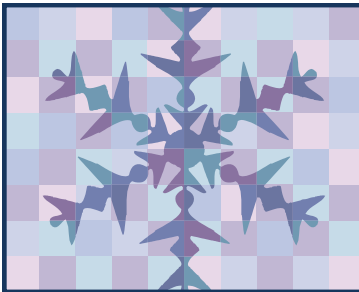


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Pilot Program for Enhancement of Protection Against Reprisals (41 U.S.C. 4712)

The University of Pennsylvania is committed to operating in compliance with applicable laws, regulations, and Penn policies in the conduct of grants, contracts, and other sponsored research. Penn relies on individual faculty, staff and students to report to appropriate University offices, in cases where it appears that a member of the university community may not be complying with an applicable law, regulation or Penn policy.

This is a reminder that a report of possible noncompliance may be made through Penn's Compliance Hotline by calling 215-P-COMPLY, or through the web site

www.upenn.edu/215pcomply . Penn also has many policies prohibiting retaliation against any member of the Penn community who in good faith reports a potential compliance issue. As one example, the University's Human Resources policy against retaliation can be viewed here: <https://www.hr.upenn.edu/myhr/resources/policy/other/retaliation> . You can view other policies against retaliation at the Office of Audit, Compliance and Privacy web site here: http://www.upenn.edu/audit/oacp_principles10.htm

In addition to Penn's existing policies, the U.S. government

has enacted a pilot program, effective until January 1, 2017, providing protection from retaliation for certain whistleblowing activities related to federal grants and contracts. A written summary of the program terms may be viewed at the ORS website (<http://www.upenn.edu/researchservices/>).

New OMB Guidance

On December 26, 2013, the Office of Management and Budget (OMB) released new guidance for the management of federal funds. The new guidance, the **OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule** (2 CFR Chapter I, Chapter II, Part 200, et al.), combines and updates existing OMB guidance and cost principles including those applicable to universities and hospitals. The Final Rule directs federal agencies granting external awards to provide OMB with implementing regulations by the end of June 2014 and the changes will go into effect on December 26, 2014. It will impact management of Penn

awards beginning in Penn's fiscal year 2016. Penn is working with our affiliated organizations such as COGR, AAU, and FDP to determine how the new Guidance will impact the management of research awards at Penn. Missy Peloso will be putting together a working group of key stakeholders to assist in the evaluation of Penn sponsored program policies to ensure compliance with the new guidance and implementing regulations later this spring.

Examples of changes include:

- permitting computers costing less than \$5000 to be treated as supplies on research grants,
- the requirement that federal agencies use the

institution's negotiated facilities and administration (F&A) cost rate for most awards and subawards, and

- the requirement that agencies make funding opportunities available for 60 days in most cases, and in no case less than 30 days.

While these examples are largely positive, the guidance also appears to impose new regulatory burden, particularly in the areas of reporting requirements, internal financial controls, and subrecipient monitoring. We will keep the Penn research community informed as we move forward with revision of Penn policies and procedures to comply with the new requirements.

New Sponsored Projects Billing and Receivables Functionality Coming to BEN Financials

This spring, new sponsored projects billing and receivables functionality will be added to BEN Financials. BEN Billing and Receivables will link PennERA with BEN Financials, and will replace Penn's current Billing and Receivables Information Management (BRIM) system, which is used by the Office of Research Services (ORS) to issue invoices and track receivables for sponsored projects.

Key Features and Benefits

BEN Billing and Receivables will streamline and improve invoice creation and billing, reconciliation, and collections. The new functionality will reduce the number of shadow processes and duplicative data entry, as well as reduce overall processing time. There will be automatic notifications and logging of collection activities, better tracking and processing of outstanding receivables, and more system flexibility to meet sponsors' evolving requirements. There is also the capability to handle other University receivables processing (non-grant related).

BEN Billing and Receivables Modules

The new BEN Billing and Receivables modules will be accessed through BEN Financials by authorized users:

- Grants & Projects – Used for invoice generation, overhead and revenue recognition, and award and project tracking

- Accounts Receivable – Used for customer setup, processing cash receipts, collections, reporting, and processing receivables transactions

Affected Users

BEN Billing and Receivables will only be used by staff in the Office of Research Services (ORS) and the Office of Research Support Services (ORSS) involved in sponsored projects billing, receivables, and collections-related operations. Training on the new functionality will be provided for these users.

Users of the current Data Warehouse BRIM collection will automatically be given access to the new Grants/Receivables data collection in the Data Warehouse.

An effort was made to minimize impact on current BEN Financials users with the introduction of the new modules. There will be minor changes to reports, and BEN Financials users will receive direct communications about these changes.

Questions

This project is jointly sponsored by the Division of Finance, the Provost's Office, and Information Systems and Computing. Please address any questions about the project to the project team at BillingAR@lists.upenn.edu.

New Resource Available: [Strategies for Planning, Developing, and Writing Large Team Grants](#) (PennKey login required)

Data Security Issues in Research Agreements, New Partnership with IT Security



ORS is receiving increasing numbers of requests that Penn comply with specific data security requirements. Often these requests are associated with licensing agreements allowing Penn researchers to download or remotely access government owned data sets. Another common occurrence is in research contracts with federal agencies, particularly the Department of Defense. For example, a new Defense Federal Acquisitions Regulations Clause (DFARS 252.204-7012) sets minimum data security controls for contractors receiving or producing "controlled technical information".

The ORS practice has been to communicate security requirements in research agreements to the Business Administrator (BA) and Principal Investigator (PI) responsible for the relevant agreement and asking for confirmation that Penn has the ability to comply. As the language related to data security in research agreements has become more technically specific, we are pleased to be able to partner with the Penn IT Security Liaisons group. Moving forward, when ORS contacts the BA and PI with questions related to specific agreement-related data security requirements, the IT Security Liaison will now be included on the communication. We hope that this new process will facilitate communication and compliance with data security requirements related to research agreements.

If you have questions about the new procedures, please contact Missy Peloso (epeloso@upenn.edu) or Heather Lewis (heatherl@upenn.edu).

Be in the Know: Preparing a Contract Proposal

When preparing a proposal submission for Federal Sponsors including DARPA, Veteran's Administration and Department of Defense, it is critical to allow sufficient time to review the requirements stated in the Opportunity Announcement which will be in the form of a Broad Agency Announcement (BAA), Request for Proposal (RFP) or Request For Quotation (RFQ) and result in a Contract award.

Contract proposals require significantly more information such as very detailed budgets, a scope of work with detailed task breakouts and timelines, and the inclusion of documents such as subcontracting plans, representations and certifications, and disclosure forms. Federal Acquisition Regulations (FAR) clauses that will be included in an awarded contract are often included in the announcement that require review by your Pre-Award contact so, if necessary, a letter identifying exceptions can be included with the submission to alert the sponsor to our need to negotiate the final clauses.

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"What's the problem here? This contract makes perfectly good non-sense."

The inclusion of subcontractors adds to the time it takes to prepare the submission. Subcontractors must be notified well in advance of our deadline for receiving your proposal and must be provided with a checklist of what they are required to submit to us. Some sponsors require subcontractors to submit the same level of detail in their proposals as we need to provide.

As with all proposals, time needs to be considered for any unforeseen problems with electronic submission systems. With the increasingly competitive funding climate, sponsors are more often encouraging submissions prior to the deadline day and are not providing extensions or other allow-

ances for proposals not submitted on time.

Once you are aware you will be submitting a Contract proposal, contact your Pre-Award contact and provide the Opportunity Announcement number. Your Pre-Award contact will work closely with you to address questions regarding requirements; provide any Representations,

Certifications, and other documents to be provided by an Authorized Official; and advise you regarding accessing needed information from the Penndata for proposals section of our [website](#) such as our DUNS and CAGE Code numbers, recent audit information, and Cost Accounting Standards Disclosure Statement (CASB).

A Contract proposal is a complex submission that requires significant time to prepare and review. Please start the process early and have the final proposal submitted to ORS three (3) days prior to the due date. We are here to assist you.

New Object Codes to Record Cost Sharing

The Office of Research Services along with the Office of Research Support Services worked with the University's Comptroller's Office to establish several new object codes to be used with 5-ledger accounts to differentiate committed and uncommitted cost share (overruns). Until now, object code 4822 (cost share) was being used for multiple purposes, most commonly to record voluntary committed and mandatory cost sharing, charge-back of involuntary uncommitted cost sharing (overruns), unallowable costs,

and write-off of disallowed costs. New object codes have been established to record revenue transfers for unallowable and disallowed costs and cost sharing due to general cost overruns. The use of separate object codes for these entries will enable the University to properly classify cost sharing revenue, allocate overhead through an automatic process and provide better accountability and reporting of cost sharing for the institution. This will also enable schools, departments and centers to identify and moni-

tor cost sharing due to cost overruns and disallowances.

Benefits of the changes:

1. Eliminates the need for ORS to do manual F&A adjustments
2. Revenue recognition and F&A burdening will be controlled within the Oracle Grants Management System (currently being developed)
3. Provides better accountability to schools and

See [Object Codes](#) page 5

Recommendations for future newsletter articles or questions that you would like addressed can be sent to

Jessica Cote at jcote@upenn.edu.

SAS Science Outreach Initiative Office provides support for fulfilling Broader Impacts requirements

Special thanks to this quarter's contributors:

Kristen M. Coakley - SAS
 Jessica Cote - Pre-Award
 Jim Clavin - Post Award
 Keith Dixon - Operations & Cash Management
 Leona Joseph - Pre-Award
 Teresa Leo - ISC
 Missy Peloso - AVP
 Carolyn Poerio - Pre-Award
 Todd Swavely - PennERA
 Chris Ulad - Post-Award
 Stuart Watson - Pre-Award

Major external funders (in particular the **National Science Foundation** and the **National Institutes of Health**) now place an emphasis on how all research efforts will more broadly impact public understanding of science. In response, the School of Arts and Sciences' **Science Outreach Initiative (SOI)** was established to encourage and support faculty participation in these outreach initiatives and to aid in the drafting of this portion of grant proposals.

Fulfilling the *Broader Impacts* criterion of National Science Foundation-funded projects is generally a greater challenge for Penn researchers than the *Intellectual Merit* of their work. With offices in the David Rittenhouse Laboratories and extensive experience in STEM teaching and learning in universities, K-12 schools, and informal settings as well as familiarity with basic science research, the staff of the SOI can assist faculty, postdocs and graduate students with developing outreach ideas, locating University and/or community partners, planning program evaluation, and

crafting effective proposals. Once funding is secured, the SOI staff is also capable of providing resources that will make it easier for grant recipients to implement their outreach strategies.

Grants Managers in SAS Natural Science departments should encourage researchers to connect with the SOI staff at least one month prior to the ORS grant deadline in order to insure a high quality response. While *Broader Impacts* are specific to NSF, many other granting agencies are asking for outreach components and the SOI is prepared to assist with these as well. The SOI can also field requests from non-SAS personnel, directing them to other appropriate contacts located throughout the University if necessary.

More resources of use to researchers may be found at <http://www.sas.upenn.edu/STEMoutreach/>. For further information, please contact Jane Horwitz (Director) or Kristen Coakley (Assistant Director) at STEMoutreach@sas.upenn.edu.

NIH Open Access Requirement

The National Institutes of Health Public Access Policy states *The Director of the NIH shall require that all investigators funded by the NIH submit or have submitted for them to the National Library of Medicine's PubMed Central (PMC) an electronic version of their final, peer reviewed manuscript upon acceptance for publication, to be made publically available no later than 12 months after the official date of publication; provided that the NIH shall implement the public access policy in a manner consistent with copyright laws.* This policy applies to any manuscript that

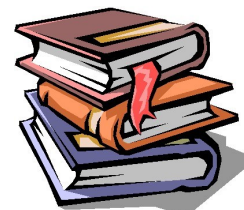
- 1) arises from any direct funding from an NIH grant or cooperative agreement active in Federal Government Fiscal Year 2008 and beyond or an NIH contract signed on or after April 7, 2008 or any direct funding from the NIH Intramural Program;
- 2) is peer-reviewed; and
- 3) is accepted for publication in a journal on or after April 7, 2008.

The NIH awardee is responsible for assuring an

applicable paper is submitted to PMC. Any investigator submitting a proposal application or report to the NIH must include the PMC reference number (PMCID) when citing applicable papers that they author or that arise from their NIH funded research. In the case of a non-competing continuation application, failure to comply with the Public Access Policy will delay the award until all applicable publications are in compliance.

Authors own the original copyright to any manuscript or other material they write. It is important that before an author signs a publication agreement or any other agreement that involves copyright transfer of a manuscript falling under the NIH Public Access Policy, that the agreement allow the paper to be posted to PMC.

Please see the following link for detailed information on the NIH Public Access Policy and tools to facilitate compliance: <http://publicaccess.nih.gov>



Object Codes *Continued*

departments to understand cost overruns and disallowances	4827 Cost Share Overrun- Uncommitted	2014. Any questions can be directed to Keith Dixon at kdixon@upenn.edu or Kim Garrison at kimmkg@upenn.edu
4. Provides better accounting of true cost sharing by the institution	5215 Unallowable Expense	
New Object Code Descriptions:	5247 Disallowance of Expense (no F&A)	
4822 Cost Share-Mandatory or Voluntary Committed	5248 Disallowance of Expense (with F&A)	
	These changes went into effect beginning in January	

PennERA System Update

An upgrade to PennERA system software was completed the weekend of January 18-20.

Although there are changes you may not notice, some notable changes include:

- Improvement to **eForm** functionality and performance, including now prominently showing the status of “completing” and a warning message if a user tries to exit before the form is saved.
- Enhancement to the **Review Dashboard** for approvers – the “*My Decision*” field has been relocated to a more convenient and visible location, as well as enhanced

messages to approvers as they are about to complete review of an item.

- **Modular Budget** – A modular budget balancing transaction will be created in Proposal Tracking to reconcile any difference between the detailed budget entered and the modular budget request.
- The **NIH Salary Cap** has been increased in the Proposal Development budget tool in compliance with the NIH notice (NOT-OD-14-043) of January 16, 2014.

As always, please send any questions to PennERAhelp@lists.upenn.edu

Reminders

Fall Semester Effort Reports were available for review on January 27, 2014. These Effort Reports are due to be completed and certified by **March 28, 2014**.



ORS Proposal Review Policy: If you are working on a proposal and will not be able to meet the 3 day prior to deadline ORS submission requirement, it is imperative that you communicate with ORS regarding your submission. If you will not be finalizing your submission to ORS at least 24 hours prior to the sponsor deadline, we ask that you notify your pre-award contact in writing, copying the Director of Pre-Award, Heather Lewis (heatherl@upenn.edu). If you are submitting to a deadline that is outside normal business hours (e.g. midnight) and will not be finalizing the proposal until the day of submission after 3 pm, please notify Missy Peloso (epeloso@upenn.edu) in writing at least 24 hours prior to the submission deadline. This will permit ORS to coordinate availability of staff to submit the proposal after hours. It is important to note that such afterhours submission will not receive additional review after the close of normal business hours.

PSOM Resource Available: Research Program Development (RPD) provides administrative direction and support to Perelman School of Medicine faculty and departments in the development and submission of large multidisciplinary grant and contract submissions, such as Research Program Projects and Centers (P awards), Cooperative Agreements (U awards) and NIH and other federal contract submissions. See <http://www.med.upenn.edu/rpd/> for more information.