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## **ORS Review of Sponsored Projects Expenditures during the Closeout Period**

The Office of Research Services is responsible for the preparation of interim and final financial reports. As a part of that process, ORS accountants may review certain expenditures which have been incurred on the award (Sponsored Projects Policy Nos. [2107](#) and [2126](#).) Expenditures may be reviewed for allowability, reasonableness, and allocability. (Please see <http://www.upenn.edu/researchservices/faq.html#allowability> for more information on these topics.)

As part of the University of Pennsylvania's program to ensure compliance with the terms and conditions of awards, ORS may question select high risk expenditures as well as those that have, as a class, been highlighted in the University's grants assessment program. As a result of this review, the department may be requested to provide further information regarding expenditures. These inquiries are made to ensure that expenditures are made in compliance with the terms and conditions of the award and that if findings have been made during the grants assessment process, that the charges have been appropriately handled. While the questioned costs may often be appropriate, they are in areas that have been found to be high risk in audits across the nation. Costs commonly questioned include:

- Charges for costs such as office supplies, administrative salaries, or similar costs which are generally considered F&A costs. See <http://www.upenn.edu/researchservices/faq.html#A21> or pages 4-6 in ORS's [October 2003 Newsletter](#) for more information.
- Charges which appear as though they may have been charged to an incorrect object code such as a charge to "Lab Supplies" for an Office Depot purchase.
- Charges for Travel and Entertainment which appear to be questionable (due to vendor name, amount, terms and conditions of award, etc.)

ORS **does not** require the submission of back up documentation to the Accountant. ORS merely requests an email which explains why a particular charge is appropriate/allowable on the award and which provides verification that the required documentation is available at the department and the expense

was approved by the PI and documented as such. Responding to these requests should not require extensive amounts of time since the department is already required to have documentation organized and readily available for audit purposes.

It is important that these requests are responded to in as timely a manner as possible. Based upon the due date of the financial report, the Accountant will provide a deadline for the response (generally one week). **If a response is not received, the report will be submitted without the questioned expenditure. The questioned charge will be transferred to the department's 0 fund.** If the department requires additional time to respond, the Accountant will normally approve a request for more time provided that this will still permit the FSR to be submitted on time.

Please note that not all expenditures which fall into one of the categories listed above will be questioned at closeout. The receipt of an email by ORS as justification for the expenditure does not in and of itself guarantee the allowability of the expenditure. It is the PI's responsibility to ensure that the costs that have been charged to the award are appropriate, are in consonance with the approved budget and goals of the project, and that proper documentation is available in the department. (Please see [Sponsored Projects Policy No. 2106](#) for more information on financial responsibility.)

Anyone who is responsible for the administration of sponsored project is strongly encouraged to attend a two day training program offered by ORS. *Sponsored Programs at Penn* will be offered during the upcoming winter months. Please watch the ORS Newsletter for announcement of future dates.

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## ENHANCED PUBLIC ACCESS TO NIH RESEARCH INFORMATION

In advancing the goals of combating disease and disabilities, NIH has funded biomedical research at the University of Pennsylvania and other universities. In addition, NIH is committed to ensuring that the research results, information and biological tools arising from such funding are widely available in a timely fashion to other researchers as well as the general public. This process enables other researchers and the general public to benefit from the research and fosters new scientific advances.


A new notice has been released which describes NIH's plans to facilitate public access to NIH created information. The notice requires NIH grantees and PIs to provide to NIH an electronic copy of all manuscripts accepted for publication if the work leading to the manuscript was supported by NIH funding (research grants, cooperative agreements, contracts, NRSA fellowships). The final manuscript is that resulting after all changes from the peer review process have been made. Submission of the publications in electronic form under this Notice will be monitored as part of the annual grant progress review and close-out process.

The notice may be read at <http://grants2.nih.gov/grants/guide/notice-files/NOT-OD-04-064.html>

In the notice, the primary rationale for the new requirement is stated as the following:

"Establishing a comprehensive, searchable electronic resource of NIH- funded research results and providing free access to all, is perhaps the most fundamental way to collect and disseminate this information. The NIH must balance this need with the ability of journals and publishers to preserve their critical role in the peer review, editing and scientific quality control process. The economic and business implications of any changes to the current paradigm must be considered as the NIH weighs options to ensure public access to the results of studies funded with public support without compromising the quality of the information being provided. The NIH has established and intends to maintain a dialogue with publishers, investigators, and representatives from scientific associations and the public to ensure the success of this initiative. "

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## NIH Announces Updated Criteria for Evaluating Research Grant Applications

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**Notice Number:** NOT-OD-05-002

### Key Dates

Release Date: October 12, 2004

### Issued by

National Institutes of Health (NIH), (<http://www.nih.gov>)

### Background

The goal of the NIH Roadmap is to accelerate and strengthen biomedical research enterprise. During consultation with the extramural scientific community that led to the development of the NIH Roadmap process, it was frequently mentioned that the criteria used to evaluate research grant applications were not placing appropriate emphasis on some important types of biomedical research (see <http://nihroadmap.nih.gov/>). The Roadmap Trans-NIH Clinical Research Workforce Committee proposed a modification of the NIH Peer Review Criteria for investigator-initiated research grant applications that would better accommodate interdisciplinary, translational, and clinical projects. The updated review criteria were adopted at the August 5, 2004 meeting of the Directors of the NIH Institutes and Centers. According to the schedule shown below, the updated criteria will replace the review criteria adopted on June 27, 1997 (see <http://grants.nih.gov/grants/guide/notice-files/not97-010.html>).

### Implementation

These updated review criteria will be effective for research grant applications received on or after January 10, 2005 that fall into the following categories:

- Investigator initiated research grant applications;
- Investigator initiated research grant applications submitted in response Program Announcements (PAs) whether published before or after this announcement;
- Solicited research grant applications submitted in response to Requests for Applications (RFAs) will continue to use the review criteria described in the RFA.

Note: RFAs published before this announcement will continue to use the existing review criteria. RFAs published after this announcement will use the newly updated criteria (shown below) as a framework for the development of review criteria specific to the RFA.

Beginning with reviews in the summer of 2005, reviewers will be instructed to use the updated review criteria (shown below) as the basis for evaluating research grant applications and for assigning a single, global score for each scored application. The score should reflect the overall impact that the project could have on the advancement of science. The emphasis on each criterion may vary from one application to another; and an application need not be strong in all categories to be judged likely to have a major scientific impact.

Future RFAs and PAs, which will be published in the NIH Guide to Grants and Contracts, will incorporate and employ these updated criteria as the basis for evaluating all research applications.

### Updated NIH Criteria for the Evaluation of All Research Applications

The goals of NIH-supported research are to advance our understanding of biological systems, to improve the control of disease, and to enhance health. In their written critiques, reviewers will be asked to comment on each of the following criteria in order to judge the likelihood that the proposed research will have a substantial impact on the pursuit of these goals. Each of these criteria will be addressed and considered in assigning the overall score, weighting them as appropriate for each application. Note that an application does not need to be strong in all categories to be judged likely to have major scientific impact and thus deserve a high priority score. For example, an investigator may propose to carry out important work that by its nature is not innovative but is essential to move a field forward.

**1. Significance** . Does this study address an important problem? If the aims of the application are achieved, how will scientific knowledge or clinical practice be advanced? What will be the effect of these studies on the concepts, methods, technologies, treatments, services, or preventative interventions that drive this field?

**2. Approach** . Are the conceptual or clinical framework, design, methods, and analyses adequately developed, well integrated, well reasoned, and appropriate to the aims of the project? Does the applicant acknowledge potential

problem areas and consider alternative tactics?

**3. Innovation** . Is the project original and innovative? For example: Does the project challenge existing paradigms or clinical practice; address an innovative hypothesis or critical barrier to progress in the field? Does the project develop or employ novel concepts, approaches, methodologies, tools, or technologies for this area?

**4. Investigators** . Are the investigators appropriately trained and well suited to carry out this work? Is the work proposed appropriate to the experience level of the principal investigator and other researchers? Does the investigative team bring complementary and integrated expertise to the project (if applicable)?

**5. Environment** . Does the scientific environment in which the work will be done contribute to the probability of success? Do the proposed studies benefit from unique features of the scientific environment, or subject populations, or employ useful collaborative arrangements? Is there evidence of institutional support?

**NOTE:** Requests for Applications (RFAs), which are published in the NIH Guide to Grants and Contracts, may list additional elements, relating to the specific requirement of the RFA, under each of the above criteria.

**Additional Review Criteria:** In addition to the above criteria, the following items will continue to be considered in the determination of scientific merit and the priority score:

**Protection of Human Subjects from Research Risk:** The involvement of human subjects and protections from research risk relating to their participation in the proposed research will be assessed (see the Research Plan, Section E on Human Subjects in the PHS Form 398).

**Inclusion of Women, Minorities and Children in Research:** The adequacy of plans to include subjects from both genders, all racial and ethnic groups (and subgroups), and children as appropriate for the scientific goals of the research will be assessed. Plans for the recruitment and retention of subjects will also be evaluated (see the Research Plan, Section E on Human Subjects in the PHS Form 398).

**Care and Use of Vertebrate Animals in Research:** If vertebrate animals are to be used in the project, the five items described under Section F of the PHS Form 398 research grant application instructions will be assessed.

#### **Additional Review Considerations**

**Budget:** The reasonableness of the proposed budget and the requested period of support in relation to the proposed research. The priority score should not be affected by the evaluation of the budget.

#### **Inquiries**

For more information, including a side by side description of the changes, and frequently asked questions, see the [OER: Peer Review Policy and Issues](http://grants.nih.gov/grants/peer/peer.htm#documents) website (<http://grants.nih.gov/grants/peer/peer.htm#documents>).

Feedback and comments regarding the criteria may be left at [grantsinfo@nih.gov](mailto:grantsinfo@nih.gov).

Inquiries regarding this notice may also be directed to:

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Review Policy Officer  
OD/OER/OEP  
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## *Getting to know your ORS Staff:*

### **Stacia Levy** **Senior Contract Administrator**

**Years at Penn:** 1

**Years in Research Services:** 1

**What she does:** Senior Contract Administrator, Corporate Contracts

**Hobbies/Interests:** Playing tennis, shooting pool, Eagles football, reading horror novels

**Favorite Foods:** Sushi, Italian, "Comfort Foods"

**Favorite ways to spend a vacation:** Relaxing on the beach with a margarita and a good book

**What Co-workers say:**

.... Stacia is bright and efficient when it comes to the daily grind at work. However, she is equally funny and entertaining ---and probably should have been a stand up comedian!

...Stacia has been a great addition to the office in every respect!

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



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

...According to Cash Policy No. [1506](#), "All petty cash expenditures should be supported by a petty cash voucher slip. The petty cash voucher slip should be approved by the custodian and signed by the recipient of the cash."

...In certain situations sales tax is an unallowable expense (see Procurement/Disbursements Policy No. [2307](#)). Instances where an employee who incurred such an expense is reimbursed, e.g. via petty cash, the sales tax cannot be charged to a sponsored project and should be charged to a department unrestricted account using Object Code 5291 "Unallowable: Other."

...The General Ledger Object Codes for FY05 are available on the web. (Click [here](#).)

...If you attended Web Enabled Salary Distribution (WESD) training, you can begin accessing this secure web based application starting October 11, 2004.

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A multi-stage project to develop streamlined processes and more efficient tools for handling pre- and post-award administrative tasks related to the sponsored projects of Penn's academic research community.

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## ! NEWS

### PennERA Phase II

- Upgrade of current installed base product to Release 10, targeted for January 2005
- Near-term solutions, fall 2004 through January 2005—see details below

### AIS Online Released

The AIS (Account Information Sheet) is now available as a web-based report in BEN Reports, allowing users to view Proposal Award and Account data, as well as cost share, sponsor, sub contracts, and sub accounts at any time

- Released October 11, 2004
- Will be used by Faculty/PIs (for accounts on which they are named), School/Center BAs (based on Org security), and central office staff in ORS
- An e-mail notification with a clickable link will be sent when an award has been set up and the report is ready to be viewed online
- Other supporting documents such as sponsors' notices of award and contracts will continue to be delivered as attachments via e-mail

Accessing the AIS Online Report in BEN Reports:

- Go to <https://galaxy.isc-seo.upenn.edu:7778/ws/benreports> and log in with your PennKey and PennKey password.
- Click the "AIS Online" link. The "AIS Online" link appears at the bottom of the page, under the "Sponsored Programs" section. The AIS Online parameters page will appear.
- Enter any or all of the Parameters under Query Options (Fund, PI, and/or Institution Number) and click "Run Report". A page will appear with the Accounts that match your parameters.
- Click on the Account for which you want to generate the AIS. The AIS Online Report for that account, PI, and date combination will appear.

## PROGRESS

### Data Warehouse

- *Proposal-Award Check-up Reports and the Data Warehouse "SnapShot"*—Reports that assist PennERA Proposals data users in checking Proposal and Award data, so any necessary corrections can be made each fall before a snapshot of the data is taken each December; snapshot is taken for longitudinal studies
  - Preliminary snapshot will be taken in October 2004; final in December 2004
  - Before final snapshot is taken, PennERA Proposals data users should check their reports to make sure data is correct
  - Reports will be available in the Data Warehouse to Business Objects and InfoView users, and instructions are included on how to use the reports
  - Users will receive notification when reports are ready for use

- *Special Budgets*
  - An infrastructure has been put in place in the Data Warehouse that enables comparison of awards and adjustments from PennERA to PBUD, PBIL, and PTCS balances in the General Ledger to ensure consistency

## ↕ ONGOING

### *Release 10 Upgrade*

Upgrade of PennERA system from version 9.x to version 10—Version 10 will include new features, enhancements, and improved navigation, and is required in order to move forward with the development modules (Proposal and Protocol Development)

### *End User Support Model*

A recommendation based on analysis and needs identified by research community is in progress

### *Faculty/Reviewer Web Interface*

Assessment of the development of a web-based interface for faculty and reviewers to potentially submit/review/track Protocol and Conflict of Interest information

### *SOMERA Interface*

Interface between PennERA and SOMERA (School of Medicine ERA); contingent on approval from SOM Research Advisory group

### *Recommendation for Research Portal*

A recommendation, in alignment with the overall Penn Portal Strategy, for a web portal to serve as one central location for information about research at Penn

For the most current information, please visit the PennERA web site at <http://www.pennera.upenn.edu/>. If you have any questions, comments, or suggestions, please send an e-mail to [pennera@pobox.upenn.edu](mailto:pennera@pobox.upenn.edu).

--Robin H. Beck,  
Vice President of Information Systems and Computing  
--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

## Frequently Asked Questions . . .

### Our department has been scheduled for a interview with an Auditor from Price Waterhouse Coopers. What can I expect?

Price Waterhouse Coopers (PWC) is the accounting firm responsible for Penn's financial and A133 audits. As part of the A133 Audit process, PWC auditors visit several departments each year to interview PI's and BA's. A representative from the Office of Research Services will be present at such meetings. The purpose of the visit is for the auditors to gain an understanding of how grant awards are administered within the department and that those responsible have a solid understanding of [University and applicable Sponsor policies](#) as well as the [OMB Circulars](#). As outlined in [Sponsored Programs Policy 2106](#), the principal investigator is directly responsible for the management and administration of the sponsored project within the administrative constraints imposed by the sponsor and in accordance with University policy. In this capacity, the principal investigator authorizes all direct cost expenditures of project funds and is responsible for reviewing and approving all project related expenditures and cost transfers.

If you have any questions regarding an upcoming interview, please contact Bob McCann, Director, Cost Studies at [mccannr@pobox.upenn.edu](mailto:mccannr@pobox.upenn.edu) or 8-1469 or Kerry Peluso, Director, Post Award Financial Administration at [pelusok@pobox.upenn.edu](mailto:pelusok@pobox.upenn.edu) or 3x6705.

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## Training Opportunities:

### ORS FAQ's and ORIC Quizzes:

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

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## SRA Annual Meeting:

October 23 – 27, Salt Lake City, Utah

*For more information, please see*

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

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## NCURA Annual Meeting:

October 31 – November 3, Washington DC

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

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### September's Contributing Authors, ORS Newsletter:

Donald Deyo, Director, Corporate Contracts, Office of Research Services

Teresa Leo, PennERA/PennERS Communications Specialist, Information Systems and Computing

Kerry Peluso, Director of Post Award Financial Administration, Office of Research Services

Andrew B. Rudczynski, Associate Vice President for Finance and Executive Director, Office of Research Services

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

Alice Tangredi-Hannon, Director, Research Compliance, Office of Audit & Compliance

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## Initial Implementation Guidance Regarding Implementation of the Revised NSF Cost Sharing Policy

NSF has received many inquiries concerning the National Science Board approved change to the NSF cost sharing policy (NSB-04-157). The following provides basic implementation details that are available to date with respect the revised NSB-approved cost sharing policy:

1. The new cost-sharing policy, as approved by the NSB, eliminates program-specific cost-sharing, and requires only the existing statutory cost sharing requirement (1%). The statutory cost sharing requirement applies to all unsolicited research proposals. This includes all proposals submitted in response to NSF program announcements and those submitted solely in response to the NSF Grant Proposal Guide.
2. All previously issued program solicitations that specify a cost sharing requirement remain valid, unless program managers issue a formal amendment modifying the cost sharing requirement in the program solicitation. (At this point, none have opted to do so.)
3. The revised policy will be effective for all new NSF program solicitations issued after October 14th. This includes those not yet published on the NSF website (i.e., still in draft form).
4. Formal implementation of the policy will be forthcoming in a widely-distributed NSF Important Notice and via changes to official NSF policy documents including the Grant Proposal Guide and Grant Policy Manual.
5. Cost sharing commitments contained in current active awards remain unchanged.

Additional information will be provided as it becomes available.

## 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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- SOM – Dean's Office

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- Institute for Environmental Medicine – SOM
- Institute for Human Gene Therapy – SOM
- Institute for Neurological Sciences – SOM
- Medical Genetics – SOM
- Neurology – SOM
- Pathology & Laboratory Medicine
- Rehabilitative Medicine – SOM

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- Renal – SOM
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- School of Dental Medicine

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

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- Genetics – SOM
- Hematology/Oncology
- Neurosurgery - SOM
- Orthopedic Surgery – SOM
- Pediatrics – SOM
- Physiology – SOM
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- Radiation Oncology
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- Dermatology
- Geriatrics – SOM
- Microbiology – SOM
- Ophthalmology – SOM
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- School of Nursing
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## Office of Research Services

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### *About Our Organization...*

#### *Our Mission*

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

In this role, ORS

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

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

## Office of Research Services Quick Contact List:

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

**Andrew B. Rudczynski, Ph.D., Associate Vice President for Finance  
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