

## **FN 29 UNIVERSITY OF PITTSBURGH POLICY (formerly 05-11-01)**

**CATEGORY:** FINANCIAL AFFAIRS  
**SECTION:** Payment  
**SUBJECT:** WePay Stored Value Card  
**EFFECTIVE DATE:** May 1, 2009  
**PAGE(S):** 7

### **I. SCOPE**

#### Purpose

This policy is applicable to all research studies conducted by the University of Pittsburgh (University) where compensation payments or expense reimbursements are made to research participants. In addition, this policy explains the purpose and function of a centralized research participant payment system, known as WePay, which was developed jointly by the University and UPMC using a stored value card (Cash Card) as the method of payment. The Cash Cards are currently provided by and processed through RBS WorldPay (formerly RBS Lynk), which is a subsidiary of the Royal Bank of Scotland through its U.S. operating group, Citizens Financial. Should this vendor change, notice will be provided to appropriate individuals or groups.

#### Background

The WePay system was developed to achieve the following goals: effective oversight and management of the University's financial assets; replacement of the manually intensive workflow with an internally-developed and customized software application; an aggregation system allowing the University to become compliant with IRS Form 1099 reporting; acknowledgement of and adherence to other regulatory requirements including HIPAA (control of protected healthcare information), Sarbanes-Oxley (financial monitoring and control) and USA Patriot Act (increased due diligence of bank accounts, foreign asset control and anti-money laundering); all while maintaining confidentiality of research participant data within a secure technology environment.

### **II. POLICY**

#### Studies Which Qualify for WePay

Participant payments for all University-wide research studies will be executed via the WePay system (Please refer to Section IV. Cash Payments for additional information on individual participant payments less than \$10.) Participant payments will be made via a Cash Card. All existing payment methods which are cash-based in nature, such as petty cash (both bank accounts or cash on hand), Payment Processing checks, travel advances and store gift cards will no longer be acceptable payment methods for participants in research studies.

Any requests for use of other payment mechanisms for research participants must be approved in writing by the Director of the University's Institutional Review Board (IRB). A copy of the written approval of such IRB exemption shall be provided to General Accounting by the department or Principal Investigator (PI).

In addition, exceptions to prohibited uses or uses of the Cash Card other than for research participant payments must be approved in writing by both the General Accounting and Payment Processing departments.

The WePay Cash Card may not be used for any purpose other than payments to research participants to compensate them for their time or reimbursements for expenses such as parking, transportation or meals. The WePay Cash Card may not be used for

the following:

- Participant payments to Foreign National Individuals. These payments require special handling due to tax regulations, and need to be submitted on a disbursement request to payment processing along with a Foreign National Tax Information Form (available at <https://www.bc.pitt.edu/payment/forms.html>) and forwarded to the Foreign National Tax Processing Unit at 207P Craig Hall.
- Department purchase using WePay (or any other purchase mechanism) of other retailer gift cards for distribution to research participants.
- Department purchases of goods and services from external suppliers or internal service centers. These are subject to existing Purchasing policies such as 05-02-15, Required Use of Contracted Suppliers; 05-02-16, Competitive Bidding; 05-02-17, Directed or Sole Source Purchase Justification; 05-07-01, Travel and Business Expense.
- Employee payments including wage advances, supplemental payments, employee travel expenses, employee travel advances, or any other employee reimbursable expenses subject to IRS Accountable Plan rules and possible federal tax withholding requirements.
- Loans.
- Refunds.
- Cashing personal checks.

#### Existing Studies

All existing studies which meet the WePay criteria above will be migrated to the WePay system. The participants will be paid via WePay upon the next study visit. The participant will be given the Participant Payment Fact Sheet as referenced in Section VI. herein before his/her payment is made.

### **III. CASH CARD MANAGEMENT/CASH CARD SECURITY**

#### Manager's Responsibility

Managers are responsible to ensure that staff under their supervision complies with all WePay policies and procedures. Misuse of WePay Cash Cards or the WePay system may result in sanctions including the possibility of termination of employment.

#### Cash Card Security

University personnel are responsible for properly securing and handling all Cash Card inventory, therefore unloaded Cash Cards are to be secured like cash or blank checks. Cash Cards are the personal responsibility of the party to whom they are assigned within the WePay system. Cash Cards in transit between two parties are the responsibility of the sending party until receipt is acknowledged via the WePay system by the receiving party. Following are specific security rules:

- Cash Card owners are responsible for all Cash Cards identified as theirs in WePay. Cash Cards should be kept in a locked facility and treated like cash or blank checks.
- Do not accept ownership of Cash Cards within the WePay system until the actual Cash Cards are in your physical possession.
- Cash Card owners must ensure that the Cash Cards owned in the WePay system

match the Cash Cards in their possession. Discrepancies must be resolved immediately.

- The actual Cash Cards should always be delivered and accepted in person. Interoffice mail should never be used to deliver Cash Cards. For offsite locations, a courier with tracking capabilities such as FedEx is acceptable.
- Cash Cards assigned to a new WePay user remain the responsibility of the sending party until the new owner accepts the Cash Cards in WePay. WePay will send an email notification to both users when Cash Cards are in transit for longer than 3, 5 and 7 business days, Finance/Audit is notified on the 7th day.
- If a Cash Card owned is lost, stolen, or damaged, it must be disabled within WePay. Cash Cards disabled within the WePay system can never be activated/reloaded.
- Older Cash Cards should be used first. Cash Cards expire after three years, and cannot be issued or reloaded in the six months before expiration.

#### Unusable Cash Card Disposition

All excess, expired or otherwise unusable Cash Cards will be returned to Payment Processing, a local Card Manager (CM), Administrator (ADM) or Business Office Manager (BOM) (as defined in IV.) for destruction as practical. The Cash Cards will be destroyed under dual control using a shredder that is capable of shredding these Cash Cards. Identifying information including Cash Card numbers, dates of destruction, and names of the persons who actually destroyed the Cash Cards will be recorded onto a Cash Card destruction certificate and confirmed by the individuals destroying the Cash Cards. This record must be kept for a minimum of 12 months by each user with a copy to Payment Processing and the Office of Finance. Cash Card remnants may be disposed of at the discretion of the individuals destroying the Cash Cards. A sample form (of destruction certificate) is included in the RBS WorldPay documentation referenced in Section VI. below (RBS Lynk Security Plan for MasterCard® Participant Incentive Payment Program.)

## **IV. SPECIFIC ACTIVITIES**

### Roles and Responsibilities

Users of the WePay system are assigned a specific “user role.” Each role is entitled to perform specific functions in the system. A WePay user may be assigned to only one of the six available roles, either administrative or payment-issuing, and may perform the tasks associated only to that role. Further, each role is responsible for monitoring and reconciling the activities of their projects or studies to appropriate accounting records. The terms “project” and “study” are defined in more detail below in Section IV.

Acceptance into WePay: Written documentation confirming authorization to add a WePay user will be approved by the appropriate University authority (e.g., responsibility center head or designate) and for WePay Administrators, further approval by General Accounting before entry into the WePay system. The WePay User Guide (Chapter 6) as referenced in Section VI. herein describes the process for Acceptance in the “Users” section and appropriate forms are provided in its appendix. The Office of Finance will manage the overall process of User access to the WePay database.

Termination from WePay: When a WePay user is terminated from the University, their access to WePay will be immediately revoked by the appropriate University authority (e.g., responsibility center head or designate) and confirmed in writing. The WePay User Guide (Chapter 6) describes the process for Termination in the “Users” section and appropriate forms are provided in its appendix.

Following are general descriptions of the primary duties of each role.

- Administrative Roles:

Finance/Auditor role – designed to oversee and monitor the system, is only able to access reports within the system, and view transactions in order to verify their appropriateness. This role is generally not available to the departments.

Card Manager (CM)

Primary CM – serves as the primary depository of Cash Cards on behalf of both the University and UPMC. Serves as the first tier of the Cash Card distribution network; is responsible for ordering Cash Cards from the current vendor, Oberthur Card Services, through RBS WorldPay; and distributing the Cash Cards to (or reclaiming cards from) Local CMs, ADMs, or BOMs.

Local CM – serves as the second tier of the Cash Card distribution network. The Local CMs will physically pick up and electronically accept Cash Cards from Primary CM. Local CMs will be created as appropriate in order to effectively distribute Cash Cards within a particular school, department or geographic campus location.

Administrator (ADM) – a required role responsible for establishing or updating project and study permissions, linking or unlinking Study Coordinator (SC) and Study Aide (SA) to studies, distributing Cash Cards to other users, resolving participant name/SSN conflicts and reconciliation of WePay activity to the University monthly level reports all as described more fully in the WePay User Guide. This role cannot create a subject nor can it load or activate a Cash Card.

Business Office Manager (BOM) – designed to accommodate the complexity of larger departments, this role is not required and has all of the same functionalities as the ADM except for creating projects.

- Payment-issuing roles:

Study Coordinator (SC) – a required role responsible for linking subjects to studies then making payments using Cash Cards in accordance with permissions established by the ADM. This role cannot create a project or study nor change any of its permissions.

Study Aide (SA) – designed to accommodate the complexity of larger departments, this role is not required and has all of the same functionalities as the SC, except for adding study access.

- Payment Processing functions:

Payment Processing is not a user role within the WePay system. However, it plays an important function as the primary CM and in the administration and review of electronic files as received from the WePay servers.

Payment Processing is responsible for such duties as managing and monitoring Cash Card inventories, electronic file management, operational monitoring of Cash Card usage, recording Cash Card usage in the University's ledgers and associated tax reporting and withholding, participating in system refinements and enhancements, and assisting in WePay system audits. Specific tasks for which Payment Processing is responsible are articulated in procedures such as the WePay Imports User Guide as referenced in Section VI. herein.

Audit Activity

Cash Card activity and inventory will be audited (1) regularly by ADMs and BOMs via direct access to WePay reports available to them electronically and (2) on a periodic

basis by both the University's Internal Audit and Payment Processing offices via direct access to the universe of WePay reports. Both physical and electronic audits will be conducted by the groups mentioned in (1) and (2) above.

These audits will monitor and evaluate various aspects of the WePay system such as proper accounting and controls, regulatory and internal compliance, operational efficiency, data and physical security, and system processing controls.

### Cash Card Services

Research participants owning a Cash Card should contact RBS WorldPay via a toll-free number (1-800-591-1110) and via the Internet at [www.cashlynkmc.com](http://www.cashlynkmc.com), for problems with a Cash Card after it has been issued. University personnel are not expected to provide primary customer service support to cardholders once the Cash Card has been issued.

### Project Definition

A project is defined as the broadest scope of work available about the research awarded as indicated by:

- Agency Notice of Grant Award or Cooperative Agreement
- Foundation Award Letter
- Industry Contract
- Internal Institutional Award Letter

Projects have at least one study. There are no limits to the number of studies under one project.

Projects must have a single source of funding. Additional sources of funding or change in grant number (e.g., 1R01XXXX-XX), contract number (e.g., N00-XXX-XXX), or document number require the establishment of a new project.

Project addendums and supplements to a project that do not change the contract number do not require a new project.

All projects should have at least two WePay Administrators (ADM) assigned for each project.

### Study Definition

Studies describe a specific scope of work within a defined project. Each scope of work under a defined project should be defined as an individual study, as typically indicated by, for example:

- Changes in payment schedule, or
- Requirement of a new IRB approval

Each study must have assigned at least one WePay Study Coordinator (SC) in order to pay study participants. All ADMs assigned to the corresponding project will also by default be assigned to all studies under that project.

### Cash Payments

The minimum Cash Card load amount permitted by MasterCard and the WePay system is \$10.00. Participant payments which are nominal in nature (defined as less than \$10.00

in a single payment), such as “man on the street” interviews, will not be required to include individual payment information by subject. Prior to implementing this type of payment, review and approval of the process must be granted by the Office of Finance to ensure proper WePay guidelines are followed. For these studies, the PI or his designate will obtain funds in a lump sum via a single load to the Cash Card. The PI or his designate will take the Cash Card to one of the two Citizens Bank branches in Oakland and withdraw funds to pay subjects in the appropriate denominations. A separate record must be maintained in sufficient detail to account for all payments (e.g., a subject receipt log initialed by recipient can be maintained.) A Cash Card should not be reloaded until the accounting for and reconciliation of all cash from the preceding load has taken place. These records will be prepared and protected in accordance with HIPAA regulations and maintained by the PI as necessary for audit purposes. Cash remaining after disbursement of each Cash Card load during the study will be deposited to the appropriate study account.

Studies in which research aims or study methods of the project require anonymous data collection are exempt from the collection of personal data. For these exceptions, the PI will produce the protocol which evidences the anonymous requirements and formal written approval will be obtained from the Director of the IRB for any exceptions, prior to any cash payments being made.

## V. CONTACT SECTION

Payment Processing	412-624-4004
- Primary CM	
- Electronic File Management	
- Operational Monitoring of Cash Card Activity	
Office of Finance	412-624-6620
- General WePay Information	
- System Access Set-up	
General Accounting	412-624-6290
UPMC	
- Help Desk	412-647-HELP
- Clinical Trials Office	412-647-4421
RBS WorldPay – Cash Card processor	
- Interactive Voice Response	1-800-591-1110
- Web Site	<a href="http://www.cashlynkmc.com">www.cashlynkmc.com</a>

## VI. REFERENCES

[Policy CS 23, Use and Management of Social Security Numbers and University Primary ID \(“UPI”\) Numbers](#) (formerly 10-02-08)

WePay User Guide, dated 2/18/2008, as subsequently amended

WePay Imports User Guide, dated 2/11/2008, as subsequently amended  
Data Entry Guidelines

University’s HIPAA policy located at <https://www.pitt.edu/hipaa>

RBS Lynk Security Plan for MasterCard® Participant Incentive Payment Program, dated November 2006, as subsequently amended

Participant Payment Fact Sheet, dated 10/01/2007, as subsequently amended