UNIVERSITY of PENNSYLVANIA

Office of Research Services

Spring 2018
Volume 13 Issue 1

Inside this issue:

A New, Simplified Proposal Approval Process

As of April 15, 2018, PennERA Proposal Development has moved to a simplified proposal approval process. PD now uses approval paths based on role-based approver assignments designated at specific Organization (ORG) levels.

In Pre-Review Routes, where proposals continue to be completely editable, there are two approval steps:

- Department level approval
- School/Center level approval

Once **Pre-Review** is complete and a proposal has been put into complete and final form by the PI and/or BA involved, the proposal record can be submitted to **Final Review**, a one-step route where Institutional Level approval can be obtained. When the proposal is submitted to **Final Review**, it will be locked down.

The Proposal Reviewer Dashboard continues to operate for approvers just as it had previously.

Department level and School/Center level approvers were identified by your School/Center access administrator for PennERA. You should be aware that the Vice Provost for Research and the Provost's Council on Research have revised University policy such that Department Chairs are no longer required to approve all sponsored projects proposals prior to submission.

A short series of slides is available on the Penn ERA Electronic Submissions Reference Materials webpage, explaining A Simplified Proposal Approval Process at this link.

For users of the PennERA Proposals data collection in the Data Warehouse, it now contains information on users' secured access and approval roles and the ORGs whose proposal records for which they have authorization. Data documentation is available via the webpage for PennERA Proposals Collection Tables & Data Elements (https://www.isc.upenn.edu/pennera-proposals-data-collection).

For those who formerly were provided individual Notifications of Proposals under review, a new Business Objects Report from the Data Warehouse is available. The report, **Proposals Sumitted_ Soon** to be Submitted is located in 2 public folders; the main report can be found in the Office of Research Services folder (*Public Folders/School and Centers/Central Administration/Division of Finance/Office of Research Services/SCHOOL AND CENTER REPORTS*). There is also a shortcut to the report in the Research Proposals public folder (*Public Folders/Research/Proposals*).

A Reminder about Timely Posting of Expenditures to Grants

The NIH Payment Management System (PMS) transition to project-level reporting (subaccount) for letter of credit drawdowns has brought increased transparency to the timing of expenditure posting on NIH awards. It is important that expenditures on grants be posted as close to actual transaction dates as possible and in all cases, prior to the end of the budget period. Failure to follow this guidance may result in the submission of inaccurate final financial reports (FFRs) to NIH and the need to resubmit revised FFRs. When the ORS Post Award group contacts the business administrator/grants manager regarding final expenditures for a NIH-funded project, it is vital that they receive responses as quickly as possible. The final expense must be properly recorded in the general ledger in a timely manner so that allowable expenses can be billed and collected from the PMS within 90 days of the end of the project. If this does not occur, the uncollected receivable balance(s) will be written off to the responsible ORG for the FUND.

NSF Account Management Updates

The National Science Foundation (NSF) has updated their account management system. As of March 26th, NSF users of both FastLane and Research.gov are able to create and self-manage accounts, including requesting new roles and resetting their own passwords.

Existing account holders will be directed to the new account management system when logging in to FastLane or Research.gov for the first time. The system will request that you verify your primary email address and phone number to transfer your account. If your email address is currently associated with more than one NSF ID, NSF will contact you to reconcile your accounts.

For complete information and instructions, visit the About Account Management page on Research.gov. If you need assistance, please contact your ORS Pre Award Associate Director.

Tips for creating requests for non-monetary agreements in the Research Inventory System (RIS)

While most material transfer agreements are relatively simple to negotiate, significant delays in completion may result if incomplete information is provided in the request. Agreements that include collaborative research are often more complex, and significant delays in negotiation may result if the collaborative research is not clearly identified as part of the agreement request in RIS. The following tips will ensure that your RIS requests are completed expediently.

MATERIAL TRANSFER AGREEMENTS

<u>All requests should include the following information:</u>

Proper name of materials: The complete, proper scientific name should always be listed.

Research summary: This should explain, in layman's terms, what is being done with the materials. One way to think of this is as an abbreviated version of the statement of work for the project the materials will be used for.

Outside party: For fastest turn-around times, please include contact name and email addresses for both the administrative and scientist/technical contact at the outside party.

Draft Agreement: If your request is to receive materials and the outside party has provided you a copy of its proposed agreement, please include this draft agreement in your RIS request.

IP considerations: If the materials are related to any Penn patents or disclosures, please indicate so in the request. In these cases, consultation with the Penn Center for Innovation is required.

TIP!

Including the outside party's administrative contact and the outside party's draft agreement (if you are receiving) significantly cuts down turn-around time.

COLLABORATIVE RESEARCH

When you are sending/receiving materials and/or data and the research is collaborative (i.e., there is joint publication and analysis of results), please also select "add collaborative research" in RIS. This informs the agreement type we put in place.

If you are unsure of what agreement you may need, please e-mail ORSMTA@exchange.upenn.edu and we will be happy to assist you.

Responding to Freedom of Information Act Requests

From time to time Penn faculty researchers receive notice from the federal agencies supporting their research that the agency has received a Freedom of Information Act (FOIA) request for information related to the grant or contract for the research. The requests most often are for the grant application itself, but can also include progress reports and other correspondence. Generally, the funder, such as NIH, reaches out directly to the faculty member named as the Principal Investigator on the grant, and may or may not include the Office of Research Services (ORS) in the communication.

If you receive notice of a FOIA request related to a federal grant, please send the request to Missy Peloso (epeloso@upenn.edu) in ORS. Missy or a member of the pre-award staff will assist in reviewing the requested information and ensuring that confidential or proprietary information is not released.

Tips for ensuring ease in responding to FOIA requests:

1. Do not put precise locations of animal facilities or narrative that easily identifies those locations in the proposal resources narrative. Similarly, do not disclose other sensitive location information.
2. If you are including preliminary data that is intended for publication in the proposal, identify it as such.
3. If you include proprietary information in the proposal, label it so that it will automatically be redacted in the event of a FOIA request.

A Reminder about Sponsor Prior Approvals: DOJ/OJP

Federal regulations require prior approval from an awarding agency for a variety of project changes. In our last issue, we outlined prior approval requirements when NIH or NSF is the sponsor. In this article, we address prior approval requirements when the Department of Justice, Office of Justice Programs (OJP) is the sponsor and share new processes ORS has implemented to ensure compliance with the requirements.

OJP requires prior approval on awards over $150,000 when cumulative budget modifications are greater than 10% of the total award, when cost categories not identified in the original budget are part of the revised budget and for all procurement contracts exceeding $150,000.

Prior approval is also necessary for subawards and procurement contracts not included in the original proposal and approved in the notice of award. The Research Inventory System now includes a question which asks users to specify whether or not a subaward was part of the initial proposal. ORS uses this information to help determine whether or not a subaward has been approved.

Prior approval requests must be submitted using a Grant Adjustment Notice (GAN) in OJP's Grant Management System. Requests to OJP must be made through the Office of Research Services and are not approved until Penn receives official notification that the GAN was approved from the OJP Grants Management System.

In the event you receive an award through the Department of Justice, ORS will send the PI a Terms Acknowledgement Form that contains more detailed information about DOJ award requirements. This form must be signed by the PI and returned to ORS in order to facilitate the establishment of a financial account.

Reminder of 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 deposit.

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 code 5332/5333) or other reimbursed expenses not paid by the sponsor. Checks that are not for grant receivables should be deposited directly by the responsible department; they should not be forwarded to ORS for processing.

Any questions regarding payments can be directed to:

Jennifer Rowan

jenrowan@upenn.edu / 215-573-8820

Issues related to the collection of an outstanding receivable balance should be directed to:

PSOM Award (per the Resp Org of the FUND): Danielle DiIanni

ddiianni@mail.med.upenn.edu / 215-573-1395

Non-PSOM Award (per the Resp Org of the FUND): Gokila Venkateswaran*

gokila@upenn.edu / 215-898-2515

*Gokila Venkateswaran is responsible for the accounts receivable collection efforts for all projects funded by the following organizations: Children's Hospital of Philadelphia, Fox Chase Cancer Center, School District of Philadelphia, and National Space Biomedical Research.

Invoices submitted by Departments for Grant Receivables:

If possible, please use the FUND number as part of the invoice number when creating and submitting invoices to sponsors to ensure that all payments are properly applied. For example, the first invoice for fund 555999 would be invoice number 599999-001, and the second would be 555999-002. 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 assist in identifying payments more quickly.

Please be sure to forward a copy of these invoices to GCINVOICING-L@lists.upenn.edu when they are submitted to the sponsor so that the necessary receivable can be recorded in our billing system. The message(s) forwarded to GCINVINGL@lists.upenn.edu should include a copy of the invoice or, if an actual invoice/bill document is not submitted, the expected dollar amount of the payment. Please include the FUND, PennERA Proposal #, PI Name and Invoice # (when appropriate) in the subject line of the e-mail. If the invoice is rejected by the sponsor or is revised for a different dollar amount, please email the revised invoice to GCinvoicing and indicate which previous invoice should be voided.

Reminder: Annual Space Update

This is a reminder that space data must be updated at least once annually in the university space database, in conjunction with your School/Division requirements.

This is especially important for research-related space (including service centers) as the University relies heavily on current and updated space data to support the F&A rate cost proposals and projections. We anticipate a site visit by DHHS within the remainder of this calendar year 2018 to validate the results of the F&A space survey conducted spring 2016. It is helpful to have all space changes since spring 2016 updated in the university space database so that we will be prepared for the DHHS site visit.

Please ensure that you have updated your space information in Web Updater within the last year and for significant changes. If you have not done so, please update it by June 30, 2018.

Important fields to update are: occupying org, room types, room descriptions, PI (where applicable), function codes, and room allocations.

Thank you for your support and cooperation!

Reminder: Moveable Equipment – BEN Assets Update

In further support of the DHHS review of Penn's submitted F&A rate proposal and anticipated DHHS site visit, each department is expected to continue to maintain current BEN Assets data for moveable equipment.

During the site visit, DHHS will select samples of university-funded equipment to review – these samples will be pulled from the FY2016 F&A rate proposal cost study. To the extent that equipment has changed locations, needs to be retired or has switched to a different responsible org, this information should be updated in BEN Assets so that we can provide updated information to DHHS during the site visit.

Research Services will provide specific lists of equipment from the FY2016 F&A rate proposal cost study to each school's senior asset administrator to assist in this effort. However, please be aware that BEN Assets data for all equipment needs to be regularly maintained.

eShip@Penn®

eShip@Penn® is the University's enhanced express shipping system that:

- Minimizes Penn's risk associated with moving hazardous material or other regulated materials
- Ensures compliance with safety and export regulations as well as other mandates
- Allows users to choose from a variety of carriers
- Provides significant discounts compared to non-eShip shipping

eShip has two review processes depending on what you are shipping. Shipments involving dry ice, chemicals, biologicals, and radioactive materials must be processed using eShip and are reviewed by Environmental Health and Radiation Safety (EHRS). All International shipments are reviewed for compliance with export controls and sanctions regulations through the Office of Research Services (ORS).

EHRS **SHIPPING RESEARCH MATERIALS & PATIENT SAMPLES: DRY ICE, CHEMICALS, BIOLOGICALS AND RADIOACTIVE MATERIALS**	**ORS (EXPORT COMPLIANCE)** **INTERNATIONAL SHIPPING**
• Training is required for anyone who does ANY one of the follow-ing: Preparing shipping documentation Marking and labeling packages Filling packages Accepting packages for shipment Supervising these activities • eShip verifies via KnowledgeLink that shippers have the proper training If training is not required, EHRS will release the shipment back to the shipper EHRS can take over a shipment to assist with shipping, if the necessary training is not in place • Biologicals and dry ice: monthly instructor-led training is offered; register for training in KnowledgeLink • Chemicals and radioactive materials: trained EHRS staff handles these shipments; contact EHRS for assistance	• eShip process designed to identify items that may require an export license • License determinations depend on: What the item is Where it's going What it will be used for Who will be using it • eShip automatically screens for destination and recipient, but not the item or the end-use • It is important to accurately answer the questions asked during the shipping process The answers help determine if an item is export controlled • If a license is required or more information is needed, you will be contacted by the Office of Research Services • Most shipments that are sent for review will be approved with no further action needed

Continued on page 8

Business Services, EHRS, and ORS work together to help get your shipments out in an efficient and compliant manner. Below are the points of contact and topics specific to each office.

BUSINESS SERVICES (ESHIP@UPENN.EDU) 215-898-MAIL (6245)	EHRS (EHRS@EHRS.UPENN.EDU; 215-898-4453)	ORS (EXPORT COMPLIANCE) (EXPCTRL@LISTS.UPENN.EDU; 215-898-7293)
• eShip system training • Account information • Become an authorized shipper • Carrier information • System information/troubleshooting	• Chemical and radioactive materials must be shipped by EHRS. • Shipping training for biologicals and dry ice • Guidance on shipping research material, hazardous material, and dangerous goods	• Export compliance and sanctions regulations for international shipments • International travel with Penn equipment and/or to sanctioned countries

The GONE Act: Funds are Gone, but Reporting is not Forgotten

According to the Government Accountability Office's April 2012 report, the U.S. government spent roughly $2.1 million per year of taxpayer funds on essentially nothing—service fees on empty bank accounts. In response, federal agencies took measures to crack down on closing these accounts. The Washington Post generated further public discussion on federal grants management in 2013 by reporting that the U.S. government was still spending at least $890,000 on service fees maintaining 13,712 empty bank accounts due to expired grants that remained open. As wasteful federal spending continued to make headlines, Former President, Barack Obama, signed the Grant Oversight and New Efficiency Act (GONE Act) into law on January 28, 2016 in order to hold federal awarding agencies accountable for timely closeout of expired grant awards.

The GONE Act requires agencies to submit a report to Congress of all federal grant awards that expired on or before September 30, 2015 and are not closed. While all of the funding may have been spent, federal agencies cannot close awards without receiving and approving required technical reports.

Penn is receiving a growing number of notices that expired awards with delinquent reporting will be reported to Congress, or that new awards to the institution will not be made until delinquent reports have been submitted. The Office of Research Services encourages you to submit any delinquent reports as soon as possible to avoid any undue delays in receiving awards. If you are uncertain about the reporting requirements for a specific award, please contact the Office of Research Services.