

Memorandum of Understanding (MOU)

UW-Madison Focus Blue Reloadable Debit Card Accounts For Research Participant Studies

Memorandum of Understanding – Custodian	
Custodian Name:	NR:
Focus Blue Account Number:	
Department ID:	Project ID:

Custodian Responsibilities

A. Overall

- A1. I, the Custodian, am a UW-Madison employee.
- A2. I, the Custodian, am not a Coordinator or Reconciler for this Focus Blue account and/or any other Focus Blue account for which the same Coordinator or Reconciler are acting in the same capacity as for this account.
- A3. I will ensure no conflict of interest and no related parties between Custodian, Coordinators, and Reconcilers, and that the Custodian, Coordinators, and Reconciler are UW-Madison employees.
- A4. I will ensure there are a minimum of two and maximum of four Coordinators authorized to enroll participants and fund cards. If extraordinary circumstances exist that require more than four Coordinators, I will work with my Business Office and Cash Management.
- A5. I will notify the Department, Dean's Office, and Accounting Services Cash Management when there is a change in Custodian, Coordinators, and/or Reconciler and prepare applicable Custodian Fund forms per the Custodian Funds Policy and Procedures.
- A6. I will monitor account activity, ensure replenishments are requested, request changes to Coordinators and/or Reconcilers.
- A7. I will maintain current with all required training related to custodian responsibilities to ensure compliance with related University procedural requirements.
- A8. I will review and follow the Custodian Funds Policy and Procedures for Focus Blue reloadable debit card accounts.

B. Responsibilities with Focus Blue Reloadable Debit Card Account

- B1. Ensure that all forms to establish and maintain this Focus Blue account are completed per the Custodian Funds Policy and Procedures.
- B2. Establish practices for the Coordinator to log and track all payments made, reloadable debit card stock inventory, and ensure that reloadable debit card stock is stored in a secure location.
- B3. Monitor to ensure all payments of \$250 or more are completed through the Payment to Individual Report (PIR) process with Accounts Payable and supported with a completed and signed W-9 form.
- B4. Monitor to ensure that tax reporting is completed for payments that are \$600 or more in total to participants in a calendar year.
- B5. Monitor to ensure all payments are made out directly to the appropriate recipient in accordance with the purposes of the account.
- B6. Monitor to ensure the individual payment amount limits for this Focus Blue account are followed.
- B7. Monitor to ensure payments are not issued to parties with a conflict of interest, such as related family members, or affiliated organizations.
- B8. Monitor US Bank Prepaid Administrative Website on a regular periodic basis dependent on account activity, at a minimum monthly.
- B9. Monitor to ensure the Focus Blue account is not overdrawn. Accounting Services Cash Management also monitors Focus Blue account overdraws which may result in closing of the Focus Blue account.
- B10. Ensure that participants are provided with the US Bank Focus Card Pre-Acquisition Disclosure and Fee Schedule.

For circumstances that may challenge appropriate segregation of duties for compliance with financial internal controls, please contact your School or College Business Office to discuss further.

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C. Replenishment Responsibilities/Oversight

- C1. Monitor to ensure replenishments are based on payments made.
- C2. Monitor to ensure replenishment of Focus Blue accounts are done every 90 days or sooner based on activity.
- C3. If no payments are made for 90 days, submit justification for continual use of the Focus Blue account to your units' Business Office and to Cash Management.
- C4. If there has been no activity for 6 months, the Focus Blue account could be closed, unless justification is provided to your units' Business Office and to Cash Management.

D. Compliance with Policies

- D1. FERPA, HIPAA, IRB, and all other UW-Madison policies are followed.
- D2. Ensure all documents, activity, and reports are maintained and stored in a central, secure location according to the UW Record Retention Policy
(https://www.wisconsin.edu/compliance/download/general_schedules_and_records_management_services_pdfs/Fiscal-and-Accounting-General-Records-Schedule.pdf)
- D3. The research study has an Institutional Review Board (IRB) Number or self-certification paperwork showing that no IRB approval or certification is necessary.

Memorandum of Understanding – Custodian (I understand, not following these procedures would result in loss of Focus Blue account privileges.)			
	Printed Name	Signature	Date
Custodian			
Department Chairperson/Project Director			
Dean/Director			

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