

## Office of Research Services -- Research Administration News --

Special Interest  
Articles:

- **IMPORTANT!** - Please see **page 6** for important information regarding **REVISED FSR's**.
- PennERA Update - See **page 7**
- Training Opportunities - See **page 8**

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The Office of Research Services announces a revised

### "Proposal Transmittal and Approval Form"

and a newly created

### "Sponsored Projects Subaccount Worksheet."

These new forms are available at <http://www.upenn.edu/researchservices/Forms%20and%20Agreements.html>.

Please review these forms and instructions carefully. Revisions have been made to the Proposal Transmittal and Approval Form in order to address the changing regulatory environment, and to address concerns and suggestions from the Penn community. While additional information is sought relating to "requested" budgets, export controls and select agents, the need for Social Security numbers has been eliminated from the form.

The new subaccount worksheet is to be used when a subaccount or a change in distribution between existing subaccounts is requested. This form has been created to provide consistent information to the pre-award staff and minimize data entry errors.

While it is **strongly** encouraged that the revised transmittal be used immediately, in order to allow for a smooth transition, the use of the new form is not mandatory until October 1, 2004.

For proposals submitted by faculty of the School of Medicine, the revised transmittal will not be required until it becomes available in SOMERA. Any questions relating to these forms should be directed to Pamela Caudill at [caudill@pobox.upenn.edu](mailto:caudill@pobox.upenn.edu).

## New Procedure for Commercial Clinical Trial Agreements

The current procedures used to establish Account Information Sheets for payments relating to commercial clinical trial agreements have been reviewed by ORS with the School of Medicine and Departmental BAs. In order to provide more efficient reporting of such payments and reduce unnecessary paperwork, the following is the procedure to be followed effective September 27, 2004.

Title: Procedure for Establishment of Awards, Account Information Sheets and Extensions for Commercial Clinical Trial Agreements

1. In submitting research proposals on commercial clinical trial agreements, Departmental BAs, in consultation with the PI, will establish project periods that realistically capture the likely duration of the clinical trial, including the monitoring and data analysis aspects that follow patient recruitment. This project period shall be entered on the Proposal Transmittal Sheet and Approval Form.
2. Departments will endeavor to negotiate budgets that include significant non-refundable advance payments to cover the initial costs of preparing and conducting the clinical trial. ORS staff negotiating commercial clinical trial agreements will work with the Departments in this process. Determination of final budgets shall rest with the Department and School.
3. Upon obtaining partial execution of a commercial clinical trial agreement and a signed Advance Account Request from the Department, an advance account will be established to enable the Department to establish family accounts. The account will be frozen upon creation by setting the end date to the date that the fund is created. An initial AIS will be produced at this time, PBUD will be set at the amount of the Advance Request and PBIL will be set at zero. Upon complete execution of the commercial clinical trial agreement, the account will be unfrozen by extending the end date six months past the date of execution with the understanding that any charges not covered will be handled in accordance with the Advance Account Request. Another AIS will be produced and sent to the Department at that time. If the commercial clinical trial agreement is not executed within three months after the initial account creation or if an approved request to extend the advance account is not received, the advance account will be disabled at ORS. When the first payment is received, the project period will be set for the time period specified in the Agreement (if not specified in the contract, as detailed on the Proposal Transmittal Sheet and Approval Form) and PBUD/PBIL will be set at the amount of the check and another AIS will be produced and sent to the Department.
4. If no Advance Account is requested by the Department, a fund will be created at the time the first check is received in ORS. An AIS will be produced for the amount of the check and PBUD/PBIL will be set at the amount of the check.
5. No Account Information Sheets will be issued on a per check basis to update for actual checks received. PBUD/PBIL will be increased as checks are received. Departments need to i) carefully monitor expenditures ii) track cash receipts with Fundsummary report and iii) cover

any over drafts which result on the account. At the specific request of the Department, copies of checks will be made available.

6. Unless the fund is extended, ORS will close out the fund within 90 days of the end date and will transfer any overage or shortage to the department as appropriate.

Accounts shall be extended by the following procedures:

- i) If the Agreement allows extensions without Sponsor approval, PI shall make a request to the Departmental Senior BA for an extension. Senior BA will review with the PI the request and determine if appropriate to grant the extension, considering continuing patient enrollment or other activities and anticipation of payments from the Sponsor. If Senior BA/Department approves, the extension request will be sent to the School for approval. Upon such approval, ORS staff will extend the end date and a new AIS will be generated at such time.
- ii) If the Agreement does not allow extension without Sponsor approval, the Department and PI shall notify the Sponsor of the need to extend the contract and the reasons why such extension is needed. Necessary amendments to the Agreement to extend the account should be obtained by the Department and then forwarded to ORS for processing and execution. Once an executed amendment is obtained, ORS staff will extend the end date and new AIS will be generated at such time.

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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\\_links.html](http://www.upenn.edu/researchservices/sponsor_links.html)

...Significant rebudgeting may be an indication of a change in Scope of Work (SOW). Changes in SOW require the prior approval of the sponsor for all federal awards.

...It's not only PIs who feel the pressure of submitting timely programmatic reports to federal sponsors but the sponsors themselves are under pressure as well for grantee late submissions. The HHS OIG has indicated to the NIH that it needs to improve grants management performance. In addressing the problem, the NIH is 1) Sending emails to PIs two months before a type 5 progress report is due and is developing a similar email for the business officer, and 2) Sending email reminders when a type-5 progress report is more than 15 days late.

...If an award is received that had required cost sharing as part of the proposal and the total dollars of the award are reduced from what was proposed, the cost sharing commitment should be reduced accordingly. If not, the University must contact the sponsor for a corrected award document.

...Sponsored Projects Policy No. [2113](#) was modified. Please review this Policy carefully and replace previous versions with this latest August revision.

...If you would like to attend a conference devoted to the profession of sponsored programs administration, there are two occurring this fall. The Society of Research Administrators (SRA) International and the National Council of University Administrators (NCURA) are holding their Annual conferences. For more information, see page 8.

**NIH/NSF NOTICES:****NIH Notice Number:** NOT-OD-04-063**Key Dates**

Release Date: September 2, 2004

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

As NIH continues towards its goal of end-to-end electronic research administration, business practices are being revised to improve efficiency and service to the grantee community. This Notice updates Notice [OD-04-054](#) published July 23, 2004. As stated in that Notice, effective with non-competing progress reports due on/after October 1, 2004, NIH is centralizing receipt and initial processing of all NIH non-competing progress reports. The new centralized mailing address for all NIH Institutes/Centers (IC) is now:

Division of Extramural Activities Support, OER  
National Institutes of Health  
6705 Rockledge Drive, Room 2207, MSC 7987  
Bethesda, MD 20892-7987 (for regular or US Postal Service Express mail)  
Bethesda, MD 20817 (for other courier/express mail delivery only)  
Phone Number: (301) 594-6584

**Reminders:**

- 1) This new business process affects only non-competing progress reports currently mailed directly to NIH ICs. It does NOT change the Center for Scientific Review mailing address used for all new and competing grants nor that process.
- 2) This change is only for progress reports received by NIH ICs. Progress reports for grants to other DHHS agencies that use the PHS2590 or the 416-9 should continue to use the mailing addresses noted for those agencies.

For additional information concerning this change see Notice [OD-04-054](#) or contact:

Office of Policy for Extramural Research Administration  
Office of Extramural Research  
National Institutes of Health  
Tel.: 301-435-0938  
E-mail: [grantspolicy@mail.nih.gov](mailto:grantspolicy@mail.nih.gov)  
FAX: 301-435-3059

**NSF** has enhanced the **Proposal File Update** application that gives users the ability to request the replacement of files or revision of other Proposal Attributes, associated with a previously submitted proposal. Changes supported by this enhancement to Proposal File Update include the ability to:

- Add or delete sections of the proposal, even sections that are not uploaded as PDF files; modify all sections of the proposal, even those that are created as forms within FastLane
- Modify several sections of the proposal as part of one Proposal File Update;

While many proposal sections will be available for update, the following proposal attributes remain unavailable for change via the Proposal File Update module:

Programs/NSF Unit of Consideration;  
Awardee Organization (changes are permitted if the proposer is an unaffiliated organization);  
Performing Institution;  
Due Date;  
Funding Opportunity number; and  
Letter of Reference Writers (Specific to Post Doctorate Proposals).

For further information on Proposal File Updates, refer to the Fastlane website at <http://www.fastlane.nsf.gov/>

## Service Centers – Depreciation

The Office of Research Services in cooperation with the Office of the Comptroller has developed a procedure whereby approved University Service Centers will be able to recover the annual depreciation expense of assets that were purchased for and used in these service centers. The new procedure is below and is effective for FY05. Questions regarding this procedure should be directed to Bob McCann, Director of Cost Studies at [mccannr@pobox.upenn.edu](mailto:mccannr@pobox.upenn.edu).

### Service Centers - Depreciation

Depreciation expense of equipment purchased for service center operations is an allowable cost of the service center. Departments wishing to include the annual depreciation expense of equipment purchased for service center use in the billing rates charged for the services provided may annually send a detailed list of the equipment items used and needed for the service center to the Office of Research Services for review and approval. The list must include the following information:

- Item description
- Penn barcode number
- Purchase Order number
- Annual depreciation expense and depreciable life of the asset <sup>(1)</sup>

ORS will review and approve the annual depreciation expense amount and forward the information to the Comptroller's Office. The Property management group in the Comptroller's Office will prepare the journal entry and charge the service center for the amount of the depreciation expense. The school's depreciation account will receive the credit for the charge.

<sup>(1)</sup> The depreciation expense and life years must match the asset life and annual depreciation schedule in the Property Management System.

This procedure is effective for FY05. Prior year depreciation expense can not be included.

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## Registry Required for Publication of Clinical Trials

In seeking to address the under reporting of inconclusive or negative results in clinical trials, on September 9<sup>th</sup>, 2004, the International Committee of Medical Journal Editors, a group consisting of the editors of the Journal of the American Medical Association (JAMA), the New England Journal of Medicine (NEJM), the Lancet and 11 other top-flight medical publications, announced that from the middle of 2005 their journals would no longer publish the results of trials that had not been registered in advance in an independent database open to the scrutiny of all. The journal editors do not advocate a particular database, but they do point out that [clinicaltrials.gov](http://clinicaltrials.gov), which is run by America's National Institutes of Health, is the only one which satisfies their criteria at the moment.

The statement of the editors may be read at <http://content.nejm.org/cgi/content/full/NEJMe048225>.

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## Frequently Asked Questions . . .

### When can a final FSR be revised?

If the adjustment in expenditures is downward (requiring a refund to the sponsor) the FSR should be filed as soon as the discovery is made even if several years after the award has ended. If the adjustment in expenditures is upward, the answer to this question can vary based upon the sponsor's requirements. The Department of Education does not accept anything after the reporting deadline (90 days after the end date). NIH's policy regarding revised FSR's is as follows:

***Excerpt from NIH Grants Policy Statement:***

"In some cases the grantee may have to revise or amend a previously submitted FSR. When the revision results in a balance due to NIH, the grantee must submit a revised FSR whenever the overcharge is discovered, no matter how long the lapse of time since the original due date of the report. Revised expenditure reports representing additional expenditures by the grantee that were not reported to NIH within the 90-day time frame may be submitted to the GMO with an explanation for the revision. The explanation also should indicate why the revision is necessary and describe what action is being taken by the grantee to preclude similar situations in the future. This should be done as promptly as possible, but no later than 1 year from the due date of the original report, i.e., 15 months following the end of the budget period (or competitive segment for awards under SNAP). If an adjustment is to be made, the NIH awarding office will advise the grantee of actions it will take to reflect the adjustment. NIH will not accept any revised report received after that date and will return it to the grantee."

Please see other sponsor's guidelines regarding their policies on the acceptance of revised FSR's. The sponsors allow a specific period of time for reporting (generally 90 days for federal awards) and they expect to receive the final report within that period. If the report is not submitted within that period of time, significant risk exists for loss of availability of funds. To ensure reimbursement of full expenses on any project, all expenses must be finalized on the grant fund within the adjustment period (generally 60 days for federal awards). **If a revised FSR is not accepted by the sponsor, the department will be responsible for the additional expenses.**

## UPCOMING CHANGE –

### Receivables will be reflected on all post close out funds

Many of our federal sponsors including NIH reimburse us for our expenditures via letters of credit. During the life of the award, the grant funds appear as though they do not have a receivable. This is not true. The receivable is automatically transferred to another fund where the receivable is addressed. Effective immediately, receivables on these letter of credit awards will be handled in this manner only through the end of the reporting period. At the end of the reporting period, receivables for any expenditures which were not included on the final FSR will be reflected in the fund. The department will be responsible for any receivables which are not reimbursed by the sponsor.

For further information on revised FSR's, please see [Sponsored Programs Policy 2137](#).

## *Getting to know your ORS Staff:*

### **Kim Garrison** **Assistant Director**

**Years at Penn:** 12

**Years in Research Services:** 8

**What she does:** Assistant Director, Financial Reporting and Invoicing

**Hobbies/Interests:** Jazz concerts, cycling, interior decorating, shopping

**Favorite Foods:** Seafood, jersey tomatoes and anything sweet (cookies, cakes and candy)

**Favorite ways to spend a vacation:** Spending time with family and friends, traveling/discovering new places, relaxing by the pool or ocean

**What Co-workers say:**

...Kim is patient, knowledgeable and a good teacher.

...She is a hard working, dedicated professional who is extremely knowledgeable about grants and contracts.



### **PennERA update** **Coming soon: AIS Online**

As the PennERA (Electronic Research Administration) project moves into the next phase of development, the team is working on near-term solutions, activities that will provide enhancements to research administration. One of these near-term solutions, the AIS Online, is rolling out this month.

The target date for rollout is September 30, 2004. As of that date the AIS (Account Information Sheet) will be available as a web-based report, allowing users to view Proposal Award and Account data, as well as cost share, sponsor, sub contracts, and sub accounts.

#### **Benefits**

The benefits of the AIS Online include:

- Accounts available online and can be viewed at any time, anywhere
- Ability to select AIS by Fund, PI, or Institution Number
- Can view previous AIS's for the same account
- Quicker delivery/availability of AIS's
- Printer-friendly version available

The AIS Online will be available to 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 will be sent when an award has been set up and the report is ready to be viewed online. The e-mail will contain a clickable link to the AIS Online. Other supporting documents such as terms and conditions and contracts will still be delivered as attachments via e-mail.

#### **Accessing the AIS Online Report in BEN Reports**

The AIS Online Report will also be available in BEN Reports. Follow the instructions below for access:

- Go to <https://comet.isc-seo.upenn.edu/wstest/benreports> and log in with your PennKey and PennKey password.
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- A solid red rectangular box redacting information at the bottom of the page.

- Click the “AIS Online” link. 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.

## Other developments

Development is also continuing on the Release 10 Upgrade and other near-term solutions including the Protocol Summary Benchmark Report and End User Support Model. Stay tuned for additional updates as the project progresses.

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

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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:

Pam Caudill, Director of Pre Award Non-Financial Administration, Office of Research Services

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

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

Robert McCann, Director of Cost Studies, Office of Research Services

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

Ann Saputelli, Director, Compliance Monitoring, Office of Research Integrity & Compliance

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

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

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## Electronic Proposal Submissions are on the Increase

In the past couple of years there has been an increase in the number of sponsors who are utilizing electronic submission for grant applications. The proliferation of a multiplicity of systems each with its own unique requirements has presented challenges to principal investigators, school administrators and staff of ORS.

Investigators who intend to submit a proposal electronically, especially for the first time to a given sponsor, should review the programmatic and technical requirements carefully. Electronic deadlines are usually day and time specific, such as June 1<sup>st</sup> at 5:00 EST and often unforgiving by time stamping each submission. Investigators should anticipate difficulties with unfamiliar software, new technology, heavy of the electronic system and the learning curve of all individuals involved in the process. Many of these systems require the files to be uploaded and approved electronically by Research Services. Research Services has experienced unresponsive websites, corrupt files, files too large for the system to handle and grants being sent to us within 5 minutes of the actual deadline, as well as deadline where 10-20 applications being submitted to the same sponsor. While every effort is made to submit the application prior to the deadline, there have been occasions that a delay in sending the files to ORS has prevented the application from being submitted on time. For this reason, ORS requests that grant applications that require electronic submission be completed **at least** 4 hours prior to the deadline or no later than 1:00pm on the day it is due.

What should an investigator consider when submitting an application electronically?

- Read the instruction carefully:
  - Do the files need to be in PDF?
  - Do I need special software? Acrobat writer, PureEdge Viewer?
  - What is the due date?
  - Does the institutional official need to approve the application electronically? If so, forward a copy of the announcement to ORS
  - Do I need a login and password? If so, how do I get one?
- Work with any unfamiliar software before the due date
- A paper copy of the proposal must still be routed through the official approval process
- ORS needs ample time to review and submit the proposal
- This may not be the only submission for the deadline, so there may be other applications ahead of yours
- Electronic Submission is not always easier

Research Services is available to assist with this process.

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## 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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- 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
- Rehabilitative Medicine – SOM

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- Institute on Age – SOM
- Pennsylvania Muscle Institute – SOM
- Pharmacology – SOM

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- President's Center
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- 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
- School of Dental Medicine

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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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- General University
- Institute of Contemporary Art
- 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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- Bioinformatics – SOM
- Center for Aids Research – SOM
- Genetics – SOM
- Hematology/Oncology
- Neurosurgery - SOM
- Orthopedic Surgery – SOM
- Pediatrics – SOM
- Physiology – SOM
- School of Medicine, Institute for Medicine & Engineering – SOM
- Radiation Oncology
- Radiology

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- Annenberg School for Communication
- Cell & Developmental Biology – SOM
- Center for Bioethics – SOM
- Dermatology
- Geriatrics – SOM
- Microbiology – SOM
- Ophthalmology – SOM
- Otorhinolaryngology – SOM
- School of Nursing
- School of Veterinary Medicine

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### CORPORATE CONTRACTS GROUP:

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#### YVETTE ACEVEDO – TEAM LEADER, SpinPlus

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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.

### FEDERAL COMPLIANCE GROUP:

**ROBERT McCANN – DIRECTOR**  
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**ANNAMARIA MOLNAR – FINANCIAL ANALYST**  
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**FLOYD HARRIS – ACCOUNTANT**  
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### POST AWARD ADMINISTRATION:

**KERRY PELUSO CPA - DIRECTOR**  
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### FINANCIAL INVOICING AND REPORTING –Group 1:

**KIM GARRISON – ASSISTANT DIRECTOR**  
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**ALIYU MOHAMMED – TEAM LEADER**  
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- School of Medicine Departments:
 

Psychiatry	Surgery
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**GRACE BEATTIE – DESK ACCOUNTANT**  
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- School of Medicine Departments:
 

Biochemistry/Biophysics	Microbiology
Cell and Developmental Biology	Pathology
Radiology	

**CHRISTINE YUN – DESK ACCOUNTANT**  
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- School of Medicine Departments:
 

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

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- School of Nursing
- Institute of Contemporary Art
- Vice Provost of University Live
- School of Medicine Departments:
 

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Neurosurgery	Physiology
Obstetrics and Gynecology	Radiation Oncology
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- School of Medicine Departments:
 

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

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- School of Engineering and Applied Science
 

Bioengineering	Chemical Engineering
Materials Science & Engineering	Mechanical Engineering
Minority Programs	
- School of Medicine Departments: Emergency Service

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- Annenberg Center
- Graduate School of Education
- Law School
- Morris Arboretum
- University Museum
- School of Arts and Sciences:
 

Chemistry	Linguistics
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- School of Medicine Departments:
 

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

Cancer Biology	Diabetes
Rehabilitation Medicine	

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

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

Economics	Physics
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- School of Medicine Departments:
 

Genetics	Penn Muscle Institute
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