

## Man on the Street (MOS) Exception Process

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Currently by policy, when participant payments total less than \$10, a MOS methodology must be used. If payment amounts are greater than \$10 the Principal Investigator (PI) must obtain written approval from the IRB to use a “man-on-the-street” card methodology (IRB request criteria is outlined below.) For all WPIC requests a copy of the request should also be sent to the Director, WPIC Grants and Contracts.

After IRB (and WPIC) approval is obtained, we ask that the PI provide a brief description of the project, card use and subject receipt log so that the Office of Finance (OOF) can also add its approval for the project’s record (see sample approval below). Our overall objective is to ensure appropriate approval and control over the project’s funds and provide a valid audit trail.

- The PI or his designate will obtain funds in a lump sum via a single load to a WePay Card issued to them and must maintain a log of the payments made this way.
- We strongly recommend that the person cashing the card not issue it to themselves, in order to avoid any appearance of impropriety.
- In MOS-designated studies, compensation payments are not permitted. The compensation payment limit is automatically set at \$0 as compensation creates taxable income to the PI or designate who is simply obtaining funds for further distribution. MOS study payments to that individual will always be made through expense reimbursement.
- In MOS-designated studies the participant, i.e., the PI or designate who is issued the card and will cash the card, must include their SSN in their subject record.
- Inherent in an MOS-designated study is the fact that little information is gathered from the ultimate participant, thus requiring that a separate record be maintained to account for all payments (e.g., a subject receipt log initialed by recipient.)

### WePay™ Input Process

If the PI is successful in obtaining the MOS exception, the collection of SSNs from study participants is also waived so that they will receive their payment with no backup withholding taken from that payment. The WePay™ system will also ensure that the PI (or designate) cashing the card will not be improperly credited with taxable compensation income. The following points describe how the WePay™ Administrator must input the study to assure these proper system controls are in place.

1. Navigate to the Create a Study screen.
2. Check the Man on the Street Study box.
3. You will be prompted to upload a pdf copy of your MOS approval document from the IRB.
4. When the save button is clicked, you will be asked to confirm that appropriate approval was obtained and uploaded.

*It is imperative that this take place before any participant payments are made in MOS studies.*

## IRB Waiver Criteria and Information Required

- a) Description of research aims or study methods that require anonymous data collection.
- b) Inherent in an MOS-designated study is the fact that little information is gathered from the ultimate participant (the one paid in cash by the PI or designate). A separate record must be maintained to account for all payments (e.g., a subject receipt log initialed by recipient.)
- c) As a result, an SSN Waiver is implicit in an MOS Exception.
- d) Investigator Name
- e) E-mail address
- f) IRB Protocol Title
- g) IRB Protocol ID
- h) Funding Source
- i) Copy of IRB protocol and consent form that describes the payment schedule

## WePay™ Policy Excerpt

The minimum [Payment] 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 [Payment] Card. The PI or his designate will 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 [Payment] 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 [Payment] Card load during the study will be deposited to the appropriate study account.

## Sample Office of Finance approval

[PI Name] – Thank you for the information about the research program payments for subjects in the [Study Name and IRB Protocol Number] as outlined in your e-mail below. Use of a WePay™ card issued to a researcher is appropriate in this circumstance, as is the cash control and information recording process outlined in your e-mail and in our phone conversations. Accounting and reconciliation of the cash used should be completed before the card is reloaded again, and that record should be maintained in your file for audit purposes.

## Project Completion

Before terminating the project and study in WePay™, any money left on a man-on-the-street card should be reversed through WePay™ back into the study (Reverse Payment on the study coordinator menu.) That will not only take the cash off of the card, but will automatically credit the amount back into your study. Also, if you have cash left, you will need to follow your department procedures for re-depositing cash and have your study account credited for that amount. Finally, your WePay™ ADM can then mark the project and study as completed. *This step is irrevocable. Once marked complete, the project and its studies can never be reopened.*