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Inside this issue:

What is the value in timely (3 days before sponsor deadline) submission of a proposal?

ORS processed more than 100 proposal submissions due to sponsors on February 5, 2015, a large NIH deadline. I'm sure that everyone gets tired of seeing the ORS emails reminding BAs and PIs of submission policies in advance of sponsor deadlines. After all, we will make every effort to submit proposals regardless of when the proposal arrives at ORS. So what does ORS do with the proposal that adds value to the submission? Here are the top reasons to get your complete proposal in final form to ORS **three business days** prior to the sponsor due date:

1. ORS will ensure that any required approvals are in place.
2. ORS will ensure that the proposal is compliant with Penn policies and regulatory guidelines, and will identify any issues that Penn may not be able to accept in a resulting award.
3. ORS will review required certifications to make sure Penn is able to comply.
4. ORS will ensure that the proposal is compliant with the sponsor proposal guidelines (required sections, formatting, font size page and word limits, etc.).
5. ORS will check the budget information for allowability, allocability and correct choice of F & A rates.
6. ORS will verify cost sharing (required, voluntary, or unintentionally proposed).
7. ORS can assist with obtaining and ensuring that information from subrecipients is received and complete.
8. ORS's submission of your proposal to the sponsor before the deadline date will give you the oppor-

See ***Timely Proposals*** page 2

NIH Simplifies Policy for Late Application Submission

There is now a two week window of consideration after the application due date, during which time NIH might consider accepting a late application. When the application due date falls on a weekend or Federal holiday, and is extended to the next business day, the window of consideration for late submission of applications will be calculated from that business day. Acceptance of late applications will be made on a case-by-case basis, dependent upon the explanation provided in a cover letter submitted with the application. NIH does not expect to accept any applications received beyond the window of consideration or for RFAs that specify no late applications will be accepted.

This is a significant change from previous policy, which tied different late windows of consideration to different types of applications, and provided no late window of consideration for applications submitted to any RFA (Request for Applications) or PAR (Program Announcement) with special application due dates.

See more, including circumstances under which NIH will not consider accepting late applications as well as examples of reasons why late application might be accepted, in NOT-OD-15-039 at: http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-039.html

Updated NSF Proposal Guide Now in Effect

On November 20, 2014 NSF released the updated *Proposal and Award Policies and Procedures Guide* (*PAPPG*) which contains the *Grant Proposal Guide* (*GPG*) effective for proposals submitted via Fastlane on or after December 26, 2014. NSF continues to emphasize in the Guide and within its policy communications, including a webinar held with Jean Feldman, Head of the Policy Office on January 27th, that "conformance is required and will be strictly enforced unless an authorization to deviate from standard proposal preparation requirements has been approved. ***NSF will not accept or will return without review proposals that are not consistent with these instructions***."

Some of the significant changes found in the GPG include:

- **Budget justifications** are limited to three pages. Now *separate justifications* of three pages each can be included *for each subaward proposed* on a budget.
- The two page biographical sketch requires in Section (e) **Collaborators and Co-Editors that are related to the specific proposal**, in addition to Graduate Advisors and Postdoctoral Sponsors; and Thesis Advisor and Postgraduate-Scholar Sponsor.
- The **project summary** is limited to one page and must include three separate sections with the headings *overview, statement on intellectual merit,* and *statement on broader impacts*. For proposals prepared in Fastlane, the template includes three separate boxes for addressing each section. As there are character limits for these boxes, cutting and pasting text may result in the file being more than one page resulting in an error. For proposals prepared as S2S in PennERA, the one page document must include the three headings as described.
- The 15-page **project description** must include a separate section labeled *Broader Impacts of the Proposed Work* which should provide a discussion of the broader impacts of the proposed activities. Uniform Resource Locators (URLs) are not to be included within the project description. Results from Prior NSF Support are also to be identified in this section.

As previously required, a **Data Management Plan (DMP)** of no more than two pages must be included with all proposals. If a collaborative proposal is being submitted, the Prime institution must provide one DMP for the submission. A **Postdoctoral Mentoring Plan** is also required if Postdocs will be supported by the project. As well for collaborative submissions, one plan is submitted by the Prime institution.

Auto-compliance checks

Effective January 26, 2015, NSF instituted 24 automated compliance checks for full proposals prepared in Fastlane. This update followed the enhancement that became effective initially on March 18, 2013. A chart identifying these checks can be found here. The checks will be triggered when the 'check proposal', 'forward to SPO', or 'submit proposal' functions are selected and a warning or error message will be received if non-compliance is identified. **ORS will not be able to complete the Fastlane submission if any errors are returned once the checks are completed and the BA and PI will be contacted to address the errors.** It is important to keep in mind content of specific sections, such as making sure broader impacts are addressed in the 15-page project description, are not auto-compliance checked. Therefore a thorough review is still required to be sure a proposal is not returned without review for incorrect or inadequate content as required by

See ***NSF Updates*** page 3

PennERA Alert for NSF S2S: Data Management Plan and Postdoc Mentoring Plan are now uploaded on the revised NSF Cover Page. Check out the PennERA website for updated NSF S2S information. http://www.upenn.edu/researchservices/PennERA.html

Timely Proposals Continued

tunity to review the proposal as the sponsor will see it in the sponsor's system.

9. Most sponsors no longer extend the proposal review period in their systems beyond the proposal deadline, so if you submit close to the deadline, you may not be able to make changes.

10. Sometimes system to system submissions fail, and having your proposal to ORS early ensures that there is time for troubleshooting and making sure that sponsor deadlines are met.

Each and every proposal represents tremendous time and effort from Penn researchers, and we appreciate your assistance in making sure that we provide you the best possible service to make sure the submissions are successful. As a reminder, if you are not able to have your proposal completed **three business days** prior to a sponsor deadline, please let ORS know that you are working on it so that we can plan ahead.

Thanks, Missy

Sponsored Project Invoicing - New Email

In an effort to more effectively track outstanding receivable balances associated with Sponsored Projects, ORS has establish a new e-mail address which should be used to send any invoices or supporting documents that have been generated and forwarded to a sponsor by department Business Administrators/ grants managers/ Clinical coordinator or investigators.

This includes:

- Any invoice generated by department Business Administrator / Grants Manager / Clinical Coordinator (including but not limited to clinical trial agreements and sponsored research agreement)
- Completion of a milestone(s) associated with a 5-FUND that will result in payment.
- Any technical reports that have been submitted that will result in payment being sent to the University.

The use of this e-mail address does not replace the interaction between department BA/ grants managers with the ORS Post Award group related to invoicing. If the department BA/grants manager is supplying information to an ORS desk accountant to facilitate the submission of an invoice to a sponsor by ORS then that should continue. This e-mail address should only be used to forward an invoice or other documents to ORS when the department BA /grants manager responsible for a 5 FUND is submitting documents or information directly to a sponsor that will result in payment. ORS will use this information to record the receivable balance in the University financial systems (BEN Financial Billing and Receivables System and General Ledger). This data will be used to properly age outstanding receivables and in time be used to send out automated collection notices to sponsors when payment is not received in a timely manner. Also, for Clinical Trail agreements, this information will be used as documentation to increase the awarded dollars (PBUD/PBIL) for a FUND.

The message(s) forwarded to the new address GCINVOICING-L@lists.upenn.edu should include a copy of the invoice or if an actual invoice/bill document is not submitted then 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.** Please note that not supplying this information will result in delays in posting payments to 5-funds in the general ledger.

Any question related to this process should be directed to Keith Dixon (kdixon@upenn.edu 215-898-1966).

See FAQs on invoicing process for more information on page 4 of this newsletter.

NSF Updates continued

the GPG.

Proposals submitted system-to-system (S2S) need to be successfully inserted into Fastlane by Grants.gov. Other than moving through PennERA and Grants.gov validations successfully, once inserted into Fastlane the proposal is not auto-compliance checked in the same way as direct Fastlane submissions. A message is received to notify the PI and ORS if Fastlane is unable to insert the application successfully or if it was submitted with warnings. These issues need to be addressed prior to the deadline for successful on-time receipt by NSF.

NSF ID required
As a reminder, prior to preparing an NSF proposal check to be sure the PI has an NSF ID. If there is a question regarding this requirement contact you Pre-Award contact who can assist in either looking up an ID or creating one if necessary. For proposals submitted as S2S, the NSF ID must be added to the PennERA profile in order for it to populate in the record on the personnel tab.

Resources
For reference, download the latest Grant Proposal Guide here. The Proposal Preparation Instructions are found in Chapter II.

Proposals submitted via Grants.gov should be prepared and submitted in accordance with the *NSF Grants.gov Application Guide: A Guide for the Preparation and Submission of NSF Applications via Grants.gov*, available through Grants.gov and on the NSF website here.

Two reference documents, namely *NSF System-to-System (S2S) FAQs* and *NSF S2S Proposal Records Quick Ref Guide* are available for reference on our website here.

As always, your Pre-award contact will assist you during the proposal preparation process. Submitting proposals as required **three (3) days** prior to the deadline will help to ensure a thorough review is conducted, with submission final-

Salary Caps and PIs with Dual Appointments at Penn and the VA

Some Federal agencies and other sponsors have a maximum salary rate at which they will pay investigators – a “salary cap”. The salary cap for the NIH, one of our common sponsors, is currently $183,300 (see Notice Number NOT-OD-15-049). While the NIH expects applicants to indicate in the proposed budget what the salary would be without applying the salary cap, the NIH will only reimburse a grantee at a rate that is below the salary cap. For investigators whose effort is only at Penn, the difference between the investigator’s salary and the reimbursement rate is a simple subtraction. However, for investigators with a dual appointment with the Veterans Administration, the calculation requires an additional step, determining the salary rate that the agency will apply. To determine an investigator’s salary rate:

Penn portion of salary ÷ Percentage of total year spent at Penn = salary rate

The proportion of time spent at Penn and the VA is expressed in eighths (such as, 3/8 at Penn and 5/8 at VA). Each eighth is 12.5%, so 3/8 is 37.5%. Using the formula above and assuming 3/8 at Penn, if an investigator on an application to the NIH receives a salary from Penn of $100,000, the salary rate would exceed the NIH salary cap ($100,000 ÷ 37.5% = $266,667). To calculate the unallowable portion of the salary:

Salary cap X Percentage of total year spent as Penn X Percentage of effort = amount reimbursed

Using the parameters, above, if the investigator is devoting 33.33% to the project, then Penn would be reimbursed $22,913, rather than $33,333.

The Perelman School of Medicine developed language for the budget justification in an application that includes an investigator with a dual appointment with the VA:

> Dr. (Named Investigator) receives financial support from the VA. The portion of his effort expended on this project reflects that portion of his/her University of Pennsylvania time. The University portion of his/her salary is listed, and the dollar amounts reflect the calendar months of his University salary to be devoted to this project. Signature by the institutional official on the application certifies that: [1] Dr. (Named Investigator) is applying as part of a joint appointment specified by a formal Memorandum of Understanding between the University of Pennsylvania and the Department of Veterans Affairs (VA); and [2] There is no possibility of dual compensation for the same work, or of an actual or apparent conflict of interest regarding such work.

Please note that the effort indicated in the PennERA Personnel and Budget tabs is the portion of the Penn time. Using the example, above, if the investigator intended to devote 33.33% of Penn time to the project, the effort in the Personnel and Budget tabs would indicate 33.33%, rather than 12.5% (which is 1/3 of 3/8, or 1/8 of the investigator’s effort at both Penn and VA). The amount requested to reimburse the investigator’s salary is $100,000.

FAQs on GCINVOICING-L@lists.upenn.edu

Will ORS send out invoices forwarded to GCINVOICING-L@lists.upenn.edu to a sponsor? No. ORS will not be sending out these invoices to sponsors. The list serv should be used to notify ORS when an invoice or supporting documents have been generated by the department and sent to a sponsor if the documentation will result in payment being sent to the University. This information will be used to record the receivable balance in the University financial systems.

How do we let ORS know about payments earned and due on clinical trials, but for which we do not invoice – i.e., the study pays based upon receipt of case report forms not invoices? If you are not submitting an invoice, just include the amount of the expected payment in your e-mail. If an actual billing document is not submitted, include the expected dollar amount of the payment. Please provide the FUND, PennERA Proposal, PI Name, and Invoice number in the subject line of the e-mail.

Instead of forwarding invoicing information to the ORS desk accountant, should it be sent to GCINVOICING-L@lists.upenn.edu? No. The use of this e-mail address does not replace the interaction between department BAs and the ORS Post Award staff. If a BA is supplying information to an ORS desk accountant to facilitate the submission of an invoice to a sponsor by ORS that should continue. This e-mail address should only be used to forward an invoice or other documents to ORS when the department is submitting documents (such as an invoice) or other information directly to a sponsor that will result in payment.

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

Special thanks to this quarter's contributors:

Jessica Cote, PreAward
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Adam Rifkind, PreAward
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PennERA Proposal Routing Paths

The most common misconception about routing paths and access to the PennERA Proposals collection is that these two issues are connected, but they are *not*:

- Granting access to an ORG in PennERA does not add someone to that ORG's routing path.
- Adding someone to a routing path does not automatically provide greater access than existing approved security. For example, if a new grants manager is added to an ORG's routing path, this will not independently provide edit access to that ORG unless separate edit access has already been set up.
- Access to ORGs within PennERA Proposals database in BEN Reports does ***not*** gain access to ORGs in the PennERA web app, and vice versa.

Checkpoints when personnel changes occur:

⇒ Is this person in the ORG's routing path?

- The ORG routing path owner should notify PennERAhelp@lists.upenn.edu of the change to the routing path, specifically identifying the ORG ***number(s).***
- Provide specific details about what needs to be changed.

⇒ Is this person also the contact name for any routing paths?

- The new owner should be identified in the e-mail. The PennERA Team may request additional authorization for the new contact from the Department/ School.
- The routing path contact name is the "From" identified in notification messages sent from PennERA to reviewers/approvers.

⇒ Does this person have or need view and/or edit access to specific ORG(s)?

- Complete the module access form here, obtain Department/School signatures, and forward to P221, Franklin Bldg., to remove and/or update existing access.
- For new hires, one or both of the PennERA Proposal Development training classes may be needed.
  - ◊ Check KnowledgeLink for current classes.
  - ◊ Write to PennERAhelp@lists.upenn.edu if no classes are available for registration.
  - ◊ The module access form should also be completed.
- If changing positions at the University involves a different School, usually separate forms are needed for removing and for adding access, since separate School signatures are required.

Can't remember the steps in your routing paths? Write to PennERAhelp@lists.upenn.edu, and the Team will send you the information.