Penn
UNIVERSITY of PENNSYLVANIA

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Office of Research Services

-- Research Administration News --

Special Interest Articles:

- IMPORTANT! -- Fall Effort Reports must be submitted immediately – **See page 8**
- Questions about **Allocability**? – **See page 4**
- How are Project Periods and Budget Periods set up? – **See page 6**

Individual Highlights:

Revised Cost Sharing Procedures

In April 2002 ORS issued a procedure and form for identifying Cost Sharing and In-Kind or Matching Requirements on sponsored projects. Since that time we have received comments that some aspects of the procedures were not clear and that specific information on the account set up process was needed.

Last month, ORS sent a revised procedure and form to the Business Advisory Board for review and comment. Based on the comments we received, we revised the procedures to clarify the requirements and included specific information related to the manner in which the cost share fund will be set up and linked to the award fund in Ben Financials. We also modified the cost share form slightly to help eliminate any confusion in filling out the form.

The new procedures and form are now available on the Research Services web site. The revised procedure as well as the cost sharing form and accompanying instructions can be accessed at http://www.upenn.edu/researchservices/CostSharing.html. Please begin using the new form for all proposals and awards in which cost sharing is a requirement.

For more information on cost sharing topics, please see Sponsored Programs Policy 2119 . Questions regarding cost sharing can be directed to Bob McCann, Director of Cost Studies, at 898-1469 or mccannr@pobox.upenn.edu, Kerry Peluso, Post Award Director, at 573-6705 or pelusok@pobox.upenn.edu or Pam Caudill, Pre Award Director at 573-6706.or caudill@pobox.upenn.edu.

NEW NIH Policy on Sharing of Model Organisms

The NIH announced the new policy in a May 7 NIH Guide notice, available at: http://grants.nih.gov/grants/guide/notice-files/NOT-OD-04-042.html.

NIH has long sought to ensure that research resources developed with NIH funding are made readily available in a timely fashion to the research community for further research, development, and application to therapeutic agents. [See NIH Grants Policy Statement (http://grants.nih.gov/grants/policy/nihgps_2003/index.htm); NIH Research Tools Policy, also referred to as Principles and Guidelines for Recipients of NIH Research Grants and Contracts on Obtaining and Disseminating Biomedical Research Resources: Final Notice (http://ott.od.nih.gov/NewPages/RTguide_final.html), December 1999).

The goal of making research resources readily available was reaffirmed and expanded in the May 7 NIH Guide notice regarding the new policy on sharing of model organisms. All investigators submitting an NIH application or contract proposal beginning with the **October 1, 2004** receipt date, are expected to include in the application/proposal a description of a specific plan for sharing and distributing unique model organism research resources generated using NIH funding so that other researchers can benefit from these resources or state appropriate reasons for why such sharing is restricted or not possible. Unlike the NIH Data Sharing Policy, the submission of a model organism sharing plan is not subject to a cost threshold of $500,000 or more in direct costs in any one year, and is expected to be included in all applications where the development of model organisms is anticipated. Model organisms include but are not restricted to mammalian models, such as the mouse and rat; and non-mammalian models, such as budding yeast, social amoebae, round worm, fruit fly, zebra fish, and frog. [See NIH Model Organism for Biomedical Research Website at http://www.nih.gov/science/models/ for information about NIH activities related to these resources.

Forms PHS 398, 2590 and Related Forms to be Revised

USE OF CURRENT PHS 398, 2590 AND RELATED FORMS (OMB No. 0925-0001)

RELEASE DATE: May 19, 2004 NOTICE: NOT-OD-04-044

The Research and Research Training Grant Applications and Related Forms (PHS-398 PHS-2590 PHS-2271 PHS-3734), OMB No. 0925-0001/ Exp. 5/2004, currently in use remain authorized until further notice in accordance with OMB regulations [5 CFR 1320.10.(e)(2)]. The revised versions have been submitted to OMB for review and approval. Once OMB approval is received, the new forms will become available for use and will be accessible on the NIH web site. There will be a transition period when both the new or old forms will be accepted. Further guidance will be provided at that time.

INQUIRIES
Questions concerning the revision of the 398, 2590 and Related Forms may be directed to:

Division of Grants Policy
Office of Policy for Extramural Research Administration
Office of Extramural Research
National Institutes of Health
(301) 435-0949
e-mail: GrantsPolicy@od.nih.gov

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

A three month summer salary appointment assumes 100% effort of the appointed individual.

…Individuals on nine month academic appointments who take 3/9 summer salary from sponsored projects may take no vacation during the year.

…Individuals in the situation above must certify to their chair or other official in writing that no vacation will be taken during this time.

…A three month summer salary appointment assumes 100% effort of the appointed individual on the sponsored projects for the three months of June, July and August.

…Individuals with significant responsibilities not directly related to the sponsored projects, should take less than a 3/9 appointment.

…Individuals who receive additional compensation for activities over summer months should adjust summer sponsored projects compensation for the extra compensation received during the summer.

PennERA—New SPIN Plus Listserv

The PennERA (Electronic Research Administration) Team is pleased to announce that a new listserv is now available for users of the SPIN Plus funding opportunities database.

The new listserv, called "SpinUsers," is an "announce-only" type of list that will be used to distribute relevant, timely information regarding the PennERA SPIN Plus product suite. No participants' names or e-mail addresses will be visible to other users of the listserv. The list is a uni-directional source of information on the product and its use at the University.

If you'd like to join the "SpinUsers" listserv, send an e-mail to LISTSERV@LISTS.UPENN.EDU and, in the text of your message (leave the subject line blank), write: SUBSCRIBE SPINUSERS.

If you have any questions about the listserv or about PennERA in general, please contact us at pennera@pobox.upenn.edu. For more information about PennERA, please visit the PennERA web site http://www.pennera.upenn.edu/.

--Robin H. Beck,
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--Andrew B. Rudczynski, Ph. D.,
Executive Director of Research Services and Associate Vice President of Finance
--Joseph R. Sherwin, Ph.D.,
Director of the Office of Regulatory Affairs

Allocability

As stated on the Research Services web site OMB Circular A-21 Cost Principles for Educational Institutions has the greatest impact on the daily accounting and administration of federal awards. The circular describes the types of costs, direct and indirect and how they may be charged to federal awards. It also describes the four fundamental elements of the costing principles: allowability, allocability, reasonableness and consistency.

Allocability appears to give us the most difficulty when trying to code purchase requisitions or C-368 forms. *Allocation* means the process of assigning a cost, or a group of costs, to one or more cost objectives, or sponsored projects, in reasonable and realistic proportions to the benefit provided (OMB Circular A-21). *A cost is allocable to a sponsored agreement if (1) it is incurred solely to advance the work under the sponsored agreement; (2) it benefits both the sponsored agreement and other work of the institution, in proportions that can be approximated through use of reasonable methods, or (3) it is necessary to the overall operation of the institution and… is deemed to be assignable in part to sponsored projects (OMB Circular A-21).*

An allowable direct-cost must be allocated in accordance with the relative benefit received. So what is the relative benefit and how is it calculated?

1) *"If a cost benefits two or more projects or activities in proportions that **can** be determined without undue effort or cost, the cost should be allocated to the projects based on the proportional benefit."*

Examples of costs that are specific to one project include: animals purchases and service, domestic travel to scientific conferences to present research, individual testing of samples, express mail service for time sensitive samples, etc. These types of costs are ordinarily easily identified as benefiting a single project.

2) *"If a cost benefits two or more projects or activities in proportions that **cannot** be determined because of the interrelationship of the work involved, then…the costs may be allocated…to benefited projects on any reasonable basis"*

For example cost generally shared by multiple projects within the laboratory such as: pipettes, media, gloves, glassware, petri dishes, etc. While it may be possible to track exact quantities of these "bulk" items to the grants based on use, doing so would be cost prohibitive and administratively burdensome. In circumstances such as this, a reasonable allocation methodology should be used. The following paragraphs describe some appropriate methodologies.

Keep in mind one allocation method is not necessary the best methodology to use for **all** purchases in a laboratory or for the Principal Investigator. Each purchase must be evaluated individually for the relative benefit received by one or more projects.

Common allocation methodologies may include the following:

- **Weighted FTEs** may be used for shared items which may be difficult to allocate among benefiting projects. Weighted FTEs (full time equivalent of employees) may be calculated based on all projects benefiting from the item purchased in all areas. You must include all projects regardless if the funding source is from an outside sponsor or is departmentally funded. Some examples of products or services using this allocation method may be: service contracts for microscopes, centrifuges, autoclaves, or freezers…

- **Individual Effort Allocation** on all projects could be used to allocate cost related to an individual's use. For example a computer purchased for an individual necessary to complete scientific results which is directly related to the individual's research but the exact benefit between projects is unknown. In this case allocation using the individual's effort distribution would be considered reasonable. Other examples may be employee health benefits for trainees or individual domestic

Allocability *continued*

travel to scientific conferences.

- **Estimates of Use** based on intensity of work or scientific use. Estimates of the allocation of benefit may come directly from the Principal Investigator or the Laboratory Manager, who have first hand knowledge of the current projects and benefiting results of the purchase. Generally low ticket lab supplies used by all projects are allocated based on estimates, for example pipettes, autoclave tape, blades, dissection scissors, gloves, slides, centrifuge tubes, etc. These expenditures could be allocated to all of the PI's projects, based on estimated use. For example 1/3 project A, 1/3 project B and remaining 1/3 among the 3 other projects. Please be careful, the use of one allocation methodology for all purchases, regardless of the benefit received may indicate a misunderstanding of the rules on allocability.

- **Grouping of certain types of awards** based on the scientific aims and use of the purchase. For example the purchase "reagents" was split between two of the PI's six project because these two projects will use the majority of the "reagents" throughout the laboratory.

- **Actual Use** (units of services), advance purchases bought in bulk and allocated to projects based on documented units of service, for example service centers. Service centers use this methodology, purchasing all related cost and billing departments based on actual use. Departments can use this same methodology to allocate large purchases or items purchased in advance of actual use. For example, the advance purchase of parking vouchers. Sometimes "parking vouchers" are purchased in bulk and distributed to research subjects participating in the various clinical trials administrated by the Department. The original purchase is coded to an advance account or departmental fund source. A journal entry is prepared to charge the benefiting projects based on actual distribution of vouchers to research participants. Any unused vouchers would remain in the advance account until the parking voucher is distributed to a research participant.

- **Use of Related Statistics**, based on the measurable units of a related product or service. Certain supplies or services are measurable based on use, for example Quest laboratory testing. Since each test is linked to a research subject, the cost can be divided among the projects. However, the supplies used by the phlebotomist may be more difficult to allocate to the related projects, such as cotton balls, syringes, needles, or tubes. One possible allocation method could be based on the previous month's Quest laboratory invoice. The ratio of total cost allocated to each project may be used as the estimated statistic to allocate the current supplies across the projects.

Examples of inappropriate allocation methods would include the rotation of costs throughout open awards, use of funds based on available fund balance, or splitting charges based on open awards regardless if the project may or may not benefit from the purchase.

If the purchase benefits more than one project and the benefit is not easily measurable, then any reasonable allocation methodology can be used (alternatives described above). If the purchase is for the primary use of one project, however other projects may receive secondary or immaterial benefit which are neither known nor measurable, than you may charge 100 percent of the cost to the primary benefiting project. Primary benefit is defined as greater than 75 percentage use/value and benefit to other projects is unknown or not measurable.

There is no one allocation methodology which would work for every purchase in one laboratory. Each purchase must be evaluated individually and the allocation method must be documented. Documentation should be easy to interpret by an outside individual with no knowledge of the subject.

Frequently Asked Questions . . .

When setting up a new award, how are the Project Periods and Budgets Periods determined?

Project Period will reflect the expected term of the award or competing segment according to the Notice of Award (NOA).

Budget Periods are determined by the NOA and any corresponding term and conditions published by the Sponsor. If the award is divided into periods with corresponding budgets, then each Period will be set up with the corresponding budget. If the NOA awards all funds for the Project Period, then both the project period and budget period end dates will be the same, i.e. one budget period and one project period. If a project period is divided into more than one budget period based on either specified funding periods (as specified in the NOA) or if a required report must be submitted before any further funding is received, then the project period will reflect the full term of the award but the budget periods will correspond to the funding or reporting periods. The Budget Periods that are currently obligated will have a status of “awarded”, while additional funding, often shown as recommended support on Federal awards, will have a status of “Future”.

Examples:

1) A notice of grant award is received stating that the award is for 3 years and that the budget is $100,000 per year. A progress report and/or financial report are required at the end of each year. This award would be set up for three separate budget years, with the first year being “awarded “ and the two subsequent years being awarded as “future”.

2) A notice of grant award is received stating that the award is made for an eighteen month period, the total of the award is $300,000 and a check for the full amount is enclosed. The award would be set up for one period of eighteen months and three hundred thousand dollars.

3) A notice of grant award is received for three year period with limitations on the amount that can be expensed for any given period within the award. ORS would set up budget periods corresponding to the restrictions in the award.

Where the Project Period is awarded as one period of more than one year, is incrementally funded, and specific budget periods can be discerned from either the award or the proposal, the award will be set up with multiple budget periods and show “Future” funding.

Where the Project Period is awarded as one period, is incrementally funded and specific budget periods are not discernable from the award or proposal (such as budgets tied to tasks or subject enrollment), the first increment will be established using a reasonable period of time (i.e. one year). A second budget period will be established and will run to the end of the Project Period and will show all the future funding. As increments are awarded, the first increment will be revised to include an extended period of time and the additional awarded dollars. The time period and the dollar amounts of the second period will be reduced accordingly.

Example:

1) A NOA is received for a period of three years and obligates $100,000 of an estimated

$300,000 award. The proposal was submitted with a three year budget of $100,000 per year. The award will be set up with a project period of three years consisting of three budget periods of $100,000 each.

2) A notice of grant award is received with a two year period of performance and obligates $20,000 of a $150,000 award. The increase in obligated funds is not tied to a budget period or the submission of a report, but is tied to the completion of a task. The initial award would be set up with a project period of two years and an awarded budget period of one year and $20,000. A second year will be set up as future funding in the amount of $130,000. If the task is completed six months into the first year of this award and an additional increment of $40,000 is received, the first budget period will be increased to $60,000 and the second budget period will be reduced to $90,000. This will continue at the time of each award until all the increments have been awarded.

Please Note:
"Future" funding is not considered awarded until ORS receives official documentation from the sponsor and should not be budgeted by the department. A notation will be added to the AIS stating that "future" funding is contingent upon receipt of documentation from the sponsor. Departments will be responsible for any expenses incurred beyond the awarded amount. If an AIS is printed prior to the start date of an award, the award will be listed as future funding on the second page of the AIS, but it will show as an award on the front page of the AIS.   This is not the same as having a status of "future".

"Future" periods are set up if the current award document notes that future funding can be expected. For those awards that do not reflect the future funding, the future years requests from the original proposal have a status of "pending" and are not listed on the AIS.

Future funding was not captured in the RSS system, so awards that were set up prior to October do not have "future" funding entered into PennERA.

It is recognized that deviations from the above guidelines might be necessary or advantageous to appropriately account for and report spending on a sponsored project in accordance with the requirements of the Sponsor. In these instances, Research Services will discuss the account set up with the responsible Business Administrator or, if the Business Administrator is requesting an exception to these guidelines, the request will be reviewed by the Executive Director or his/her designee.

May's Contributing Authors, ORS Newsletter:

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Getting to know your ORS Staff:

Sheila Atkins, Associate Director, Corporate Contracts

Years at Penn: 18.5

Years in Research Services: 5.5

What she does: Sheila is responsible for negotiating contracts on behalf of the University of Pennsylvania for industry sponsored clinical trials.

Hobbies: Collecting cancelled but "beautiful" domestic and foreign stamps.

Interests: As coined by Mahatma Gandhi: "Being the change that I want to see in the world," and improving the social conditions and quality of life for the elderly.

Favorite Restaurant: Illuminare and Audrey Claire's

Favorite ways to spend a vacation: Traveling alone to any island and indulging in the customs of the native islanders!

What Co-workers say:
………Sheila's expertise, humor and candor have been a wonderful welcome when I recently joined the Penn community
……….The woman does it all: work, school, volunteer work –and still maintains a confident aura of having everything under control (well –sometimes)
………."Refreshingly Candid" comes to mind

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/).

FALL EFFORT REPORTS:

Effort Reports for the Fall Semester (July – December 2003) FY04 were due to be returned to Research Services by April 23, 2004. As of today, over 6 weeks after the due date, over 2,000 effort reports are still outstanding. Business Administrators need to make a real effort to have these reports certified and returned to ORS as soon as possible. The annual federally required A-133 audit of grants and contracts is already underway and the auditors will be asking for some of these reports very soon. There is no legitimate reason to have so many reports not returned more than 5 months after the reporting period.

Delinquent NIH FSR Notifications:

Please be aware that NIH has recently sent out several delinquent FSR notifications that were not correct. Only in very rare circumstances is an FSR submitted late to NIH. NIH is aware of this problem and is resolving it. In addition, for each notice received, Research Services contacts the NIH representative directly to ensure that the correct status is communicated. If you receive any contacts of this type, please forward them to Research Services.

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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- 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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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.

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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.

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