I. PURPOSE

To provide guidance on how to process Intergovernmental Personnel Act Agreements (IPA) within the PennERA System.

II. POLICY STATEMENT

2101-Administration of Sponsored Projects
Further policy references for Sponsored Research Services Projects Section 2100
https://researchservices.upenn.edu/resources/sponsored-projects-policies/

III. REASON FOR PROCEDURE

To ensure that ORSS and Departments are consistent in our decision making when the Perelman School of Medicine (PSOM) processes various types of IPA proposals in the Office of Research Support Services (ORSS).

IV. WHO SHOULD KNOW THIS PROCEDURE

Faculty
Business Administrators
Departmental Grant Administrators
Office of Research Support Services (ORSS)
Office of Research Services (ORS)
Department of Veterans Affairs (VA)

V. GENERAL INSTRUCTIONS

An IPA is an agreement between a Federal entity and a Non-Federal entity. The documents for the IPA are submitted by the Department and processed through the Central Office (ORSS) when the sponsor requests a new signature page from our Institution.
Standard Rules for an IPA:

- Assignments are for Permanent Penn employees who are currently employed at least ninety (90) days at the institution.

- For Non-US Citizens, per the staff at the Veteran Affairs (VA), in addition to the standard WOC paperwork the VA HR will need VISA information, in accordance to the OPM guidance around IPAs [https://www.opm.gov/policy-data-oversight/hiring-information/intergovernment-personnel-act/#url=Provisions](https://www.opm.gov/policy-data-oversight/hiring-information/intergovernment-personnel-act/#url=Provisions), verification that the person is currently a permanent Penn Employee for at least ninety (90) days, a copy of a job posting at Penn for which “No US Citizens applied or were qualified, and a letter from the department stating that the person hired was hired by Penn and that there were not any US Citizens qualified or had applied for this position.

- Assignments for the IPA can be made for up to two years initially.

- Assignments can be extended for up to an additional two years, but the VA’s policy is that at the 3-year mark, an employee will have to take a 60-day break from all active IPA’s.

- After four continuous years on the IPA, an employee cannot continue another assignment without a break of at least 12 months.

- Normally, the budget includes salary and fringe for the hired staff assigned on the IPA and no overhead is charged.

- Administrative Support Staff, Clinical Staff, and students should not be listed on an IPA.

It’s important to note that when the 60-day break is completed, the four years segment starts over again for all IPA’s.

Please Remember:

- The completed IPA documents should match as it relates to the staff members name on the IPA according to the performance dates and total budget amount.
- The PennERA record is always in the PI/Faculty Member’s name.
If the VA amends their own policy by allowing other charges in the budget, such as supplies, then the IPA should already be signed by the VA and uploaded into the PD Record for our approval/signature.

In some cases, those assigned on an IPA provide their services through a Core Center which causes service fees to be included in the budget. An appropriate justification for these fees should be included within the budget justification. The IPA should already be signed by the VA and uploaded into the PD Record for our approval/signature.

The original date of hire for the employee within the VA must be inserted for all IPAs within Part 4, section 14.

The budget in PennERA should be for the initial budget period listed on the IPA in Part 5, box 20.

Types of IPA’s and their processes when entered in the PennERA:

- NEW
- SUPPLEMENTS
- NON-COMPETES
- REVISED BUDGETS
- MODIFICATION/AMENDMENTS
- EARLY TERMINATION
- AWARD

**NEW:**
- A *New PD Record* is needed within PennERA.
- Please include within the title who the IPA is for since the Principal Investigator name listed in PennERA may be different. For example: 
  "Title: IPA is for Jane Doe: Decreases in Neuron Activity Increases Pain"
- The *ORSS Pre-Award* team will review and sign the IPA.
- IPA Type (Found within PART 1 of the IPA):
  - NEW

**SUPPLEMENTS:**
- A *Supplement* entry is used for when a *New Person* or *New Money* is being added to an *Existing Project*.
- A Child Record is needed within PennERA.
- The *ORSS Pre-Award team* will review and sign the IPA.
- IPA Type (Found within PART 1 of the IPA):
  - MODIFICATION
• **NON-COMPETES:**
  
  o Extending an *Existing Person* with an *Existing IPA* should be treated as a *Non-Compete Continuation*.
  
  o After the *60-day break*, the entry for the next segment should be entered as a *Non-Compete Continuation* even though the IPA paperwork has the “New” box selected. The Department is asked to make a comment in PennERA explaining it’s the “New Segment” after the 60-day break, which ultimately is a continuation of the previous record “100xxxxx.”
  
  o A Child Record is needed within PennERA.
  
  o The **ORSS Post Award** team will sign off on the IPA.
  
  o IPA Type (Found within PART 1 of the IPA): [EXTENSION]

• **REVISED BUDGETS:**
  
  o *Revised Budget* should only be used for budget changes when a “New” proposal is not awarded yet and a fund number was not established.
  
  o The changes from the original proposal should be entered into PennERA by following our **ORSS Revised Budget SOP**.
  
  o The **ORSS Pre-Award team** will complete the Revised Budget Process and sign off on the updated IPA.
  
  o IPA Type (Found within PART 1 of the IPA): [MODIFICATION]

• **MODIFICATIONS/AMENDMENTS:**
  
  o The project is already awarded, and a fund number has been established.
  
  o The Modifications/Amendments are entered into PennERA.
  
  o If the modification is to change the budget dollars or dates on the IPA, then the budget revision option is chosen in PennERA. The changes from the original proposal should be entered into PennERA by following our **ORSS Revised Budget SOP**.
  
  o The **ORSS Pre-Award team** would review in PD and sign the IPA.
  
  o IPA Type (Found within PART 1 of the IPA): [MODIFICATION]

• **EARLY TERMINATION:**
  
  o This is for a project already awarded and a fund number has been established.
  
  o You may see the “**Modification**” box checked on the actual IPA paperwork from the VA.
o If signature is needed, send an email to your assigned ORSS Post Award Team member.
o Forward fully executed agreement to RS-Awards@lists.upenn.edu.
o IPA Type (Found within PART 1 of the IPA):
  - **MODIFICATION**

**AWARD**
o The Department is responsible for sending the fully executed award to rs-award@lists.upenn.edu.