Agenda

- Introductions
- **Announcements:** Raquel Espinosa
  - Change in Subcontract invoice payments
  - PO and EDI update
  - Effort Reports
  - NIH Update
  - Retro EDC’s for monthly employees
  - Pre-Award Update, John Cavanaugh
- **PI Eligibility Policy,** Robin Cyr
- **On Boarding Checklist,** Catharyn Gildesgame
- **Open Forum:** All
Subcontract Invoice Payments Change

- Paper Check Requests are being phased out by Accounts Payable
- Partners Research Management explored other options for payment:
  - eCheck would route the invoice to the level 1 approver (in many cases the PI), which would not be efficient given that approval has already been obtained
  - PO’s proved to be more administrative work with less benefit
- To facilitate the payment of subcontract invoices, the sticker (shown below) will be placed directly on the invoice and uploaded into InfoEd
- Email payment notifications will no longer be sent to the department by AP
  - To check the status of your invoice, use InfoEd to see that the status reads “Invoice Sent to AP” and Insight to see the status of the payment
  - Invoice will be encumbered and a date and voucher number will be assigned when it reaches AP
  - Invoice will be expensed when the following month’s GL posts

PHS Research Management
- Vendor ID ____________________ Remit Loc ____________________
- BU _____ Acct ________ Proj ________ Amt$ ______________
- BU _____ Acct ________ Proj ________ Amt$ ______________
- AUTH ____________________ Print Name ____________________
Subrecipient Invoicing and PI/DA Review and Approval of Payment

- Research Finance uploads invoices to InfoEd and email is automatically sent to PI and Department Administrator for their review in InfoEd. The PI has 20 days to notify Research Finance of an objection.
- PI verifies the following: “Expenses are aligned with technical progress. All costs are allowable and appropriate in accordance with the subcontract budget. All costs were incurred within the performance period.”
- If subrecipient is “low risk” and invoice amount is less than $25,000, payment will be processed by Research Finance in the absence receipt of an objection by the PI or the Department Administrator within 20 business days. If objection is raised, Research Finance will not process the invoice for payment until the PI, Research Finance and/or the Contracts Team have resolved all issues with the subrecipient.
- If the subrecipient is “low risk” and the invoice amount exceeds $25,000, Research Finance will not process payment until electronic approval is received from the PI.
- If the subrecipient has been designated “high risk”, Research Finance will not process payment until electronic approval is received from the PI.
- Secondary review by Research Finance is required prior to processing for payment invoices exceeding $50,000.
- For more information see: http://resadmin.partners.org/RM_Home/Policies_SOPs/RM_Policies/Alphabetical/PolicySOP-RMPolicy-Alpha.aspx
PO and EDI Update

The following forms and FAQ’s have recently been updated:

- **PO Clearing Request Form:** The MMPO_OPEN_POS_BY_PROJECT query in PeopleSoft will show all PO’s currently open on a fund regardless of when opened (PSsoft/Financials Production/Reporting Tools/Query/Query Name)

- **EDI Contact List and EDI Closeout Form:** Can also be used to update information for an existing EDI account (i.e. a new fund)

- **FAQ’s for PO and EDI Transaction Information:** Provides information regarding what an EDI charge is, how to look into or stop recurring charges that are posting to a fund, what an FDSI expense is, etc.

These forms are very useful when closing out a fund. To access the above please visit:

*Partners Research Management Internet* ➔ click on *Forms, Tools & Resources* ➔ click on *By Alphabet* under *Forms* for the EDI and PO forms

Or

*click on Frequently Asked Questions* under *Tools & Resources* ➔ *FAQ’s by Lifecycle* ➔ *Research Finance* for the PO and EDI Information

If you have any questions, please contact Polly Burke by email, pburke6@partners.org, or phone, 617-954-9825.
Effort Reporting Reminder

- 1 report in pre-review
- 3 reports in certification
- 1 report in post-review
- 88 reports completed

Please work with your investigators to certify their effort.
FY2011 Pd 1 Effort Certification Follow-up Plan

INITIAL NOTIFICATION
• April 17 - Primary Effort Managers (cc: Dept Admin) for investigators who had an ECF generated

EMAIL REMINDERS
• May 3 – Reminder to Primary Effort Managers with effort reports in Pre-review queue to finish pre-reviewing forms so investigators have enough time to certify
• May 6 – Reminder to Investigators with incomplete effort reports to complete certification
• May 13 – Final reminder to Department Administrators, Primary Effort Managers, and Investigators who don’t have their forms completed to complete certification

DEADLINE
• May 18 – Deadline for effort report return (marked as completed in Insight)

ESCALATION
• June 2 – Chief, Dept Admin, Institutional Research Administrator, and Entity Compliance Officer
• June 17 – Entity VP Research, PHS Corporate Director RM and RF, PHS Compliance Officer, PHS Director of Research Analytics & Reporting + everyone above
• July 6 – PHS VP Finance + everyone above
NIH Update

- NIH Caps Out-Year Budget Escalation to 2%
  - See NIH Notice, 4/25/11, at:
  - Inflation adjustment to recurring costs on competing awards is limited to 2%.
  - Budgets for all new proposals should limit escalation for out-years to 2%, unless directed otherwise by the sponsor’s guidelines.

- NIH Continues the FY10 Salary Cap through FY11: Salary Cap continues at FY10 rate, $199,700. See NIH Notice, 5/4/11, at:
Retroactive Employee Data Changes (EDCs): Effective Dates for Monthly Employees

- *Effective immediately*, employee data changes with effective dates of the 15th of the month will no longer be allowed *for monthly employees*.
- PeopleSoft does not process mid month retro funding periods for monthly employees. The system defaults to the first of the month regardless of what date is entered.
- Manual adjustments are required after the fact if effective date is not the 1st.
- These manual adjustments are time consuming and often create issues with effort reporting and for data changes that are submitted for the employee in the future.
New Policy Update!

PI Eligibility

Robin Cyr
Director of Training and Policy
Partners Research Management
DRAW June 21, 2011
Why a policy?

• To help both Investigators and Administrators gain a better understanding of the responsibilities of serving as a PI from the regulatory, sponsor and entity/Partners perspectives.

• To better enable all involved in the life cycle of an award - to apply for and administer awards in a compliant manner.
The process of developing

- Start with the federal definitions (NIH Glossary)

  - Program Director/ Principal Investigator: The individual(s) designated by the applicant organization to have the appropriate level of authority and responsibility to direct the project or program to be supported by the award. The applicant organization may designate multiple individuals as program directors/principal investigators (PD/PIs) who share the authority and responsibility for leading and directing the project, intellectually and logistically. When multiple PD/PIs are named, each is responsible and accountable to the applicant organization, or as appropriate, to a collaborating organization for the proper conduct of the project or program including the submission of all required reports. The presence of more than one PD/PI on an application or award diminishes neither the responsibility nor the accountability of any individual PD/PI.
The process of developing, continued

- NIH Grants Policy Statement (10-1-2010); Part I: NIH Grants—General Information, Part 2.1.2 Grantee Staff

- “…..Each PD/PI is responsible and accountable to the grantee organization or, as appropriate, to a collaborating organization, for the proper conduct of the project or program, including the submission of all required reports…..”

- PD/PIs are members of the grantee team responsible for ensuring compliance with the financial and administrative aspects of the award. They work closely with designated officials within the grantee organization to create and maintain necessary documentation, including both technical and administrative reports; prepare justifications; appropriately acknowledge Federal support of research findings in publications, announcements, news programs, and other media; and ensure compliance with other Federal and organizational requirements.
The process of developing, continued

• So, based on the NIH defined responsibilities AND the business processes of the entity’s and Partners, the draft was created.

• We have covered eligibility criteria and the PI’s responsibilities over the entire life cycle of an award.

• The clearer the responsibilities are the better! Goal is to reduce the likelihood of problems arising that will keep our PI’s out of the labs, OR’s and clinics or result in our being deemed a high risk grantee.
It is inclusive?

- As best it could be!
  - Too many titles across all entities
  - Need to be clear and as easy to follow as possible

- Titles not covered; default to the application for a special circumstances exceptional approval, Attachment A
The process of developing, continued

THANK YOU!

- We received over 75 comments from the research community during the open comment period!

- Your diligence helped clarify many points.
So, what does it say?

• Policy Statement:
  – Eligibility to serve as a Principal Investigator (PI), Co-Principal Investigator (Co-PI) or Multiple Principal Investigator (Multi-PI) or Project Director of a research award is a privilege that is limited to individuals;

  • Partners hospital or a Partners hospital Institute appointment who are principally paid by a Partners hospital or a Partners hospital Institute

  • Transferring to a Partners hospital with a written agreement from the institution or a letter signed by the Department Chief

  • Who hold a minimum academic rank of Instructor or Lecturer at Harvard Medical School or are in the process of obtaining such an appointment
So, what does it say, continued

• Policy Statement, continued

- Individuals holding a clinical appointment are not automatically eligible to serve as a PI and will have to be considered on a case by case basis as delineated in Attachment A.

- Eligibility and continued service as PI are contingent upon compliance with all applicable Partners or hospital policies, as well as all federal, state and local government policies and regulations and the terms and conditions of the award.
So, what does it say, continued

• Policy Statement, continued

• **PI eligibility and status may be revoked** by the Department Chief or the Sr. Vice President of Research in the event of failure to:

  – Comply with the provisions of this policy;
  – Comply with the Partners Research Management polices and procedures;
  – Comply with all applicable federal, state and local government policies and regulations;
  – Comply with the terms and conditions of the award for which the individual has been named PI;
  – Monitor all grant accounts regularly, demonstrating fiscal responsibility for all projects; or
  – Maintain all sponsored project accounts in good financial standing. A pattern of accounts in deficit status that cannot be readily resolved through transfer of the overrun to an unrestricted account may result in withdrawal of the privilege to serve as Principal Investigator.
What about post docs?

• Certain funding programs (e.g., Individual National Research Service Awards and NIH Career Development Awards) are tailored to post-doctoral fellows/research associates who, by convention, would be named “Principal Investigator” upon receipt of the fellowship.

• It is understood that graduate students, post-doctoral research fellows, and other individuals who are approved to serve as a PI do so under the supervision of a responsible faculty member or mentor.

• The mentor has responsibility for the performance of the grant, supervision and fiscal accountability and award oversight.

• Department Chief approval is signified via signature on the Partners Proposal Cover Sheet or routing approval in InfoEd PD.

• When applying for other programs, use Attachment A application for special circumstances exception.
How about resources and space?

- Special attention should be given to the issue of resources necessary for successful execution of the project. Department Chief approval, certified on the Partners Proposal Cover Sheet, signifies an intended commitment on;
  - the laboratory and/or office space required by the project
  - personnel named in the application/grant for the level of effort specified in the resulting award

➢ The use of hospital space and resources is at the discretion of the hospital, Department Chief and/or Sr. VP of Research. Continued use of space and resources is dependent upon availability and the PI’s ability to maintain eligibility to serve as a PI under the provisions of this policy and on the condition of continued employment.
What else is covered in the Policy Statement?

• Limitation of Authority:
  – Designation as PI, Co-PI, Multi-PI, or PD per se does not confer institutional signature authority.

• This policy pertains only to eligibility to apply for sponsored project funding (for internal and external funding programs) and to be named as the Principal Investigator in any/all resulting awards.

• Consult the respective entity compliance officer or specific compliance committee personnel for eligibility criteria related to submission of a research or clinical study protocol for approval of human or animal research, stem cell research or work with recombinant DNA or select agents.
What else is covered?

• The remainder of the document covers the PI’s responsibilities at all stages of the award life cycle.
  • Application stage
  • Just-In-Time
  • Award stage
  • Through the life of the award or project period

• What policies to follow, what tools and systems are available to administer and monitor the PI’s portfolio.

• Special section on Multiple PI awards.

• Key contacts and the chronology of the development and approval process.
Where can I find the policy?
Where can I find the policy?

- RM Policies by Alphabet
- RM Policies by Lifecycle
Where can I find the policy?

<table>
<thead>
<tr>
<th>Policy Name</th>
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<tbody>
<tr>
<td>Billing and Collection Policy</td>
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<td>Budget Revision and Carry Forward Policy</td>
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<td>Cost Charging Policy</td>
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<tr>
<td>Cost Charging Policy - Appendix</td>
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<tr>
<td>Cost Sharing Policy</td>
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<tr>
<td>Cost Share Request Form</td>
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<td>Cost Transfer Policy</td>
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<td>Effort Reporting Policy</td>
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<td>Export Control Policy</td>
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<td>Export Control Guidance Document</td>
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<td>Facilities and Administrative (F&amp;A) Costs Policy</td>
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<td>Financial Reporting Policy</td>
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<td>Medicare Coverage Analysis for Clinical Research Studies Policy</td>
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<tr>
<td>Overdraft and Deficit Monitoring Policy</td>
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<td>PI Eligibility Policy</td>
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<tr>
<td>Research Cores/Recharge Policy</td>
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<tr>
<td>Research Equipment Management Policy</td>
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<td>Subrecipient Monitoring Policy</td>
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<td>Subrecipient Monitoring Guidance Document</td>
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Where can I find the policy?
Where can I find the policy?
Questions?
For new joint appointees (MDs/PhDs as well as trainees moving to faculty positions)

- This document is meant to be a helpful hiring guide for new faculty and their supervisors. Where there are blank spaces under “Staff Responsible”, a supervisor may choose to take responsibility or delegate to an appropriate designee. Most entries, though not all, are necessary for all faculty.

<table>
<thead>
<tr>
<th>Staff Responsible</th>
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### Position Approval

- Position
- Space renovation
- Furnishings (new and/or upgrades)

### Funding

- Position
- Space renovation
- Furnishings (new and/or upgrades)

### Work Space (PI and assoc staff)

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<td>Telecommunications (phone, phone #, pager, voice mail)</td>
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<td>Key Card Access</td>
<td>McLean RA</td>
<td>MRC and MRC Animal Care Facility access requires approval of Sr VP for Research and Animal Care Facility designee</td>
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For new joint appointees (MDs/PhDs as well as trainees moving to faculty positions)

★ - This document is meant to be a helpful guide for new faculty and their supervisors for the process of welcoming, orientation and on-boarding. Where there are blank spaces under “Staff Responsible”, a supervisor may choose to take responsibility or delegate to an appropriate designee. Most entries, though not all, are necessary for all faculty.

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<th>2nd month</th>
<th>End of 3 months</th>
<th>Comments / URLs for more info</th>
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<td>Check-in (at 3 months)</td>
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<td>Infection Control</td>
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<td>McLean Values</td>
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<td>McLean Benefits</td>
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<td>HR forms</td>
<td>Human Resources</td>
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<td>Preparable to complete TB skin test prior to start date. If this is not possible, contact Occupational Health during first week of employment. Beth O'Neil, HR, Service Building 1st floor 617-855-2438</td>
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<tr>
<td>TB Test</td>
<td>McL Occ Health</td>
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Contact

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