Penn ERA Upgrades are Coming!

An upgrade to the PennERA (Electronic Research Administration) application is currently being planned with a target of an August – September (2015) implementation. The goal of this upgrade is to bring improved and enhanced functionality to our users.

Updated Design

Proposal Development (PD) has received a face-lift. The proposal screens will have a sleek, updated design and feel. Outdated icons have been replaced with active links and easily recognizable buttons. Users will notice that, while the design has been updated, the layout and process for creating and completing a proposal is largely the same as to remain intuitive to those already familiar with the application.

Enhancements

Subcontract Budget Form Import and Export – For external subcontracts where Penn is the Subcontractor, users will be able to import completed subcontract budget data directly from Adobe Research and Related (R&R) subcontract budget forms into their PD record in lieu of entering the data manually. Conversely, for projects where Penn will be a subcontract recipient, users using the generic template will be able to export their PD created Penn budget (if entered in detail) to an Adobe R&R budget form, eliminating the need for duplicate data entry.

Predictive Text – Users will notice in many places that the Alpha-Split pick lists have been replaced with predictive text. The new predictive text boxes will be available on the proposal search page as well as in PD proposal screens. This will allow users to simply begin typing a name and choose from a populating list resulting in fewer mouse-clicks and quicker loading times.

Attachment File Name Editing – S2S proposal records now feature the ability to easily view and change the filenames of uploaded documents in one place. This will be done using a simple editor on the Finalize tab, eliminating the need to remove the file and re-upload with a different filename at its original location.

Complex Projects

This new version of the software lays the groundwork for the submission of

A133 Audit Findings

For the Fiscal Year 2014 A-133 audit, Penn once again received an unqualified rating from PwC, our external audit firm. However, several research related findings appear in this year’s report, and these findings serve as a reminder that the entire Penn research and research support community plays a role in supporting Penn’s compliance with federal requirements related to sponsored projects. Here is a summary of selected findings related to

Research and Development (R&D) for federal awards:

Lack of timely and fully documented support for cost transfers

See A133 Audit Findings page 2
A133 Audit Findings continued...

As this is the second year in a row that we have had findings related to cost transfers, we will continue to experience greater audit scrutiny in this area.

Per Penn Sponsored Projects Policy #2113, all cost transfers, including those performed within 90 days of the original transaction date, require documentation at the time of the transfer of:

- The reason for the transfer, including a full explanation of how the error occurred and a correlation of the charge to the project to which the transfer is being made, and,
- PI approval for the transfer. When making the journal entry in Ben Financials, keep in mind that "to correct an error" or "to transfer to the correct project" is not sufficient as a justification for the transfer. The journal line description field is the recommended place to explain the error that is being corrected and how the expense correlates to the project for each line of the journal.

Noncompliant use of purchasing cards and insufficient documentation of policy exceptions.

Purchases made on all sponsored projects shall be acquired in accordance with established University policies. Goods and services acquired using Penn purchasing cards must adhere to policies, restrictions and limitations set out by Purchasing Services. In cases where an exception has been made, such exceptions must be properly documented.

As Penn is a decentralized and complex organization with a very large volume of federally sponsored activities, we must rely on the cooperation of the academic departments and central administration to maintain compliance of our sponsored programs.

If you have questions about any of Penn’s policies related to the oversight of sponsored programs, they can be viewed at http://www.finance.upenn.edu/vpfinance/fpm/

PennERA Upgrades continued...

NIH Complex Projects through PennERA as System-to-System (S2S) submissions. This feature is expected to be available for use in a late fall/early winter timeframe. Once available, users will no longer need to work in NIH’s ASSIST system and can create these projects in PD where the look and process is familiar.

Proposal Development Training and Documentation

No additional mandatory training requirements are expected. Demonstration sessions will be scheduled and communicated to current users along with the availability of updated documentation.

PennERA new user training will reflect the changes and new design after completion of the upgrade. New users can register for training at: http://www.knowledgelink.upenn.edu.

Current PennERA documentation, including the User’s Manual and Quick Ref guides, is available at: http://www.upenn.edu/researchservices/PennERA.html.

More Information

PennERA users will be contacted directly with information about the upgrade as more information becomes available. For questions regarding the PennERA upgrade please contact: PennERAhelp@lists.upenn.edu.
We are pleased to announce that University Laboratory Animal Resources (ULAR) will be rolling out the latest version of POLARIS (version 5.0) and the Office of Animal Welfare (OAW) will be rolling out revisions to ARIES in late summer 2015.

The purpose of these upgrades will be to reduce the administrative burden on the faculty. This will enable a PI to assign multiple grant proposals and fund numbers to a new or currently approved IACUC protocol. This change will also reduce the need to transfer animals between IACUC protocols. The overall goal of this project is to increase the efficiency and flexibility in administering research protocols involving live vertebrate animals by changing the method of cost allocation for animal research protocols within POLARIS for animal purchasing, per diems, and services.

**Key Features and Benefits of the Upgrade**

ARIES will soon allow addition of multiple funding sources to a single protocol.

POLARIS will soon allow the use of a "Nickname" to assist with the identifying of proposals, projects and funds.

POLARIS will soon allow multiple grant proposals to be used to support animals and animal-related charges associated with a single IACUC protocol.

Grant fund numbers will automatically be downloaded from PennERA directly into POLARIS. The research community will be able to spend more time conducting scientific research and less time on tasks to fulfill regulatory requirements.

**Training Requirements and Recommendations**

Please note that all researchers & BAs who utilize POLARIS will be impacted by this change.

Training for current users to learn about “what’s new” will be optional but is recommended for all staff with access to Animal Requisitions, ACCR Requestors, and Business Office Approvers.

Training for new users will be required (as currently).

More details will be issued shortly regarding how to prepare for this implementation as well as when the training will be accessible.

**Questions**

If you have any questions, comments or suggestions, please send an e-mail to Polarishelp@lists.upenn.edu
The Office of Management and Budget (OMB) published the final rule of the Uniform Administrative Requirement, Cost Principles and Audit Requirement (Uniform Guidance) for federal awards in December 2014. The effective date of the implementation of the final Uniform Guidance for new awards is 12/26/2014.

The National Science Foundation (NSF) and the National Institutes of Health (NIH) are among the few agencies that issued FAQs and interim implementation plans which incorporate the requirements of the Uniform Guidance for its agency. We want to call your attention to final reporting and closeouts.

Prior to the Uniform Guidance, NIH and NSF required that official closeout documents (Final Federal Financial Report [FFR], Final Invention Statement [FIS], Final Progress Report [FPR], Termination Notice [TN]) and Final Cash Transaction Reports be submitted within 90 calendar days of the budget/project period end date.

Now, under Uniform Guidance, NIH and NSF have extended the report due date to 120 calendar days following the end of the grant support. In consideration of our current closeout practices and the increased monitoring of spending ORS is revising its reporting and closeout policy as follows:

- Federal Financial Report and Termination Notices will continue to be due within 90 calendar days of the end of grant support;
- Final Project Reports for NSF will continue to be due 90 days following the expiration of the grant. Final NIH Progress Reports and Final Invention Statement will be due within 120 calendar days of the end of grant support. Subrecipients will still have 60 days to get their final reports to Penn.
- We are using the maximum time allowed for the Final Progress Report and Final Invention Statement to allow for proper closeout and progress reporting for subawards.

We believe this will ensure timely closeout, timely reconciliation of expenditures and Payment and Award Cash Management System disbursements (PMS & ACM$) and reconciliations and timely release of future funding increments for NIH and NSF awards.

Please feel free to contact our office if you have any questions regarding the NIH or NSF’s interim implementation or Penn’s closeout and reporting policy.

As for Non NIH and NSF financial and project reporting requirements, we expect the other agencies to be consistent with NIH and NSF however we have yet to receive research terms and conditions and or Uniform Guidance implementation plans from each federal agency.

Please refer to the each agency website for implementation plans and guidelines on financial and project reporting.

Additional resources:


Subaccount Transitional FFR for converted SNAP awards—If the award is under Streamlined Non-competing Award Process (SNAP), the grantee will be required to submit subaccount transitional FFR expenditure data that covers the project period from the original start date through the new project period end date.

Due Date for Progress Reports—There will be no change to the due dates, submission, or review of progress reports for domestic awards for FY 2016.

Recipients should use the SF-425 as they would for an annual FFR and mark "annual" in box 6. Additionally, grantees should enter "Subaccount Transitional FFR" in box 12.

The following are procedural changes in carryover of funds for non-competing continuation awards issued in FY 2016:

**Carryover Funds and Federal Financial Reports for**

**Domestic Non-Competing Continuation Awards during FY 2015 (October 1, 2015 – September 30, 2016):**

The requirement to submit the Subaccount Transitional FFR for non-competing continuation awards is to ensure that approved balances will be transferred to the Payment Management System P (PMS P) subaccount and made available to the grantee. This requirement does not change the carryover authority listed in Section III of the Notice of Award. If the award was issued with automatic carryover authority, the Office of Financial Management (OFM) will automatically authorize the carryover in the PMS P subaccount equal to the amount of unobligated balance reported on the FFR.

If the award was issued without carryover authority, OFM will automatically transfer the unobligated balance reported on the FFR to the PMS P subaccount; however, the grantee will still be required to submit a prior approval request to use carryover funds as detailed in the NIH Grants Policy Statement, Section 8.1.1.1.

Failure to submit this Subaccount Transitional FFR will affect the availability of those and future funds.

Please stay posted for Penn’s implementation procedures, which we will be rolling out prior to October 1. In the meantime, in preparing for the change, keep in mind that new fund account numbers will be required for awards that are not awarded are transitioning to subaccount reporting.

It is important to monitor spending on awards and grant activities, as it will be critical that progress reports and financial reporting be completed on time in order to avoid funding lapses.
ORS Welcomes Three New Employees

ORS is pleased to welcome three new employees to its ranks, although, in the case of two of them, a “welcome back” would be more appropriate!

Kerry E. Wilson, Esq. has accepted the position as Sr. Associate Director in Pre-Award. Kerry has been with the University of Pennsylvania for eight years. Most recently, she served as an Associate Director in the Corporate Contracts group, which transitioned to the Clinical Trial Contracting Unit in the Office of Clinical Research in 2013. Kerry has significant experience and expertise in negotiating research agreements and also sits on the Stem Cell Committee at the University.

Also returning to ORS is Alicja Nalewajek. In addition to her Post-Award experience at ORS, Alicja has ten years of experience serving as a Business Manager/Grants Manager in both the School of Medicine and the School of Nursing. Alicja will assist with effort reporting, A-133 audit support, service center compliance and the F&A and EB rate submissions.

Collin Overby has joined ORS as a Contract Administrator. Collin is a member of the State of Illinois Bar and has a Master’s degree in Labor Relations & Human Resources, as well as in Social Work; from Michigan State University and The University of Michigan, respectively. Originally from the Washington D.C. metropolitan area, we are pleased to welcome him to Philadelphia and to ORS.

F&A Rate Proposal Update

On June 25, 2104, the Office of Research Services submitted its F&A Rate Cost Study for negotiating FY15-FY18 F&A rates to the Department of Health and Human Services, the University’s federal cognizant agency.

We have finally been contacted by DHHS with additional data requests related to the cost study, which means that a site visit and departmental reviews will follow over the summer. The departmental reviews typically consist of space walk-throughs, PI interviews and equipment reviews. As selections are made, we will contact affected departments for coordination of reviews.

Upon the completion of this review and negotiation process, we will have federally negotiated F&A rates for FY15-FY18 in place and will update the research community on the outcomes.