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Inside this issue:

Financial Disclosure System Implemented	2
P-Comply	3
Salary Limitations and Carryover	4
Training Opportunities	4

Special points of interest:

- FIDES, a web-based application to be used as the sole means for disclosure of financial interests and relationships related to participation in specific research projects.
- New NIH salary limitations on grants, cooperative agreements and contracts were recently published and distributed.

NIH Fiscal Policy for Grant Awards – FY12

The following NIH fiscal policies are instituted in FY 2012:

FY2012 Funding Levels: Non-competing awards will be issued without cost of living/inflationary adjustments in FY 2012; however adjustments for special needs (such as equipment and added personnel) will continue to be accommodated. This policy applies to all grants (research and non-research) when applicable. The NIH will make efforts to keep the average size of awards constant at FY 2011 levels or lower. For new and competing grants, NIH awarding Institutes/Centers (IC) will develop funding principles consistent with overall NIH goals, considering the funds provided to their IC this fiscal year.

Inflationary Increases for Future Years: Inflationary increases for future year commitments will be discontinued for all competing and non-competing research grant awards issued in FY 2012, however adjustments for special needs (such as equipment and added personnel) will continue to be accommodated.

Please see *NIH Fiscal Policy* on page 2

Export Control Liaisons Council Formed

The Export Liaison's Council met for the first time in January, 2012. The council includes broad representation from schools and administrative units across the Penn community. The members of the council will advise and assist the Director of Export Compliance in the development and implementation of practices and procedures to maintain Penn's compliance with the ap-

plicable federal export control regulations while minimizing the associated compliance burden to the campus community.

In addition, the Export Liaisons will serve as first points of contact within the schools for information about the export control regulations. Among the

activities the Liaisons will be able to assist with are



Please see *Export Controls* on page 3

FINANCIAL INTEREST DISCLOSURE ELECTRONIC SYSTEM ANNOUNCED BY THE OFFICE OF THE VICE PROVOST FOR RESEARCH

The Financial Interest Disclosure Electronic System (FIDES), is a web-based application to be used as the sole means for disclosure of financial interests and relationships **related to participation in specific research projects**. The requirement to disclose in FIDES is separate and distinct from required, school-based annual extramural activities reporting. Paper disclosures will no longer be accepted by the Office of the Vice Provost for Research.

Individuals required to disclose any time after February 1 may access FIDES at <https://fides.isc-seo.upenn.edu> using their

PennKey and Password and a Penn-supported web browser.

It is important that the specific research project that is the subject of the eDisclosure is accurately identified as it appears in PennERA or HS-ERA, as applicable. For example, if the eDisclosure involves an IRB protocol, the individual will be asked to identify both the protocol (by title and IRB number) as it appears in HS-ERA and all sources of external funding for that protocol (e.g., grant, sponsored research agreement, clinical trial agreement) as they appear in PennERA (by title and institution



number). Individuals should have this information available prior to logging in to FIDES.

OVP staff will be happy to provide individual guidance to any individual required to submit an electronic disclosure in FIDES.

For additional information, please visit the OVP staff website at

www.upenn.edu/research/ or contact the OVP staff at 215-898-3603 or email at coi@exchange.upenn.edu

“Individual training for the new disclosure system is available by the OVP staff”

NIH Fiscal Policy from page 1

FY 2012 awards that have already been issued will be revised to adjust the award level and future year commitments in accordance with these principles.

Ruth L. Kirschstein National Research Service Awards (NRSA): The NIH will implement a two percent increase at all stipend levels. Further information about NRSA stipends in FY 2012 will be published in the NIH Guide in the near future.

New Investigators: NIH will continue to support new investigators on R01 equivalent awards at success rates equivalent to that of established investigators submitting new (Type 1) R01 equivalent applications. Achievement of comparable success rates should permit the NIH to support new investigators in accordance with the policies established in FY 2009 and subsequent years and described at <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-09-013.html> and at http://grants.nih.gov/grants/new_investigators/index.htm.

Salary Limits: Section 203 of the Consolidated Appropriations Act prohibits payments for salaries under grants and other extramural mechanisms to rates in excess of Executive Level II. Guidance related to Section 203 will be published in the NIH Guide in the near future.

215-P-COMPLY

PENN'S CONFIDENTIAL REPORTING AND HELP LINE

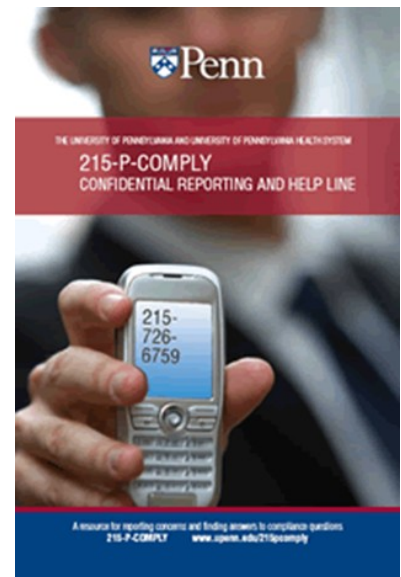
There are many policies, procedures and legal requirements that apply to University and Health System employees and others. As a member of the Penn community, you are encouraged to raise questions and concerns, particularly if you suspect violations of policies or legal requirements.

One way for you to raise these questions or concerns is to contact Penn's Confidential Reporting and Help Line by phone at 215-P-COMPLY (215-726-6759) or via the web at www.upenn.edu/215pcomply.

Penn's Office of Institutional Compliance will look into the matter reported to 215-P-COMPLY and/or refer it to an appropriate office. You may also wish to contact directly an office with compliance responsibility for a particular area such as Human Resources or Environmental Health and Radiation Safety. Contact information for these offices and others with compliance responsibilities may be found at: <https://secure.ethicspoint.com/domain/media/en/gui/22868/resources.html>.

Penn prohibits retaliation against employees reporting compliance concerns in good faith through its Policy Against Retaliation found at <http://www.hr.upenn.edu/Policy/Policies/718.aspx>.

For more information on 215-P-COMPLY please visit: <https://secure.ethicspoint.com/domain/media/en/gui/22868/index.html>.



Recommendations for future newsletter articles or questions that you would like addressed may be sent to Pam Caudill at caudill@upenn.edu

the identification of export controlled equipment on campus, the I-129 deemed export visa application certification, screening of international visitors and international shipments, the identification of international activities, such as travel that may require special li-

censing or documentation, and the identification of training needs. The members of the Export Liaison Council, along with contact information may be found on the export control web page under "Export Control Contacts".

If your school or administrative unit is not listed, and you would like representation, please contact Missy Peloso, the Director of Export Compliance at epeloso@upenn.edu or 215-746-0234.

Export Controls from page 1

Training Opportunities

[National Council of University Research Administrators
http://www.ncura.edu/content/educational_programs/](http://www.ncura.edu/content/educational_programs/)

[Society of Research Administrators
www.srainternational.org](http://www.srainternational.org)

[SRA International 2012 Delaware Valley Chapter Meeting
University of Delaware-Newark, DE
June 11, 2012
www.srainternational.org/sra03/template/](http://www.srainternational.org/sra03/template/)

NIH SALARY LIMITATION AND CARRYOVERS

The most recent notice of salary limitations on grants, cooperative agreements and contracts was recently published and distributed (<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-12-035.html>).

As stated in the notice, any grants awarded in previous fiscal years (e.g, FY2011, FY2010, etc.) are not impacted by the FY2012 salary limitation. Carrying over previous years' funds to support salaries will remain at the salary limitation levels in effect at the time those awards were issued.

Awards that require spon-

sor approval for carryover will continue to be set up under the current procedure. If carryover funds will be used to pay salaries, departments must determine the amount available based on limitations in effect at the time the funds were awarded and should be inclusive of benefits and F&A. Departments will be responsible for monitoring the salary expended on the carryover funds to ensure compliance.

Awards that do not require sponsor approval for carryover will continue to retain the same fund account number throughout the competing segment. Departments must review the grants at the end of the

budget period to determine the amount that will be carried over and expended in the continuation year. If carryover funds will be used to pay salaries, departments will be responsible for monitoring the salary expended on the carryover funds as well as salary expended on the current year fund to ensure compliance with previous and current year limitations.

Departments may request a sub-account be set up for the carryover if this would facilitate the management of the award.

If you have any questions, please contact your ORS representative.

Office of Research Services Quick Contact List:

ORS General Phone Number: 215-898-7293

- **Pamela S. Caudill, Associate VP, Office of Research Services:**
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- **Kathryn Steinbugler, Director, Corporate Contracts:**
215-573-9970, kathryns@upenn.edu
- **Missy Peloso, Director, Export Compliance**
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- **Heather Lewis, Director Pre-Award Non-Financial Administration:**
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General Staff Listings <http://www.upenn.edu/researchservices/contacts.html>