BIOMEDICAL RESEARCH INSTITUTE OF NEW MEXICO	INTERF	ACE CONTROL DIRECTIVE			
PROCEDURE FOR: Study Participant Payments					
PROCEDURE NO.: BRINM-ICD-105	REV. NO.: 2	PAGE:/1 of 6			
ISSUE DATE Joune 2017	DU	JE FOR REVIEW; June 2019			
Issued By:	Ap	oproved By:			
() () () () () () () () () ()		Authorizer			

1.0 SCOPE

This interface control directive (ICD) applies to all Biomedical Research Institute of New Mexico (BRINM) operations. ICDs provide instructions for all program personnel, including principal investigators (PIs) and contract personnel, needed to meet BRINM's mission, operations, and regulatory requirements. This ICD describes BRINM's process for controlling study participant payments.

BRINM's processes have been designed to meet the requirements of Generally Accepted Accounting Principles (GAAP), the appropriate provisions of the Federal Acquisition Regulations (FAR), and Office of Management and Budget (OMB) Circular A-110.

2.0 Definitions

<u>Great Plains (GP)</u> – refers to an accounting software program used by BRINM for their accounting procedures.

<u>Protected Health Information (PHI)</u> – according to HIPAA, is any information about health status, provision of health care, or payment for health care that can be linked to an individual. This includes any part of a participant's medical record or payment history.

3.0 PROCEDURE

This SOP describes BRINM's process for the payments to those who have participated in a study. PHI must always be in the physical custody of an authorized BRINM employee, whenever not secured in the designated locked cabinet.

3.1 General

BRINM implements its study participant payment procedures whenever BRINM Staff receives a participant payment request. All payments are processed by the Assistant Director. The process is complete once the participant has been payed, as shown in Figure 1.

3.2 Participant Payment or Travel Reimbursement

BRINM receives participant payment or travel reimbursement documents from the study personnel. Payment requests may be submitted either for participant payment on BRINM-SOP-411 Form 1, Payment Request for Study Participants, Initial (see Attachment 1), on BRINM-SOP-411 Form 2, Payment Request for Study Participants, Subsequent (see Attachment 2) or on BRINM-SOP-411 Form 4, Payment Request for Participant Travel Reimbursement (See Attachment 3). The process for both request types is the same.



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All participant payment or travel reimbursement request documents MUST be hand-carried and in the physical custody of authorized study or BRINM personnel at all times. The payment document contains sensitive PHI, including the participant's:

- Name
- Social security number
- Mailing address
- Study number

Because the payment request contains PHI, this document is secured upon receipt in a locked cabinet.

The BRINM Assistant Director is responsible for participant payments and uses the payment request to process payments to study participants.

3.3 Processing Initial Requests

Prior to submitting the initial request, the coordinator must:

- 1. Provide BRINM with a copy of an Institutional Review Board (IRB) approval to use debit cards as a source for study participant payments
- Submit a completed BRINM-SOP-411 Form 1 (Initial Request) to the BRINM administrative office at least two weeks prior to the participant's scheduled visit

Upon receipt of the processed form and card, the coordinator must:

- 3. Review the information sheet that accompanies the debit card with the participant
- 4. Ensure the participant signs the BRINM-SOP-411 Form 1 (Initial Request)
- Submit the completed, signed BRINM-SOP-411 Form 1 (Initial Request) to BRINM

3.4 Processing Subsequent Requests

Prior to submitting the subsequent request, the coordinator must:

- 1. Submit a completed BRINM-SOP-411 Form 2 (Subsequent Request) to the BRINM (BRINM does not process subsequent requests until the signed acknowledgement is returned to BRINM)
- 2. Inform the participant that the transfer takes five business days, from the time BRINM receives the request, for the funds to be transferred to the debit card

4.0 PROCESS RECORDS

Records generated provide solid data to ensure that required processes or subprocesses, as described in this ICD, have been effectively completed. The original payment or reimbursement request is a unique record generated by this ICD.

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5.0 **EXCEPTIONS**

There are no known exceptions to this procedure.

6.0 **REFERENCES**

BRINM Handbook BRINM NPC Checklist Federal Acquisition Regulations, Applicable Sections Office of Management and Budget Circular A-110

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Attachment 1, Sample BRINM-SOP-411 Form 1, Payment Request for Study Participants (Initial)



1501 San Pedro SE, Bldg 14 (151) Albuquerque, NM 87108 Voice: 505-260-1033 Fax: 505-256-5467

PAYMENT REQUEST FOR STUDY PARTICIPANTS (Initial Request)

DATE:		
TO: BRINM	ž	
REQUESTED BY:	BRINM Project #:	
Requested Amount:\$		
Participant:	SS#:	
A consent form for this participant is on file f	For participation in HRRC#:	
Study Coordinator:		
VA approved research project conducted on e #151-5, dated March 29, 2005, participant: O Research Projects, paragraph 3b. VA employ		
Investigator Signature	BRINM Account	
Card #	Payment ID:	
BRINM Authorization	Date:	
I certify that I am not a Veterans Affairs e I certify that I am a Veterans Affairs e duty hours for pay.	irs employee mployee and have participated in this research project <u>only after</u>	
Participant's Signature of Receipt	Date	
BRINM-SOP-411 Form 1, Revision 3		

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Attachment 2, Sample BRINM-FRM-411 Form 2, Payment Request for Study Participants (Subsequent)



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PAYMENT REQUEST FOR STUDY PARTICIPANTS (Subsequent Request)

DATE:	
TO: BRINM	
REQUESTED BY:	BRINM Project #:
Requested Amount:\$	
Participant:	
A consent form for this participant	s on file for participation in HRRC#:
Study Coordinator:	
VA approved research project cone #151-5, dated March 29, 2005, par	are prohibited from participating for pay as human research participants in a acted on duty per Albuquerque VAMC Professional Services Memorandum cipant: Obtaining Informed Consent for Human Participation in VA Approval employees may participate for pay after duty hours only.
Investigator Signature	BRINM Account
Transferred to Card on	
BRINM Authorization	
BRINM-SOP-411 Form 2, Revisio	. 2



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Attachment 3, Sample BRINM-FRM-411 Form 4, Payment Request for Participant Travel Reimbursement



1501 San Pedro SE, Bldg 14 (151) Albuquerque, NM 87108 Voice: 505-260-1033 Fax: 505-256-5467

DATE:		ARTICIPANT TRAVEL REIMBURSEMENT DATE NEEDED:		
TO: BRINM				
Please issue a check	n the amount of: \$			
Participant:Address:			SS#:	
The above-named particip that NMVAHCS employed approved research project	s participant is on file for particant is not a New Mexico VA Healthces are prohibited from participating for conducted on or off duty per NMVA. Obtaining Informed Consent for Human States are prohibited.	are System (NN or pay as humar HCS Medical C	AVAHCS) employee. It is understood in research participants in any VA Center Memorandum 151-5 dated	
Date of Travel	Mileage Claimed	Rate	Total Payment Requested	
	r Signature ************************************		BRINM Account ***********	
BRINM Authorization			Date	
Participant's Signature of Receipt			Date	

BRINM Proprietary Information

BRINM-SOP-411 Form 4, Revision 0