HHS Issues Revised Grants Policy Statement Which Sets New Requirement for Cost Transfers

Effective October 1, 2006

The Department of Health and Human Services has issued a revised Grants Policy Statement, effective October 1, 2006, which can be accessed at http://www.acf.hhs.gov/grants/HHS_GPS_Oct_2006.doc. The Department of Health and Human Services Grants Policy Statement (HHS GPS) is intended to make available in a single document the general terms and conditions of HHS discretionary grant and cooperative agreement awards. These general terms and conditions are common across all HHS Operating Divisions (OPDIVs)\(^1\) and apply as indicated in the HHS GPS unless there are statutory, regulatory, or award-specific requirements to the contrary (as specified in individual Notices of Award).

It is important to note that the National Institutes of Health (NIH) maintains its own Grants Policy Statement which was most recently revised on 12/1/03. While the requirements of both policy statements are generally equivalent, the NIH GPS has not yet been issued in a revised version. We have been told that there currently is a revised version awaiting approval and issuance. The new HHS GPS addresses cost transfers in section II-44. The following is an excerpt from that section:

**Cost Transfers**

Cost transfers by recipients between grants, whether as a means to compensate for cost overruns or for other reasons, generally are unallowable; however, cost transfers by recipients (or subrecipients or cost-type contractors) may sometimes be necessary to correct bookkeeping or clerical errors. Recipients (and subrecipients and contractors) should have systems in place to detect such errors within a reasonable time frame. Untimely discovery of errors could be an indication of poor internal controls.

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\(^1\) As indicated under “Applicability,” the National Institutes of Health (NIH) maintains its own Grants Policy Statement. While the requirements of both policy statements are equivalent, the NIH GPS addresses only research and research-related matters as well as requirements that apply only to NIH.
Permissible cost transfers should be made promptly after the error occurs but no later than 90 days following occurrence unless a longer period is approved in advance by the GMO. The transfer must be supported by documentation, pursuant to 45 CFR 74.53 or 92.42, that fully explains how the error occurred and a certification of the correctness of the new charge by a responsible official of the recipient, subrecipient, or contractor. An explanation merely stating that the transfer was made “to correct error” or “to transfer to correct project” is not sufficient. This information need not be submitted to the GMO but is subject to audit. If the transfer affects a previously submitted FSR, a revised FSR must be submitted.

Please note that this policy is stricter than Penn’s current cost transfer policy which states that cost transfers must be completed within 90 days of the end of the month in which the original charge occurred. According to University policy, any transfers done beyond this date require the approval of the Post Award Director. Please note that for any awards subject to the HHS GPS, cost transfers done October 1, 2006 or later will be subject to the stricter requirements of the HHS’s new GPS which require Grants Management Officer approval for any cost transfers done over 90 days from occurrence in addition to Penn’s current policy. Please note that this applies for cost transfers done at any point in the life of an award. Until further notice, cost transfers done on awards from other sponsors will continue to be subject to Penn’s cost transfer policy (Sponsored Projects Policy 2113). Please keep in mind that many anticipate NIH’s GPS to be issued with wording similar to that of the new HHS GPS.
Request for Information (RFI)

Possible Page Limit Reduction For the Research Plan Section of the Research Project Grant (R01) Application

Notice Number: NOT-OD-07-014

Key Dates
   Release Date: November 9, 2006
   Response Date: January 5, 2007

Issued by
National Institutes of Health (NIH), (http://www.nih.gov)

This is a time-sensitive Request for Information (RFI) regarding a possible change in the current 25-page limit of the Research Plan section (PHS 398 Sections A-D) of the NIH Research Project Grant (R01) application. Comments will be considered from interested applicants, reviewers and other members of the research community.

This request for information is for planning purposes only and should not be construed as a solicitation for applications or an obligation on the part of the government. The government will not pay for the preparation of any information submitted or for the government’s use of that information.

Background
The NIH is considering reducing the current 25 page limit for the Research Plan section of the research project grant (R01) application. A significant number of applicants and reviewers have suggested that NIH peer review could be improved by focusing less on experimental details and more on key ideas and the scientific significance of proposed projects. In addition, recruitment of qualified reviewers has become increasingly difficult, resulting in greater reviewer turnover and reduced consistency from one review meeting to the next.

To ensure that the NIH review process identifies the most promising scientific projects, we are evaluating the possibility of shortening the Research Plan section and focusing it more on ideas and significance. A committee has been formed at NIH to gather additional information from the external community and explore possible options. We would like your opinion, as an applicant and/or reviewer, of this potential change.

Information Requested
Information in the following areas will help NIH determine whether to shorten the R01 application. Depending on whether you are an applicant and/or a reviewer, please provide information in the following areas:

Applicant issues
1. Would a shorter grant application affect your ability to present your scientific ideas? Describe whether your ability would be the same, less, or greater.
2. Would a shorter application take less time to prepare? Describe whether your preparation time would be the same, less, or greater.
3. In your opinion, which of the following models would best serve your needs?
   a. Five pages [1 for statement of question and significance, 1 for specific aims, 3 for Approach],
   b. Ten pages [1 for specific aims, 1 for background and significance, 3 for preliminary data/progress, 5 for research design and methods],
   c. Fifteen pages [1 for specific aims, 2 for background and significance, 4 for Preliminary data/progress, 8 for research design and methods], or
   d. Twenty five pages [the current application format – 1 for specific aims, 2-3 for background and significance, 6-8 for preliminary data/progress, 13-16 pages for research design and methods].

Reviewer issues

1. Would a shorter grant application affect your ability to judge the scientific merit of a proposed project? Describe whether your ability would be the same, less, or greater.

2. In your opinion, which of the following models would best serve your needs?
   a. Five pages [1 for statement of question and significance, 1 for specific aims, 3 for approach],
   b. Ten pages [1 for specific aims, 1 for background and significance, 3 for preliminary data/progress, 5 for research design and methods],
   c. Fifteen pages [1 for specific aims, 2 for background and significance, 4 for preliminary data/progress, 8 for research design and methods], or
   d. Twenty five pages [the current application format – 1 for specific aims, 2-3 for background and significance, 6-8 for preliminary data/progress, 13-16 pages for research design and methods].

3. If you were assigned an equivalent number of shorter grant applications, would it affect your willingness to serve as a reviewer? In your opinion, would your willingness be the same, moderately increased/decreased, or greatly increased/decreased.

General issues

1. If the page limit were reduced, should the review criteria be changed to emphasize key ideas and significance more strongly?

2. Would a decreased page limit place any group of investigators or type of research at a disadvantage? If yes, please describe which group(s) or type(s).
3. Do you define your research as clinical?

4. Do clinical research plans require more application space than basic research plans?
   (Note: assume that clinical protocols, letters of consent, data and safety monitoring plans, survey instruments, etc. would be in application sections outside the Research Plan.)
   If yes, please explain.

5. Do you have additional comments about the effects of a shorter application on the NIH application/review process?

**How to Submit a Response**

Please submit responses through the following special Web site:

(Alternatively, responses may be submitted by sending an email to orosc@csr.nih.gov.)

Responses will be accepted until January 5, 2007

All information provided will be processed and analyzed with strict anonymity.

The results obtained from the responses to this RFI will be available to the public on the CSR website. [http://cms.csr.nih.gov/](http://cms.csr.nih.gov/)

**Inquiry**

Inquiries concerning this Notice may be directed to:
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Room 3030, MSC, 7776
Bethesda, MD
Phone: 301-435-1133
Fax: 301-480-3965
E-Mail: orosc@csr.nih.gov

Respondents will receive an automated email notification acknowledging receipt of their responses, but will not receive follow-up information concerning NIH’s assessment of the information received. No basis for claims against the NIH shall arise as a result of a response to this Request For Information, or from the NIH’s use of such information as either part of its evaluation process or in developing any subsequent policy or announcement.
After completion and evaluation of the Proposal Development pilot, the PennERA (Electronic Research Administration) team is gearing up for a wider release of the application for use by investigators and other research personnel beginning mid January 2007. Proposal Development is a web-based application that streamlines the process for preparation, review, approval, and submission of proposals. In addition, the application allows researchers at Penn to meet government requirements as federal grant-making agencies transition to mandatory electronic grants submission.

**NIH-only submissions**

Initially the Proposal Development application will be available to create, route, approve, and submit only NIH proposals. Other sponsors/mechanisms will be added to the application as the software allows. Please refer to the PennERA web site for the available mechanisms as well as creation and submission options for NIH at [http://project.pennera.upenn.edu/project/current_phase/propmatrix.pdf](http://project.pennera.upenn.edu/project/current_phase/propmatrix.pdf).

**Access and training**

The PennERA team is working on a Proposal Development implementation plan with each School and Center. Researchers will be able to access the Proposal Development application as each School/Center’s routing and approval path is set up in the system.

Hands-on training for research administrators is targeted to begin mid January 2007. Investigators will be provided with orientation sessions as well as a web-based self-service training guide. All users will be contacted directly with detailed information about access, training dates, and end-user support.

**More information about PennERA**

Additional updates about PennERA will be provided throughout the project. For more information about PennERA, see the PennERA web site at [https://www.pennera.upenn.edu/](https://www.pennera.upenn.edu/). If you have any questions, comments, or suggestions, please send an e-mail to pennera@pobox.upenn.edu.
Non-Monetary Agreement Review Form

As previously discussed, the processing of research proposals for external funding requires the preparation and submission of a completed Proposal Transmittal and Approval Form (PTAF). The purpose of this requirement is to ensure that such proposals seeking external funding comply with Penn financial and research compliance policies.

To reiterate, a variety of agreements related to Penn research which do not directly result in external research funding are often implemented. In the case of agreements which did not result in direct research funding, it is possible that a research proposal transmittal form was not prepared and submitted since no financial approvals were necessary. The primary reason for this practice was the administrative burden involved preparing a PTAF. Such agreements included collaboration agreements without external sponsor funding and teaming agreements. More recently, data use agreements and software licensing agreements (Penn as licensee) are being used with increasing frequency (these agreements usually do not involve any external funding). ORS has characterized these as Non-monetary Agreements. A common example would be an agreement from a pharmaceutical company which is providing a drug at no cost to be used in an NIH-funded study. Such an agreement is directly related to an existing research proposal and usually contains many of the terms and conditions found in a clinical trial agreement even though no additional funding is provided.

One issue that needs clarification is when do agreements need to be sent to ORS as opposed to being sent to another office? The general rule is that agreements should be sent to ORS when such agreements directly relate to the conduct of sponsored research. For example, if a software license had to be reviewed for a PI, if the software being licensed were to be used to further the PI’s sponsored research project (as opposed to an administrative function like processing accounts payable invoices, etc.), then such a license for software, being used as part of the programmatic research would be handled in the first instance by the Office of Research Service, and ORS would, in consultation with OGC as needed, would endeavor to ensure the contract terms are consistent with the PI’s original gov’t or sponsored research award and review the proposed license to make sure it doesn’t impede the PI’s research and has other terms Penn can comply with. If it is software for an administrative function for the PI, then University Purchasing and ISC would assist review the agreement.

We wish to remind faculty and staff that, with the increasing need to ensure compliance in research activities and to more carefully track Non-monetary Agreements, ORS has developed a simplified Non-monetary Agreement Review Form (NMARF) to use with such Agreements. The reasons for this are as follows:

1. Non-monetary Agreements may involve issues requiring departmental and school approval, such as use of space, equipment, security plans and faculty commitment.
2. Certain agreements may involve the use of funds from other sources to support the activities under Non-monetary agreement. The use of such funds still requires approval from departments and schools to ensure that no inappropriate use of funds dedicated to other projects is ensuing.
3. Compliance and monitoring for regulatory affairs, conflict of interest and other policies is advanced by use of the NMARF.
4. The NMARF will ensure proper notice and tracking of agreements so that all necessary parties are aware of the activities and any needed approvals.

The NMARF is posted on the ORS website. Call Donald T. Deyo, Esq., with any questions or comments (215) 573-9970 or deyo@pobox.upenn.edu.
ORS Monthly Quick Quiz

Answers can be found in the Sponsored Projects Handbook Section 9.1

1) All of the following are considered types of project changes EXCEPT:
   a. Programmatic
   b. Scope
   c. Budgetary
   d. Administrative

2) _________ changes are necessary when the PI determines that expenditures are required for unanticipated items not included in the proposal budget.
   a. Programmatic
   b. Scope
   c. Budgetary
   d. Administrative

3) Below are examples of what type of project changes?
   Changes in scope of work, Expenditure of funds before receipt of the formal award, extension of the project period, changes in effort of the PI or other key personnel named in the notice of award, carryover of unexpended funds from one budget period to another.
   a. Programmatic
   b. Scope
   c. Budgetary
   d. Administrative

4) _____ changes are necessary when the PIU determines the direction of the project must change based on the results of results obtained to date.
   a. Programmatic
   b. Scope
   c. Budgetary
   d. Administrative

For answer key, see Page 11 & Section 9.1 of the Sponsored Projects Handbook

Did You Know.......??

....the Department of Health and Human Services has issued a revised Grants Policy Statement, effective October 1, 2006, which can be accessed at http://www.acf.hhs.gov/grants/HHS_GPS_Oct_2006.doc

.........For awards covered by the HHS GPS, permissible cost transfers should be made promptly after the error occurs but no later than 90 days following occurrence unless a longer period is approved in advance by the GMO.
Frequently Asked Questions’s

What is the current information regarding Multiple PI’s on an NIH grant application?

Beginning with research grant applications submitted for February 2007 receipt dates, the NIH will allow applicants and their institutions to identify more than one Principal Investigator (PI). The Multiple PI option will be extended to most research grant applications submitted electronically through Grants.gov (http://www.grants.gov/) using the SF424 R&R application package. Grant applications that will accommodate more than one PI beginning in February include: R01, R03, R13/U13, R15, R18/U18, R21, R21/R33, R25, R33, R34, R41, R42, R43, R44, and C06/UC6 (see http://era.nih.gov/ElectronicReceipt/strategy_timeline.htm). Some types of applications including individual career awards (K08, K23, etc.), individual fellowships (F31, F32, etc.), Dissertation Grants (R36), Director’s Pioneer Awards (DP1), and Shared Instrumentation Grants (S10) will not accommodate more than a single PI. The restriction to a single PI will be described in announcements for those programs.

The NIH will extend the multiple PI option to most research grant applications when they transition to an electronic format. Some paper applications submitted on PHS 398 application forms also will allow inclusion of more than one PI, but only when the multiple PI option is clearly specified in the soliciting Request for Applications (RFA) or Program Announcement (PA). Other paper applications listing more than one PI may be delayed in the review process or returned to the applicant.

The decision to apply for a single PI or a multiple PI grant will be the responsibility of the investigators and the applicant organization. Those decisions should be consistent with and justified by the scientific goals of the project. As described in the Background section below and on the Multiple Principal Investigator website at http://grants.nih.gov/grants/multi_pi/index.htm, the NIH expects the availability of the Multiple PI option to encourage interdisciplinary and other team approaches to biomedical research.

Inquiry

For additional information please visit the Multiple Principal Investigator website at http://grants.nih.gov/grants/multi_pi/
Training Opportunities:

**Upcoming ORS Brown Bags:**

**November 30, 2006:** Hot Topics in Compliance  
Time: 12:00 - 1:30  
Location: Terrace Room/Logan Hall  
Registration: [http://knowledgelink.upenn.edu](http://knowledgelink.upenn.edu)

**December 14, 2006:** Cost Sharing Procedures and Perspectives -ORS and Deptmental Perspectives  
Time: 12:00 - 1:30  
Location: Terrace Room/Logan Hall  
Registration: [http://knowledgelink.upenn.edu](http://knowledgelink.upenn.edu)

**Upcoming Grants.gov Training**

This course will be an instructor led course that will give students hands-on training using the PureEdge Viewer and SF424(R&R) forms to prepare NIH electronic grant applications.  
Registration: [http://knowledgelink.upenn.edu](http://knowledgelink.upenn.edu)

- **December 5, 2006**  
  Time: 2:00p-4:00p  
  Location: Franklin Bldg Room 409
- **December 7, 2006**  
  Time: 10:00a-12:00p  
  Location: Franklin Bldg Room 409
- **December 11, 2006**  
  Time: 10:00a-12:00p  
  Location: School of Medicine  
  Anatomy & Chemistry Bldg Room 202
- **December 13, 2006**  
  Time: 2:00p-4:00p  
  Location: Franklin Bldg Room 409
- **December 19, 2006**  
  Time: 2:00p-4:00p  
  Location: School of Medicine  
  Anatomy & Chemistry Bldg Room 202
- **January, 4 2007**  
  Time: 2:00p-4:00p  
  Location: Franklin Bldg Room 409
- **January, 8 2007**  
  Time: 2:00p-4:00p  
  Location: Franklin Bldg Room 409
- **January, 10 2007**  
  Time: 10:00a-12:00p  
  Location: Franklin Bldg Room 409
- **January, 16 2007**  
  Time: 2:00p-4:00p  
  Location: Franklin Bldg Room 409
- **January, 18 2007**  
  Time: 10:00a-12:00p  
  Location: Franklin Bldg Room 409

**Upcoming NCURA Events**

- **Fundamentals of Sponsored Project Administration** -- January 17-19, 2006, Orlando, FL  
  [http://www.ncura.org/events/funds/](http://www.ncura.org/events/funds/)  
- **Financial Research Administration (FRA) VIII** -- April 1-3, 2007 Gaylord Texan Resort Grapevine, TX  
  [http://www.ncura.org/events/fra/](http://www.ncura.org/events/fra/)

**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/](http://www.upenn.edu/researchservices/)).

**Research Compliance Tutorials and Other Education:**

For further guidance on administering 5-funds here at Penn, please visit the Research Compliance Training and Education page at [http://www.upenn.edu/researchservices/rc/pages/training.htm](http://www.upenn.edu/researchservices/rc/pages/training.htm).
Getting to Know......
Stephen Fratantaro

Years at Penn: 4 years in January
Years in Research Services: 7 months
ORS Responsibilities: Functional Team Leader, Proposal Development
Hobbies/Interests: reading, traveling, fantasy sports, sports in general
Favorite Restaurant: Nan

Favorite ways to spend a vacation: I don’t know if I have a favorite way to spend a vacation, but my favorite vacation to date was our trip to Spain last March. We spent time in Barcelona, Seville, and Madrid, and while I enjoyed all three cities, Barcelona was amazing. I’d return in a heartbeat.

What Co-workers say:

"Hardworking, diligent with a wicked sense of humor."

He is incredibly diligent, thoughtful, funny, and despite the fact that he is extremely busy meeting exacting and challenging PennERA demands, you will never see him walking and eating at the same time.

“He is a pleasure to work with he rolls with the punches and is always there help in any way he can”

November Contributing Authors, ORS Newsletter:

Pam Caudill, Director of Pre Award Non-Financial Administration, Office of Research Services
Don Deyo, Director of Corporate Contracts, Office of Research Services
Teresa Leo, PennERA/PennERS Communications Specialist, Information Systems and Computing
Anita Mills, Associate Director - Sponsored Programs Compliance Training, Office of Research Services
Kerry Peluso, Director of Post Award Financial Administration, Office of Research Services
Todd Swavely, Associate Director –Penn ERA, Project Manager, Office of Research Services

Answer Key to ORS Monthly quiz:
1:B; 2:C; 3:D; 4:A
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.

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• Institute for Human Gene Therapy – SOM
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• Endocrinology – SOM
• Gastrointestinal – SOM
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• Pulmonary, Allergy & Critical Care – SOM
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• Genetics – SOM
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• Orthopedic Surgery – SOM
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• School of Medicine, Institute for Medicine & Engineering – SOM
• Radiation Oncology
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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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Office of Research Services
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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POST AWARD ADMINISTRATION:

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    - Cell and Developmental Biology
    - Radiology

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    - Institute for Environmental Medicine
    - Institute of Neurological Sciences
    - Medical School
    - Orthopedic Surgery
    - Pediatrics Admin
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    - Otolaryngology:

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  - Vice Provost of University Live
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    - Center for Sleep
    - Neurosurgery
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    - Cancer Biology
    - Rehabilitation Medicine

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    - Systems Engineering
    - Institute for Environmental Medicine
    - Institute of Neurological Sciences
    - Center for Experimental Therapeutics
    - Institute for Aging
    - Institute for Human Gene Therapy
    - Family Practice
    - Molecular & Cellular Engineering

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About Our Organization...

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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.

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- 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;
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