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information  
regarding federal  
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## Account Set Up of Awards with Restricted Funds

In an effort facilitate the management of awards with certain award restrictions, Research Services (ORS) has implemented a new procedure for setting up Special Budgets for those awards that have restrictions for a **specific** dollar amount **and** require additional approval from the sponsor to lift the restrictions and spend the funds. An example of this type is restriction is “\$35,000 of this award is restricted for the purpose of purchasing XYZ equipment. Copies of at least three bids must be sent to the Grant Officer and written approval from the Grants Officer must be obtained prior to purchasing the equipment.” Examples of restrictions that would not be subject to this procedure are “\$35,000 of this award is restricted for the hiring of a research subject advocate”, or “No funds may be spent on this award for the use of animals.”

When an award is received that contains a specific prior approval restriction, the award will be set up at the full amount of the award but PBUD and PBIL will be reduced by the amount of the restriction. A comment will be entered on the Account Information Summary describing the restriction and that PBUD and PBIL are reduced by that amount.

When ORS receives notice from the sponsor that the restriction has been removed, PBUD and PBIL will be increased to the authorized amount.

If you have any questions, contact the appropriate pre-award staff member.

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## PennERA Update

### PennERA: Penn's Electronic Research Administration project

#### Goal

Build on the foundation laid in Phase I and move to next phase of the project. Phase II will include:

- Upgrade of current installed base to Release 10
- Delivery of additional tools and processes to support Penn's research enterprise
- Enhanced access to information to the Research Community

#### What's Next?

- Upgrade of PennERA system from version 9.x to version 10—Version 10 will include new features, enhancements, and improved navigation, and is required in order to move forward with the development modules (Proposal and Protocol Development).
- Develop a recommendation and implement a formal End User Support Model—Based on analysis and needs identified by Research Community
- Implement near-term solutions—Activities that will provide enhancements to research administration
- Decision as to which Development module to implement, Proposal or Protocol Development
- Decision on Faculty/Reviewer Web Interface—Assess development of a web-based interface for faculty and reviewers to potentially submit/review/track Protocol and Conflict of Interest information
- Recommendation for Research Portal—Develop recommendation, in alignment with the overall Penn Portal Strategy, for a web portal to serve as one central location for information about research at Penn

#### Who will be affected?

- Faculty and Principal Investigators across the University
- School/Center Business Administrators
- Central office staff in ORS and ORA

#### When?

- System upgrade by January 2005
- Near-term solutions Fall 2005 through January 2005

#### Near Term Solutions

- *Protocol Summary Benchmark Report*—A report to be attached to the Protocol approval letter providing a snapshot of the lifecycle of the Protocol
- *AIS Online*—The AIS (Account Information Sheet) will be available as a web-based report. The AIS online will provide the end user the ability to view Proposal Award and Account data, as well as cost share, sponsor, sub contracts and sub accounts
- *SOMERA Interface*—Interface between PennERA and SOMERA (School of Medicine ERA)

#### Where are we?

- Rollout of all Phase I modules complete
- New applications web site launched; address (<http://www.pennera.upenn.edu/>) was not changed, but the site was improved for easier access
- Automation of Special Budgets completed on July 26; entry of Special Budget (PBUD, PBIL, and PTCS) values for new awards and award changes are automatically fed from PennERA to BEN Financials

More information about PennERA at <http://www.pennera.upenn.edu/>  
 Comments or questions to [pennera@pobox.upenn.edu](mailto:pennera@pobox.upenn.edu)

## Did you know that.....?



For more information on Sponsor's Policies, please see the links located on the ORS website:  
<http://www.upenn.edu/researchservices/spo/nsor%20links.html>

...The cost of an identification card for a temporary employee cannot be charged to a sponsored project as a direct cost. This type of expense is included in the F&A rate calculation and therefore must be treated consistently for all employee classifications whether full time, part time, or temporary.

...Terms and conditions applicable to an award often will be found in a proposal announcement or guide. For example, the revised NSF Grant Proposal Guide published in July states, "No NSF funds may be spent on meals or coffee breaks for intramural meetings of an organization or any of its components, including, but not limited to, laboratories, departments and centers."

...Harvard and Beth Israel Deaconess Medical Center paid NIH \$2.4 million to settle a false claim allegation. The allegation included but was not limited to: paying scientists on an award who did not work on the award; charging salary of scientists who did meet the 75% effort requirement of the award; charging supplies and equipment to one award but used for another; and charging salary of scientists who did not meet the citizenship requirements of the award.

...Federal agencies other than Penn's cognizant agency (HHS) can perform audits. Both the Department of Education and the National Science Foundation are known to visit campuses and audit their awards. In addition to reviewing salary charges and effort reports, documentation of required cost sharing is reviewed as are other types of expenses such as cell phones and computers.

....Patient Oriented Research (POR) Program training recertification is now required for all Faculty and Research Staff by January 1, 2005. This means if you were POR certificated prior to December 3, 2003, you must be recertified before January 1, 2005

\*\*Tip for Business Administrators: New grant submissions or non-completing continuations submitted during calendar year 2004 would be a good time to check all POR certifications and remind Faculty and Staff of the new requirement. Contact Office of Human Research for more information. <http://www.med.upenn.edu/ohr/>

...ORS signatures are required on many documents including:

- \*Relinquishing statements
- \*NSRA termination notices
- \*Requests for carryovers when required
- \*Requests for no-cost extensions
- \*All financial reports on sponsored programs funds
- \*NIH Just In Time Requests

**NIH NOTICES:****CHANGE IN PROCESS—CENTRALIZING THE RECEIPT OF PROGRESS REPORTS FOR ALL NIH INSTITUTES/CENTERS EFFECTIVE OCTOBER 1, 2004**

RELEASE DATE: July 23, 2004, NOTICE: NOT-OD-04-054

As NIH continues towards its goal of end-to-end electronic research administration, business practices are being revised to improve efficiency and service to the grantee community. Effective with non-competing progress reports due on/after October 1, 2004, NIH is centralizing receipt and initial processing of all NIH non-competing progress reports. The new centralized mailing address for all NIH Institutes/Centers (IC) will be announced in a separate NIH Guide Notice issued after September 1, 2004. As part of this centralized activity, all progress reports will be scanned and stored in the eRA Enterprise system. As a result, the scanned images will also be available to grantee institutions through the eRA Commons.

Progress reports that are due before October 1st should continue to be mailed directly to the NIH awarding IC. Those addresses can be found at:

[http://grants.nih.gov/grants/type5\\_mailing\\_addresses.htm](http://grants.nih.gov/grants/type5_mailing_addresses.htm)

Note this new business process affects only non-competing progress reports currently mailed directly to NIH ICs. It does NOT change the Center for Scientific Review mailing address used for all new and competing grants nor that process. The new non-competing process will use a unique address.

It should also be noted that this change is only for progress reports received by NIH ICs. Progress reports for grants to other DHHS agencies that use the PHS2590 should continue to use the mailing addresses noted for those agencies.

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**DETERMINING FULL-TIME PROFESSIONAL EFFORT FOR CAREER AWARDS**

RELEASE DATE: August 3, 2004, NOTICE: NOT-OD-04-056

Almost all NIH supported career development awards (Ks) require that recipients devote a specified minimum percentage of their full-time professional effort (in most cases 75%) to the goals of the career award.

In addition, policy requires a full-time appointment at the applicant organization, with salary based on a full-time, 12-month staff appointment.

NIH has previously defined this requirement as encompassing the entirety of the professional commitments of the investigator, both within and outside the applicant institution. Although designed to protect the investigator's time for research and career development, this definition recently has been cited as problematic because investigator appointments are becoming increasingly complex.

In an effort to address these concerns and to foster more consistent treatment across all NIH Institutes and Centers, the following policy regarding the determination of full-time professional effort will now be applied to all K awards: A career award recipient meets the required commitment of total professional effort as long as: 1) the individual has a full-time appointment with the applicant organization; and 2) the minimum percentage of the candidate's commitment required for the proposed Career award experience is covered by that appointment. Please note that a candidate may propose a career award experience that involves sites beyond the

**NIH NOTICES:** *(continued)*

applicant institution or organization, provided that the goals of the total experience are encompassed and supported under the appointment with the applicant organization.

This policy also applies to individuals who hold additional appointments with an independent clinical practice plan, the Veterans Administration or other organizations. Assuming a full-time appointment with the applicant organization, a candidate meets the professional effort requirement of the career award as long as the minimum percentage required for the proposed Career award experience is supported by the appointment at the applicant organization. Responsibilities outside of the applicant organization appointment are not restricted but also cannot be used to meet any minimum effort requirement.

The following example is illustrative:

An investigator has a full time appointment at a university and a half time appointment with another organization (VA or independent clinical practice plan). Under this new policy, the investigator can be supported because the university and candidate can commit at least 75% of the full time appointment to the award.

The purpose of this policy is to clarify this requirement to ensure that the criteria for proposing and charging effort on career awards are consistent with the other NIH funding mechanisms. We also expect that this clarification will expand the pool of eligible candidates for NIH career awards.

This revised policy applies to all existing Career Development Award announcements for all applications and resubmissions submitted on/after October 1, 2004.

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**BUDGET LIMITATION ON AHRQ LARGE RESEARCH AND CONFERENCE GRANT APPLICATIONS**

RELEASE DATE: August 5, 2004, NOTICE: NOT-HS-04-007, Agency for Healthcare Research and Quality (AHRQ)

This announcement informs the research community that effective with grant application receipt dates beginning October 1, 2004, AHRQ is implementing a budget limit of \$300,000 total (direct and indirect) costs per year for large (R01, R18) grant applications. For large conference grant applications (R13) AHRQ is implementing a total cost budget limit of \$100,000 per year. The existing budget limits of \$100,000 total costs for small research (R03) grant applications and \$50,000 direct costs for small conference (R13) grant applications remain unchanged.

AHRQ is implementing this policy due to limitations on available grant funds. This budget limit is being implemented for all competing large research and conference grant applications submitted to AHRQ, including new, amended, and competing continuation applications, unless otherwise indicated in a specific grant announcement. AHRQ is discontinuing its policy concerning unsolicited applications that request more than \$500,000 in direct costs in any year (see <http://www.ahrq.gov/fund/advance.htm>). AHRQ will no longer accept applications that request more than \$300,000 in total costs in any year of the proposed grant project.

This new grant budget limit for large research and conference grant applications will be in effect until further notice from AHRQ.

**Please contact your ORS Pre Award Administrator with any questions regarding these Agency notifications.**

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## Frequently Asked Questions . . .

### What is a Letter of Credit?

While most sponsors reimburse the University of Pennsylvania for any expenses incurred on sponsored projects via invoices which are submitted to them by ORS or according to a predetermined payment schedule, several federal sponsors reimburse the University under a letter of credit. This provides the University with the ability to draw down funds as they are disbursed.

### How do letters of credit work?

When awards issued under a federal letter of credit are set up in BEN, they are designated as such by the selection of the appropriate attribute in BEN. Each night a process which is referred to as “revenue running” occurs for any expenses that were incurred on the fund (that were charged to allowable object codes). During this process, an entry is created in BEN which makes the fund appear that payment has been received for all of these expenditures. This is not the case. The entry has transferred the receivable to an account where all receivables under that letter of credit are tracked. ORS reviews these accounts on a regular basis and takes the required actions to request the expenditures (up to PBIL) as they are incurred. Amounts are drawn only up to what has been expended on the award (in allowable object codes) **per BEN**. *Please note that departments should review their 115 or 134 reports to verify that total expenditures match total revenue. Draw downs occur against total revenue. If charges are not included in total revenue, the funds will not be drawn. This happens when expenditures are charged to object codes which have been designated as not allowable on sponsored projects. Any expenditures on a sponsored project for which revenue does not run are the responsibility of the department to move to the appropriate object code or to provide other resources to cover. Please contact your ORS accountant for assistance or with questions related to this issue.*

### What happens if my final expenses are not reflected on the fund at the end of the adjustment period?

All expenses are required to be reflected on the fund by the end of the adjustment period which is 60 days after the end date for most federal funds. For some letter of credit sponsors, any funds not drawn within 90 days following the end date will be deobligated and will no longer be available to the University. **Please note that in these cases, any costs which were not reflected on the fund at the end of the adjustment period and resulted in the unavailability of funds will be the responsibility of the department to cover with other resources. Any resulting deficits will be transferred to the department’s “0” fund by the responsible ORS Accountant.**

### What about revised FSR’s on letter of credit funds?

While some sponsors have policies that state revised FSR’s are allowable up for a limited time following the end date of the award, others do not allow revisions of this type. Some sponsors such as Department of Education do not require FSR’s. The final expenses are considered to equal the final amount drawn. Any funds not drawn within 90 days following the end date are no longer available to the University. If you wish to submit a revised FSR (or adjust final expenses), please contact your ORS Accountant for guidance as to what the sponsor’s policies are. As with all sponsored programs, to ensure ability to collect full payment, final expenses must be appropriate and reflected on the fund by the end of the adjustment period. **Any expenses added after this point will be the responsibility of the department to cover if the sponsor will no longer provide reimbursement.**

## *Getting to know your ORS Staff:*

### **Yvette Acevedo** **PennERA Project Leader**

**Years at Penn:** 6

**Years in Research Services:** 2.5

**What she does:** In addition to being the PennERA project leader for SPIN Plus and end user support planning, Yvette is the PennERA System Administrator

**Hobbies/Interests:** Travel, photography, reading, bikram yoga

**Favorite Restaurant:** El Vez, Continental, Buddakan, South Street Souvlaki

**Favorite ways to spend a vacation:** Intrepid travel

**What Co-workers say:**

... Quiet, but an incredible sense of humor

... An absolute pleasure to work with

... Very knowledgeable, but always looking to learn something new

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## **Effort Reports**

Yes, it is that time of year for Research Services to distribute the Spring Semester Effort Reports. Floyd Harris is busy organizing and mailing over 7,500 effort report forms to departments all across campus.

Please review the effort reports to determine if the information on the form matches the salary distribution in payroll and then distribute the reports to the faculty and staff in your department. Keep the roster with the names of staff for which a report was distributed so you can keep track of the reports that have been certified and returned to Research Services. As you know, Floyd also has a copy of the roster and has access to the database to enable him to identify individuals for whom a report has not been returned.

The Spring Semester effort reports are due to be returned to Research Services by **October 8, 2004**. However, why wait? We suggest that you encourage your faculty and staff to review and certify the reports before the Fall Semester 04 gets in full swing. This way you will avoid the frequent email reminders that ORS will for certain send to all departments with delinquent effort reports.

### **August's Contributing Authors, ORS Newsletter:**

**Pam Caudill, Director of Pre Award Non-Financial Administration, Office of Research Services**

**Kim Garrison, Assistant Director, Office of Research Services**

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**Ann Saputelli, Director, Compliance Monitoring, Office of Research Integrity & Compliance**

**Todd Swavely, Associate Director –Penn ERA, Project Manager, Office of Research Services**

**Alice Tangredi-Hannon, Director, Research Compliance, Office of Research Integrity & Compliance**

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## Training Opportunities:

### ORS FAQ's and ORIC Quizzes:

Take a moment to look at our quizzes or FAQ section for more guidance on administering 5-funds here at Penn. Both can be accessed by clicking Training on our home page (<http://www.upenn.edu/researchservices/>).

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### Available from ORS:

#### Sponsored Programs at Penn August 25<sup>th</sup> and 26<sup>th</sup>

ORS is once again offering their workshops on "Sponsored Programs at Penn". This two-day program is intended for administrative and other support staff at the University who manage grant and contract accounts. The program is a series of workshops that will cover the life cycle of extramural research from proposal preparation to account closeout. Topics include Proposal Preparation & Processing, Contract Negotiation, Award Acceptance and Account Set-up, Financial Compliance & Allowability, Post Award Management, Reporting Tools and Data Sources, Closeouts, and Audits.

This program has been designed to provide a comprehensive introduction to the basic knowledge required to effectively monitor and manage grant funds at Penn. The program is being offered on August 25th and 26th 2004. Please see the Financial Training Department Website for registration information. For more information or to register, please go to:

<http://www.finance.upenn.edu/ftd/courses.html>

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### SRA Annual Meeting:

October 23 – 27, Salt Lake City, Utah

*For more information, please see*

<http://www.srainternational.org/NewWeb/meetings/annualmeeting/04/index.cfm>

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### NCURA Annual Meeting:

October 31 – November 3, Washington DC

*For more information, please see* <http://www.ncura.edu/conferences/46/>

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## Pre-Award Administration Staff

The Pre-award staff is responsible for processing proposals, reviewing, negotiating, and accepting awards (except for corporate contracts), as well as, providing post-award non-financial administration for these accounts. Questions concerning issues such as no-cost extensions, carryover requests and other administrative matters should be directed to the appropriate pre-award contact.

Questions concerning **industrial clinical trial agreements and sponsored research agreements** should be addressed to the Corporate Contracts Group. Greg Curley is responsible for Account Information Sheets (AIS's) for all industrial clinical trials and sponsored research agreements.

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- SOM – Dean's Office

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- Biostatistics – SOM
- Cancer Center – SOM
- Center for Experimental Therapeutics – SOM
- Institute for Environmental Medicine – SOM
- Institute for Human Gene Therapy – SOM
- Institute for Neurological Sciences – SOM
- Medical Genetics – SOM
- Neurology – SOM
- Pathology & Laboratory Medicine
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- Obstetrics & Gynecology – SOM
- Surgery – SOM
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- Law School
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- Hematology/Oncology
- Neurosurgery - SOM
- Orthopedic Surgery – SOM
- Pediatrics – SOM
- Physiology – SOM
- School of Medicine, Institute for Medicine & Engineering – SOM
- Radiation Oncology
- Radiology

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- Annenberg School for Communication
- Cell & Developmental Biology – SOM
- Center for Bioethics – SOM
- Dermatology
- Geriatrics – SOM
- Microbiology – SOM
- Ophthalmology – SOM
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- School of Nursing
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- Clinical Trial Agreements

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## Office of Research Services

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### *About Our Organization...*

#### *Our Mission*

The Office of Research Services (ORS) oversees the administrative support of the University's externally funded research and is responsible for implementation of University policies established for this purpose. An important part of the ORS mission is service to the research faculty, through the provision of information and advice for the development of applications, and assistance in the administration of awarded grants and contracts.

In this role, ORS

- Supports the schools and centers in the development of proposals for grants and contracts;
- Reviews and approves all proposals before submission to the potential sponsor
- Coordinates negotiations of awards;
- Accepts awards for the University, including the signing of contracts;
- Provides oversight and guidance to faculty and staff concerning the proper management of sponsored projects;
- Prepares all financial reports to sponsors.

In addition to these functions, ORS is responsible for billing of contracts management of letters of credit for payment of grants, preparation of the facilities & administrative and employee benefit rate proposals and rate negotiations, management of the effort reporting system, and oversight of service center rate development. ORS reports jointly to the Senior Vice President for Finance & Treasurer and Vice Provost for Research.

## Office of Research Services

### Quick Contact List:

**ORS General Phone Numbers:** 215-898-7293 (General Information, Proposals, Awards)  
215-898-7269 (Financial Reports & Invoices, Accounting)

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