Penn
University of Pennsylvania
Office of Research Services
January 2013
Volume 8 Issue 3

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

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2013 Changes to Compliant NSF Proposal Submissions

The National Science Foundation (NSF) has released guidelines via document NSF 13-1 for proposals submitted on or after January 14, 2013. The *January 2013 Proposal and Award Policies and Procedures Guide* (*aka* Grant Proposal Guide or GPG) can be accessed via NSF's website here: www.nsf.gov/publications/pub_summ.jsp?ods_key=nsf13001. Part I of the Guide relates to Grant Proposals, while Part II relates to Award and Administration Guidance.

On 11/19/2012 NSF held a webinar to outline and discuss these changes. A summary of the changes can be found in the GPG Summary of Changes page accessible here: www.nsf.gov/pubs/policydocs/pappguide/nsf13001/gpg_sigchanges.jsp.

In regards to preparing compliant proposals, the specific changes to note include:

- The **project summary** must include 1) Overview; 2) Intellectual Merit; 3) Broader Impacts completed in text boxes in Fastlane. This section is not to exceed 4,600 Characters.
- The **project description** must incorporate the Broader Impacts in a separate section within the narrative. As well Intellectual Merit and Broader Impact activities must be described in two separate sections in the *summary of results from prior NSF support*. The page limit of 15 **has not** changed.
- The '*publications*' heading in the **biosketch** has been changed to '*products*' which can include, but are not limited to data sets, software, patents and other such items in addition to written publications. The limit of 5 'closely related' to the project and 5 'other' **has not** changed.
- The **facilities, equipment and other resources** section must include a full description of internal and external, physical and personnel, resources available to the project. A new format for this section is available in Fastlane.
- Regarding **budget** preparation, if no person months and no salary are being requested for senior personnel they should not be included on the budget pages (Section A on the budget form). The names will remain on the cover sheet with the roles described in the *facilities, equipment and other resources* section.

Proposals to NSF can also be submitted system-to-system (S2S) via Grants.gov directly from PennERA. For further details please see PennERA's S2S update article.

Whether submitting an NSF application via Fastlane with a corresponding generic PD record prepared or as S2S, as per the ORS submission policy the proposal is to be received final by ORS three days prior to the due date. In order to ensure the proposal is submitted promptly upon receipt, be sure to adhere to all the preparation guidelines as well as any special instruction in the specific program announcement. Doing so will result in a smooth Pre-award review and pain-free submission for all involved. As always, contact your Pre-Award contact for any questions regarding NSF proposal preparation requirements.

PennERA NSF S2S Update

The PennERA team is pleased to report a steady increase in the numbers of National Science Foundation (NSF) proposals being submitted as system to system (S2S) submissions to Grants.gov. The feedback from users has been very positive as we see more and more departments across the different schools and disciplines opting to "Go S2S".

Almost all NSF funding opportunities **can** be submitted as either Grants.gov or FastLane submissions. There are some "FastLane only" submissions (opportunities not available as Grants.gov submissions), most notably those "collaborative" proposals which require individual proposal submissions from collaborating institutions and any proposal for which there will be no Key Personnel with both measurable effort and funds requested.

See *PennERA S2S* on page 4

Helpful Reminders for the New Year

Payment Process for Grant Receivables

If you receive a check for grants receivables, please forward it to the Office of Research Services for the cash management group to handle the deposit. Only Research Services should make entries to grant receivables.

The Office of Research Services Cash Management Group is responsible for processing all payments for grants receivables (object code 1220). This includes all checks, lockbox checks, ACH, and wire payments for grants receivables, but does not include payments for subcontract reimbursements (object codes 5332/5333) or other reimbursed expenses not paid by the sponsor. Checks that are not for grant receivables should not be forwarded to ORS for processing; they should be deposited directly by the responsible department.

Any questions regarding payments can be directed to

Jennifer Rowan jenrowan@upenn.edu / 215-573-8820

Or to the cash management group:

Miriam Stevenson (checks): stevenso@upenn.edu / 215-573-6711

Rick Flom (Lockbox checks, ACH and Wires): rickflom@upenn.edu / 215-898-7295

- Checks for grant receivables should be submitted to ORS for processing.
- If possible, invoices completed by departments should contain the fund number.
- International travel reimbursements no longer need to be sent to ORS prior to submission to the Travel Office.

Invoices Submitted by Departments for Grant Receivables

To ensure that all payments are properly applied, if possible, when creating and submitting invoices to sponsors, please use the fund number as part of the invoice number. For example the first invoice for fund 555999 would be invoice number 555999-01 and the second would be 555999-02. The invoice number is often included in the payment description that is received. If the fund number is used as part of that invoice number this will greatly assists in identifying payments quickly.

Please also be sure to forward a copy of these invoices to the responsible desk accountant when they are submitted to the sponsor so that the necessary receivable can be recorded in the ORS invoicing system. At this time, ORS does not require copies of invoices for clinical trials as they are not currently recorded in our invoicing system.

Foreign Travel on Federally Awards

Requests for reimbursement of international travel on federally sponsored program awards should be routed directly to the Travel Office for processing. As required for all sponsored program activity, departments, schools and centers are expected to ensure that expenses incurred for international travel are justified, well documented and in compliance with the sponsor and University policies. Expenses incurred for international travel must also be appropriate to and specifically benefit the intent and purpose of the award and be incurred within the period of the performance or any authorized extension. As a reminder, in conjunction with business administrators, higher level approvers are responsible for ensuring the following:

- the PI & Sponsor have approved the foreign travel
- the traveler is aware of Fly America Act and “open-airline” skies agreement
- travel expenses were allocable, necessary, reasonable and consistent with University policies and the stated business purpose
- an expense report includes the required documentation
- travel expenses meet any and all Sponsored Program guidelines
- report documentation and related justifications are maintained in the departmental records per the University record retention policy
- the traveler is aware that travel expenses are subject to University and sponsor audit and disallowances

ORS has revised the Expenditure Justification for Sponsored Research Projects form (www.upenn.edu/researchservices/docs/TravelandEntertainmentForm.doc)
to assist departments in compiling all of the relevant documentation. However the form no longer needs ORS signature.
Please contact your Post-Award Accountant with any questions or concerns.

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

Did You Know…..Sponsor Updates

NIH Enforcement of Public Access Policy

The National Institutes of Health (NIH) announced that it will begin a more rigorous enforcement of its public access policy in Spring 2013. NIH will delay processing of noncompeting continuation awards if the investigator(s)' publications arising from that award are not in compliance with the access policy. The award will not be processed until the investigator(s) are in compliance. The enforcement will be implemented as a part of the required use of the Research Performance Progress Report (RPPR) form for all Streamlined Non-Competing Award Process (SNAP) and fellowship awards. The RPPR requires reporting publications and investigators can use their eRA Commons My Bibliography link to access My NCBI (National Center for Biotechnology Information) information including publications linked by other co-investigators to the award. The RPPR will be pre-populated with publications and the investigator(s) select the related publications. In the event an investigator submits a RPPR with non-compliant publications, an email notification will be sent to the investigator providing a two-week window for compliance. The enforcement notice, *Upcoming Changes to Public Access Reporting Requirements and Related NIH Efforts to Enhance Compliance* (NOT-OD-12-160, November 16, 2012 http://grants.nih.gov/grants/guide/notice-files/not-od-12-160.html), includes helpful links to policies and resources.

- December 20, 2012 Council On Government Relations Update

NIH Announces Pilot of ASSIST System for Multi-Project Applications

NIH has recently announced the availability of ASSIST, a new web-based system which is currently being piloted for preparation and submission of multi-project applications such as Program Projects. ASSIST will be used to electronically process multi-project applications for the first time rather than submitting paper proposals.

NIH will post 6-9 pilot Funding Opportunity Announcements (FOAs) with deadlines between January and September 2013

- Electronic submission will be **required**
- Paper PHS 398 applications will **not** be accepted
- Participating FOAs will clearly state that they are part of the pilot and require electronic submission

The timeline of NIH transitions to electronic, complex, multi-project applications is available on their website (see link below) and in the NIH Guide.

http://grants.nih.gov/grants/ElectronicReceipt/files/Time-line_NIH_Complex_Transition.pdf

While InfoEd (as well as other service providers) are working on System-to-System solutions for these submissions, any investigators wishing to reply to the pilot FOAs must use ASSIST and create a PennERA generic record in Proposal Development. Please be sure to contact your ORS Pre-Award representative and the PennERA Help Desk (PennERAhelp@lists.upenn.edu) as soon as possible if an application is planned in response to any of the pilot Funding Opportunity Announcements.

ASSIST can be accessed at https://public.era.nih.gov/assist using your NIH eRA Commons credentials.

CDC Moved to FFR Reporting

As of October 1, 2012, all Centers for Disease Control and Prevention (CDC) financial expenditure data must be submitted using the Federal Financial Report (FFR) via the electronic FFR system in eRA Commons. All new submissions should be prepared and submitted as FFRs.

Since January 1, 2010, CDC grantees have been required to report cash transaction data via the Payment Management System (PMS) using the FFR cash transaction data elements. All federal reporting in the Payment Management System (PMS) is unchanged.

The transition to use the FFR for reporting expenditure data includes new reporting dates for annual FFRs, and reporting of cumulative data only. CDC's implementation of the FFR retains a financial reporting period that coincides with the budget period of a particular project. However, the due date for annual FFRs will be 90 days after the end of the calendar quarter in which the budget period ends. Note that this is a change in due dates of annual FFRs and may provide up to 60 additional days to report, depending upon when the budget period end date falls within a calendar quarter. For example, if the budget period ends 1/30/2012, the annual FFR is due 6/30/2012 (90 days after the end of the calendar quarter of 3/31/2012). Due dates of final reports will remain unchanged. The due date for final FFRs will continue to be 90 days after the project period end date.

- October 1, 2012 letter from the CDC Procurement and Grant Office

Missy Peloso Appointed to Lead ORS

We are pleased to announce the appointment of Elizabeth D. (Missy) Peloso as the new Associate Vice President/Associate Vice Provost for Research Services. Missy replaces Pam Caudill, who held the position for six years before departing earlier this year.

In her role, Missy will oversee the Office of Research Services, which is responsible for pre- and post-award grant and contracts administration, research billing, accounting and cost analysis, export controls and material transfers, as well as PennERA information systems.

Missy has served here at Penn as Director of Export Compliance since July, 2011. In her capacity, she organized and coordinated the University's Office of Export Controls, ensuring that Penn is fully compliant with all federal laws and regulations in an increasingly complex global environment. In addition, Missy has assumed responsibility for overseeing the University's material transfer activities, and has been instrumental in reevaluating Penn's policies on fee-for-service and third-party use agreements.

Prior to coming to Penn, Missy served as Director of Research Compliance at the University of Delaware, where she was responsible for compliance oversight over human subject research, animal welfare, research agents and materials, export controls, responsible conduct of research and conflict of interest. In addition, Missy was an adjunct faculty member in the Department of Psychology at Delaware for five years, and, prior to that, directed two major multi-year NIMH clinical trials, supervising professional staff, consultants, graduate students and undergraduates.

Missy is an active participant in the national research community, chairing the Association of University Export Control Officers and serving as a member of the National Council of University Research Administrators.

Please join us in welcoming Missy to her new role here at Penn.

Sincerely,

Stephen D. Golding
Vice President for Finance and Treasurer

Steven J. Fluharty, Ph.D.
Senior Vice Provost for Research

Special thanks to this quarter's contributors:
Leona Joseph,
Jennifer Rowan
The PennERA Team

Greetings from the New Associate VP/ Associate Vice Provost of ORS

Happy New Year!

The start of 2013 is an exciting time for me, as I move into my new role in ORS. The academic research environment is changing rapidly with both increased regulatory compliance and reporting burdens and reduced federal funding for research available. At the same time, new opportunities for industry collaboration and alternate funding emerge. I look forward to working with the Penn research community and my ORS colleagues to position Penn to meet these challenges and optimize the opportunities. I am sure many of you have ideas and challenges to share as we move forward. Please feel free to drop an email, pick up the phone, stop by the office, or schedule a time to meet to share them with me.

I can't wait to hear from you!

Sincerely,

Missy Peloso

Associate Vice President/Associate Vice Provost for Research Services

Penn ERA S2S *Continued from Page 1*

For those proposals which can be submitted as S2S submissions, there are some real advantages to using PennERA as the submission system of choice:

- Only one proposal record is created, eliminating duplicate data entry in both a generic record required in PennERA for routing and approval and a full proposal record in the FastLane system.
- One system submissions. This is especially appealing to those unfamiliar with FastLane as there is no need to learn a new submission system – everything is done within PennERA.
- Proposals become fully available to investigators in FastLane, so that updates can be done as desired (and allowable) – just as occurs now with FastLane-only submissions.

A comprehensive PennERA NSF FAQ is now available on the PennERA website (www.upenn.edu/researchservices/pdfs/NSF%20FAQs%202012-12-19.pdf) and, as always, the PennERA team (pennerahelp@lists.upenn.edu) is available to answer any questions you may have pertaining to NSF specific submissions.

In addition, the User Guide has been updated:

- NSF FAQs are Appendix D.
- Existing FAQs have been updated (now labeled Appendix C).
- Instructions for adding education information to PennERA Profiles (an essential part of NSF submissions) has been added on page 21 of the User Guide.