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
• **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

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 than 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