

Symposium for Research Administrators

University of Wisconsin-Madison October 25th, 2022

Clinical Trials Post-Award

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Agenda

- Know your audience
- What is a clinical trial?
- Clinical Trial Budget
- Clinical Trial Revenue Cycle
- Revenue & Expenses
- Tracking Systems & Tools
- Questions





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Show of hands...

- Part of SMPH?
- Worked on a clinical trial before?
- Know what a clinical trial is?
- Heard of Billing Compliance?
- Worked in OnCore?
- Familiar with Smartsheet?





Clinical Trials

- NIH- "... clinical research studies involving human participants assigned to an intervention in which the study is designed to evaluate the effect(s) of the intervention on the participant and the effect being evaluated is a health-related biomedical or behavioral outcome."
- Phases 1-4
- Regulations (21 CFR)



UWCCC Clinical Research Finance Office

- All financial aspects of trial activation and maintenance for oncology studies done under contracts
 - Industry (133)
 - Other Academic Institutions (133/144)
 - Consortiums
 - Department funded (233)
- Includes pre-award and post-award
 - Post-Award is hiring!



Clinical Trials Agreements vs Grants

- Degree of uncertainty- ?? Patients, ?? Visits
- Work First, Money Second
- Clin Trial Accounts are set up in WISER as \$0 Budget
 - Budget is increased as payments are received
- Staff are not salaried at % effort (usually a fee per visit)
- Invoicing is typically done by Department (not RSP)
 - RSP will not have the data needed to invoice



CRFO Guiding Principles



#1- Everything Costs Money!



#2- Someone has to pay the bills

- Industry sponsors should cover all costs associated with running their trial
 - They will get exclusive financial benefit if the trial is successful
 - As a public/state institution, UW should NOT "subsidize" the cost of research for a multi-million/billion-dollar corporation
- Department Funding/Support
 - IITs
 - Underfunded studies (non-industry)



At the end of the day...

• Goal is for REVENUE to be equal to (or slightly more than) EXPENSES





Clinical Trial Budget

The Art & Science of Prediction



Define "Everything"

- Clinical procedures (labs, scans)
- Which drugs are provided/will be reimbursed by sponsor
- Non-clinical procedures (consenting, medication review, adverse events)
- Stipends/Travel Reimbursement
- Which collaborators will provide which services
- PI/Coordinator/Data Per-Visit Fees
- Administrative Fees (Startup, Annual Maintenance, Regulatory, Closeout)
 - SMPH Pilot Fees
- Indirects



Resources

- Study protocol
- Pharmacy/Lab/Imaging/Etc. Manuals
- Billing Compliance
- **Study Staff**
- Investigators
- Collaborating Departments
- UW Health
- Sponsor



Billing Compliance

- CMS has rules about what can and can't be billed to Medicare as part of a clinical trial
- Medicare Compliance Analysis (MCA) is done to determine which clinical procedures can be billed to insurance.
- This is vital information when developing your budget- anything that can't be billed must be covered by the study account.
- ALL trials that have at least ONE clinical procedure (a blood draw, etc.) MUST have a study calendar built in OnCore, and undergo Medicare Compliance Review



Example Study Budget

| | Screening | C1D1 | C1D15 | C2+ | EOT | LTFU |
|-------------------|------------|------------|-----------------|------------|------------|----------|
| Consent | \$200.00 | | | | | |
| Clinic Visit | SOC | SOC | SOC | SOC | SOC | |
| СВС | SOC | SOC | SOC | SOC | SOC | |
| СМР | SOC | SOC | SOC | SOC | SOC | |
| Mag/Phos | \$100.00 | SOC | SOC | SOC | SOC | |
| Imaging | SOC/INV | | | SOC | SOC/INV | |
| RECIST | \$200.00 | | | \$200.00 | \$200.00 | |
| Biopsy | INV | | | | | |
| Fresh Tissue | INV | | | | | |
| Archived Tissue | INV | | | | | |
| PRC Drug Dispense | | \$75.00 | | \$75.00 | | |
| Chemo Admin | | SOC | | SOC | | |
| CPL Processing | \$225.00 | \$150.00 | \$75.00 | \$75.00 | \$150.00 | |
| Stipend | \$50.00 | \$50.00 | \$50.00 | \$50.00 | \$50.00 | \$50.00 |
| Investigator | \$500.00 | \$300.00 | \$150.00 | \$300.00 | \$300.00 | \$150.00 |
| Coordinator | \$350.00 | \$175.00 | \$100.00 | \$175.00 | \$175.00 | \$100.00 |
| Data | \$225.00 | \$100.00 | \$85 .00 | \$100.00 | \$100.00 | \$85.00 |
| Subtotal | \$1,850.00 | \$850.00 | \$460.00 | \$975.00 | \$975.00 | \$385.00 |
| ОН | \$518.00 | \$238.00 | \$128.80 | \$273.00 | \$273.00 | \$107.80 |
| Total | \$2,368.00 | \$1,088.00 | \$588.80 | \$1,248.00 | \$1,248.00 | \$492.80 |

| Visits | |
|-----------|------------|
| Screening | \$2,368.00 |
| C1D1 | \$1,088.00 |
| C1D15 | \$588.80 |
| C2+ | \$1,248.00 |
| EOT | \$1,248.00 |
| LTFU | \$492.80 |

| Invoiceables | |
|--------------------|-------------|
| DOT Activation | \$9,600.00 |
| CRCO Activation | \$3,840.00 |
| PRC Activation | \$3,200.00 |
| CPL Activation | \$2,272.00 |
| Biobank Activation | \$1,984.00 |
| Radius Activation | \$1,280.00 |
| Reg Submission | \$1,280.00 |
| CT Chest | \$3,200.00 |
| Biopsy | \$12,800.00 |
| Fresh Tissue | \$192.00 |
| Archived Tissue | \$384.00 |

These will be paid automatically based on data entered in EDC.

These will be paid once post-award sends an invoice.



Payment Terms

- Know and understand the Payment Terms in the contract
 - Schedule for Visit Payments
 - Invoice Payment Term
 - Rules on Invoicing (i.e. within X days of occurrence)
 - Timeline for final invoice
 - Holdback
- Beware ACH/wire payments- all payments come into one UW-Madison deposit account, and ACH/wire payments are light on details- hard for RSP to know which project it goes to

\$11,644.42 CHK-CREDIT (22) 832090 IQVIA RDS INC CCD 22/10/11 ..Board of Regents of EDI PYMNTS 7561323952 091000017653991 EDI

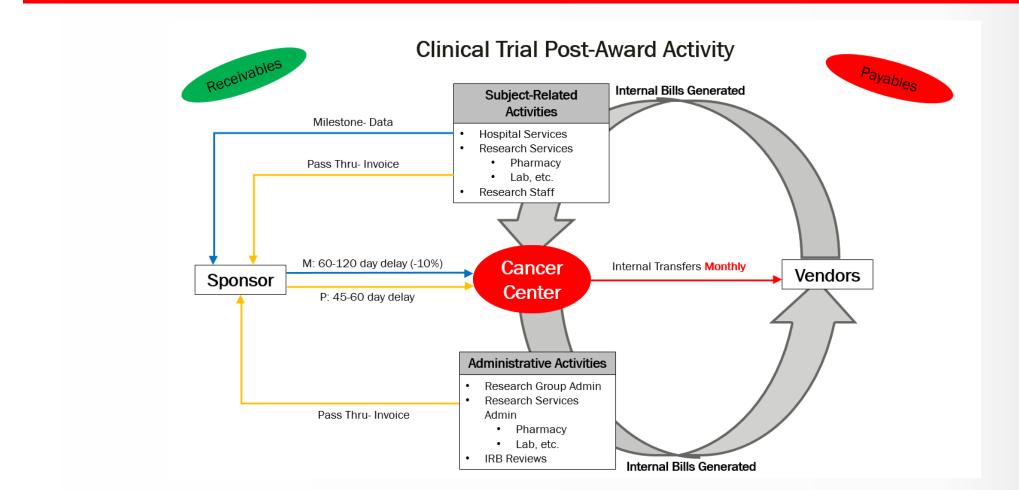


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Post-Award



Clinical Trials Revenue Cycle





Example Visit

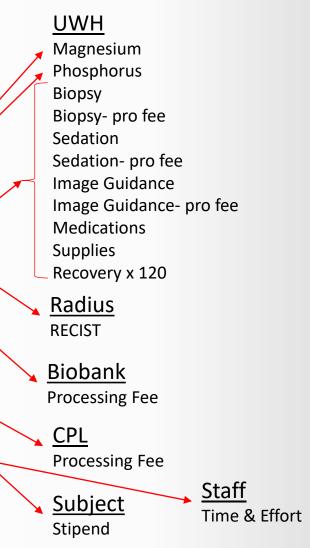
Invoiceables Biopsy- \$12,800 Fresh Tissue- \$192 •

| Mile | ston | <u>es</u> | |
|------|------|-----------|--|
| - | | | |

Screening Visit- \$2368.00 🛀

| | PLANNED | ACTUAL |
|-------------------|------------|-----------|
| | Screening | Screening |
| Consent | \$200.00 | X |
| Clinic Visit | SOC | X |
| СВС | SOC | X |
| СМР | SOC | X |
| Mag/Phos | \$100.00 | X |
| Imaging | SOC/INV | SOC |
| RECIST | \$200.00 | X |
| Biopsy | INV | X |
| Fresh Tissue | INV | X |
| Archived Tissue | INV | N/A |
| PRC Drug Dispense | | |
| Chemo Admin | | |
| CPL Processing | \$225.00 | X |
| Stipend | \$50.00 | X |
| Investigator | \$500.00 | X |
| Coordinator | \$350.00 | X |
| Data | \$225.00 | X |
| Subtotal | \$1,850.00 | |
| OH | \$518.00 | |
| Total | \$2,368.00 | |

EXPENSES



Now multiply it...

- ... by many visits (CRFO-managed studies avg 450 visits/month)
- Tons of data to keep track of
- UWCCC CRFO depends on OnCore to track everything
 - Adopted OnCore for all new studies 2016 forward



Establish Tracking Method

- Determine how you will track financial data
 - Contract items that will trigger revenue (visits, invoiceable procedures)
 - Expected expenses from those activities
 - Choice of tracker will depend on number and complexity of studies
- Options
 - Excel
 - QuickBooks
 - OnCore
 - Other



OnCore

- Clinical Trials Management System (CTMS)
 - Protocol, Study Calendar, Subject Visits, Budget
- Ties the budget to study activity in real time to generate Accounts Receivable (A/R) for each study
- Generate invoices
- Log payments & reconcile against A/R
- Payables Module
- Reporting



Administrative Fees

| Protocol Items | | | | | | | | | |
|--|---|--------------------------------|-----------------------|----------|----------|----------|---------------------------|--------|----|
| Show 10 v entries | | | | | | Filter | | | |
| Event | Triggering Event | Occurred Date \Rightarrow | Last Invoiced Date | Direct 🔶 | Total 🔶 | Withhold | Total After Withheld 🔶 | Select | NA |
| Clinical Research Central Office (CRCO) Annual Maintenance- Complex | Date Based | 09/23/2022 | 05/27/2022 | 2,500.00 | 3,200.00 | | 3,200.00 | | |
| PRC Fee: Quarterly Pharmacy Fee Beginning Mo. 4 | Date Based | 09/23/2022 | 05/27/2022 | 360.00 | 460.80 | | 460.80 | | |
| UWCCC: CPL Fee: Annual Maintenance Fee | Date Based | 09/23/2022 | 05/27/2022 | 520.00 | 665.60 | | 665.60 | | |
| UWCCC: Disease Oriented Team (DOT) Annual Maintenance- Complex | Date Based | 09/23/2022 | 05/27/2022 | 2,000.00 | 2,560.00 | | 2,560.00 | | |
| UWCCC: Disease Oriented Team (DOT) Change in Research- Complex | IRB Review: Change Review, Full, Approved (05/31/2022) | 05/31/2022 | 05/27/2022 | 750.00 | 960.00 | | 960.00 | | |
| UWCCC: Disease Oriented Team (DOT) Change in Research- Complex | IRB Review: Change Review, Full, Approved (08/22/2022) | 08/22/2022 | 05/27/2022 | 750.00 | 960.00 | | 960.00 | | |



Visit Payments

Budget Set Up in OnCore

| | | Screening - Screening | 4251.07 |
|-----|---------------------------|-----------------------|---------|
| Set | 1 HR+/HER2- Breast Cancer | Treatment - C1D1 | 1971.07 |
| in | 1 HR+/HER2- Breast Cancer | Treatment - C1D8 | 1496.07 |
| 111 | 1 HR+/HER2- Breast Cancer | Treatment - C1D15 | 1621.07 |
| ore | 1 HR+/HER2- Breast Cancer | Treatment - C2D1 | 1746.07 |
| | 1 HR+/HER2- Breast Cancer | Treatment - C2D8 | 1271.07 |
| | 1 HR+/HER2- Breast Cancer | Treatment - C2D15 | 1271.07 |
| | | | |

| Study team documents | Initials 🔶 | Milestone 🔶 | Occurred Date 🝦 | Direct 🔶 | Total 🔶 |
|-------------------------|------------|--------------|-----------------|----------|----------|
| visits | ** | Screening | 01/05/2021 | 4,251.07 | 5,441.37 |
| | ** | Arm 1: C1D1 | 01/22/2021 | 1,971.07 | 2,522.97 |
| OnCore creates a | ** | Arm 1: C1D8 | 02/01/2021 | 1,496.07 | 1,914.97 |
| list of items | ** | Arm 1: C1D15 | 02/08/2021 | 1,621.07 | 2,074.97 |
| completed and | ** | Arm 1: C2D1 | 02/23/2021 | 1,746.07 | 2,234.97 |
| the amount | ** | Arm 1: C2D8 | 03/02/2021 | 1,271.07 | 1,626.97 |
| owed to us | ** | Arm 1: C2D15 | 03/09/2021 | 1,271.07 | 1,626.97 |



Invoiceable Subject Procedures

- If a procedure needs to be invoiced to sponsor (common for high-dollar procedures), Pre-Award will set it up that way in the budget
- Once the visit is occurred, the invoiceable item will appear as a separate line item from the visit so we can invoice it.

| Procedure/Lab | Sequence No. | Initials 🔶 | Milestone 🔶 | Occurred Date 🧅 | Direct 🔶 | Total 🔶 | Withhold | Total After Withheld 🧅 | Select | NA |
|---------------------------|--------------|------------|-----------------|-----------------|----------|----------|----------|------------------------|--------|----|
| BONE IMAGING - WHOLE BODY | | | Arm 1: C3D1 | 08/04/2022 | 1,400.00 | 1,792.00 | | 1,792.00 | | |
| BONE IMAGING - WHOLE BODY | | | Arm 1: C13D1 | 02/23/2022 | 1,400.00 | 1,792.00 | | 1,792.00 | | |
| BONE IMAGING - WHOLE BODY | | | Screening | 05/31/2022 | 1,400.00 | 1,792.00 | | 1,792.00 | | |
| BONE IMAGING - WHOLE BODY | | | W8 | 09/09/2021 | 1,400.00 | 1,792.00 | | 1,792.00 | | |
| BONE IMAGING - WHOLE BODY | | •• | Screening | 05/23/2022 | 1,400.00 | 1,792.00 | | 1,792.00 | | |



Invoicing

- Depending on contract terms and study activity, review for invoicing quarterly
- Create & send invoices to sponsor
- Keep track of invoice due dates and follow up with sponsor if invoice is not paid
- Expect pushback from sponsors
 - Invoiced for items not in sponsor EDC
 - Dates do not match EDC
 - Wording on invoice doesn't EXACTLY match contract



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Revenue Reconciliation

- Look for remittance details with payments
 - If you have an outstanding invoice that matches the dollar amount of the check, may not need details
- A lot of the time you will need to request these from the sponsor
- Use these details to reconcile the payments against your A/R
 - Auto-paid visits will need to be reconciled to ensure full payment
- Follow up with sponsor regarding discrepancies
 - Sponsor paid for visit not in your tracker
 - Sponsor did NOT pay for a visit that IS in your tracker
 - Sponsor paid incorrectly (wrong arm)





- Different internal departments have different processes
 - Some allow department "pre-review" before posting, some don't
- WISER is **not** a PHI-secure system
 - Backup documentation will not be uploaded if it contains PHI
 - Departments are responsible for keeping copies of detailed line items with the PHI
- Bills should be reviewed for accuracy if feasible
 - UW Health bills should ALWAYS be reviewed



OnCore Payables

- Payables can be set up to help track expected expenses
- Salary
 - Budgets have \$\$ allocated to staff for each visit, OnCore tracks this and we report it out each month for chargeback
- Subject Reimbursements
 - Stipends and travel reimbursement are attached to the budget in OnCore, so we can track which subjects are owed reimbursement based on the visits that have been occurred. These are processed as PIRs or non-employee reimbursements.



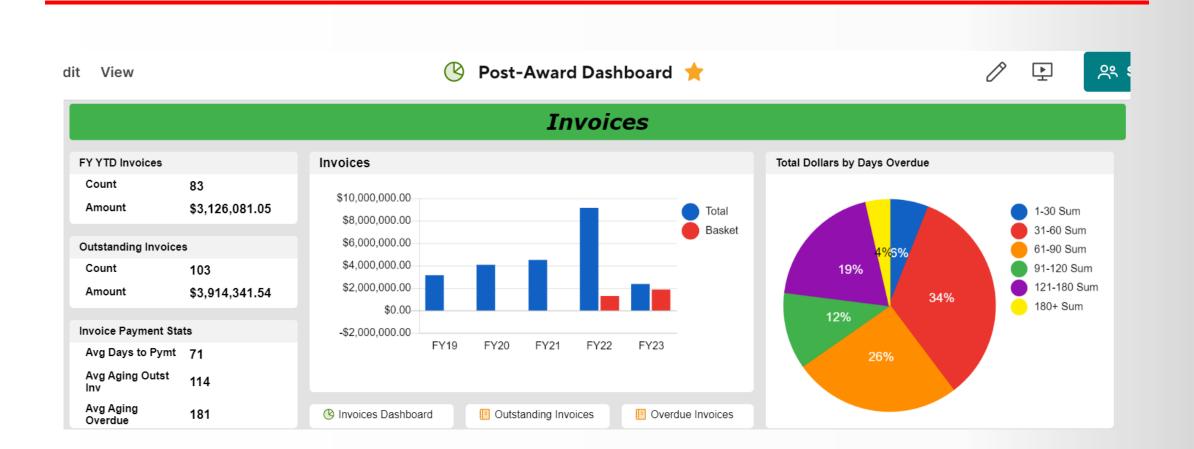
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Smartsheet

- Use as supplemental system to OnCore to manage WISER accounts
- Converted from MS Access to Smartsheet in 2020
- Tracks info on payments received in office
- Tracks invoices & due dates, sends reminders to sponsors
- Import data from WISER and OnCore
- Dashboards & Reports
- Not PHI-secure (yet)
- In the works- reports to show tx for all CRFO managed accounts for monthly review



Smartsheet Dashboard 1





Smartsheet Dashboard 2

| Ń | Filter Off | · | | | | | | | New |
|---|--------------------|--------------|------------------------|--------------------|--------------|----------------|------------------------|---------------------|-----------------|
| | Invoice Overdue | Follow Up | Invoice Number | Protocol Number | Invoice Date | Invoice Amount | Outstanding Balance | Invoice Due Date | Days Overdue |
| | • | • | AAI5439_UW20102_005 | UW20102 | 10/12/22 | \$499.20 | \$499.20 | 12/11/22 | -59 |
| | • | • | AAJ2126_UW21000_002 R1 | UW21000 | 04/27/22 | \$1,408.00 | \$1,408.00 | 06/11/22 | 124 |
| | • | • | AAD3554_UW17154_004 | UW17154 | 09/06/22 | \$1,448.00 | \$1,448.00 | 10/21/22 | -8 |
| | • | • | AAK1395_UW21133_001 | UW21133 | 04/25/22 | \$2,500.00 | \$2,500.00 | 06/09/22 | 126 |
| | • | • | AAC8641_UW17053_006 | UW17053 | 01/28/22 | \$2,634.24 | \$2,634.24 | 03/29/22 | 198 |
| | • | • | AAJ8998_UW21087_002 | UW21087 | 09/06/22 | \$3,000.00 | \$3,000.00 | 11/05/22 | -23 |



Smartsheet Dashboard 3

| Payments | | | | | | | | | |
|---------------------------|------------------|---------------|--------------|-------------------|-------------------------------|---------------------|----------------|--|--|
| New Checks to Allocate | | | | | | | | | |
| Checks 1- Allocation | Active Checks | 0 | | | | | | | |
| | | | | | | | | | |
| Verify Allocations | 灯 Filter Off 🔹 😭 | 4 <u>-</u> | | | | | N | | |
| Checks 2- Verify | | | | | | | | | |
| Checks to Deposit | Check Number | Check Date | Check Amount | Payment Method | Payor | Check Rec'd Date | Check Comments | | |
| Checks to Deposit | | | | | | | | | |
| Oncerts 3- ready for De | 1005069965 | 10/05/22 | \$2,992.64 | Check | Greenphire, Inc. | 10/12/22 | | | |
| Checks in Transit | 023091 | 09/29/22 | \$19,340.80 | Check | MedPace Clinical Research, LI | 10/12/22 | | | |
| 🕒 Checks 4- In Transit | 020071 | 07727722 | Q17,010.00 | oncon | | 10/12/22 | | | |
| | 107702 | 09/29/22 | \$4,529.60 | Check | ICON Clinical Research | 10/04/22 | | | |
| Check for Posted to WISER | | | | | | | | | |
| | 828329 | 09/28/22 | \$3,086.40 | Check | DrugDev | 10/04/22 | | | |
| | | | | | | | | | |

Account Closeout

- When the study is fully closed at the IRB, can start processing the account for closure
- Final review & reconciliation of account
 - Send final invoice ASAP (check contract for timeline)
 - Remind sponsor to pay any outstanding visits or unpaid invoices
- Notify collaborating departments to send final billing
- Close any encumbrances & subawards, review expenses
- Confirm final payment received (including any holdbacks)
- Once final payment is received, assess final balance & perform cost transfers if negative/submit Residual Balance Request if positive



Closing Thoughts

- A well-drafted budget makes post-award so much easier
 - Clear terms
 - Minimize invoiceables
- Keep track of your invoices & A/R- make sure Sponsor is paying!
- Build relationships with your study team(s)- they know what is happening on the ground with the study & subjects
- Try to stay as up-to-date as possible
- Be consistent, document your workflows





- Email- <u>dawsontibbit@wisc.edu</u>
- Reach out over Teams!

