From the Director’s Office

Aloha Kākou,

Once more for American Recovery and Reinvestment Act (ARRA) award recipients, please be mindful of the critical spending timeline and reporting requirements mandated by ARRA award terms and conditions. A comparison of spending levels between the University of Hawaii and other universities in the United States is provided in this month's article.

As new principal investigators often ask about proposal tips for federal funding, we have provided an article below with some tips, as well as a link to the ORS search funding website for your reference. An update of the National Science Foundation’s Graduate Research Fellowship Program is also included.

To assist principal investigators and fiscal officers in determining the allowability of meals or refreshment charges under federal grants, some examples and clarification are provided below. I hope you find them useful.

As the university quickly approaches its financial fiscal year end, we greatly appreciate your cooperation in meeting the year-end closing deadlines to ensure all transactions are recorded to the project accounts in a timely manner.

Happy summer!

Mahalo,

Yaa-Yin Fong
Director

The National Science Foundation (NSF) Makes a Change in Policy to the Graduate Research Fellowship Program (GRFP)

The National Science Foundation (NSF) Graduate Research Fellowship Program (GRFP) has announced a policy change to its GRFP Administrative Guide for Fellows.

(Continued on the next page)
Previously, Fellows were restricted from engaging in teaching/research assistantships or internships while on tenure. The rationale was that Fellows were expected to devote 100% time and effort to their graduate studies and research during tenure.

However, the NSF recently announced that it stated it will allow Fellows to remain on tenure while engaging in teaching/research assistantships or internships without NSF approval. In its Revised May 2011 NSF GRFP Administrative Guide for Fellows, the NSF acknowledged that it is “generally accepted that teaching and similar activity constitutes a valuable part of the education and training of many graduate students.”

For more specific language on the policy change, please consult the GRFP webpage: http://www.nsf.gov/funding/pgm_summ.jsp?pims_id=6201

Proposal Tips for Federal Funding

“Where do I find funding?” is a common question asked by the University of Hawaii community. A great source of funding is the U.S. government. Under the U.S. government, there are several federal agencies that may be able to provide researchers with funding opportunities. When working with federal agencies, the following are some ideas to keep in mind:

- Although federal agencies use the umbrella term “federal,” each federal agency’s policies, procedures, and terminology may vary when applied to research funding. For example, some agencies fund research through statutory formula grants whereas others fund research through discretionary grants. Knowing the unique features of the funding agency is important when determining whether the agency is a good fit for an applicant’s research project.

- Before approaching a particular agency for information on funding or applying for funding, learn as much as possible about that federal agency. A researcher can learn about a federal agency and the type of research it funds by either going to the agency’s website or Grants.gov. The agency’s website typically provides the public with information about the agency’s goals, mission, and what the agency has funded in the past.

  Grants.gov is a central hub for funding and applying for federal funding, and it is another way for researchers to get an idea of what the agency is funding. Having detailed knowledge of the agency helps to align the researcher’s goals and objectives with the agency’s goals and objectives.

- A researcher may want to consider contacting the agency’s program manager. A program manager can give a researcher a better perspective on what the agency is looking for and whether a researcher’s project would be something that the agency would be interested in funding.

To get a complete list of links to all the federal agencies along with links to Grants.gov, please visit the ORS search page at http://www.ors.hawaii.edu/index.php/funding-announcements.
Spending Levels on American Recovery and Reinvestment Act (ARRA) Awards

As of March 31, 2011, spending on the American Recovery and Reinvestment Act (ARRA) awards by the University of Hawaii was 17.6% of total award amounts, falling significantly below the national average of 76.1% for the university’s ARRA sponsors.

As a reminder, spending on ARRA awards should be made timely and expeditiously in accordance with the pace of your project(s). If you encounter any problems or difficulties in the execution of your ARRA award, please contact Dawn Kim at dawnkim@hawaii.edu.

A comparison of spending levels by sponsoring agency as of March 31, 2011 is provided below:

<table>
<thead>
<tr>
<th>Sponsoring Agency</th>
<th>UH % of Spending</th>
<th>National % of Spending</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department of Commerce</td>
<td>6.4%</td>
<td>31.4%</td>
</tr>
<tr>
<td>Department of Energy</td>
<td>3.0%</td>
<td>40.5%</td>
</tr>
<tr>
<td>Department of Health &amp; Human Services</td>
<td>25.3%</td>
<td>90.8%</td>
</tr>
<tr>
<td>Department of Interior</td>
<td>70.3%</td>
<td>62.3%</td>
</tr>
<tr>
<td>Department of Justice</td>
<td>70.4%</td>
<td>63.1%</td>
</tr>
<tr>
<td>National Science Foundation</td>
<td>24.1%</td>
<td>33.3%</td>
</tr>
<tr>
<td>National</td>
<td>17.6%</td>
<td>76.1%</td>
</tr>
</tbody>
</table>
Allowability of Meals or Refreshments on Federal Grants

A question that comes up from time to time is whether or not meals or refreshments are allowable charges to federal grants. An important concept to keep in mind is that although a portion of business related meals and entertainment costs are allowable as deductions under federal tax regulations, the federal tax regulations do not apply to federal grants management. They are two different sets of rules.

Under OMB Circular A-21, Sections J3 and J17, alcoholic beverages and entertainment costs, such as meals, are unallowable charges to federal grants. This means that under normal circumstances meals and other refreshments are not allowable.

Section J32 creates an exception for meals that are incidental to meetings and conferences, the primary purpose of which is the dissemination of technical information. This guidance works fine for conference grants that fund annual conferences, meetings or workshops. However, the guidance does not specifically address the circumstances in which meeting related meals or refreshments can be charged to other types of grants.

Section J32 implies that there should be an infrequent, large gathering of individuals to discuss technical information. This means that researchers meeting weekly to discuss progress on a grant or a PI having lunch/dinner with a colleague to discuss research would not qualify.

Here are some examples of circumstances which could qualify:

- A periodic all-day meeting of collaborators on a project where technical information closely related to the project is being shared. There is a formal agenda and documented attendee list. Meeting participants are from different locations.
  
  Note that technical information does not only include scientific or scholarly information. It can also include important information related to grant management. For example, an invited speaker explains the new FFATA reporting requirements to the collaborators so that they can assist in data collection.

- A project end luncheon held to discuss research results and acknowledge scholarly excellence, which is an integral part of a grant to increase interest in science & engineering among middle school or high school students. There is a formal program and documented attendee list.

- Community meetings where meals or refreshments are provided as an incentive to elicit participation or enrollment in the project. Generally, this occurs in projects involving underrepresented groups and project success is dependent on targeted community participation or enrollment.

Important things to remember for non-conference grant meetings:

- Document the purpose of the meeting and why the meals or refreshments are necessary. Retain a copy of the agenda and the list of external and internal attendees.

- If you know that the meeting will be scheduled in advance, include the expense in the proposal budget, with justification.

Should you have any questions, please contact Kevin Hanaoka, Cost Studies Manager at hanaokak@hawaii.edu or (808) 956-9242.
Fiscal Year End

In order to meet any closeout deadlines for the month of June, please ensure that transactions are recorded in FMIS in a timely manner, taking into account the fiscal year end processing deadlines. Here are a few reminders from the ORS Accounting section:

- Please review and refer to the year-end schedule and calendar distributed by the General Accounting department.

- The RCUH Fast Track JVs will be disabled at 4:00 p.m. on Friday, June 24, 2011.

- The deadline to submit non-general fund AFPs is June 17, 2011 at 11:00 a.m.; therefore, please plan accordingly to have the account transactions recorded in a timeframe to meet this deadline for any accounts that require a sponsor refund prior to fiscal year-end.

- Please submit requests to establish accounts or process changes, such as changing the status of an account from advance to open, as soon as possible. The auditor in the past has noted that advance accounts represent a risk to the University. Therefore, we are seeking to reduce the number of advance accounts, especially at year-end. Requests to open accounts will also allow ORS to record any payment received to the proper project account, as all amounts recorded to the ORS clearing account must be reclassified to the project account by fiscal year end.

- The last transmission for RCUH Fast Tracks for account establishment and changes is Thursday, June 30, 2011 at 4:00 p.m. After June 30, Fast Track requests may be submitted but the transmission to FMIS will be suspended until FMIS is opened for the new fiscal year, currently anticipated for Friday, July 8, 2011.

Please communicate with your ORS fiscal accounting specialist if you anticipate any special handling required on your project accounts or closeouts due in the month of June. We thank you in advance for your assistance during the busy year-end period.

ORS Subaward Forms

As you are aware, effective as of March 1, 2011, all new subawards issued by the University of Hawaii (UH) to a subrecipient under a prime award made to UH will be processed through the Office of Research Services (ORS). To ensure a smooth transition, ORS has been flexible in processing the packets when received. However, effective as of July 1, 2011, when submitting subaward packets to ORS for processing, please make sure to include ORS Form S-1, and ORS Forms S-2 and S-3; and the form for FAR 15.406-2, if applicable. Copies of these forms may be found at: http://www.ors.hawaii.edu/index.php/apply/forms

More information may be found here:

http://www.ors.hawaii.edu/index.php/start-up-a-manage/81-start-up-a-manage/145
http://www.ors.hawaii.edu/files/Subaward_vs_Vendor.docx

If you have any questions, please contact Darcie Yoshinaga at dsy@hawaii.edu or (808) 956-4806.
ORS Helpline Frequently Asked Questions (FAQs)

What is RCR?
RCR stands for Responsible Conduct of Research.

What is the University of Hawaii National Sciences Foundation Institutional Plan for Responsible Conduct of Research (RCR) Training and Oversight?
The National Science Foundation (NSF) has announced its implementation of Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Sciences (COMPETES) Act (see http://edocket.access.gpo.gov/2009/pdf/E9-19930.pdf). This section of the Act requires, effective January 4, 2010, that every proposal submitted to the NSF include a statement that the University of Hawai‘i (UH) has a plan for the appropriate training and oversight in the responsible and ethical conduct of research and teaching.

Details for the UH NSF RCR plan are available at:

Who is required to undergo RCR training?
Effective as of January 25, 2010, NIH requires that all trainees, fellows, participants, and scholars receiving new or renewal support from any of the above awards must receive instruction in RCR.

The online Collaborative Institutional Training Initiative (CITI) and a Responsible Conduct of Research (RCR) interactive training session are resources available to support our faculty as they fulfill their responsibilities in accordance with NIH. Specific instructions and requirements are posted on the ORS website: http://www.ors.hawaii.edu/education-and-training.asp

The National Science Foundation (NSF) requires all undergraduate and graduate students postdoctoral researchers who are to participate in proposed NSF-funded projects and programs.

Does the RCR requirement flow down to subawardees?
Yes, the RCR requirements flow down to all subawardees, at any tier and the proposing institution is responsible for ensuring that the RCR requirements are appropriately addressed.

When is the next RCR seminar?
The next interactive session is scheduled to be held on June 16, 2011. See here for the full announcement: http://www.ors.hawaii.edu/files/RCR_Interactive_Session_Announcement.pdf

Do you have a Question or Comment for ORS?
Please feel free to contact us at the ORS Helpline:
Email: helpline@ors.hawaii.edu or Phone: (808) 956-5198