

October 15, 2019

Dear ECU Faculty:

Thank you for your memo dated October 1, 2019 regarding the Greenphire ClinCard (debit card) research participant payment system. We appreciate your concerns regarding the collection of social security numbers, participant anonymity, costs, and administrative burden and hope to relieve some of those concerns by addressing them later in this memo.

First, a bit of background information, over the past 5 years ECU on average has paid \$283,000 annually to research participants via cash, checks, and gift cards (excluding reimbursement for travel/meals, etc.). The new Greenphire debit ClinCard card will give research participants more options on how they want to receive their participant payment. With the debit card, participants can withdraw cash from ATM machines or use their card for purchases and cash withdraws at retail stores.

The benefits to research coordinators/Pis:

1. A more satisfied research participant:
 - a. The reloadable debit cards give participants more options on how they chose to get remunerated.
 - b. Helpful for populations that do not have access to banking.
 - c. Cards with Spanish instructions are available.
 - d. Participant can keep their personal debit card for any future/other studies utilizing the Greenphire system at ECU.
 - e. No fees will be incurred by the participant (depending on the bank, there may be an ATM withdraw fee).
 - f. Participants can easily check their card balances.
 - g. A participant's personal information is loaded directly into the system, stored securely, and only needs to be entered once, even if they participate in multiple studies.
 - h. Employees who are research participants can now be paid via the Greenphire debit card, instead of reporting their payments to payroll.
2. Less administrative burden:
 - a. No need to maintain logs with participants names to be submitted to accounts payable for tax reporting purposes.
 - b. No need to secure/lock cash or gift cards in a PI's/coordinator's desk.
 - c. No need to travel to the cashier's office to get cash or retail locations to purchase gift cards.
 - d. The ability for the PI to configure payments to any predetermined payment schedule.
3. Works for all type of projects, both clinical and non-clinical studies.
4. Provides comprehensive reports to PIs/Coordinators of payments on their study.

The benefits to the University:

1. Better security for the University's resources (cash and gift cards) with a visible and complete audit trail.
2. Improves compliance with both Federal and State tax reporting rules.

After receiving your comments, we have revised our processes. Below are responses for each of the concerns you presented in your memo:

1. "...public health and social sciences faculty were not meaningfully represented in the process..."

Even though public health and social science faculty may not have been directly represented in the evaluation of this payment system, there was direct representation by faculty from the Brody School of Medicine and the College of Arts and Sciences, as well as the University Research Council whose membership includes Associate Deans of Research from the Brody School of Medicine, School of Dental Medicine, College of Health and Human Performance, College of Fine Arts and Communication, Thomas Harriot College of Arts and Sciences, College of Nursing, College of Business, College of Education, College of Engineering and Technology, and Integrated Coastal Programs. Dr. Keith Keene, Director of the Center for Health Disparities, was also in attendance at one of the briefings.

2. "... require the collection of names, addresses, social security and country of origin..."

The IRS requires that ECU report all payments to individuals who receive at least \$600 from the University in a calendar year, and to remit tax on all payments of any amount paid to nonresident aliens. To comply with these requirements, we need to be able to calculate the total payments for each participant from all studies, and identify payments made to nonresident aliens. For this calculation, we need a consistent means for identifying participants. Therefore, individuals who participate in multiple studies need to have a social security number in Greenphire so we can calculate cumulative payments. Also, if the participant will receive at least \$100 in total from a single study, ECU will need the participant's name, address, tax residence, and social security number.,

Anonymous questionnaires or surveys that offer an incentive of \$10 or less to the recipient for completing and returning a questionnaire or survey are not required to use the Greenphire system or collect personal data. The PI must maintain a payment log as proof of payments to individual participants.

3. "...Cost will be substantial..."

The cost for a debit card of \$3.50 is an allowable direct cost that can be charged to the study. The cost to add funds to the card of \$1.15 is an allowable direct cost that can be charged to the study. The University has made a one-time purchase of 3,000 debit cards to be given to studies, without charge, as Greenphire is phased in. This will give PIs time to budget the extra cost into their future studies.

4. "...stymie research participation...hinder community-engage research, including research involving marginalized populations..."

The debit card gives participants more flexibility to use the remuneration they receive. This is helpful for research populations that don't have access to a bank. Debit card instructions are available in Spanish.

5. "...cause substantial backlogs and burden on our IRB..."

The IRB will continue to provide the participant with a "Consent to Collect, Use and Disclose Social Security Numbers". There will be no additional administrative burden on the IRB.

6. "...substantially increase the paperwork burden on researchers by requiring multiple layers of consent and documentation to obtain social security numbers..."

The Greenphire system will not require an additional layer of consent or documentation to obtain a social security number. When the participant receives payments that are greater than \$100, the coordinator will ask the participant to verbally provide their social security number so it can be typed into the secure Greenphire system. No written record is needed or maintained for this personal data. Only the last four digits of the social security numbers are viewable in Greenphire. Financial Services will only have access to information required to issue tax forms.

The Identity Theft Protection Committee (ITPC) and the Clinical Information Steering Committee (CIS) have reviewed the Greenphire software and have stated it meets the criteria to safely secure social security number information and other personal data. The Greenphire system will not maintain the names of the studies, only the IRB number. Social security numbers will only be used to report taxable income.

7. "...The system will not work for field studies where there is not internet access..."

Access to the internet is required. This technical challenge has not been assessed. I will work with ITCS to resolve this issue. I will also contact Greenphire to learn how other Universities handle this technical issue.

8. "...That the exemption for collection of social security numbers be raised to a minimum of \$100..."

Please see above.

9. "...That Greenphire system, which is expensive, not be required for low-value participant incentives..."

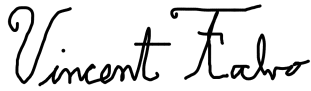
We recognize that each study is unique. There are unique research protocols, vulnerable populations, technical field issues, and cost issues. PIs may contact the Senior Associate Vice Chancellor of Research, Economic Development and Engagement or their designee for an exemption.

I hope I was able to address many of your concerns. We are currently conducting Greenphire pilot studies and testing the system and have scheduled the following meetings to answer your questions and show you the system.

Meeting	Date	Time	Location
Campus Demo/Town Hall	November 7th	9-11	Main Student Center Room 125
Campus Demo/Town Hall	November 13 th	9-11	ECHI

In the meantime, please let me know if you have any additional questions. I can be reached at falvov16@ecu.edu or (252) 737-1140.

Sincerely,



Vincent Falvo, MBA, CPA
University Controller

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