BILLING PROCEDURES FOR CLINICAL TRIAL CONTRACTS AND OTHER AWARDS WHERE DELIVERABLES ARE SUBMITTED DIRECTLY BY DEPARTMENTS AND THE SPONSOR ISSUES PAYMENT

Health Sciences Center

BACKGROUND
The department that performs the clinical trials oftentimes processes the patient reports to the sponsoring agency. HSC Financial Services Post Award (HSC FSDPA) Department is not made aware of billings to the pharmaceutical companies for the clinical trials at the time the fee for service costs are incurred. As a result, HSC FSDPA is not aware of the deliverable sent to the agency and the receivable is not recorded in the general ledger until the payment is received from the sponsor. Since the receivable is unknown, the University would not know if a payment was not received.

DEFINITIONS
For the purpose of this procedure, any awards that require a non-financial deliverable sent directly by the department to prompt a sponsor to pay the University, must contact HSC FSDPA to ensure that receivables are recorded in the financial system.

PROCEDURES

1. Duties performed by the department at the time of service can ensure that the billing process is centralized in the HSC Financial Services Department Post Award.

1.1 HSC FSDPA must process all bills to sponsoring agencies.

1.2 Exceptions apply when the sponsor requires by contract:
   a. Confidential patient information
   b. Billings processed through sponsors’ billing system
   c. Additional approvals / signatures / deliverables

1.3 Bills requiring confidential patient information:
   1.3.1 HSC FSDPA will prepare bill and create receivable based on amount given from department or actual costs
   1.3.2 Original signed bill will be sent to department for processing with additional patient information if applicable
   1.3.3 Department will be responsible for sending to sponsor ASAP

1.4 Bills processed through sponsors’ billing system
   1.4.1 Department will process billing request via system provided by sponsoring agency
   1.4.2 Department will send an email to HSC FSDPA indicating the actual or estimated amount of the billing
   1.4.3 FSDPA will document the billing and create the receivable
1.5 Billing requiring additional approvals / signatures
   1.5.1 HSC FSDPA will prepare bill and create receivable based on amount given from department or actual costs
   1.5.2 Original signed bill will be sent to department for additional signature and processing and returned to FSDPA ASAP for mailing to sponsor.

2. If the department is unable or unwilling to provide the HSC Financial Services Post Award with the information required for billing, HSC FSDPA will process a fixed receivable amount.

   2.1 If the billing processes detailed in 1 above are not feasible options, HSC FSDPA will process a receivable amount each month based on the anticipated amount (percentage of contracted amount).

3. The Clinical Trials Center will provide assistance to those departments conducting sponsored clinical trials where payments are dependent on patient reports and the department does not communicate to HSC FSDPA the expected amount of payment.