Changes in Cuba Policy

On June 16, 2017, the White House released a National Security Memorandum on Strengthening the Policy of the United States toward Cuba, which is expected to result in the rollback of certain authorized activities. While the changes are not expected to significantly affect the types of travel eligible for University of Pennsylvania Sponsorship, please note that we will not know the full extent of the changes until the Office of Foreign Assets Control (OFAC) issues the new regulations. The current regulations remain in effect until the new regulations are released. If you have already completed at least one travel-related transaction (e.g., purchased a flight or reserved accommodation) prior to the President’s June 16th announcement, all additional travel-related transactions remain authorized provided that they are consistent with OFAC’s regulations as of June 16, 2017.

Please note that unless and until the U.S. Congress repeals the embargo, trade and travel restrictions remain in place, and Penn-related Cuba travel will still require general authorization. For information about Cuba travel that is eligible for University of Pennsylvania sponsorship, please visit http://www.upenn.edu/researchservices/

Did You Know?

The Research Inventory System (RIS) is used to request Material Transfer Agreements, Data Use Agreements, Collaborative Research Agreements without exchange of funds, Equipment Loan Agreements, Service Agreements, and Confidentiality Agreements related to research as well as Outgoing Subawards. Access to the system is via Pennkey. The system sends automated email notices about agreement status, including an introductory email from the negotiator assigned to handle the agreement. Users may also check on their agreements within the system.

Principal Investigators, Business Administrators and individuals identified by the individual who makes a request as “Other contacts” in Research Inventory System can obtain information about the request by logging into the system and viewing the activity log. The activity log includes dates and times that the request was submitted, identifies the negotiator assigned to the agreement and documents all compliance approval processes. More importantly, the activity log includes information on communications with the outside party and the current status of the negotiation.

Researchers can access the RIS activity log by logging in at https://researchinventory.apps.upenn.edu.

Selecting “My MTA/NMA requests” or “My Subaward Requests” from the menu will reveal a submenu including “Requests history”. Selecting Request History provides users a list of submitted agreements within the agreement type. Specific agreements may be selected from the list and the Activity History is available once a specific agreement is selected.

Users may also obtain copies of their fully executed completed agreements directly from the RIS system.
Research Shared Governance Board

This past spring, MaryFrances McCourt, Penn’s Vice President for Finance and Treasurer, established the Research Shared Governance Board (RSGB). The RSGB includes administrative representatives from schools and centers as well as from central administration offices that intersect research. The board will serve as a forum for business offices to share practices related to the management of sponsored research. Importantly, the board will collaborate with the Office of Research Services (ORS) to ensure that Penn is in compliance with the requirements of the Uniform Guidance for federally sponsored awards. This will occur through review, advisement, and communication of changes to sponsored programs policies as well as support of the annual audit process.

The RSGB is already hard at work. The group has been instrumental in the recent changes to Sponsored Projects Policy 2113 Cost Transfers and Payroll Reallocations. The group will also be key to this year’s audit activities for the single audit. In past years, ORS took on responsibility for repeated follow-up with department business offices for requested documentation for the audit. This year, ORS will still take the lead, but the RSGB-designated audit compliance contact will step in as needed to resolve requests that are not met in a timely manner by the business office. The procedural change is designed to streamline the audit process.

Please contact Missy Peloso (epeloso@upenn.edu) if you identify a research-related issue that you would like the RSGB to address.

F&A Rate Process Update – Space Surveys & Equipment

As Penn’s latest federal rate agreement for a Predetermined F&A rate ended June 30, 2017, we are currently operating on Provisional F&A rates at the FY17 level (61% F&A for federal research). The Provisional rate will be in effect for all proposals until a new agreement is in place. To this end, the Office of Research Services has been working on the F&A rate cost proposal, and expects to submit it to our cognizant federal agency before the end of summer.

Because facilities-related costs account for the largest portion of the F&A rate, it is critical for the University to maintain accurate and up-to-date space and asset information.

Space@Penn Web Updater: All space data must be updated at least once annually in the Space@Penn database, in conjunction with your School/Division requirements.

BEN Assets (in Ben Financials): Senior Asset Administrators and Asset Administrators are reminded to update BEN Assets whenever an asset is relocated. Please be sure to identify and record asset retirements in a timely manner, per Financial Policy 1106.3 Plant Assets – Retirements. Timely asset updates are important for federally funded equipment (for annual Uniform Guidance Audits). In addition, timely asset updates for university-funded and non-federal equipment are necessary for the periodic F&A rate proposal reviews by our federal cognizant agency.

Once the current F&A cost rate proposal is submitted, the Office of Research Services will send each School a list of the equipment included in the proposal to facilitate careful tracking over the upcoming year, in preparation for the federal site review. At the time of review, a sample of university-funded equipment items included in the F&A submission will be inventoried.
Research Agreement Submissions:
A Decision Tree

Which Office will be Negotiating my Research Agreement?

Is the outside party a government agency or non-profit entity?  

Yes: The agreement will be negotiated by the Office of Research Services.  
Contact phone: 215-898-7293

No: Is the agreement related to an industry sponsored human clinical trial or other research that requires informed consent for study subjects?  

Yes: The agreement will be negotiated by the Clinical Trial Contracting Unit in the Office of Clinical Research.  
Contact phone: 215-746-8913  
Ctcu-ocr@mail.med.upenn.edu

No: Is the agreement (research agreement, material or data use agreement) with a commercial sponsor?  

Yes: The agreement will be negotiated by the Penn Center for Innovation  
Contact phone: 215-898-9591  
PCLinfo@pci.upenn.edu

No: Agreement should be entered by the PI or BA into the Research Inventory System  
https://researchinventory.apps.upenn.edu

What System Should I Use for my Agreement Request?

Is this a grant or contract with funds coming to Penn?  

Yes: Agreement should be entered by BA or PI into PennERA  
https://www.pennera.upenn.edu

No: Agreement should be entered by the PI or BA into the Research Inventory System  
https://researchinventory.apps.upenn.edu
Limited Engagement in Sponsored Research

Recent changes to Penn’s policy and procedures for the classification of workers (employee versus independent contractor) have raised questions within the research community. In an effort to support Penn’s compliance with the U.S. Department of Labor and Internal Revenue Service regulations while minimizing administrative burden, the Office of Research Services (ORS) is available to assist with the evaluation of proposed service provider relationships related to activities on sponsored research projects.

The following grant-related activities are eligible for consideration as Limited Engagement:

- Service on a Data Safety Monitoring Board
- Service on a Scientific Advisory Board
- Service on other Advisory Boards (e.g. Community Advocate or Patient Engagement)

Business offices should contact Missy Peloso (epeloso@upenn.edu or 215-746-0234) prior to submitting the Limited Engagement Agreement form for individuals serving in these roles on sponsored projects. ORS will provide documentation that the activity meets the Limited Engagement criteria that may be used to support the PDA request for payment.

Additionally, there has been some confusion with regard to community physician practices and other small entities used as recruitment sites for research activities. In cases where there is a formal research agreement (subaward) in place for the activity with scheduled rates of payment for the service provided, a purchase order should be created to manage the payments. The service provider will be required to go through Penn’s vendor process.

Other types of service provider arrangements, including consultative activities on sponsored projects, should be reviewed via the Service Provider Questionnaire. The Service Provider Questionnaire and additional information on the University of Pennsylvania Individual Service Provider classification process are available at https://www.hr.upenn.edu/policies-and-procedures/processes-and-procedures/service-provider-classification.
A Message to the Research Community

Penn’s prolific researchers are keeping us very busy! We at ORS endeavor to serve our colleagues in an efficient manner and are making some changes that we hope will streamline the outgoing subaward process for all involved.

Penn will begin to issue subaward amendments as unilateral modifications for non-substantive changes to the period of performance and budget of outgoing subawards. Additionally, where permitted by the Prime award, Penn will include automatic carryover as a standard term in new subawards to low-risk subawardees.

Unilateral modification means that only Penn’s institutional signature will be required for an outgoing subaward amendment (with no change in scope of activities) to be considered “fully executed”. Subawardees will have a window of ten business days within which to object to the terms of the amendment reviewed and signed by the Office of Research Services prior to issuance. If the subawardee does not respond to us by the end of the ten-day period, Penn will consider the agreement in full effect, thereby allowing departments to immediately create a new Purchase Order and approve invoices against the amended subaward. We would like to take this opportunity to gently remind business administrators that creating Purchase Orders for the full value of the subcontract relieves administrative burden on both the department and the Accounts Payable group.

Adopting automatic carryover as a default term in new subawards to low-risk entities means that Penn will flow down this authorization in cases when it is extended to us as the Prime Awardee. Our subrecipients will not be required to obtain our permission to carryforward funds from prior funded periods. A Penn PI should only restrict the automatic carryover privilege if she/he believes additional subrecipient project monitoring is required. If the RIS subaward request indicates that the PI does not authorize carryover where the prime award permits, ORS will request justification for the restriction.
PennERA Helpful Tips/Reminders

What kind of proposal is this? Why did my proposal route to the wrong people?

- When setting up a proposal record, be sure to correctly identify the Program Type of your proposal on Setup Questions (Research, Clinical Trial, etc.). Incorrect selection can result in the proposal record routing incorrectly!

- If your proposal has routed incorrectly, please email the PennERA helpdesk (pennerahelp@lists.upenn.edu) for assistance.

Help! I can’t find my proposal!

- If your proposal is going to be administered in an ORG other than the PI’s Department (Payroll) ORG, don’t forget to change the Associated Department ORG before exiting the proposal record. If you do not make the appropriate update, and you do not have access to the PI’s Department ORG, you will not be able to find the proposal when searching by Institution Number or PI name.

- If you forgot to change the Associated Department ORG, do not create a new proposal record. Please email the PennERA helpdesk for assistance.

What should I do if I have New/incoming faculty/staff? What should I do if I cannot find the person in PennERA?

- Incoming faculty and/or staff who do not yet have a salaried payroll appointment in Penn Works will not be selectable in PennERA. In order to have them added to the PennERA system, a temporary or courtesy appointment must be made in Penn Works. Once that has been done, notify the PennERA team (pennerahelp@lists.upenn.edu) so that we can add a “Research Affiliation” in the Penn Community. This will feed overnight to the PennERA system and the incoming faculty and/or staff member will be available for selection on the following business day.

- When requesting a Research Affiliation, please provide the FIRST and LAST name and the Associated Department ORG with which the incoming faculty and/or staff member should be affiliated. Do not provide their PennKey and Password, this is personal proprietary information.

- New faculty/staff members who will be serving as PIs on proposal records must obtain a PennKey and password in order to complete the PennERA PI Certification Form. This form is required for proposal submission.

User Access (Default and Expanded)

- By default, users of PennERA have access only to their own items (proposals on which they are listed as PI). Users with default access can create and modify these records only.

- If expanded (ORG secured) access is needed, users should fill out the Module Access Request Form available in the Access and Forms section of the PennERA website (www.pennera.upenn.edu) and contact the PennERA helpdesk for training requirements.

(continued on next page)
PennERA Helpful Tips/Reminders (continued)

◆ As a rule, any user requesting the ability to edit records that are not their own (access to an entire ORG, for example) will be required to complete in-class training before expanded access is granted.

Adding Subcontractors

◆ Whether manually adding or importing a subcontractor into a PennERA proposal record, **do not add the subcontract performance site on the Performance Site tab.** This will ultimately cause a duplicate listing of the site. PD will automatically populate the subcontract performance site once the subcontract has been added in the budget. You may find that there is additional information (full street address, congressional district, if applicable, etc.) that will need to be entered. This information can be added to the existing data on the Performance Site tab.

New Sponsor or New Subcontractor?

◆ If you need a new sponsor or subcontractor added to PennERA, please email the helpdesk (pennerahelp@lists.upenn.edu). Include in the email: the full name and mailing address, including 9-digit zip code if a US entity.

◆ **In both cases, do not select an alternate sponsor or subcontractor as a placeholder!** The PennERA group can add these entities to the database as soon as the appropriate information is received. All types will be immediately available for selection with the exception of additions to the RIS system, which feeds nightly from PennERA.