Managing Sponsored Projects; A Quick Guide for Faculty

Office of Research Services (ORS)

Welcome to the University of Pennsylvania!

The ORS staff, in cooperation with your departmental administrator, is eager to assist you in managing your sponsored projects. This is a brief overview of Penn’s proposal and research administration processes. For more extensive information, please call us at (215) 898-7293 or see the “Sponsored Projects Handbook” on our website at University of Pennsylvania, Office of Research Services.
Penn's Proposal Process:

1. Contact your business administrator (BA) early, for assistance in preparing the proposal budget. BAs know the University policies about effort, benefits, cost sharing, and budget preparation.

2. Complete the Transmittal form. This form documents your cost sharing, use of research space, and attributes of your account. It also incorporates required certifications: conflict of interest, your acknowledgement of University policies regarding intellectual property, and statements that you are not debarred and that you accept the obligations that Penn requires of Principal Investigators (PIs).

3. Send the original and a copy of your proposal, the completed Transmittal Form, and anything else your School requires, through your Department Chair and Dean to the Office of Research Services (ORS) for final processing. ORS will retain the copy of your proposal as the official University record. Allow up to five days for this process, especially if your project involves participants from multiple schools. If your project involves multiple investigators, the transmittal form must be signed by all involved departments and schools.

4. Only Research Services is authorized to sign proposals and agreements on behalf of the Trustees of the University. Do not sign any award on behalf of the institution!

5. Effort must be proposed and charged in terms of total effort, not hours. Total effort may never exceed 100%. Plan carefully!

6. The University will not set up awards for which ORS does not have proposals.

7. An increasing number of sponsors require grants applications to be submitted electronically. It is important to review these requirements and determine if you need an account to be setup by ORS. This is true for sponsors such as the National Science Foundation and the NIH. Plan for technical difficulties and allow ORS plenty of time for the electronic submissions. You must still satisfy Penn's institutional requirement by sending a copy of the proposal and Transmittal form through your dean's office, to ORS.
8. If your research requires the use of vertebrate animals, you must submit your protocol through Penn's Institutional Animal Care and Use Committee. Many sponsors, including the NIH, allow you to submit proof of an approved protocol on a “just in time” basis, after they have assessed the probable success of the grant proposal’s funding.

9. If any of the research described in the grant proposal involves human persons or human biologicals, you must submit a protocol encompassing that research to the Institutional Review Board (IRB) for review and approval. Most sponsors require that you submit your protocol to the IRB prior to submitting your proposal to them. NIH allows you to submit proof of an approved protocol on a “just in time” basis, after they have assessed the probable success of the grant proposal’s funding. **The IRB cannot accept a grant proposal in lieu of a protocol**! After you receive approval from the IRB, it is your responsibility to inform the funding sponsor. Protocols must be updated at least annually, or whenever the protocol changes. All research involving human subjects is subject to the conditions set forth in the applicable portions of the Code of Federal Regulations. Call the Office of Regulatory Affairs (ORA) (215-573-2540) or check their website at [http://www.upenn.edu/regulatoryaffairs/](http://www.upenn.edu/regulatoryaffairs/) for submission requirements and forms for both human and animal subjects.

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**Penn’s Sponsored Projects Management Process:**

1. When an award is received Research Services will establish an account for the project. Your business administrator will budget the funds. Meet with your business administrator to plan for your project needs.

2. You are responsible for reading your award notice, and understanding any restrictions on the use of the funds.
3. You must meet monthly with your business administrator to review all charges made to the project and to assure that all corrections (cost transfers) are made promptly. See Sponsored Projects Policy No. 2113, Cost Transfers and Payroll Reallocations.

4. Contact Research Services if you need subawards to be written to other institutions on your project.

5. Possible inventions must be reported promptly to the Center for Technology Transfer.

6. Cost Sharing is subject to the same rules as sponsors’ money, and must be accounted for in a similar manner. An additional account will be established and must be used to track any required cost sharing.

7. Charges to grants must benefit the award charged. For example, it is not appropriate to average costs of research supplies across all a PI’s grants, regardless of how the supplies are used. Costs charged to a sponsored project must be necessary, reasonable and allowable. See Sponsored Projects Policy No. 2110, Federal Direct Cost Expenditures and Sponsored Projects Policy No. 2134, Expense Approval & Documentation Requirements.

8. The University is audited on whether it treats similar costs in consistent ways across the institution. Administrative costs, office supplies, or telephone equipment, which are included in our indirect cost base, cannot be charged directly except for non-federal sponsors (see Sponsored Projects Policy No. 2138, Direct Cost Expenditures for Non-Federal Sponsors).

9. You are responsible for submitting the scientific and invention reports which most sponsors require. Your BA and ORS will prepare the financial report, usually due 90 days after the project end. Failure to submit these reports promptly may jeopardize your future funding, and the University's.