



Reviewing concept of total research effort via Data Warehouse queries and to assist with Effort Reporting

Consequences and Lessons
Learned

ORSS Forum 02/24/21

Why all the concern now?

- [The Scripps Research Institute \\$10 mil settlement with DOJ – Fall 2020](#)
 - Whistleblower complaint from former employee
 - Failure to properly account for time spent on proposal submissions
 - Improperly charged time spent on other activities directly to NIH grants
 - Teaching, Clinical, other Admin tasks
- At Penn, Faculty are responsible for certifying their own effort
 - Is what they are certifying reasonable and correct?
 - PSOM internal review of effort charged over the last year.

Updating policy in response—Research Shared Governance Board

- Under discussion for review and acceptance
- Capping Sponsored Research Effort to 95%
- Other Duties- Clinical, Teaching, Administration, Proposal prep, etc
- Approvals for exceptions

Penn Financial Policy Manual Effort Guidance

- **2114 - Personnel Activity Effort Reporting**
 - Cost disallowances on sponsored projects resulting from a department's failure to complete effort report forms or the certification of inaccurate effort report forms to Research Services will be charged to the department's unrestricted budget.
- Reminder Fall 2020 Effort Forms due 04/02/21

Total Research Effort charged – where do we find that?

- PennERA- committed levels - not in Data Warehouse
- HCM - not available...costing allocations made based on % of pay
- Effort Reporting - %'s of pay are shown requiring reconciliation of required cost sharing – not in Data Warehouse
- Modifications to existing Webi reports that showed NIH Cap Equivalent Effort to determine Total Research Effort:
 - fundsummary (with date range)
 - Effort Report – Individual
 - Effort Report – Fund
 - Effort Report – Home Dept Org

Things lacking and/or you might not be aware of when pre-reviewing Effort in PennERS

- No Sponsor or PI identifiers related to the grant to assist with pre-review
- NIH flow thru projects are not being identified as funds where the NIH Cap is applicable
- Someone may be above the Cap and flags are not appearing because their pay didn't exceed half of the cap during the reporting period (example: they were hired during the effort reporting cycle)
- Conclusion: Even if the NIH Cap flags appear we aren't always correctly reporting cost share and equivalent effort for the amount charged to the grant.

Even More Updates to Effort Report –Individual and Effort Report –Home Dept Org

- Mimicked the order of grants ERS which sorts by:
 - Sponsored/Non-sponsored
 - Org
 - Fund
- Added Sponsor Column
- Updates are posted to Public Folders/Schools and Centers/Schools/Perelman School of Medicine/ORSS

How to edit applicable cap in Webi

The screenshot displays the SAP Web Intelligence interface in Design mode. The 'Available Objects' pane on the left is open, and the 'NIH Cap' variable is selected. The 'Edit Variable' dialog box is open, showing the 'Formula' field with the value '=197300'. The 'Design' mode is selected in the top right corner. A table with columns for 'Total Pay', '% Pay', '197,300 Cap', 'Cal Months', '192,300 Cap', 'Cal Months', and 'Months Paid' is visible in the background.

| Total Pay | % Pay | 197,300 Cap | Cal Months | 192,300 Cap | Cal Months | Months Paid |
|-----------|-------|-------------|------------|-------------|------------|-------------|
| | | | | | | |
| Sum: | | | | | | |

In “Design “ Mode select “Available Objects Icon to the far left and edit value of [NIH Cap] in “Edit Variable” Formula box.

Use ½ the NIH Cap as a guide

- $197,300/2 = 98,650$ if total amount charged over 6 mos exceeds ½ the value of the NIH Cap then the person definitely exceeds the cap. Queries prorate value if less than 6 months worked. Remember: Effort Reporting System isn't flagging cap if under the cap for shortened periods or for NIH flow through projects.
- If total amount charged to NIH/NIH flow thru exceeds 98,650 or if total calculated research effort exceeds 100% you're going to have to adjust and charge less. Do not reduce cost share calculations to fit under 100%.
- Current NIH Cap is 199,300 effective 01/03/21
 - Salary cap history link always available at [ORSS page Resources/Other Resources](#)

Examples of Effort Queries ORSS website Post Award Grants Mgmt/Reporting Tools

- [Effort Report – Individual example](#)
- [Effort Report – Home Dept Org example](#)