



Office of Research Services

Fall 2014
Volume 11 Issue 1

3451 Walnut Street, Philadelphia, PA 19104
www.upenn.edu/researchservices



Preparing for New Uniform Guidance

The Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (UG) becomes effective on December 26, 2014. The UG consolidates many existing OMB circulars that govern federally sponsored activities at institutions of higher education, including A-21 (Cost Principles), A-110 (Administrative Requirements), and A-133 (Audit Requirements). The UG consolidation also incorporates requirements for other types of entities receiving funds from the federal government such as state and tribal governments, hospitals,

and non-profit organizations.

The Office of Research Services has been working with stakeholders across campus to ensure that Penn's policies are consistent with the new requirements. Our review



and revision of Penn's Sponsored Program Policies (Financial Policy Series 2100) has included participation by representatives from

all 12 schools to ensure that the impact of changes on the full spectrum of federally sponsored research at Penn has been considered, and that required policy changes are made in a way that supports the ability of the Penn research community to comply with the requirements. We expect to complete our work and introduce the revisions to the broader research community through brown bags and announcements beginning in December.

The good news is that Penn's current policies are largely compliant with the new UG, so many of the revisions will be simply updates of refer-

See *Uniform Guidance* page 2

Inside this issue:

NIH Update: Individual Development Plans in RPPR	2
NIH Update: Revision of Clinical Trial Definition	2
PennERA Items of Interest	3
Fisher Scientific Global Exports Protram	3
Viewing Carryover in PennERA	4
Who is Who in Research Services?	5

Penn ERA to BEN FUND Attribute Mismatches

During the BEN Billings and Receivable system implementation some of the FUND Attributes such as Account End Date and Current Budget Period End Date were erroneously updated in the general ledger. This update has resulted in discrepancies between the PennERA data (which is displayed on the AIS documents) and the general ledger data. ORS has been reviewing and updating these differences and has corrected the vast majority of the problem records. In addition ORS will be reviewing a data mismatch report on a weekly basis to verify that the two system will remaining in sync.

If you identify any data discrepancies please send a message to e-mail address AIS-PROB@LISTS.UPENN.EDU and ORS will correct the issue as soon as possible. Thank you for your patience and understanding.

The following link to the BEN Financials Documentation page includes information concerning the BEN Billings and Receivables System and may answer additional questions related to Sponsored Projects Revenue, Indirect Costs, Receivables and Cash Receipts. <http://www.finance.upenn.edu/ben/benfin/documentation/>
http://www.finance.upenn.edu/ben/benfin/documentation/Notes_BEN_Billing_Receivables.shtml

NIH Policy: Individual Development Plans as of 10/1/2014

NIH recently revised its progress report requirements to include information on Individual development plans for grad students and post doc students associated with awards. This information is being requested for students supported on awards whether the awards are for training grants, fellowships or for research projects grants. NIH is requesting that the development plans focus on identifying and promoting career goals of grad students and post docs. NIH hopes that providing this structured program training experience will result in better trained students and better prepared students for a research related economy. NIH



instituted this requirement in its effort to accomplish its goal to attract and retain the best and brightest scientist, engineers, and physicians from

around the world.

Starting October 1, NIH is not requiring but is encouraging grantees to develop and use

IDP's for grad students and post doc researchers supported with NIH awards. Instead, NIH is requesting the grantees report on whether they use IDP on the grad students and post doc researchers. The progress report should include a brief description of how and whether IDP's are used to help manage the career development of students and post-docs. The actual IDP's should not be included. The grantees will determine not only the use but the manner in which IDP's are used.

Additional information can be found in the NIH Notice Numbers NOT-OD-13-093 and NOT-OD-14-113.

NIH Revises Definition of "Clinical Trial", Effective January 2015

NIH plans to drop its general definition of "clinical trial" as a "prospective biomedical or behavioral research study of human subjects that is designed to answer specific questions about biomedical or behavioral interventions (drugs, treatments, devices, or new ways of using known drugs, treatments, or devices)." Instead, the agency announced Oct. 23 that a clinical trial will be defined as a "research study in which one or more human subjects are prospectively assigned to one or more interventions (which

may include placebo or other control) to evaluate the effects of those interventions on health-related biomedical or behavioral outcomes."

The new definition, which also includes footnotes, is "designed to make the distinction between clinical trials and clinical research studies clearer and to enhance the precision of the information NIH collects, tracks, and reports on clinical trials," the agency said. "The revised definition will replace the current clinical trial definition in relevant extramu-

ral and intramural NIH policies, guidance, and instructional materials. It will apply to competing grant applications that are submitted to NIH for the January 25, 2015 due date and subsequent due dates and contracts proposals that are submitted to NIH on or after January 25, 2015."

See NIH notice NOT-OD-15-015 for additional information at <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-015.html>

ences to the OMB guidance documents. This is a reflection of Penn's strong existing policies, internal controls, and tradition of responsible conduct of sponsored research. It has also allowed us to focus our attention on areas with significant new requirements including procurement and subrecipient monitoring.

Further information on the new Uniform Guidance is available on the ORS website at <http://www.upenn.edu/researchservices/OMB%20Announcement.html>. Resources available at this link include links to the full text of the Uniform Guidance, to additional OMB resources, and to FAQs, and outreach webcasts that the Council on Financial Assistance Reform

(COFAR) has made available on the topic. Additionally, links to resources made available by the Council on Government Relations, the National Council of University Research Administrators, and the Federal Demonstration Project may be accessed from the link.

Uniform Guidance Continued



Areas to Pay Special Attention to at in PennERA

- Deadline Dates
- Investigator Credentials
- Subaward Performance Sites
- Application Type
- K Submissions
- NRSA Submissions

PennERA Items of Interest

Following are some reminders of issues commonly seen in proposals which may result in submission errors:

Deadline Dates: Some agencies will include a default deadline date in their funding opportunities. This information is provided to Grants.gov by the funding agency and will auto-populate in the PennERA proposal record. For example, NIH opportunities automatically return the next “NEW” deadline date for a given opportunity. *This information may not be correct.* Revised/Amended applications and some deadline-specific opportunities will have different deadline dates. *Always check the auto-populated deadline and revise accordingly.*

Investigator Sponsor Credentials: Some sponsors (NIH, NSF, and DOD-CDMRP for example) **require** that a PI’s, sponsor-specific, “Sponsor Credential ID” information be included in proposal submissions. If this information is not included, the proposal may fail upon Agency retrieval, or, in the case of NSF submissions, *the PI will not be able to view the proposal record* once it is inserted into the Fastlane system. Sponsor Credential information is added in the PennERA Profile. Instructions on updating Credential information can be found in the PennERA Users Guide, page 23. Once added to the Profile, it will automatically populate all future applications.

Questions about **obtaining** sponsor-specific credentials should be directed to your ORS Preaward contact.

Other Attachments and Appendix Names: Provide a clear descriptive name for uploads to both Other Attachments and Appendix sections. Some opportunities have specific re-

quirements for both the naming convention and type of uploads allowed. If Appendix items are referenced by specific names in the research description (e.g., “Appendix A” or “Survey Questionnaire”), use those names for the uploads, so that application reviewers at the federal agency can easily locate specific appendix documents.

Subcontract Performance Site information:

If you will have a subcontract included in your S2S proposal submission, do NOT manually enter Performance Site information. This information will be automatically added once the subcontract information is entered in the Budget Items section. Once the Budget Items information has been entered, you should THEN go to the Performance Site tab and update any missing information for the subcontract site (DUNS, Congressional District, Street address, etc).

NIH *Revision S2S Submissions (*request for supplemental funding): Proposed start date must be later than today’s date. Proposal title must be the same as the project title on the Parent (currently awarded) grant, including punctuation and spaces. No Cover Letter upload is allowed (Type 3, 6, and 7 applications).

K submissions and Citizenship Status: Confirm that the correct status is selected on the K Awards Documents tab. PD will default to Permanent Resident.

NIH NRSA Fellowship (type F): Be sure to review the funding opportunity announcement requirements as SOME F submissions now require an “Additional Educational Information document upload on the Other Attachments tab: See notices NOT-OD-14-133, NOT-OD-14-134, NOT-OD-14-135, and NOT-OD-14-137.

Fisher Scientific Global Exports Program

Purchasing Services, in collaboration with the Office of Research Services, is pleased to announce a new Global Exports program through a new distribution partnership with Fisher Scientific, the University’s strategic supplier for laboratory equipment and supplies, effective October 29, 2014.

Fisher Scientific Global Export is uniquely positioned to deliver the same high level of support that you expect worldwide. Their logistics, customer service and trade compliance personnel attend on-going training to assure they observe the most current regulatory and logistics guidelines to support supply chain solutions. The Global Export team will work closely with our on-site Fisher Scientific Sales and Customer

Service representatives to address your product requirements, timelines and delivery.

Please note that your shipment may be subject to export control regulations. If your shipment involves export-controlled items, and/or requires an export license, please see <http://www.upenn.edu/researchservices/pdfs/DecisionTree%20shipments.pdf> and contact expctrl@lists.upenn.edu.

Please direct all questions regarding this program to the Fisher Scientific or the following R&D representatives: Gary Witte (gary.witte@thermofisher.com), Anthony Gatt (Anthony.gatt@thermofisher.com) and Josh Pelta-Heller (josh.peltaheller@thermofisher.com).

Viewing Carryover in PennERA

Awarded Project Period Dates 26-Apr-2010 - 31-Mar-2015

Award Summary DR. TREVOR M PENNING - 4119 - PH-Pharmacology

Year/Period	Start	End	Inst Dircts	SubContract	Total Dircts	F&A	Sponsor
1	26-Apr-2010	31-Mar-2011	\$1,034,367	\$16,952	\$1,051,319	\$604,508	\$1,655,82
2	01-Apr-2011	31-Mar-2012	1,032,824	17,673	1,050,497	618,090	1,668,58
3	01-Apr-2012	31-Mar-2013	1,361,267	18,200	1,379,467	711,762	2,091,22
4	01-Apr-2013	31-Mar-2014	1,082,880	0	1,082,880	649,728	1,732,66
5	01-Apr-2014	31-Mar-2015	1,047,908	0	1,047,908	628,745	1,676,65
Total			\$ 5,559,246	\$ 52,825	\$ 6,612,071	\$ 3,212,833	\$ 8,824,9C

Account Summary

Fund Number	Proposal Number	GMS Award Number	Fund Status	Task
400.4119.4.558727.3000.2433.2560	10020965	GP1912	Enabled	Task 3
400.4119.4.558727.3000.2433.2561	10020965	GP1912	Enabled	Task 4
400.4108.4.558727.3000.2433.3119	10020965	5-54605	Enabled	Task 1
400.4108.4.560136.3000.2433.3119	10020965	5-54613	Enabled	Task 1
400.4256.4.560136.3000.2433.2466	10020965	5-54622	Enabled	Task 3
400.4119.4.560136.3000.2433.1422	10020965	5-54639	Enabled	Task 2
400.4119.4.561122.3000.2433.2306	10020965	5-55786	Enabled	Task 2
400.4119.4.561122.3000.2433.2562	10020965	5-55787	Enabled	Task 5
400.4119.4.561122.3000.2433.2561	10020965	5-55782	Enabled	Task 4
400.4256.4.561122.3000.2433.2466	10020965	5-55781	Enabled	Task 6
400.4624.4.561122.3000.2433.2953	10020965	5-55790	Enabled	Task 7
400.4119.4.561122.3000.2433.1422	10020965	5-55793	Enabled	Task 1
400.4119.4.561122.3000.2433.2560	10020965	5-55809	Enabled	Task 3
400.4119.4.563260.3000.2433.1422	10020965	5-58248	Enabled	Task 1
400.4119.4.563260.3000.2433.2306	10020965	5-58486	Enabled	Task 3
400.4256.4.563260.3000.2433.2466	10020965	5-58487	Enabled	Task 4
400.4119.4.563260.3000.2433.2562	10020965	5-58500	Enabled	Task 7
400.4119.4.563260.3000.2433.2560	10020965	5-58493	Enabled	Task 6
400.4119.4.563260.3000.2433.2561	10020965	5-58491	Enabled	Task 5
400.4119.4.563260.3000.2433.2953	10020965	5-58479	Enabled	Task 2

Funds

Fund Number	Proposal Number	GMS Award Number	Fund Status	Fund Adjustments	Delete
554452	10020965	GP1912	Enabled	Fund Adjustments	
559538	10020965	GP1912	Enabled	Fund Adjustments	
558727	10020965	GP1912	Disabled	Fund Adjustments	
558742	10020965	GP1912	Disabled	Fund Adjustments	
560136	10020965	GP1912	Disabled	Fund Adjustments	
561122	10020965	GP1912	Enabled	Fund Adjustments	
563260	10020965	GP1912	Enabled	Fund Adjustments	

Historic Adjustments

Adjustment Date	Trans Type	Adjustment Type	Adjustment Amount	Adjustment Comment
07/15/2013 10:23:56 AM	PBUD	CarryOver-Unexpended Balances	\$402,331.00	This revised award is issued to auth direct costs and \$108,538 facilities grantee's letter and e-mail dated 10/23/2012 and cannot be used for any of Environmental Health Sciences.
11/15/2013 10:23:28 AM	PBIL	CarryOver-Unexpended Balances	\$402,331.00	This revised award is issued to auth direct costs and \$108,538 facilities grantee's letter and e-mail dated 10/23/2012 and cannot be used for any of Environmental Health Sciences.
6/13/2014 10:01:24 AM	FSR_DIRECT	Closeout	\$61,664,904.00	post FSRD for closeout
6/13/2014 10:02:00 AM	FSR_INDIRECT	Closeout	\$624,372.45	post FSRI for closeout
6/13/2014 10:00:37 AM	BILLABLE	Closeout	\$-348,001.67	closeout
4/30/2014	BILLABLE	Closeout	\$402,331.00	Adjustment for Carryover to PEN

Since the implementation of the Oracle Grant Management System (GMS), AISs no longer display Special Budgets. Carryover from one period to another is expressed in Special Budgets, so AISs may cause concern among personnel who are expecting carryover, but do not see carryover expressed on an AIS. If carryover is expected, or a comment on an AIS mentions carryover, then personnel can review the carryover in PennERA. In Proposal Tracking, select "Awards" from the column on the left side of the window (Figure 1), then select "Award/Fund/Account Summary" (Figure 2). On the resulting screen, select the "Fund Adjustments" link corresponding to the fund in question (Figure 3). The resulting screen shows adjustments made to the award amount for that fund, such as carryover (increase) or a closeout adjustment (often a decrease) (Figure 4). We will try to change the AIS to include the special budgets information; however PennERA is a good place to find carryover information, in the interim.

Who is Who in the Office of Research Services (ORS)?

ORS provides administrative support to faculty and departmental managers for sponsored project activities. ORS reports to both the Vice Provost for Research and the Vice President for Finance. Under the direction of Associate Vice President/Associate Vice Provost, Missy Peloso, there are six main organizational areas of ORS under which research services are provided to campus.

Contact information for ORS staff by area of service can be found <http://www.upenn.edu/researchservices/staffbydept.html#compliance>

Pre-Award & Non-Financial Post-Award—Director Heather Lewis

This team handles proposal review and submission, inquiries and requests from sponsors, award negotiation and acceptance, outgoing subaward agreements, non-monetary agreements, and post award changes requiring sponsor prior approval, among other items.

Post-Award Financial Administration—Director Kim Garrison

This team handles monitoring of sponsored programs spending, accruals, and accounts receivables; financial reporting to sponsors; cost transfer review; invoicing; and interim and final financial reporting.

Post-Award Compliance—Director Susie Won

This team handles F&A proposal preparation and negotiation, effort reporting and audits.

Research Operations and Cash Management—Director Keith Dixon

This team handles ORS data management, cash management, receivables, Letter of Credit (LOC) reporting and Account Information Sheet (AIS) setups.

PennERA—Director Todd Swavely

This team handles the development, maintenance, support and training infrastructure for research information systems and accompanying processes.

Academic Material Transfers & Export Compliance—Director Missy Peloso

This team handles the review of material transfer agreements and manages the University's compliance with export control laws, including conducting outreach with faculty.

*Recommendations for future newsletter articles or questions that you would like addressed can be sent to
Jessica Cote
jcote@upenn.edu*

Special thanks to this quarter's contributors:

PennERA Team
Adam Rifkind—PreAward
Missy Peloso—AVP
Keith Dixon—Operations
Grace Beattie—PreAward
Jenni Newell—MTAs
Jessica Cote—PreAward
Jessi Buchanan—Export Control