Agenda

- Introductions
- **Announcements:** Raquel Espinosa
  - NIH Public Access Policy
  - Debarment
- **Cost Transfers,** Kevin O’Neill and Rick Mancinelli
- **Effort Reports,** Kacey Barker
- **eCheck,** Karen Walsh & Alex Weatherall
- Open Forum: All
NIH Public Access Policy: PubMed Central

- A PI must ensure that manuscripts are deposited into PubMed Central within 12 months of publication, if the Public Access Policy applies.

- When does the Public Access Policy apply?
The NIH Public Access Policy applies to an investigator if:
  - The work is funded directly, in whole or in part, by NIH funds
  - Any peer reviewed manuscript results from the work,
  - The manuscript is accepted for publication after April 7, 2008

- What is PubMed Central?
An archive of full-text biomedical journal articles available online at no cost, not to be confused with PubMed, which includes only citations and abstracts.
NIH Public Access Policy: PubMed Central (continuation)


- Trainings available:
  - Add a New Citation to My Bibliography in My NCBI
  - Associate a Paper with a Grant in Commons
  - Link an eRA Commons Account to a My NCBI Account
  - Move Publications from eRA Commons to My NCBI
  - Use eRA Commons to Check Citations for Valid NIHMS ID
Pre-Award Debarment/Exclusion Review

- Grant Administrators (GA) are responsible for checking the GSA Excluded Party List System (https://www.epls.gov/) for all proposed subcontract entities or individual consultants included in a grant application or contract proposal. They will perform this search using only:
  - First and last name and SSN for individuals (no address, middle initials, etc.)
  - Entity name and TIN for entities

- If the GA experiences difficulty with the system, feels they may have a false positive, or is unable to rule out a potential match, s/he may call Partners Compliance and Business Integrity (CBI) to run the individual/entity through the CBI database for confirmation (617-724-1177.)
In situations where an individual or entity is identified as debarred or otherwise excluded from doing business with the US government, this individual or entity may not be included in the application or proposal.

If an entity or individual has an exclusion rather than debarment, the GA should review the exclusion with the Research Compliance or Corporate Compliance Office to determine whether the scope of the exclusion precludes the entity or individual from participating in the research project. An individual or entity with an exclusion may not be included in the application or proposal without Compliance prior approval. Partners CBI is available to provide assistance to the compliance offices in reviewing possible exclusions.
Pre-Award Debarment/Exclusion Review (continued)

- Partners Materials Management is responsible for running initial exclusion checks of vendors when they are set up for payment.

- CBI runs periodic post-payment vendor exclusion checks for entities and individuals through its database.

- If an excluded individual or entity is identified at any stage of the post-award review, the Partners Research Compliance Officer (mmitchell14@partners.org) will be notified for resolution with the Entity Research Compliance Officer or Corporate Compliance Officer.

- The Partners Research Compliance Officer is responsible for notifying the entity Sr. VP of Research Administration and CFO of debarment/exclusion matches and their resolution.
Cost Transfers—Easy, Right?

Rick Mancinelli- Team Lead, Research Finance

Kevin O’Neill- Research Finance Specialist
Cost Transfers

- Definition- A cost transfer is the reassignment of an expense to a sponsored project after the expense was initially charged to another sponsored project or non-sponsored project.
The Problem

- When a charge is originally charged to a grant, we are certifying that it is allowable, allocable and directly benefits the project.
- A cost transfer- "OOPS"- invalidates the original certification
Federal Government Expectations

- The federal government scrutinizes cost transfers closely
- Transfers should be accomplished within 90 days of the transaction
- Must be supported by documentation that fully explains how the error occurred, and a certification of correctness of the new charge by responsible organization official
- Maintain documentation of cost transfers
What Auditors look for

- Transfers between two federal projects
- Transfers to federal projects occurring 90 days after original transaction
- Transfers to federal projects at the end of the project period
- Transfers between two federal projects to clear a deficit, this is not allowed
- Inadequate justification/explanation
Own the Problem—Create a solution

- Ensure the reason for the transfer is acceptable
- Explain how the costs benefits the grant being charged
- Explanations such as “to correct error” or “to transfer to correct project” are not sufficient
Justifications should answer the following questions…

- An explanation as to why the expense was originally charged to an account from which it is now being transferred.
- An explanation as to why the charge needs to be transferred to the proposed receiving project.
- An explanation as to why the charge is allowable, reasonable and allocable based on the terms and the conditions of the receiving award.
Bad to Good to Great

- Please Transfer $100 in lab supplies

- I incorrectly charged account 123456 instead of account 789101

- This was a data keying error that I noted once the month closed and we reconciled our accounts
Over 90 Day Justification

- It should include the items in the previous slide as well as
  - Why are the costs being moved off of the fund where they were originally charged?
  - What is the basis for moving the costs to the fund where they will now be charged?
  - Why wasn't the transfer requested within 90 days as defined by the PHS Cost Transfer Policy?
  - What steps have been taken to eliminate the need for a late cost transfer going forward?
<table>
<thead>
<tr>
<th>Fund 1</th>
<th>Fund 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fund 123456</td>
<td>Fund 655454</td>
</tr>
<tr>
<td>Title: T1 Cell Agent study</td>
<td>Title: Surface membrane of cells</td>
</tr>
<tr>
<td>Project Period: 10/1/08-9/30/13</td>
<td>Project Period: 07/1/10-06/30/15</td>
</tr>
</tbody>
</table>

- Voucher 12345665 for $2,469.23: account 912300: fund 123456: date 09/18/10

- In January the PI discovered that the above expense supports HG33b/JK20 testing for surface membrane of live cells.

- The PI was out of the country from 9/20/10 through 1/3/11
Please follow the steps below to submit a Journal Transfer to Research Finance.

1. **STEP 1:** Select Organization
   - **None Selected**

2. **STEP 2:** Fill in the Journal Entry Form to the right.

3. **STEP 3:** If transfer is over 90 days, go to Justification Form and Complete.
   - **Click to go to Justification Form**

4. **STEP 4:** After the Journal Entry is complete, click below to SAVE and EMAIL this Journal Entry to Research Finance.
   - **No Organization Selected**
   - **Click to Save and Send Email to Research Finance**

5. **STEP 5:** Click below to print this journal entry.
   - **Click to Print Journal Entry Only**
   - **Click to Print Journal Entry and Justification Form**

**EXPLANATION FOR JOURNAL ENTRY:**

I CERTIFY THAT THE ABOVE CHANGES ARE CORRECT.

SIGNATURE OF PRINCIPAL INVESTIGATOR OR
Acceptable or Unacceptable

1. Why are the costs being moved off of the fund where they were originally charged?
   
   These expenses are being moved off Dr. Smith’s fund because the lab manager charges them to the wrong project.

2. What is the basis for moving the costs to the fund where they will now be charged?
   
   These expenses are being moved to the appropriate project due to the lab manager charged them to the wrong project.

3. Why wasn't the transfer requested within 90 days as defined by the PHS Cost Transfer Policy?
   
   No one was watching the funds

4. What steps have been taken to eliminate the need for a late cost transfer going forward?
   
   Going forward we will watch the funds
1. Why are the costs being moved off of the fund where they were originally charged?
   Expenses are being transferred off the fund because the expenses do not support T1 cell agents.

2. What is the basis for moving the costs to the fund where they will now be charged?
   The expenses are to support the position and orientation of HG33vA in full-length HG33b/JK20 on the surface membrane of live cells in its default low affinity and activation-induced high-affinity states and explore the potential of high affinity HG33vA as a renoprotective agent.

3. Why wasn't the transfer requested within 90 days as defined by the PHS Cost Transfer Policy?
   A careful analysis of the two funds in question revealed that these expenses were not allocated to the correct fund at the time of purchase. The complexity of the expenses required the PI’s review but do to the PI traveling out of the country for a three month period she was not available to do the review.

4. What steps have been taken to eliminate the need for a late cost transfer going forward?
   An updated fund lists will continually be given to the research techs and PI as new projects are created and others end. Also monthly review of each fund will be done with the PI.
Questions?
Agenda

- Important Reminders
- System Build Updates
- Contact information
Important Dates to Remember

- **April 18** – Effort Report generation notification
- **May 3** – Email reminder to Effort Managers who have reports in pre-review
- **May 6** – Reminder to Investigators who have incomplete forms
- **May 13** – Final reminder to Effort Managers and Investigators who have incomplete forms
- **May 18** – Signed Effort Certification Form Due Date
System Enhancements
System Enhancements

• Email notifications to be sent to effort managers affected by hierarchy changes

• Submitted paper forms now accounted for in system

• Significant change in effort flag logic fixed so that it only appears for reductions in effort by 25% or more
System Enhancements Continued

• Moved the ECF to a "completed" status instead of "post-review" if the investigator makes no changes, even if a significant change in effort is detected.

• Save button and validations checks added in post review queue

• Users have access to see prior period payroll and commitment values by clicking on the ‘name’ link on the Effort Summary page
System Enhancements Continued

• Effort entry values expanded to allow for 2 decimal places

• Effort managers enabled to edit effort in the certification queue

• Changes made to the "DHHS Salary Cap Requirement" validation flag logic to account for IBS of PI
Hierarchy Maintenance Enhancements

• Expanded the removal reason limit from 150 to 300 characters
• Added a download to excel feature
• Improved logging of hierarchy maintenance.
• All users can view the “unassigned” investigators list to pull investigators onto their hierarchy
• Both the primary and secondary effort managers are listed in the grid
Mouse-overs and highlighted header text added to enhance intuitiveness of what is needed to complete certification

Rename:  

To:  

Mouse-overs added to buttons to clarify actions for both investigators and administrators:

- **This button will reset your effort values to your last saved entry.**

- **This button will save your effort entries & notes, recalculate totals, and validate errors.**

- **This button will take you to your signature page to electronically sign if your total certified effort sums to 100%. You can still return to this form if you need to make any changes. Please disable any pop-up blockers. Your form will not move to the completed queue unless you electronically sign on the next page.**

- **This button will automatically send an email on your behalf to your investigator letting him/her know their effort certification form is ready to certify/recertify.**

Change:  

To:  

**AUTHENTICATION PAGE: Review and electronically sign your Effort Certification**

**SIGNATURE NEEDED: Review final attestation and scroll down to electronically sign below**
A "New hire as of" calendar selection was added to ECF Notes section and will be transcribed to final ECF.
Effort Summary Pie Chart colors standardized to keep color scheme consistent for queues

Before:

![Pie chart showing effort summary before changes](image1)

After:

![Pie chart showing effort summary after changes](image2)
Improvements to the “History” in the notes section and a “Certified Effort Change Log” has been added.

### History

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>User</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/30/2010 11:55PM</td>
<td>Admin, D'Patte</td>
<td>Effort certification workflow completed</td>
</tr>
<tr>
<td>10/27/2010 6:30AM</td>
<td>Simple, Simon</td>
<td>Email notification with subject “Effort Reporting - Potential Significant Change in Effort Detected” was sent to these email addresses: <a href="mailto:DADMIN@PARTNERS.ORG">DADMIN@PARTNERS.ORG</a></td>
</tr>
<tr>
<td>10/27/2010 6:30AM</td>
<td>Simple, Simon</td>
<td>Effort certification form moved to post-review queue</td>
</tr>
<tr>
<td>10/21/2010 9:00AM</td>
<td>Admin, D'Patte</td>
<td>Effort certification form moved to certification queue for override request</td>
</tr>
<tr>
<td>10/21/2010 9:00AM</td>
<td>Admin, D'Patte</td>
<td>Email notification with subject “Effort Reporting – Change Request” was sent to these email addresses: $<a href="mailto:3IMCN1@PARTNERS.ORG">3IMCN1@PARTNERS.ORG</a></td>
</tr>
<tr>
<td>10/21/2010 9:00AM</td>
<td>Simple, Simon</td>
<td>Effort certification form moved to post-review queue</td>
</tr>
<tr>
<td>10/07/2010 3:30AM</td>
<td>Admin, D'Patte</td>
<td>Effort certification form moved to certification queue</td>
</tr>
<tr>
<td>10/07/2010 3:30AM</td>
<td>Admin, D'Patte</td>
<td>Email notification with subject “Action Needed – Effort Certification Form Ready for Review &amp; Electronic Signature” was sent to these email addresses: $<a href="mailto:3IMCN1@PARTNERS.ORG">3IMCN1@PARTNERS.ORG</a></td>
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<tr>
<td>10/01/2010 10:40 AM</td>
<td>Admin, D'Patte</td>
<td>Effort certification form moved to pre-review queue</td>
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</table>

### Certified Effort Change Log

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>User</th>
<th>Fund #</th>
<th>Fund Description</th>
<th>Sponsor</th>
<th>Sponsor Award #</th>
<th>Start Date</th>
<th>End Date</th>
<th>Old Effort Value</th>
<th>New Effort Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/27/2010 5:25AM</td>
<td>Simple, Simon</td>
<td>MG1111</td>
<td>Clinical fund</td>
<td>NIH-NIMH National Inst</td>
<td>SR01MH000000-02</td>
<td>04/01/2007</td>
<td>04/01/2012</td>
<td>20.0%</td>
<td>24.0%</td>
</tr>
<tr>
<td>10/21/2010 6:00AM</td>
<td>Admin, D'Patte</td>
<td>222222</td>
<td>Effect of multiple deadlines on salary</td>
<td>NIH-NIMH National Inst</td>
<td>SR01MH000000-02</td>
<td>04/01/2007</td>
<td>04/01/2012</td>
<td>60.0%</td>
<td>60.0%</td>
</tr>
<tr>
<td>10/19/2010 7:00AM</td>
<td>Simple, Simon</td>
<td>222222</td>
<td>Effect of multiple deadlines on salary</td>
<td>NIH-NIMH National Inst</td>
<td>SR01MH000000-02</td>
<td>04/01/2007</td>
<td>04/01/2012</td>
<td>60.0%</td>
<td>60.0%</td>
</tr>
<tr>
<td>10/07/2010 2:45AM</td>
<td>Admin, D'Patte</td>
<td>MG1111</td>
<td>Clinical fund</td>
<td>NIH-NIMH National Inst</td>
<td>SR01MH000000-02</td>
<td>04/01/2007</td>
<td>04/01/2012</td>
<td>20.0%</td>
<td>20.0%</td>
</tr>
<tr>
<td>10/07/2010 2:57AM</td>
<td>Admin, D'Patte</td>
<td>222222</td>
<td>Effect of multiple deadlines on salary</td>
<td>NIH-NIMH National Inst</td>
<td>SR01MH000000-02</td>
<td>04/01/2007</td>
<td>04/01/2012</td>
<td>55.0%</td>
<td>59.0%</td>
</tr>
</tbody>
</table>
Sundry funds will be grouped together in their own category and if no effort is charged to a sundry fund, the sundry fund will be collapsed.

Expanded view:

<table>
<thead>
<tr>
<th>SUNDRIES WITH NO EFFORT</th>
<th>Actual Effort</th>
<th>Commitment</th>
<th>Payroll</th>
<th>Actual Effort</th>
<th>Commitment</th>
<th>Payroll</th>
<th>Actual Effort</th>
<th>Commitment</th>
<th>Payroll</th>
<th>Actual Effort</th>
<th>Commitment</th>
<th>Payroll</th>
</tr>
</thead>
<tbody>
<tr>
<td>MRI</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
</tr>
<tr>
<td>IRB SUPPORT FUND</td>
<td>Sundry</td>
<td>100000</td>
<td>11/15/1999</td>
<td>12/31/2015</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
</tr>
</tbody>
</table>

Collapsed view:
Here to help:

Please contact our team mailbox at: PHSEffort@partners.org

Kacey Barker
kabarker@partners.org
617-954-9828

Daniel Davis
ddavis12@partners.org
617-954-9648
eCheck

PeopleSoft Electronic Check Request Solution
What is eCheck?

– Existing PeopleSoft AP module
– Replaces paper based check request process
– Electronic workflow built in
  • eCheck uses eBuy level 1 approver
  • Ability to add an additional approver
– Easy to use
Primary Benefits

– eCheck status always known
  • Elimination of ‘black hole’
– Get it ‘right’ the first time
  • Missing COA and signatures
– Faster turnaround, from submission to approval to payment
Correct Use of A Check Request

– Dues
– Subscriptions
– License Fee’s
– Registrations

Complete list can be found on PHS Pulse:
Search: PO vs Check Request
eCheck Process Flow

Manual – Paper Based

- Paper CR filled out by end-user
- Manually signed by approver
- Sent to AP via interoffice mail
- Date stamped and batched for auditing and processing in AP
- Missing information or out of policy communicated back to end-user
- CR issues resolved
- Check is cut

eCheck

- End-user enters CR into PS eCheck
- Fax or upload receipts
- Request is electronically forwarded to AP for 100% auditing
- Out of policy items communicated back to end-user
- CR issues resolved electronically
- Submitted to Level 1 eBuy approver
- Check is cut

Expense to GL

Notification sent to:
- Payroll
- Capital
- Tax Dept
<table>
<thead>
<tr>
<th>Time Frame</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 – 4 days after</td>
<td>eCheck request is audited by Accounts Payable</td>
</tr>
<tr>
<td>submission</td>
<td></td>
</tr>
<tr>
<td>5 – 8 days after</td>
<td>eCheck request goes through approval process</td>
</tr>
<tr>
<td>submission</td>
<td></td>
</tr>
<tr>
<td>8 – 10 days after</td>
<td>eCheck request is prepared for mailing</td>
</tr>
<tr>
<td>submission</td>
<td></td>
</tr>
</tbody>
</table>
Resources:

- How To....:
  http://pulse.partners.org/howto/index.htm

- Policy on Payments to Independent and Corporate Contractors:
  http://pulse.partners.org/mm/indcontractor.htm
Questions?
Contact

Raquel Espinosa
Phone: 617-855-2868
respinosa@partners.org