Message from the Director

Aloha kākou,

As part of ORS’ continuing improvement process, we have reorganized post-award actions in myGRANT to streamline the process. Please see the article below for details. In addition, as suggested by ORS’ Faculty Advisory Council, we will form a working group to assess the current subaward process to make the review and execution of subaward agreements more transparent. We are looking for representatives from principal investigators, research project staff, and fiscal administrators. If you are would like to participate in the subaward working group, please let me know.

Please note that the Council on Governmental Relations (COGR) has extended its period for comments on the Federal Policy for the Protection of Human Subjects (Common Rule) Notice of Proposed Rulemaking to January 6, 2016.

This month’s newsletter also includes information on the Federal Demonstration Partnership (FDP) subaward FAQs specific to fixed price subaward agreements, National Institutes of Health’s Application Submission System & Interface for Submission Tracking, and payments within 30 days of invoice receipt date for subrecipient monitoring.

May you and yours a wonderful holiday season!

Yaa-Yin Fong
Director

There are proposed changes related to biospecimens. To the extent the proposed changes would impact their research, investigators are encouraged to submit a separate response.

Please contact Lisa Nichols at lnichols@cogr.edu if you have any questions.

When should I use a fixed price subaward agreement?

Fixed price agreements are appropriate when the work to be performed is specific and can be priced with a reasonable degree of certainty. Samples of appropriate mechanisms to establish an appropriate price include the subrecipient past experience with similar types of work for which outcomes and their costs can be reliably predicted or the subrecipient can easily obtain price estimates for significant cost elements.

Under the Uniform Guidance, fixed price subaward agreements must be approved by the sponsor prior to issuance, up to the Simplified Acquisition Threshold $150,000. Prior approval requirements vary by federal agency and may be subject to change, so it is important to verify the current policy directly with the sponsor. Payments are generally based on meeting specific requirements or deliverables of the subaward scope of work. Accountability and payment are based on performance and results. It is important that the pass-through entity (PTE) principal investigator monitor and approve progress on deliverables for payments.

Most of the subaward agreements between FDP institutions utilize the cost-reimbursable methodology. However, there may be some occasions where a fixed price agreement is appropriate, even though the prime agreement is cost-reimbursable to the PTE. Some institutions prefer to issue fixed price subaward agreements to foreign entities, or entities identified as high-risk. However, fixed price subaward agreements cannot be used in programs that require a mandatory cost-share or match.

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Also note that it is not appropriate to issue a cost-reimbursable subaward utilizing a payment schedule/deliverable type budget in order to circumvent the Uniform Guidance prior approval requirement.

The entire FAQ is available at: [http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga_161028.pdf](http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga_161028.pdf)

Should you have any questions, please contact Victoria Rivera, Manoa Contracts & Grants Administrative Manager, at riveravg@hawaii.edu, or (808) 956-5300.

On July 20, 2015 and September 17, 2015, the National Institutes of Health (NIH) issued notices (NOT-OD-15-126 and NOT-OD-15-156) expanding their ability to accept other applications beside multi-projects grant programs. ASSIST can now accept the following applications:

- SBIR: R43, R44 U43, U44
- STTR: R41, R42, UT1, UT2
- CRP: SB1, UB1
- Small Research Grants (R03) and Exploratory/Developmental Grant (R21) programs (January 205: NOT-OD-15-062)
- Research Grant (R01), and Research Projects Cooperative Agreements
- Institutional Training and Career Development programs (T's and K's), other training programs (D's), and additional research applications (DP7, R13, R15, R18, R21/R33, R24, R25, R33, R34, R35, R26, R61/R33, RF1, RM1, S12/ R00, U13, U18, U24, U2R, U34, UA5, UF1, UG3/UH3, UH1, UH2, UH2/UH3, UH3, UH4, UM1)

ASSIST will become an option for additional grant programs throughout 2015 (NOT-OD-15-044; timeline).

Those that wish to submit through ASSIST may find the following web addresses helpful:

1. [https://public.era.nih.gov/assist/](https://public.era.nih.gov/assist/)

Should you have any questions, please contact Emmitt Ford, Kakaako Contracts & Grants Administrative Manager, at emmitt@hawaii.edu, or (808) 356-5764.
As a pass-through entity, the University of Hawaii must make payment to its subrecipients within 30 calendar days after receipt of a proper invoice (2 CFR 200.305 "Payment"). If there are outstanding performance or financial issues or evidence that invoices are improper, project staff should clearly document such issues. Improper invoices should be rejected timely with a request for a revised invoice. Once a proper invoice is received, the payment deadline must be met. All invoices should be date stamped when received to document our compliance with these requirements.

ORS will be requesting subrecipient payment information periodically to test compliance with these requirements. If projects are making payments more than 30 days after receipt of the invoice, documentation should be provided to justify the late payment. For additional information, please refer to the Subrecipient Monitoring Guide.

Should you have any questions, please contact Dawn Kim, Compliance Manager at dawnkim@hawaii.edu, or (808) 956-0396.

In the past, in order to route post-award documents related to already awarded proposals, creation and approval routing of a myGRANT Proposal Development record (PD) was required. Effective as of January 4, 2016, this process will be streamlined to reduce the number of actions for which a PD must be created. The table below lists the various categories of post-award actions, with the second column showing the updated actions to be taken for each category. In addition, the "Post Award Action" proposal type is being replaced with specific proposal types, also noted in the second column below.

<table>
<thead>
<tr>
<th>Post-Award Action</th>
<th>Action to be taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Change in PI</td>
<td>• Create and submit PD for approval routing</td>
</tr>
<tr>
<td></td>
<td>• Select Proposal Type: Post Award – Change in PI</td>
</tr>
<tr>
<td></td>
<td>• Attach all relevant documentation</td>
</tr>
<tr>
<td>Change in Scope of Work</td>
<td>• Create and submit PD for approval routing</td>
</tr>
<tr>
<td></td>
<td>• Select Proposal Type: Post Award – Change in Scope of Work</td>
</tr>
<tr>
<td></td>
<td>• If copying a prior PD, delete any inapplicable documents and attach all relevant documentation</td>
</tr>
</tbody>
</table>

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<tr>
<th>Post-Award Action</th>
<th>Action to be taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Change in RTRF allocation</td>
<td>- Create and submit PD for approval routing&lt;br&gt;- Select Proposal Type: <strong>Post Award – Change in RTRF Allocation</strong>&lt;br&gt;- If copying a prior PD, delete any inapplicable documents and attach all relevant documentation</td>
</tr>
<tr>
<td>PI changes departments</td>
<td>- If the change will result in a change to the current RTRF allocation for the award, submit a Change in RTRF allocation PD as described above and also attach the updated department information to the record.&lt;br&gt;- If the change does not result in a change to the RTRF allocation for the award, no PD is needed. Submit written notice of the department change to your <strong>assigned ORS Specialist</strong>.</td>
</tr>
<tr>
<td>Addition/deletion of or change in key personnel</td>
<td>- If the change will result in a change to the current RTRF allocation for the award, submit a Change in RTRF allocation PD as described above and also attach the updated key personnel information to the record.&lt;br&gt;- If the change does not result in a change to the RTRF allocation for the award, no PD is needed.</td>
</tr>
<tr>
<td>Addition to or change in research certifications approval</td>
<td>No PD is needed. Send relevant documents to your <strong>assigned ORS Specialist</strong> for review and further guidance.</td>
</tr>
<tr>
<td>De-obligations</td>
<td>No PD is needed. Send relevant documents to your <strong>assigned ORS Specialist</strong> for review and further guidance.</td>
</tr>
<tr>
<td>Rebudgets</td>
<td>No PD is needed. Send relevant documents to your <strong>assigned ORS Specialist</strong> for review and further guidance.</td>
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</table>
Updated myGRANT Procedure for Post-Award Documents (continued)

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<thead>
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<th>Post-Award Action</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Change in conflict of interest disclosure</td>
<td>No PD is needed. Send relevant documents to your assigned ORS Specialist for review and further guidance.</td>
</tr>
<tr>
<td>Addition of consortium</td>
<td>No PD is needed. Send relevant documents to your assigned ORS Specialist for review and further guidance.</td>
</tr>
<tr>
<td>Change in performance site</td>
<td>No PD is needed. Send relevant documents to your assigned ORS Specialist for review and further guidance.</td>
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</tbody>
</table>

Should you have any questions, please contact Victoria Rivera, Manoa Contracts & Grants Administrative Manager, at riveravg@hawaii.edu, or (808) 956-5300.

ORS will continue its monthly myGRANT 6.0 informational sessions in 2016 to help familiarize users with the new myGRANT user interface. If you are interested in attending, please be sure to sign up online. This will assist ORS to plan staffing accordingly. For more information and to sign up for an informational session, please see http://www.ors.hawaii.edu/index.php/mygrant-6-0-is-live.

If you have any questions, please contact ORS Helpline at helpline@ors.hawaii.edu or (808) 956-5198.

How do I know if my proposal is eligible for system to system (S2S) submission in myGRANT?

You can check to see if the Grants.gov opportunity is eligible for S2S submission by logging in to myGRANT, creating a proposal and selecting the opportunity in the “S2S Opportunity Search” tab. If you are able to select the opportunity and all forms are available under the “Forms” section, the opportunity is eligible for S2S submission. You will need either the Funding Opportunity Number or CFDA number to search for Grants.gov opportunities in myGRANT.

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What steps should a PI take to before submitting a document for workflow approval in *myGRANT*?

A data validation check should be performed to see if there are any errors or omissions that will prevent the document from being submitted. On the top tool bar, click "Data Validation" then "Turn On". If there are any errors in the document, they will appear as errors.

On the far right side of each error, there will be a "Fix It" button. Clicking this button will take you to the location of the error with a description at the top of the page on how to fix the error.

The principal investigator or aggregator may ask for an ORS Specialist to assist with reviewing the proposal before it is routed through the workflow approval process. To locate the specialist assigned to your school/unit, please refer to the ORS Contracts & Grants Specialist Assignments page located at [http://www.ors.hawaii.edu/index.php/ors-assignments](http://www.ors.hawaii.edu/index.php/ors-assignments). This will minimize the possibility of a proposal being returned after it has entered the workflow process. When a proposal is returned for changes, it will be re-routed through the entire approval workflow.

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**Do you have any questions or comments for ORS?**

*Please contact us at the ORS Helpline:*

*Email: helpline@ors.hawaii.edu or Phone: (808) 956-5198*