

Office of Research Services -- Research Administration News --

Special Interest Articles:

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Happy New Year from ORS!

Ten Ways for Proposal Writers and Researchers to Make Grant Writing and Processing Easier

1. Contact the funding agency's program officer for advice before writing and submitting a proposal. directly via email.
2. Submit all proposals for institutional approval following the deadlines set by your School to allow for a thorough review and have all research subject approvals up to date.
3. Use a spell checker on proposals; moreover, read it through to see if there are any "woods" you didn't mean to use which your spell checker didn't catch.
4. Have a second pair of eyes look at the proposal: perhaps a colleague, chair, or mentor.
5. Attend a Grant Writing/Fund Seeking Workshop.
6. Make use of SPIN subscription to get funding opportunities sent
7. Thoroughly read proposal guidelines issued by the funding agency and familiarize yourself with things like page limits, fonts, margins, and all the other niceties that will help get the proposal written well before deadline and prevent rejection without review.
8. If a proposal is rejected, make sure to get copies of proposal reviewers' comments so the next proposal will be better.
9. Submit agency reports on time for funded grants, so that the program, fellow researchers, and the institution are not jeopardized.
10. Practice using NSF FastLane--prior to actually needing it for proposal submission--by using the demonstration site at https://www.fastlane.nsf.gov/jsp/homepage/demo_site.html

ORS Welcomes the New Year with a New Website

Please Visit Our New Website at www.upenn.edu/researchservices/

Comments and Suggestions are very welcome and should be forwarded to Kerry Peluso at pelusok@pobox.upenn.edu

A Message from The Office of Audit and Compliance

Given the importance of the research enterprise at Penn, and the increasingly complex regulations regarding compliance, identification and mitigation of risks related to research administration has been an area of focus by the Office of Audit & Compliance. Two of our initiatives that focus on research administration include **Business Process Reviews (BPR)** and the **University Grants Audit Program**. During the Business Process Review we assess the effectiveness and efficiency of the Schools' administrative and financial processes, including grants administration, and identify opportunities for process improvement and risk mitigation. To date we have completed BPR's at eight of the Schools with the remaining to be initiated during the current fiscal year. Our second initiative is the more focused University Grants Audit Program, through which we will select individual grant awards and audit a sample of transactions for compliance with sponsor requirements, applicable federal regulations and University policy. The primary goals of this program include ensuring compliance with requirements and regulations prior to reporting, providing principal investigators and grant administrators with feedback on the adequacy of monitoring controls over grant expenditures, and to identify training and education needs. The Grants Audit Program will be an ongoing effort throughout this and future fiscal years and will begin with a focus on Federal awards. The Program includes all University schools with the exception of the School of Medicine, which is conducting its own Federal Grant Monitoring Program. For further information, please contact Mary Lee Brown, Executive Director, University and Information Systems Audits, Office of Audit and Compliance at marylb@pobox.upenn.edu or 215-898-7958.

National Science Foundation Advisory

Effective 12/30/02, the National Science Foundation's FastLane has been changed so that *non-lead* collaborative proposals can no longer have their own Project Summary, Project Description, and References Cited.

The lead organization's submission will include a proposal Cover Sheet, project summary, project description, references cited, biographical sketches, budgets and budget justification, current and pending support, and facilities, equipment and other resources for their organization.

As stated in the Grant Proposal Guide, non-lead organization submissions will include all of the above for their organization except the project summary, project description, and references cited which are the same for all collaborating organizations. FastLane will combine the proposal submission for printing or electronic viewing.

Training Opportunities:

The Account Set Up Process, Thursday, January 16, 10 a.m. For further information and to register, please go to <http://www.finance.upenn.edu/ftd/>.

Allowability of Costs, Thursday, February 13, 10 a.m. For further information and to register, please go to <http://www.finance.upenn.edu/ftd/>.

Effort Reporting, Tuesday, February 18, 10 a.m. For further information and to register, please go to <http://www.finance.upenn.edu/ftd/>.

Post-Award Project Management, Thursday, March 13, 10 a.m. For further information and to register, please go to <http://www.finance.upenn.edu/ftd/>.

Closeouts, Tuesday, March 18, 10 a.m. For further information and to register, please go to <http://www.finance.upenn.edu/ftd/>.

National Conference for University Research Administrator's (NCURA) Financial Research Administration (FRA) Conference, February 16 – 18 in New Orleans, LA See <http://www.ncura.edu/conferences/fraiv/default.asp?Id=1> for more information.



Attention:

New Policy for Program Income

The following policy is now effective and available as part of Penn's Financial Policy Manual at http://www.finance.upenn.edu/fpm/2100/2100_pdf/2121.pdf.

2100 Sponsored Projects

Subject: *Sponsored Projects*

Title: *Accounting for Program Income*

No.: 2121

Effective: December 1986

Revised: December 2002

Responsible Office: Research Services

Approval: Research Services

Purpose

To establish accounting policy for program income earned on sponsored projects. Certain sponsored projects generate income which, depending on sponsor regulations or the terms of the award, either is required to be remitted to the sponsor, or may be used as additional project support.

Definition

Program income is gross income earned that is directly generated by a sponsored activity or earned as a result of the sponsored activity. Federal regulations (OMB Circular A-110, Section 24) provide three alternatives for accounting for program income;

- a) Additive method whereby the income is added to the funds committed to the project to further the objectives of the award.
- b) Matching, used to finance the non federal share of the project.
- c) Deductive method whereby the funds are used to reduce the federal share of the project.

Program income earned on non-federal awards must be accounted for according to the terms and conditions of the award.

Policy

- 1 Research Services will establish a separate fund to account for program income when the additive method is required to be used, unless the amount of program income is nominal, i.e., less than \$5,000. The fund will have the same F&A rate as the sponsored project fund.
- 2 When the matching or deductive method is used, the program income must be deposited and accounted for in the fund established for the sponsored project.
- 3 The deductive method will necessitate that PBIL be reduced by the amount of program income since the income is required to off-set the sponsor share of the project cost.
- 4 Types of program income include, but are not limited to:
 - a. Income from fees or service performed
 - b. Rental fees
 - c. Proceeds from the sale of tangible property or items fabricated under an award

Income earned from license fees and royalties on patents and copyrighted material is not considered program income for federal awards unless agency regulations or the terms and conditions of the award provide otherwise. Refer also to the terms and conditions of non-federal awards for the requirements related to patent and copyright income.

- 5 Program income received must be deposited by the recipient into object code 4620 in order to preclude the commingling of such funds with regular project payments received from the sponsor.
 - 6 Awards in which Gross Program income may be off-set by the costs of collecting the income to enable reporting Net Program Income, the Program Income fund is to be set up to account for the costs as is appropriate.
 - 7 Research Services has the responsibility to report program income earned, and, when applicable, to either remit such income to the sponsor or to apply the income as funding for related project expenses in accordance with sponsor requirements.
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New Policy for Advances of Cash from External Sponsors

A new policy has been issued for advances of cash on sponsored projects. This new policy regarding the accounting treatment of advances of cash on sponsored programs is primarily for the Office of Research Services, and was issued to formalize the requirement, when applicable, to remit interest earned on those cash advances to the sponsor. Interest earned is credited to the project fund in **object code 4780**.

Departments need to know the terms and conditions of these awards in order to know when the interest credited will be remitted to the sponsor, and when they may use these funds for additional project expenses. In no instance can interest earned on Federal awards be used for additional project expenses. We are required to remit interest earned on all Federal awards to the Department of Health and Human Services. Any questions regarding this policy can be forwarded to your post award administrator.

Subject: Sponsored Projects

Title: Advances of Cash on Sponsored Projects

No.: 2133

Effective: November 2002

Responsible Office: Office of Research Services


Approval: Research Services

Purpose

Some federal agencies and some non-federal sponsors provide cash in advance of the work to be performed under a sponsored project. This policy establishes the appropriate accounting treatment of these cash advances.

1. OMB Circular A-110 requires that cash advances be deposited into an interest bearing account, and that interest earned on those advances be remitted annually to the Department of Health and Human Services (DHHS), Payment Management System.
2. Non-federal sponsors who also provide cash advances and require that the cash be deposited into interest bearing accounts, may require that the interest earned be returned to the sponsor, or used to further the objectives of the award, depending on the terms of the award.

Policy

1. Sponsored projects awarded to the University as described above must be credited with TIF (Temporary Investment Fund) interest income on positive cash balances.
 2. Research Services will ensure that all such Sponsored Projects will be identified and designated as funds to earn TIF income.
 3. The Division of Finance will post the amount of any TIF interest earned on the funds identified by Research Services on a monthly basis, calculated according to their written procedures.
 4. The amount of interest earned will be based on the monthly TIF interest rate calculated by the Treasurer's Office.
 5. Interest earned on all federally supported projects will be reported to the sponsor as required at termination, and then transferred to a special fund established for aggregating the interest earned.
 6. At the end of each fiscal year, the total amount of interest income in the special fund will be remitted to DHHS, less the administrative allowance allowed. The amount of the allowance is currently \$250.
 7. Interest earned on non-federal awards will be accounted for in accordance with the terms of the specific award.
 8. This policy does not apply to awards funded under a letter of credit, or awards in which an invoice must be issued to effect payment, or awards with scheduled payments that do not include an advance payment.
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Frequently Asked Questions.....

How do I determine if a cost is allowable?

To ensure appropriate institutional stewardship of research funds all expenditures must follow the rules for allowability enunciated in OMB Circular A-21 and federal regulations. Expenditures must meet the following criteria in order to be charged as a direct cost of a sponsor research project no matter what its purpose. The following criteria are known as the Cost Accounting Standards (CAS) Principles of OMB circular A-21.

- Reasonable A prudent person would have purchased this item and paid this price.
- Allocable Expenditures can be allocated to the sponsored project or activity based on benefits derived, cause and effect, or other equitable relationship.
- Allowable Allowable or not unallowable as specified by the sponsoring agency and federal regulations.
- Consistency like expenditures must be treated the same in like circumstances.

REASONABLENESS

Reasonableness is a subjective measure that requires application of the “prudent person” test. An auditor may legitimately question a cost that is clearly allocable and not otherwise unallowable if, in the auditor’s judgment, the cost exceeds what a prudent person would have paid in similar circumstances.

For example, the cost of a luxurious hotel suite would be considered an excessive cost even if the travel were allocable and allowable to the project. Non-federal sponsors would require certification or justification of the excessive costs approved by the Principal Investigator, and may require approval directly from the fund sponsor. The vast majority of research funding at Penn comes from taxpayer dollars therefore we are required to spend those funds cautiously and in a cost effective manner.

ALLOCABILITY

An expenditure is allocable to a project if the material or service being charged benefits that project. Allocability is not the same as allowability; an otherwise allowable cost, e.g., salary or travel, may be unallocable to a particular project if the project did not benefit from the cost.

For example if travel costs are an allowable cost for the fund source (i.e. the Sponsor Terms & Conditions allow travel), yet the individual traveling neither presented nor contributed to the research project, then the travel to the seminar did not directly benefit the project and that individual’s travel costs are considered to be unallocable and can not be charged to that research project. Often the determination of assignment of expenditures directly to sponsor research funds is not always clear. A cost is allocable to a specific grant, function, department, etc., if the goods and services involved are chargeable or assignable to that funding source in accordance with the relative benefit received or other equitable relationship.

PennNet charges include the computer port and connection to the Penn intranet and internet. PennNet charges can not be identified specifically with a particular sponsored project or activity, or can not be directly assigned to the project or activity relatively easily with a high degree of accuracy, and provide direct benefit to the project. Therefore PennNet costs are included in the University’s F&A cost pool. For example, even if a PI has only one fund source assuming that PennNet charges are allocable to that cost object would be incorrect. In order to be consistent, all of the University’s PennNet charges are classified as an F&A cost and therefore individual PennNet charges should not be charged directly to a federal fund source.

Likewise, local mail and telephone cost are included in the University of Pennsylvania F&A cost calculation since they can not be can be identified specifically with a particular sponsored project or activity. These costs are part of the normal operation of a laboratory and are included in the F&A cost pool. In general all local mail and telephone charges must be charged to an unrestricted departmental account.

If toll or long distance telephone calls can be can be identified specifically with a particular sponsored project or activity, or can be directly assigned to the project or activity relatively easily with a high degree of accuracy, and

provide direct benefit to the project, the cost may be directly charged to a federal sponsored fund, with proper documentation authorized by the Principal Investigator. Federal Express or any other type of express mail service that can be identified specifically with a particular sponsored project or activity, or can be directly assigned to the project or activity relatively easily with a high degree of accuracy, and provide direct benefit to the project, may be directly charged to a federal sponsored fund, with proper documentation authorized by the Principal Investigator. However, the cost of preparing or mailing grant applications can not be charged to a sponsored project.

ALLOWABILITY

Allowability for costs related to government-funded sponsored projects is determined by the provisions of the governing sponsored agreement, or by cost principles established by the federal government in OMB Circular A-21. For example, A-21 defines certain types of expenses, e.g., alcohol, lobbying, or entertainment, as categorically unallowable. Other costs may be unallowable per the specific terms of an award, e.g., unapproved foreign travel, capital equipment purchases, or patient care costs. These types of expenses are therefore, by definition, unallowable. A reminder about allowability: A cost, which is unallowable for a sponsored project may be an allowable expense for a non sponsored project account. These expenditures should be charged to an unrestricted departmental account.

Some of the most common mistakes made regarding allowability of cost involve Travel and Entertainment costs. Travel cost must pass all four tests listed in OMB A-21, the Cost Accounting Standards. Travel costs must not include, travel cost for spouses, alcoholic beverages, luxury items, gift shop purchases, movies, mini bar purchases or any other items viewed as unallowable.

Entertainment costs include business meals for staff not in "travel status". Travel status is defined as a University Employees traveling (out of town) on official University business (University Policy #2367). In general, reimbursement for meals for employees not in "Travel status" are considered Entertainment costs. This would include the cost of meals to welcome a new staff member to the department providing refreshments or having a pizza lunch as part on your normal laboratory or departmental meetings, regardless of the agenda items being discussed. These costs are considered Entertainment and must be charged to an unrestricted departmental account.

Catering services and luncheons given during an organized conference or seminar, which are necessary to achieve a specific aim of the research project, are allowable. These costs are allowable if and only if the meal cost are specially approved by the sponsor and are part of achieving the specific aim of the grant such as holding a scientific conference or seminar. The meal cost must be allocable to the fund source, meaning the participants of the meal were attendees of the seminar or conference. Any meals which include Penn employees and the speakers outside the conference or seminar are considered entertainment costs and must be charged to an unrestricted departmental account. If the Speaker is provided lunch during the conference and entertained at Dinner, the speaker is not entitled to the full per diem meal reimbursement for that day.

For more information regarding the allowability of costs, review the notice of grant award, sponsor guidelines or the appropriate links below:

Sponsored Projects Manual - <http://www.upenn.edu/researchservices/spmanual/a21.html>

Research Investigator's Manual - <http://www.upenn.edu/researchservices/rih/chapter10.html>

Post Award Overview - <http://www.upenn.edu/researchservices/rs/pao.html>

OMB Circular - <http://www.whitehouse.gov/omb/circulars/a021/a021.html>

NIH Grant Policy Statement - <http://grants1.nih.gov/grants/policy/policy.htm>

Research Services staff can also provide guidance on the allowability of specific costs.

Frequently Asked Questions.....

What is required for a proposal using human subjects and/or animals?

When submitting a proposal for institutional signature, please note that as part of the approval process, Research Services confirms that the appropriate approvals for the use of human subjects and animals are in place.

For all new proposals, the approvals for both human subjects and animals can be "pending", unless prior approval is specifically mandated by the sponsor. The National Institutes of Health allows for "just-in time" submission of protocols which means that protocols can be submitted to Regulatory Affairs after the submission of the proposals, but approval **must** be obtained prior to the award. It is important to review the sponsor requirements while preparing the application.

For non-competing continuations the NIH rules are as follows:

Human Subjects - The protocol number and the date of the last approval must be shown on the transmittal sheet. This date must not be earlier than one year before

the start date for which the Progress Report is submitted. Verification of Certification must be on hand before submitting a non-competing NIH application. It is sometimes necessary to submit for annual reapproval early in order to comply with NIH requirements.

Animals - The protocol number and the date of the last approval must be shown on the transmittal sheet. The protocol provided must be an active protocol. Progress reports for continuation support should NOT be submitted until the necessary verification of IACUC review has been obtained.

While it is not required, it is helpful to attach a copy of the most recent approval letter from Regulatory Affairs regarding your proposal when it is submitted to Research Services for review and approval.

For additional information on the use of research subjects, visit the Regulatory Affairs website.

www.upenn.edu/regulatoryaffairs



For quickest processing of your proposal, please ensure that the appropriate approvals for the use of human subjects and animals are in place.

REMINDER:

**NO COST EXTENSIONS MUST BE REQUESTED
AT LEAST 30 DAYS PRIOR TO END DATE**

Where can I get more information about administering my grants?

Office of Research Services Web Site:
www.upenn.edu/researchservices/

Research Investigator's Handbook:
www.upenn.edu/researchservices/rih/intro.html

A Quick Guide for Faculty:
www.upenn.edu/researchservices/pdfs/newfacbk.pdf

University of Pennsylvania Cost Sharing Policy:
www.upenn.edu/researchservices/rs/costshare.html

Contact an Office of Research Services Staff Member:
www.upenn.edu/researchservices/rs/contact.html

National Conference for University Research Administrators (NCURA):
www.ncura.edu

**For timely news
and updates,
subscribe to our
mailing list...**

<http://www.upenn.edu/researchservices/rs/subscribe.html>

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 now 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
- Medical Genetics – SOM
- Neurology – SOM
- Pathology & Laboratory Medicine
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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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- Cerebrovascular Research Center – SOM
- Family Practice – SOM
- Graduate School of Fine Arts
- Obstetrics & Gynecology – SOM
- Surgery – SOM
- Psychiatry – SOM

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- Morris Arboretum
- Provost Interdisciplinary Program
- School of Art and Sciences
- School of Social Work
- Student Services
- Van Pelt Library

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- 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
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CORPORATE CONTRACTS GROUP:

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- Sponsored Research Agreements

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- Account Information Sheets for Corporate Contracts

Post Award Administration Staff

The main functions handled by these ORS staff members are the preparation of financial invoices and reports, coordination of audits, collection of receivables, cash management functions, and close outs of funds. The Federal Compliance Group handles facilities and administrative costs, employee benefit rates, effort reporting, and compliance issues. Contact Information for all areas is provided below.

FEDERAL COMPLIANCE GROUP:

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 - Center for Sleep
 - Muscle Institute
 - Physiology
 - Psychiatry
 - Radiation Oncology
 - Surgery
 - Neurosurgery
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 - Obstetrics and Gynecology
 - Pathology
 - Pediatrics –Neonatology
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 - Genetics
 - Institute of Neurological Sciences
 - Neurology
 - Neuroscience
 - Medical School
 - Ophthalmology
 - Orthopedic Surgery
 - Otorhinolaryngology: Head and Neck Surgery
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 - Institute for Aging
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 - Center for Clinical Epidemiology and Biostatistics
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- Fine Arts
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- Law School
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- University Museum
- School of Medicine Departments:
 - Center for Bioinformatics
 - Institute for Medicine & Engineering

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 - Diabetes
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About Our Organization...

Our Mission

The Office of Research Services 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, Research Services

- 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, Research Services is responsible for billing of contracts management of letters of credit for payment of grants, preparation of indirect cost and employee benefit rate proposals and rate negotiations, management of the effort reporting system, and oversight of service center rate development.

Office of Research Services Quick Contact List:

ORS General Phone Numbers:

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