templates</u> on Penn's Greenphire webpage.



ClinCard Payments

- When making a payment for a participant, you have two options:
 - Select the study in the dropdown box in the participant's profile and then select the correct payment button.

SUBJECT INFORMATION	AUDIT HISTORY
Study Name	
ALL 400-4492-823761-PENN	Study status Enrolled

• Click on the correct payment button and then select the study from the dropdown box.

Study*		
ALL Please select a study ALL 400-4492-823761-PENN	•	
Note*		
MAKE PAYMENT	CANCEL	

o If you try to load a payment in the ALL Study, you will receive an error message in Greenphire and via email.

- A *Miscellaneous Payment* over \$100 will need a second level of approval. The coordinator can load the payment, but then must approve the payment in Greenphire before the money will be issued to the participant's ClinCard.
 - The same person that loads the payment can be the same person that approves the payment. Most payments in Greenphire are less than \$100; we just want the Coordinator to <u>double check</u> they entered the correct amount before they issue the payment.
 - To approve the payment, click on PAYMENT APPROVALS.
 - o If you have a pending payment, the system will send you an email at 6am and at 4pm to remind you.
 - \circ $\;$ The study team determines how they want to handle this process.



Milestone Payments

- To avoid this two-step process for payments, you can set up milestone payments if all or most of your patients will receive the same payment(s) for the same visit(s).
 - Send an email with the list of visits and dollar amounts in the order they occur to <u>dofclinreq@pobox.upenn.edu</u>, and we set up the payment milestones in Greenphire. You can also include this in your initial request.
 - When paying participants, click on REQUEST PAYMENT in the participant's profile. You will see *Miscellaneous Payment* listed first and then all the milestone payments. Click the appropriate milestone and then click **PAY**.
 - Once you pay a milestone payment, it disappears from the list. This prevents accidentally paying a subject twice.
 - Milestone payments are **preferred** since they are pre-approved and because they decrease the chance of any payment error.

Other Payment Information

- The cap on single payments is set at \$1,000. If you need to issue a stipend or reimbursement above that amount, please contact us at <u>dofclinreq@pobox.upenn.edu</u>, and we can temporarily raise the limit.
- Once the money has been loaded onto the ClinCard, the participant has several options for accessing the money:
 - Take the ClinCard to any major bank that cooperates with MasterCard and ask a bank teller for the balance in cash
 - Use the ClinCard as credit in store or online
 - Cardholder can set up a pin number for their ClinCard. They can use debit when making a purchase in a store and receive cash back. There are no fees.
 - If a Cardholder goes to an ATM to withdraw money, there will be an ATM and a fee deducted from the balance of the ClinCard.
 - For bank issues, see <u>MasterCard Face-to-Face</u> on Penn's Greenphire webpage.
 - See <u>Cardholder FAQ</u> on Penn's Greenphire webpage.

Please ask all participants to hold on to their ClinCards because they are good for 3 years. They can use them for multiple payments as well as another study also under the Penn site in Greenphire.

If a ClinCard is Lost or Stolen

- If lost/misplaced, the ClinCard can be spent by anyone until it is deactivated by Greenphire or replaced by the Coordinator.
- Only one ClinCard can be active for a participant at a time. If they are still active members of your study, you can
 assign them a new ClinCard, and the system will automatically transfer the available balance to the new ClinCard
 (may take about 10 minutes to update) and deactivate the old ClinCard.
 - Pull up the participant's profile, and on the right hand side, click 'Replace ClinCard.' Enter the Token# found on the front of the card envelope, and then click 'Assign.'
- If someone finds the lost ClinCard before it is deactivated and spends any of the money on it, there is nothing we can do to reclaim or replace that money.
- The participant can also contact Customer Service by calling the phone# on the back of the ClinCard (866-952-3795). If Customer Service replaces the ClinCard, then \$7 is deducted from the balance.
 - See <u>Cardholder FAQ</u> on Penn's Greenphire webpage.



GREENPHIRE SECURITY

User Access

If a Greenphire user does not log in to the Greenphire ClinCard system for a period of 3 months, their user access will be deactivated. When they need to access the system again, either they or the study's main contact will need to contact us at <u>dofclinreq@pobox.upenn.edu</u> to reactivate their user access.

To prevent any possible fraud, please contact us if a Greenphire user will be leaving the department or Penn or if they

no longer need access to a particular study.

Please do not share your login credentials

Card Security and Recordkeeping Requirements

- Keep ClinCards in a secure location.
- Limit authority to issue ClinCards 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 ClinCards.

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.

Closing a Study

When you submit the Greenphire ClinCard Request, we ask for the duration of the study. We keep a record of when studies/projects are estimated to end, and we will email the main contact to check if a study is ready to be closed in Greenphire. We understand there are many reasons why studies get extended, and we will not close a study in Greenphire without confirming with the main contact first. We also ask that you contact us at

<u>dofclinreq@pobox.upenn.edu</u> when you have finished paying all your participants, and your study is ready to be closed.

If you realize later you need to pay a participant, we can always reopen a study.

We also recommend you closing your study if it has been postponed and you're not sure when or if it will continue. We can always reopen it if you decide to continue.



We do not want any studies just "sitting" out there with money available in their budget. We are trying to limit the opportunity for fraud as much as possible.

ALL Study and HIPAA Compliance

See <u>ClinCard Data Security and Privacy Statement</u> on Penn's Greenphire webpage.