RESEARCH PARTICIPANT PAYMENTS FOR CHECK REQUEST SUBMISSIONS
(Took Effect 1/1/14)

Careful collection of names, permanent addresses and Social Security Numbers are necessary for research participant payment and non-cash incentives to meet 1099 reporting requirements. To ensure HIPAA protected information is closely guarded, and to reduce the threat of identity theft, UVM only requires social security numbers when payments and/or non-cash incentives to participants are greater than $100. The only exception is for a participant who is a Nonresident Alien. They will be required to provide their social security number for any payment and/or incentive of any amount.

The following guidelines apply to both Check Requests & Petty Cash submissions. All necessary participant information is required to be collected on the Payment Acknowledgement Form. When issuing a check, the Payment Acknowledgement Form is to accompany the Check Request.

Any subsequent payments are made to this person, only their name, mailing address and the last four digits of their Social Security Number need to be on the paperwork (in the applicable Social Security Number field).

HIPAA protected information should never be referred to on any payment forms, including the Check Request, Petty Cash Replenishment or Closeout form. The HIPAA Code of Federal Regulations states that UVM is required to have “adequate provisions to protect the privacy of Research Participants and to maintain the confidentiality of data.”

To meet this requirement, there must be no reference to the name or nature of the study on any of the above paperwork sent to the Disbursement Center or General Accounting, only that it is a payment and the date of the participation in the study. (Participant-specific information is needed on the Payment Acknowledgement Form, but no reference is needed to the name or nature of the study to ensure proper confidentiality. As noted previously, participant information is only collected to meet 1099 reporting requirements)

Check Requests received by the Disbursement Center or Petty Cash replenishment or closeouts that do not meet the above requirements will be returned to the department for correction. This will cause a delay in payment(s).

Forms
UVM Privacy Policy
UVM Privacy Procedures