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Spring Edition



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NSF Automatic Compliance Checking

Beginning March 18, 2013 the National Science Foundation (NSF) will begin automated compliance checking of all required sections of proposals submitted in FastLane and through Grants.gov. All required sections must be completed or addressed in some manner in the application or FastLane will block submission. If a section is not applicable for any reason, investigators must insert a page/section that states NOT APPLICABLE.

Principal investigators (PIs) will receive a warning message if any of the Grant Proposal Guide (GPG) -required sections are missing but the PI will still be able to submit the proposal to their Pre-Award contact. However, if Pre-Award attempts to submit a proposal that is missing any

of the GPG required sections, they will receive an error message identifying the missing section(s), and FastLane will prevent submission to NSF.



After obtaining all required sections, Pre-Award may submit the proposal to NSF in accordance with the established deadline date policy. The required sections of a proposal include:

- Project Summary

- Budget Justification
- Project Description
- Current and Pending Support
- References Cited
- Facilities, Equipment and Other Resources
- Biographical Sketch(es)
- Data Management Plan
- Budget
- Postdoctoral Mentoring Plan (if applicable)

All these required sections are described in the proposal preparation requirements in the NSF *Proposal and Award Policies and Procedures Guide* (PAPPG) (Chapter II.C.2 of the GPG). It is very important to note that some proposal instructions for programs like conferences, symposia or workshops; international travel grants may deviate from the GPG instructions.

See [NSF Compliance Checking](#) page 2

Are You RPPR Ready?

As a reminder, as of July 1, 2013 all NIH non-competing progress reports transition from E-snap to the Research Performance Progress Report (RPPR) format with submission via era Commons. As well, NSF interim, annual and final project reports transitioned to the RPPR format as of March 18, 2013 with submission via Research.gov.

The RPPR is the result of a government-wide effort to create consistency in the administration of federal research awards by creating a streamlined, standardized

reporting format. Federal agencies that support research and research-related activities will utilize the RPPR format for collecting performance data.

Development of the RPPR format by the various agencies is based on selection of categories from a standard template. The mandatory category all agencies must use is 'Accomplishments.' Other optional categories can be used by each agency.

New report information which varies from the E-snap includes:

- Foreign component information
- Dollars spent in foreign countries through subcontracts
- Organization affiliation of personnel at foreign sites

The reporting of publications is required using the eRA-Commons 'My Bibliography' link to access the National Center for Biotechnology Information (My NCBI). The RPPR will be pre-populated with publications and the investigator(s) will select related publications.

See [RPPR Ready](#) page 2

New Tools in Tracking Awards with Pending FCOIs

A new PennERA increment status “Pending FCOI” was recently added to PennERA. The new status will help both ORS and administering schools/departments recognize when a Notice of Grant Award (NOGA) from a PHS (Public Health Services) funded project has been received, but the award cannot be set up until the project is compliant with the PHS Financial Conflict of Interest (FCOI) policy.

A Webi query is now available in the Public Folders/Research/Proposals folder so you can determine if your Resp Org has any increments with a “Pending FCOI” status that needs to be in cleared so that the award can be set up. Reminder: No PHS award or advance account can be is-

Departments should work with their investigators to be sure that all project investigators and individuals responsible for the design, conduct or reporting have completed the FCOI training course as well as all investigators have submitted a current PHS-FITS, including a relatedness assessment for the research. For now, if business administrators run the query and see any projects with the “Pending FCOI” status and if they can confirm all the re-

quirements have been met, they should complete and send the [PHS-FITS confirmation form](#) to their Pre-Award contact in ORS so that the NOGA can be awarded.



The institution is currently working on a “Manage Investigators” module within the PHS-FITS application which will allow business administrators to identify project investigators/individuals responsible for the design, conduct or reporting of the research. This will then allow users to run reports in PHS-FITS to see who is required to submit disclosures and who has or hasn’t submitted. This should help streamline the process going forward and help identify if projects are in compliance without having to complete the PHS-FITS confirmation form.

they should complete and send the [PHS-FITS confirmation form](#) to their Pre-Award contact in ORS so that the NOGA can be awarded.

NSF Compliance Checking Continued

If the submission instructions do not require one of the previously noted sections to be provided, proposers will need to insert text or upload a document in that section of the proposal that states “Not Applicable.” Without entering something for each section, the proposal will not be accepted by FastLane. Additionally, proposers providing Biographical Sketches and/or Current and Pending Support information for Principal Investigators (PIs), co-PI(s) or Senior Personnel in a single PDF file associated with the PI must insert text or upload a document in that section of the proposal that states, “Not Applicable,” for any co-PI or Senior Personnel so that FastLane will accept the proposal.

For additional information regarding this NSF release please contact your Pre-Award representative or view the frequently asked questions at

http://www.nsf.gov/bfa/dias/policy/autocheck/faqs_march13.pdf

RPPR Ready Continued

The NSF RPPR also includes the following optional categories:

- Products: What has the project produced?
- Participants & Other Collaborating Organizations: Who has been involved?
- Impact: What is the impact of the project? How has it contributed?
- Changes/Problems
- Special Reporting Requirements (where applicable)
- Appendix 1: Demographic Information for Significant Contributors

Keep in mind the change in these reporting formats does not change the reporting requirements for awards. Be sure to connect with your ORS contact for any questions regarding the submission of progress reports.

For additional information access the following references and resources:

- The final format document including definitions for each category and reporting components: http://www.nsf.gov/bfa/dias/policy/rppr/format_ombostp.pdf
 - The RPPR Data Dictionary defines all the data elements and attributes to assist in streamlining data entry and collection: http://www.nsf.gov/bfa/dias/policy/rppr/data_dictionary_guide_aug12.pdf
 - NIH instruction guide: http://grants.nih.gov/grants/rppr/rppr_instruction_guide.pdf
 - The relevant NIH guide notices: <http://grants.nih.gov/grants/guide/notice-files/not-od-12-160.html>
- NSF RPPR Website: <http://www.nsf.gov/bfa/dias/policy/rppr/index.jsp>

The Location of the New “FCOI - Pending” Report in Webi

- Public Folders
- Research
- Proposals

DUNS Number Required for Subaward Entities

Due to requirements imposed by the Federal Funding Accountability and Transparency Act (FFATA), the PennERA group is now requiring that a DUNS number be supplied when Schools/Centers and Departments are requesting that a new entity be added to PennERA as a subcontractor or subawardee. Although this requirement may be waived for foreign entities, it is suggested that every effort be made to obtain a DUNS number from collaborating entities as early in the proposal preparation process as possible.

For additional information regarding this change please contact pennera@lists.upenn.edu.

Common Subaward Request Form Errors

The generation of outgoing subaward agreements requires attention to many details by the Office of Research Services (ORS) Subaward team. The content of the subaward agreements generated by the subaward team, is largely based upon the information and details provided by the Department Business Administrator and/or Manager, via the Subaward Request Form. Therefore, the ORS subaward team working *together* with the department have a joint responsibility to ensure that we generate a high quality work product in a timely fashion.

Below are some of the most common errors presented on the subaward request form.

1. Subrecipient's Amount Funded this Action

The dollar amount entered into the Subrecipient Form should be consistent with, and reflective of the exact dollar amount of the "Budget" submitted with the Request.

Note: The few exceptions may be when a project is being funded "incrementally" during a specific "Period of Performance."

2. Subrecipient's "Period of Performance" vs "Project Period"

The dates reflected on the Subaward Request Form should cover the specific "Period of Performance" for which the Subawardee is being funded at the current time. (Note: these dates *differ* from that of the entire "Project Period.")

3. Subrecipient's Contact Information

It is particularly important to provide the correct email addresses for both the Principal Investigator and Authorized Official. This is the means by which ORS will be able to communicate, when necessary, *directly* with the subawardee. Very often we are not aware that the contact information that has been provided is out dated and/or incorrect, until ORS attempts to send out a subaward agreement via email and receives an "error message." It is important to stay current and up to date with your subawardees contact information, this may include: *change in*

street addresses, email addresses and; telephone numbers, particularly for the Principal Investigator and the Authorized Official.

Note: It is also good to complete the Subrecipient's Administrative contact information, however, including this information remains optional.

4. Special Instructions:

Including any "Special Instructions" in the cover email submitted with the Subaward Request is very helpful. However, please remember to include this information on the request form,

under the section entitled: "SPECIAL INSTRUCTIONS." Should the email, for any reason become separated from the request, we should still be able to capture the special instructions from the Subaward Request Form.

5. Including "Budget Justification" vs. "Scope of Work"

Very often the "Budget Justification" will not include a detailed description of the actual work to be performed by the subawardee Principal Investigator. However, the "Scope of Work" specifically provides a summary of what the subawardee will "do" to carry out their part of the research plan. Therefore, it is important to be sure a "Scope of Work" is included with your submission of the Subaward Request.



Areas to Pay Special Attention to on the Subaward Request Form:

- Amount Funded this Action
- Period of Performance
- Subrecipient's Contact Information
- Special Instructions
- Scope of Work

We are making greater efforts in the subaward area to provide a better service to our stakeholders. To continue this effort, it will require your help. Let us know what we can do to help you by emailing subaward@exchange.upenn.edu.

Obtaining NIH No-Cost Extensions

The [NIH Standard Terms of Award](#) provide the University the authority to extend the final budget period one time for a period of up to 12 months beyond the original expiration date in the notice of award. To obtain this extension, the Business Administrator should forward an email or letter from the PI to the Pre-award contact specifying the request for the no-cost extension and the total months being requested. The email should include the reasons why additional time is needed to complete the research project. The fact that funds remain at the expiration of the grant is not, in itself, sufficient justification for an extension. When the email is received for the no-cost extension, we will use the eRA Commons No-Cost Extension feature to electronically notify NIH that the University is exercising the one-time authority to extend without funds the expiration date of an award. A confirma-

tion email from NIH will be sent to ORS to confirm the change of budget/ project period end date of the grant. Once the NIH confirmation is received, ORS will extend the end date on the grant. Extensions should be requested 30 days prior to the end date of the grant. For NIH awards, a no-cost extension can be requested up to 90 days prior to current project end date. Any late notification of the initial no-cost extension will require NIH Grants Manager prior approval. It is important to make the request in a timely manner to avoid seeking NIH approval.

Any additional project period extension beyond the initial extension of up to 12 months will **require** NIH prior approval. The Business Administrator should forward a letter from the PI requesting the additional no-cost extension. The request should include a description of the project ac-

tivities that require support during the extension and a statement about the funds available to support the extension. The letter should affirm that additional work remains to be completed on the project and that resources are available to continue to support the project, or that additional time is needed to provide for an orderly closeout of the grant. The Pre-award administrator will review the request and forward to the NIH Grants Manager Officer. The GMO will review the request and provide a response indicating the final disposition of the request. Once the GMO approves the request a revised Notice of Grant Award (NOGA) will be sent to ORS. The end date of the grant is extended once the revised NOGA is received.

For further information on no-cost extensions, please contact your ORS Pre-award Administrator.

The federal government has proposed combining OMB Circulars A-21, A-110, and A-133 to streamline the administration of sponsored projects and make changes to the regulations.

Pending Proposal to Combine Research Related Circulars

The National Council of University Research Administrators (NCURA) held the annual Financial Research Administration Conference in New Orleans this past March. There were many topics discussed over the three day session including issues surrounding sequestration, accounts receivable, audit findings and service centers. One topic on the mind of all attendees was the proposed changes to OMB Circulars A-110 and A-21. The federal government has proposed combining these two circulars along with OMB Circular A-133 into one Omni Circular. The rationale is not only to help streamline the administration of sponsored projects but also to make any overdue changes to the regulations. Council of Government Relations (COGR) representative, David Kennedy, presented some of the changes that the government has proposed and how COGR plans on counter proposing these



changes.

Some areas that the government has decided to change include but are not limited to:

- Clarifying the definition of subrecipient vs. contractor
- Subrecipient monitoring as it relates to the A-133 Single Audit
- Voluntary cost share and its factor in reviewing of applications

- CAS and DS-2 requirements for smaller institutions
- Clerical and administrative salaries
- One time, four year extension of negotiated F&A rate
- Defining allowable computing equipment

COGR estimates that by late June it will finalize discussing these and other changes within the COGR membership and collaborating with other associates in order to release an official reaction and counter proposal to the government, depending on whether the government grants an extension for the counter proposal period. Mr. Kennedy expects to have final guidance on the Omni-Circular by the end of this calendar year. Please keep an eye on communication from ORS and so that you are up to date on the changes to these circulars. Here is a link to the proposed changes from OMB: http://www.whitehouse.gov/omb/grants_docs#proposed

ORS Revealed: MTAs

Why do I need a material transfer agreement when I am sending or receiving research materials?

Material transfer agreements can provide important benefits to individual researchers and Penn, institutionally, including,

For outgoing materials:

- The right of the Penn faculty member to receive a report of the results of the research done at another institution
- The right of the Penn faculty member to review and comment on publication
- Potential financial and other benefits that could accrue in the event of commercialization of any inventions incorporating Penn materials.

For incoming materials:

- Confirmation of control over the content of any publication the faculty member might wish to publish regarding the results of any research using the material
- The right to use the materials without interference by the provider.

By way of explanation, an agreement for incoming mate-

rials typically permits the use of the materials in a specific line of research and ensures that the Penn faculty member has final control over any publication. If there is no agreement, the provider of the materials, particularly a provider that generated the materials without federal funding, could demand the return of the materials, citing unauthorized use, and could attempt to interfere with publication due to lack of clarity regarding the right to use the materials in the first place. Defending against such claims can consume a researcher's time and resources in unproductive activity.

Also, a request for a material transfer agreement triggers other checks that help protect Penn, Penn faculty, other Penn people and recipients of materials sent from Penn, including:

- Export control review, which helps ensure that Penn, Faculty and other Penn people are not exposed to

liability for noncompliance with export control laws

- Environmental Health and Radiation Safety ("EHRS") review, which helps ensure that dangerous and hazardous materials are shipped and received in a safe manner consistent with legal requirements, thereby mitigating the risk of harm to those who are exposed to the material.

Reminder: Material transfer agreements typically allow materials to be used only by the lab and individual who made the request. This means that a new agreement needs to be put in place if an investigator in another lab wants to use the material.

Please make any request for review of a material transfer agreement on-line via the system at the attached link:

<https://medley.isc-seo.upenn.edu/researchInventory/jsp/fast2.do>

Have you ever wondered why ORS has asked you to fill out a form or follow a certain procedure? Now is your chance to receive an explanation in our *ORS Revealed* column.

Please submit your questions to ywilmoth@upenn.edu.

Did You Know? — Insight on the NIH Receivables Process

Most National Institute of Health (NIH) awards are reimbursed through a letter of credit (LOC). The Cash Management group within ORS processes a drawdown request for NIH each day and applies the ACH payment to the LOCNiH revenue parent. For LOC funds, grant revenue is applied to the 5-fund but the receivable balance is posted to the associated account of that LOC award. LOCNiH drawdown requests sum of all the expenses from the prior day and a single amount is requested on NIH's Payment Management System (PMS).

Every quarter the LOCNiH FFR is submitted to PMS. Once the report has been

submitted the awards are audited to make sure PBIL is not over the authorized amount on PMS. Once the final Federal Financial Report (FFR) has been submitted by Post Award the fund is transferred to the LOCNID revenue parent. LOCNID is the dead revenue parent for NIH. Any LOCNID awards with account receivable balances need to be reviewed by the Financial Analyst in ORS. For AR balances to be transferred PBIL, revenue, FSRD plus FSRI, and the accepted FFR in Commons totals must all match. If any of the totals do not match, the post award accountant of the award is contacted to ask if a revised FFR needs to be submitted or if they are waiting for

additional charges to be applied to the award. If a revised FFR was submitted to Commons for an award that has been closed for over 5 years a refund check is usually requested when the FFR has been accepted. A Post Award Assistant Director or the Financial Analyst can access the FFRs in Commons to check to see if there is a note requesting a refund. If no refund is requested and everything matches a journal transfer will be done to transfer the AR balance.

Any questions regarding AR transfers can be directed to April Johnson at 215-746-0235 or apriljoh@upenn.edu.

Message from the Associate VP/Associate Vice Provost of Research Services

Elizabeth D. Peloso

Since the last ORS newsletter was published in January, we have moved into a new research funding reality with the arrival of sequestration. Sequestration, the mandatory federal budget reductions that went into effect on March 1, 2013, reduces federal discretionary spending by about five percent and defense spending by seven percent for the remainder of the federal budget year, with likely increases in cuts for the fiscal year that will begin in the fall.

While different funding agencies will be implementing the cuts in different ways, the cuts will impact the Penn research community and those of us who support the research enterprise. Some research granting agencies will be reducing the dollar value of awards, while others will reduce the number of awards. In either case, the result is the same; our faculty and researchers will be spending more time writing and submitting grant applications in order to maintain pre-sequestration levels of research funding. This in turn will result in increased numbers of proposals reviewed and processed at the university level. ORS understands that this new reality increases burden on the entire research community and will work to maintain excellent proposal submission support. We are also monitoring agency response to sequestration and will be pushing information out to you through our web site:

<http://www.upenn.edu/researchservices/sequestrationinfo.html>.

If there are ways we can better support the research community through sequestration, I want to hear about them! Please feel free to give me a call or send an email.

Missy
epeloso@upenn.edu
215-746-0234

Recommendations for future newsletter articles or questions that you would like addressed can be sent to Yvette M. Wilmoth at ywilmoth@upenn.edu.

Frequently Asked Questions on FCOIs

How Does NIH Determine which Senior/Key Personnel are Named on the Prime Award?

In accordance with revised NIH and Penn Conflict of Interest policies effective 8/24/2012, all Investigators (including the PI, PD [and any other person](#) responsible for the design, conduct or reporting of this research) must submit a disclosure of financial interests and travel statement and answer additional questions regarding relatedness of any identified financial interests to this award before any accounts may be set up. The University has developed an electronic disclosure process specific for PHS proposals, the PHS Financial Interests and Travel Statement (PHS- FITS). A disclosure must be submitted even if you have no financial interests or travel to report. You may access PHS-FITS at <https://medley.isc-seo.upenn.edu/phsFits/jsp/fast2.do?fastStart=investigator>.

Special thanks to this quarter's contributors:

Sheila Atkins—SubAwards
Grace Beattie –Pre-Award
Kim M. Garrison - Post-Award
Michael Hay - Post-Award
April Johnson - Operations

Do I have to submit a Public Health System-Financial Interest and Travel Statement (PHS-FITS) disclosure for No Cost Extensions (NCE) on a NIH award issued prior to 8/24/12?

This issue is not addressed in the regulations and NIH frequently asked questions. Our interpretation of the regulatory requirement is that a NCE is not a new award; it is solely an extension of the term. Therefore, if a NCE is received where the last NOA for the last awarded period was prior to 8/24/12, Penn will not consider the NCE as a new NOA and PHS-FITS will not be required. PHS-FITS will be required if we are awarded supplemental funds on an existing award and if a just-in-time request is received for a competing renewal.

Leona Joseph - Pre-Award
Heather Lewis - Pre-Award
Richard Snyder - ORSS
Kathryn Steinbugler - Corporate Contracts
Todd Swavelly - PennERA