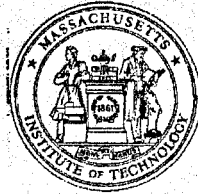


MASSACHUSETTS INSTITUTE OF TECHNOLOGY

Patrick W. Fitzgerald, Director
Office of Sponsored Programs
Massachusetts Institute of Technology
77 Massachusetts Avenue, Room E19-750
Cambridge, Mass. 02139-4307



Telephone (617) 253-2762
FAX (617) 253-4734
pwf@mit.edu

To: Members of the Faculty and Other Research Principal Investigators, Deans,
Assistant Deans, Administrative Officers

From: Patrick W. Fitzgerald

A handwritten signature in black ink that reads "Patrick W. Fitzgerald".

Re: Payment of Human Subjects

Date: January 18, 2005

MIT must comply with certain policies and procedures relating to the privacy of health information when human subjects are used in any research study. The Health Insurance Portability and Accountability Act, (HIPAA), requires that MIT must first obtain the permission of the human subject, prior to the release of any of the subjects health information. The instructions for meeting these requirements are part of the application process for approval of a research protocol by COUHES. Although HIPPA refers only to health information that is transmitted outside of MIT, the Institute feels that subjects who are paid for their participation in a Research Project should also be afforded such protection since there is a possibility that the protected health information could be identified through MIT's accounting records. For this reason, the following procedures will take effect immediately when a payment is made to any human subject.

- 1) The Departments, Labs, or Centers (DLCs) will prepare a Request for Payment form, (RFP), with the individual subject's name, social security number, mailing address, cost object, GL account 421572 (Human Subject GL), and the wording "Human Subject Participant Payment - Backup Documentation is on File in the Department" in the Explanation portion of the RFP form.
- 2) Under no circumstances should copies of the Informed Consent Forms be attached to the RFP. These Forms should be kept on file in the DLC.
- 3) The RFP will be submitted to the Office of Sponsored Programs, which will approve the RFP before forwarding to Accounts Payable for processing. The expense will be posted to a special cost object that has been set up for Human Subject costs and will then be transferred by journal voucher to the appropriate cost object listed on the original RFP. The detail on the monthly Detail Transaction Report (DTR) for all cost objects charged will only show the words "Human Subjects". To further protect the confidentiality of the Human Subject, the original RFP will be marked as "sensitive" and will not be scanned. The original RFP will be kept on file in the Controller's Accounting Office.

If you have any questions, please call Jim Hanlon at 2-2382 or Paul Arsenault at 3-7903.