

Office of Research Services

-- Research Administration News --

Special Interest Articles:

- **Happy Holidays from the Office of Research Services**
- Questions about Subrecipients? -- See page 5
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New Accounting Procedures for Non-Federal Sponsors and the Indirect Costs of Research

Since many of the University's non-federal sponsors, (commercial entities, foundations and associations) do not reimburse Penn for Facility & Administrative (F&A) costs at the negotiated federal rate, and some do not reimburse for any F&A costs, the University has changed its accounting practices in order to recover more of these costs.

According to Sponsored Projects Policy No. 2116, commercial entities are expected to reimburse the University at the full federal negotiated research rate.

There are many foundations and associations that are willing to pay the direct costs of a project and also a reasonable share of the administrative costs associated with their funded project. In order to enable schools and centers to more fully recover the costs associated with the conduct of research, the University has instituted a series of changes to its procedures to enable recovery of some of these costs. The procedures below are designed to provide consistent charging and accounting practices for certain direct and F&A costs or supporting expenditures to non-federal grants.

Implementing these new procedures will require extra effort by investigators and administrators. In order to encourage Schools to incorporate these charges, in FY 2004 and FY 2005 the University will waive its 19% share of the overhead on the amounts Schools recover under these new procedures (collected in Object Codes 5295, 5296, 5297, 5299.)

Changes to Cost Accounting Standards

First, the University has revised the Cost Accounting Standards Disclosure Statement (DS-2) and submitted it to the Department of Health and Human Services to inform the Department of the change in University accounting practices to treat non-federal sponsors differently from Federal sponsors.

Dependent Tuition Charges for Projects with Non-Federal Sponsors

Second, effective July 1, 2004, the University will charge the dependent tuition benefit cost (currently 1.8% of full time EB-bearing salaries) to all awards from non-federal sponsors. As Principal Investigators and Business Administrators prepare proposals, please build these costs into the requested budgets. Effective January 1, 2004, new applications to non-federal sponsors must begin budgeting the 1.8% dependent tuition benefit.

Full Federal F&A Rate for Projects Sponsored by Commercial Entities

Third, the Provost has asked Deans not to waive or accept reduced F&A charges from commercial sponsors, and to request the full federal research rate on all proposals to commercial sponsors. This is consistent with the University's policy on F&A cost recovery ([Sponsored Projects Policy No. 2116](#)), which specifies that all projects should

pay the University's appropriate negotiated F&A rate, while making exceptions for non-profits.

New Accounting Procedures for Non-Federal Sponsors and the Indirect Costs of Research *(continued)*

New Options for Projects Sponsored by Foundations and Associations

Fourth, recognizing Foundation and Association's traditional reluctance to pay "full overhead", we ask you to request reimbursement for the following items of cost that are normally precluded from Federal reimbursement. These items of cost are identified in a new policy, Sponsored Projects Policy No. 2138 (Direct Cost Expenditures for Non-federal Organizations)

Direct Costs for Projects Sponsored by Foundations and Associations

Where the following items of cost can be specifically identified to a project, they should be budgeted as direct costs:

School and Departmental Administrative Costs

- Administrative and Clerical Salaries
- IT support costs
- Telephone line charges
- Ethernet Connections
- Office Supplies

Subcontract Costs

- Use Object Code 5332 for total subcontract costs (the "greater than \$25,000" exclusion will not apply to non-federal sponsors)

Space Used by the Project

- Lease Costs

Protocol Specific and Research Infrastructure Charges

- Protocol Preparation Fees for Clinical Trials
- Pharmacy Fees for Clinical Trials
- IRB and IACUC fees
- Environmental Health and Radiation Safety fees for waste disposal and radiation safety tests

F&A Costs for Projects Sponsored by Foundations and Associations

Charges for School and Departmental Administrative Costs

If specific School and/or Department costs for a project cannot be precisely quantified (and thus charged directly), then one may be able to negotiate a reasonable reimbursement of the project's fair share of these School and Departmental administrative costs. A new Object Code, 5299 has been established for this purpose.

How to Calculate: Add together the project's appropriate fair share of salaries, EB, telephone and Ethernet charges, office supplies, IT support and related costs. Note that when an employee's effort is more than 5% on a project, it should be direct charged. Salaries and benefits should be included as an indirect charge only when the effort is 5% or less. Document the calculation for the above items of costs and the method used.

How to Post: Debit the project in Object Code 5299 for School and Departmental Administrative Costs and credit the school's general unrestricted fund (the 000000 fund) in Object Code 5511. These charges should be posted monthly.

New Accounting Procedures for Non-Federal Sponsors and the Indirect Costs of Research *(continued)*

Cost of Space Used by the Project

If the project is the sole occupant of leased space, then the lease should be built into the project budget as a direct cost using the standard Object Code, which is 5250 for leased non-University space.

If the project shares leased space with other projects, one may be able to negotiate a reasonable reimbursement of the project's fair share of the lease cost as a F&A cost. A new Object Code, 5297 has been established for this purpose.

If the project occupies University space, for which the Operations and Maintenance and Facilities Renewal costs are allocated to the schools as part of "allocated costs" then the sponsor may be willing to include a reasonable reimbursement of the project's fair share of the space costs as an indirect cost. A new Object Code, 5295, has been established for this purpose.

How to Calculate: Determine where the project will be conducted and make a reasonable estimate of the net square footage needed. The Budget Office will supply to Senior Business Officers on an annual basis a schedule showing the space the school occupies and the cost per square foot for each building. Document the calculation for the above items of costs and the method used.

How to Post: Debit the project in Object Code 5295 for the project's share of University space or in Object Code 5297 for the project's share of leased space and credit the school's general unrestricted fund (the 000000 fund) in Object Code 5511. These charges should be posted monthly.

Charges for the Project's Fair Share of the University Services

In a very few cases, where a single large project is a significant portion (greater than 5%) of the entire school's total activity, it may be appropriate to negotiate a reasonable reimbursement of the project's fair share of the schools' portion of University Services allocated costs. A new Object Code, 5296, has been established for this purpose.

How to Calculate: The Budget Office will assist schools in making the following calculations. At the time of proposal, estimate the project's and the total school's expected Total Direct Costs (TDC) used in the University Services allocation, and the school's expected University Services Allocated Cost Charge (or that proportion of University Services that the sponsor will agree to pay) to estimate the project's fair share of the school's University Services charges for each year of the project period. Use the amount in the proposal, and for the first year of the project.

Annually during the life of the project, calculate the project's actual cumulative project share of school TDC, and the actual cumulative University Services costs (or that proportion the Sponsor is paying) and project these amounts for the rest of the project. Recalibrate the charge to adjust for changes in the project's share of the School TDC, changes in the School's University Services costs, and any amount previously over or under recovered.

How to Post: Debit the project in Object Code 5296 for the project's share of University Services costs and credit the school's general unrestricted fund (the 000000 fund) in Object Code 5511. These charges should be posted monthly.

Questions on charging costs not described above or for clarification of the instructions should be directed to Robert McCann in the Office of Research Services or Fran Seidita in the Office of Budget.

Did you know?



The NIH Revised Grants Policy Statement is available and is effective for all NIH grants and cooperative agreements with budget periods beginning on or after *December 1, 2003*. http://grants2.nih.gov/grants/policy/nihgps_2003/index.htm

If you are engaging an independent contractor (consultant) who will be performing their services within the City of Philadelphia they must obtain a Business Privilege license from the City. http://www.finance.upenn.edu/comptroller/tax/contractor_guide.shtml

Honoraria are not allowable as a charge against most government sponsored projects. They are considered a payment or reward where the primary intent is to confer distinction on, or to symbolize respect, esteem or admiration for, the recipient. Allowable services chargeable to a government sponsored project should be classified as to type of service, i.e., consulting fees, lecture fees, etc. Non-Government sponsored projects may be charged for honoraria with the specific approval of ORS. <http://www.upenn.edu/researchservices/rih/chapter10.html#honoraria>

The Office of Research Services announces a clarification of procedures for the review and approval of travel expenditures on sponsored projects.

Travel expenses charged to a sponsored project must follow University policy unless the sponsor imposes greater restrictions on the award. [Financial Policy 2367 Travel and Entertainment: Sponsored Agreements](#) states that it is “the responsibility of the traveler and the PI to know the terms set forth in the award of a sponsored project with reference to allowable travel expenditures.” The Office of Research Services is available to assist in the determination of the allowability of particular charges and whether or not prior approval from the sponsor is required. Also available from Research Services is a [Travel and Entertainment Expenditure Justification Form](#) which can be used to document the reason for the travel, as well as the approval of the PI. It is highly recommended that this form be kept in the grant file along with a copy of the reimbursement request.

Foreign travel to be charged to a federal award must follow the [Fly America Act](#) which requires the use of a United States flag carrier. More information on these rules can be found at <http://www.finance.upenn.edu/comptroller/travel/foreign/flyamerica.shtml>. Prior approval from Research Services must be obtained if a traveler needs to deviate from this policy.

To ensure compliance with the rules surrounding foreign travel on a federal award, Research Services must review and approve all foreign travel advances and reimbursements. The above referenced justification form must accompany any reimbursement requests that are to be approved by Research Services.

According to [Financial Policy 2367](#), Research Services must review and approve all foreign travel charged to a federal grant or contract. No other travel needs Research Services review but must be in conformity with [Financial Policy 2367](#). The [Travel and Entertainment Expenditure Justification Form](#) must accompany all travel forms sent to Research Services for approval.



Frequently Asked Questions...

What needs to be provided with an application that includes a proposed subrecipient?

For every application for federal funding that includes a proposed subrecipient the following items or information must be provided to Research Services prior to issuing a sub award.

- a) Name of Principal Investigator
- b) Scope of Work;
- c) Budget;
- d) Period of Performance;
- e) Name and Address of Institution and Institutional Official;
- f) Entity Identification Number;
- g) Letter of Intent signed by the subrecipient's authorized institutional official including a statement declaring whether the subrecipient is or is not subject to OMB Circular A-133;
- h) If not subject to OMB Circular A-133, (e.g. a commercial entity) a copy of the entity's most recent audited financial statement;
- i) Current F&A Cost Rate Agreement (unless already in ORS "library")

See [Sponsored Project Policy 2131](#) and [Sponsored Project Policy 2135](#) for further information.

What is subrecipient monitoring and who is responsible?

Many federal awards made to the University have funds that are "passed-through" to another organization in the form of a subaward to support a collaboration related to the project. Although these funds are expended by the subrecipient, it is ultimately the University's responsibility to ensure that federal funds are spent according to the applicable federal requirements. OMB Circular A-133, *Audits of States, Local Governments and Nonprofit Organizations* and OMB Circular A-110, *Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Nonprofit Organizations* require the proper stewardship of federal funds, including subawards.

The responsibility for subrecipient monitoring is a shared responsibility between Research Services, the principal investigator (PI) and the business administrator (see [Sponsored Project Policies 2131](#) and [2135](#)). While the Office of Research Services has procedures in place to review the subrecipient organization from a financial perspective, ***it is the responsibility of the Principal Investigator (PI) to monitor the scientific progress of the subrecipients and to review and approve all expenditures of the subrecipient. The PI must sign all invoices submitted by the subrecipient prior to the invoices being approved for payment.*** If there is concern regarding the programmatic performance of the subrecipient, it must be brought to the attention of Research Services at the earliest possible time to determine if payments should be withheld, the subaward modified or some other corrective action taken.

Research Services Announces New and Revised Sponsored Projects Policies

In collaboration with the Office of Research Integrity and Compliance, the Office of Research Services has revised a number of its Sponsored Projects Policies. These revisions were then reviewed further by the Business Advisory Board, an advisory group to the Sr. Vice President for Finance and Treasurer, Craig Carnaroli.

In particular, new policies have been written and important changes have been made to existing policies. Summaries of the new policies and important changes are below:

SPP #2106	Financial Responsibility	Identifies ORS as the office that enters into sponsored agreements on behalf of the Trustees of the University of Pennsylvania. Changes to budget/expenditures requiring institutional and/or sponsor approval require ORS review and approval. Change from 120 days to 90 days regarding corrections to expenditures.
SPP #2119	Cost Sharing/Matching Requirements	Clarifies the policy on cost sharing including discouraging the use of voluntary cost sharing in proposals. Confirms that cost sharing must be treated consistently and uniformly.
SPP #2127	Sponsored Projects Close-out	Adds <i>programmatic</i> reports to the timely submission of reports and requires the PI to prepare required invention reports which must be signed by Research Services after verification from CTT.
SPP #2131	Compliance with Subrecipient Standards of OMB Circular A-133	Identifies the necessary documents needed from the subrecipient. Defines the responsibility of the PI regarding subrecipient monitoring as well as the responsibilities of Research Services.
SPP #2135	Monitoring Subrecipients Not Subject to OMB Circular A-133	New Establishes policy for monitoring of subrecipients not subject to OMB A-133 by PI and ORS. Identifies the necessary documents needed from the subrecipient.
SPP #2138	Direct Cost Expenditures for Non-Federal Organizations	New Establishes policy for the direct charging of certain hitherto F&A costs to non-federal sponsors. Provides examples of costs that should be included as direct costs.

In order to successfully administer sponsored programs, it is important to be familiar with not only the requirements of the sponsor but the financial policies of the University. As regulations change so may the University's policies. Access to all of the Sponsored Projects Policies for your review is at the following URL: <http://www.finance.upenn.edu/vpfinance/fpm/2100/index.shtml>

NIH: Revised NIH Grants Policy Statement Now Available

The National Institutes of Health (NIH) is pleased to announce the publication of the revised NIH Grants Policy Statement (NIHGPS, rev. 12/03). The NIHGPS (12/03) is applicable to all NIH grants and cooperative agreements with budget periods beginning on or after December 1, 2003. This revision supersedes, in its entirety, the NIH Grants Policy Statement (03/01) as a standard term and condition of award. However, the March 2001 NIHGPS continues to be the standard term and condition for all NIH grants and cooperative agreements with budget periods that began between March 1, 2001 and November 30, 2003.

The NIHGPS provides both up-to-date policy guidance that serve as NIH standard terms and conditions of awards for grants and cooperative agreements, and extensive guidance to individuals that are interested in NIH grants.

The NIHGPS (rev. 12/03) incorporates NIH policy changes since March 2001, public policy changes, policy clarifications, as well as document enhancements. Sections of the revised policy statement have been rewritten to provide clarity; however, the overall policies in these sections have not changed. The document is available in the following electronic formats: HTML and PDF http://grants.nih.gov/grants/policy/nihgps_2003/index.htm. Links to the 10/98 and 3/01 NIHGPS will remain the same.

NIH will publish interim grants policy changes through the issuance of NIH Guide Notices. Each change will be described, including its applicability and effective date; and the necessary language to implement it as a term or condition of award provided.

Important policy changes that are implemented with the 12/03 NIHGPS include:

- Closely related work: the option for grantees to pursue prior approval to account for multiple projects under a single cost objective has been eliminated. NIH will now apply the relatedness provision of OMB Circular A-21 (C., 4., d., (3)) to all NIH recipients which states if a specific cost can not be reasonably allocated to a specific project; it can be charged to any of the benefiting projects on any reasonable basis.
- Cost transfers: policy now states that transfers of costs from one project to another or from one competitive segment to the next solely to cover cost overruns are unallowable.
- Cost overruns: included a definition to the glossary that states: "Any amount charged in excess of the Federal share of costs for the project period (competitive segment)."

Below are examples of NIH policy changes that have occurred since March 2001. Please note that the list below should not be considered all-inclusive; therefore, please refer to the NIH Guide for Grants and Contracts for details on other changes since March 2001

<http://grants.nih.gov/grants/policy/notices.htm>.

*Expanded Authorities: Application of expanded authorities as a standard term and condition to all NIH awards.

*Examples of the latest changes in the application submission policies:

- NIH will continue to accept no more than two revised applications after the submission of the original application; however, the two year limitation has been eliminated;
- Resubmission of Application policy changed to allow grantees to resubmit unfunded applications as new applications in the following instances:
 - 1) unsuccessful applications for an RFA can be resubmitted as a new investigator-initiated application
 - 2) previously unsuccessful investigator-initiated applications can be resubmitted in response to an RFA as a new application, and
 - 3) unfunded applications that are reviewed for one research grant mechanism may be resubmitted for a different grant mechanism and should be prepared as a new application.
- Data Sharing: Implementation of the NIH data-sharing policy.

- Just-in-Time procedures: Expanded to include option to submit IACUC approval.
- NRSA Section Highlights:
 - In accordance with the amendment of the Public Health Service Act, NIH renamed the National Research Service Awards to the Ruth L. Kirschstein National Research Service Awards;
 - Includes the regulatory changes of NRSA part-time training;
- Audit: Threshold for A-133 audits has increased from \$300,000 to \$500,000 for fiscal years ending on or after 12/31/2003.

Public Policy Changes that are discussed in the 12/03 NIHGPS:

- Stem Cell Research
- USA PATRIOT Act
- Public Health Security and Bioterrorism Preparedness and Response Act of 2002
- HIPAA Privacy Rule

Policy Clarifications since March 2001:

Clinical Practice Compensation (Institutional Base Salary):

- Compensation may be considered in the institutional base salary as long as all criteria are met:
 - clinical practice must be guaranteed by the university,
 - clinical practice must be reported on the university's appointment form and paid by the university, and
 - clinical practice effort must be included and accounted for in the university's effort reporting.
- Key Personnel: Expanded definition to describe the contribution of key personnel as "measurable" whether or not salaries are requested. Zero percent effort and "as needed" are not acceptable for individuals that the grantee identifies as key personnel.
- PI Eligibility: Elaborated on eligibility criteria for certain mechanisms/programs, no change in policy.
- A discussion on the unallowability of patent costs has been added to the NIHGPS. The policy now states that Invention, Patent, or Licensing Costs are unallowable as either direct or F&A costs because the creation of intellectual property is not a requirement of NIH grant awards. Such costs include licensing or option fees, attorney's fees for preparing or submitting patent application, patent maintenance, or recordation of patent-related information.
- Consortium Written Agreements: Outlined that it is the responsibility of the grantees to include applicable requirements of the policy statement in their written agreements and highlighted that agreements must also include a reference to the financial conflict of interest policy, intellectual property, and data sharing requirements.

Document Enhancements:

- NIH Grants Policy Statement and the PHS 398 application glossaries have been merged, where appropriate.
- Other Support Policy: Previously located in the PHS 398 application has been included in the NIH Grants Policy Statement.
- Glossary included in a table format.
- Select Items of Cost section included in a table format.
- Bayh-Dole Inventions reporting requirements are now included in a table format.
- Cross Referencing Roles with eRA: NIH Grants Policy Statement role titles have been cross-referenced with the NIH eRA role titles, e.g.: authorized organizational official (also known as the signing official).
- Abbreviations and acronyms: are used throughout the policy statement without parentheses; therefore, readers should refer to the master list to identify unfamiliar terms abbreviations and/or acronyms.
- Index included.

ADDITIONAL INQUIRIES

Additional questions about the NIHGPS may be directed to the NIH Division of Grants Policy at (301) 435-0949 or the Grants Management Specialist that is identified on the NIH Notice of Grant Award.

NIH: MENTORED CAREER DEVELOPMENT AWARDS: CHANGE IN NIH POLICY CONCERNING CONCURRENT SUPPORT FROM CAREER DEVELOPMENT AWARD AND A RESEARCH GRANT

NIH RELEASE DATE: November 14, 2003 NOTICE: NOT-OD-04-007

With this notice, the National Institutes of Health (NIH) modifies its policy on mentored career development awards (K Awards) to allow award recipients to hold concurrent support from their career award and a competing research grant when recognized as a Principal Investigator or subproject Director. Thus, mentored career award recipients in the last two years of their support period will be permitted to reduce the level of effort required for the career award and replace that effort with an NIH research grant or subproject provided they remain in a mentored situation. This policy will permit those candidates who are ready to apply for and receive NIH research support to continue to benefit from the period of protected time offered by the career development award.

Background

NIH mentored career development mechanisms are intended to support a period of career development in preparation for a role as an independent researcher (see <http://grants.nih.gov/training/careerdevelopmentawards.htm>). In some cases, current NIH policy has delayed the period of transition to independence until the career award is completed or nearly completed.

This policy has often led to a hiatus in research support and an increased likelihood that career award recipients will not transition to independent research support. In rare cases, the NIH has discontinued mentored career awards at the time of receipt of independent research funding. With this announcement, the NIH will discontinue the practice of early termination of a career award when the recipient receives an NIH research project grant or when the recipient is named as the director of a subproject on a multi-project NIH grant. This policy is consistent with the NIH Roadmap Initiative in terms of promoting the career development of clinical researchers (see <http://nihroadmap.nih.gov/>). It is our hope, that this change in policy will facilitate the transition of all mentored career award recipients to independent NIH research support.

Implementation

Effective for competing research applications submitted for February 1, 2004 and beyond, mentored career award recipients, in the last two years of career award support, are encouraged to obtain funding from NIH either as Principal Investigator on a competing research grant award or cooperative agreement, or as project leader on a competing multi-project award. Requested budgets for a competing research grant or a subproject on a multi-project grant should request appropriate amounts for the salary and associated costs for the career recipient's effort.

At the time the research grant is awarded, the effort required on the career award may be reduced to no less than 50 percent and replaced by effort from the research award so that the total level of research commitment remains at 75 percent or more for the duration of the mentored career award.

This change in policy applies to the following mentored career award mechanisms: K01, K07 (developmental) K08, K22, K23, and K25, as well as the individuals mentored through institutional K12 awards. To be eligible for salary support from the Center or Research Project Grant (RPG):

(1) The career award recipient must be the named Principal Investigator on a competing NIH research project grant (R01, R03, R15, R21, R34, etc.) or the recipient must become the sub-project director on a competing multi-component research or center grant or cooperative agreement (P01, P50, U01, etc.).

(2) The career award must be active when the RPG or center competing application is submitted.

(3) The career award must have no more than two years of support remaining by the planned start date of the Center or RPG award.

In a letter accompanying the Center or RPG application, the chair of the mentored award recipient's department or other responsible institutional official must provide evidence that the recipient will continue to focus on the development of his/her research career, will continue to have access to his/her mentor, and that the recipient's total level of research effort will be maintained and protected at a minimum of 75 percent.

When a mentored career award recipient obtains independent support, as described above, the NIH Institute or Center supporting the career award will adjust the level of effort committed to the career award to no less than 50 percent consistent with maintaining total research effort at 75 percent or more of total professional effort. NIH will maintain the total salary amounts committed to the career award if consistent with the adjusted level of effort and institutional base salary (up to the legislative limit). The career award may also be adjusted to avoid budgetary overlap. Consistent with long-standing policies, additional salary for career award recipients may not be derived from NIH research grants unless the recipient is the named Principal Investigator on the research grant or has been named director of a subproject on a competing multi-component NIH grant.

For additional information concerning this change contact:

Walter T. Schaffer, Ph.D.
Acting Director, Office of Extramural Programs
NIH Research Training Officer
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NIH: REQUESTING RELOCATION OF PREVIOUSLY APPROVED NIH RESEARCH PROJECT

When a PI transfers from Penn to another organization and wishes to request continued support from the NIH for the previously approved research project at the new location, the NIH requires submission of a complete application kit PHS-398 from the new institution following the instructions included with the kit. The application will receive an administrative and scientific review and determination of the funding level provided (1) the project is relinquished by Penn (2) the PI plans no significant change in the research plan, the resources and environment, or the level of support requested.

ADDITIONAL REQUIREMENTS

For continued support at a new institution, the following must be submitted:

A. FROM THE ORIGINAL GRANTEE INSTITUTION

*[Form PHS-3734](#), Official Statement Relinquishing Interest and Rights in a PHS Research Grant. The relocation application cannot be processed until this form, signed by the proper institution officials, has been received by this NIH awarding unit. The kit provides for a statement of general intent concerning the transfer of items of equipment. PI's and BA's must comply with University policies on equipment transfer including consideration of whether equipment purchased in whole or in part with grant funds will be retained by Penn, transferred outright or sold to the receiving organization. ([See Financial Policy 1106.3](#)

* Standard Form 269, Financial Status Report (FSR). The FSR must be submitted within 90 days following termination of the project.

*Form HHS-568, Final Invention Statement and Certification. This kit must be submitted within 90 days following termination of the project.

B. FROM THE NEW INSTITUTION

*Request for Previously Approved Support - Administrative Review

The new institution must submit a complete research grant application, form PHS 398, for the remaining years of committed support for the project. The application (original and 3 copies), with "**CHANGE OF GRANTEE INSTITUTION**" typed in capital letters across the top of both the application face page and the detailed budget page, should contain all the information requested in the instructions including:

- a. A description of the facilities and environment at the new institution, and the probable affect of the move on the project.
- b. Biographical sketches of all professional personnel to be associated with the project.
- c. A list of all equipment to be transferred from the original grantee institution which was purchased entirely with grant funds during the current competitive segment and which has an acquisition cost of \$5,000 or more per item.
- d. A comprehensive progress report, which will serve in lieu of a final progress report from the original grantee institution, and will be treated by NIH as restricted interim information.

Training Opportunities:

ORS Quizzes and FAQ's:

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/>).

Outside Upcoming Training

National Council for University Research Administrators (NCURA), Financial Research Administration Conference, San Diego, February 29 – March 2. For further information or to register, please go to <http://www.ncura.edu>.


Have Issues and Questions regarding Post PennERA Sponsored Project Queries?

Send email to pennerahelp@pobox.upenn.edu.

Please send details and, if available, attach old and new queries for assistance in resolving these issues.

December's Contributing Authors, ORS Newsletter:

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Fran Seidita, Director, Budget Policy, Office of Budget and Management Analysis
Alice Tangredi-Hannon, Director, Research Compliance, Office of Research Integrity & Compliance



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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- 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
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- Pennsylvania Muscle Institute – SOM
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- School of Engineering and Applied Science
- Wharton School
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- Cardiology
- Clinical Research Center – SOM
- Diabetes – SOM
- Endocrinology –SOM
- Gastrointestinal – SOM
- General Intestinal Medicine – SOM
- Infectious Disease – SOM
- Pulmonary, Allergy & Critical Care – SOM
- Renal – SOM
- Rheumatology – SOM

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- Family Practice – SOM
- Graduate School of Fine Arts
- Obstetrics & Gynecology – SOM
- Surgery – SOM
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- Law School
- Morris Arboretum
- Provost Interdisciplinary Program
- School of Art and Sciences
- School of Social Work
- Student Services
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- Bioinformatics – SOM
- Center for Aids Research – SOM
- Genetics – SOM
- 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
- Otorhinolaryngology – SOM
- School of Nursing
- School of Veterinary Medicine

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Psychiatry	Surgery
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Biochemistry/Biophysics	Microbiology
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Radiology	
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Biomedical Graduate Studies	Dermatology
Institute for Environmental Medicine	Neurology
Institute of Neurological Sciences	Neuroscience
Medical School	Ophthalmology
Orthopedic Surgery	Pharmacology
Pediatrics Admin	Pediatrics -Neonatology
Otorhinolaryngology: Head and Neck Surgery	

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- School of Nursing
- Institute of Contemporary Art
- Vice Provost of University Live
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Cancer Center	Center for Sleep
Neurosurgery	Physiology
Obstetrics and Gynecology	Radiation Oncology
Center for Research on Reproduction and Women’s Health	

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Anesthesia	Center for Bioethics
Center for Experimental Therapeutics	Institute for Aging
Institute for Human Gene Therapy	Family Practice
Molecular & Cellular Engineering	
Center for Clinical Epidemiology and Biostatistics	
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 - School of Engineering and Applied Science

Bioengineering	Chemical Engineering
Materials Science & Engineering	Mechanical Engineering
Minority Programs	
 - School of Medicine Departments: Emergency Service
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 - Annenberg Center
 - Graduate School of Education
 - Law School
 - Morris Arboretum
 - University Museum
 - School of Arts and Sciences:

Chemistry	Linguistics
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 - School of Medicine Departments:

Center for Bioinformatics	Institute for Medicine & Engineering
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- General University
- School of Social Work
- Van Pelt Library
- Wharton School
- School of Arts & Sciences:
 - All except Chemistry, Linguistics, Economics and Physics
- School of Medicine Departments:

Cancer Biology	Diabetes
Rehabilitation Medicine	

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- Graduate School of Fine Arts
- School of Dental Medicine
- Wharton School
- Law School
- School of Engineering and Applied Science:

Electrical Engineering	Computer Science and Engineering
Institute for Research in the Cognitive Sciences	
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- School of Arts and Sciences:

Economics	Physics
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Genetics	Penn Muscle Institute
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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

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