From the Director’s Office

Aloha kākou,

As of the end of May 2014, the University of Hawaii has received a total of $351.5 million in awards. Although the total number of awards has decreased from May 2013, the total proposal submission count has increased to 2,014. During the month of June 2014, ORS staff is extremely busy and working diligently to executing award agreements on time before the fiscal yearend close.

This month's articles include the National Institutes of Health's (NIH's) and Agency for Healthcare Research and Quality's (AHRQ's) updated policy for A1 Application resubmission and proposed revisions to the National Science Foundation's (NSF's) proposal and award policy and procedure guide to implement Office of Management and Budget Uniform Guidance (OMB U.G.). Comments are due to NSF on July 8, 2014. This newsletter also includes an update on prior approval requirements for rebudgeting and how the new Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards have been updated to clarify the university's entitlement to facilities and administrative (indirect) costs on federal subawards.

ORS is continuing to monitor the OMB U.G. which goes into effect on December 26, 2014. We will review and update University of Hawaii (UH) policy and procedure as appropriate, and also prepare necessary training/information workshops as federal agencies finalize their policies and procedures. Please stay tuned.

Finally, ORS provides you with some helpful hints for myGRANT to help expedite your proposal review and assist those in workflow routing with accessing records needing approval.

Wishing you a productive summer!

Yaa-Yin Fong
Director
Request for Comments for Revisions to National Science Foundation (NSF) Proposal & Award Policies & Procedures Guide

The National Science Foundation (NSF) is currently preparing for issuance of the revised Proposal & Award Policies & Procedures Guide (PAPPG) in Fall 2014. (See link for PAPPG below.) NSF is accepting comments from the external community until close of business (Eastern Time) **July 8, 2014.**

The primary purpose of this revision is to implement 2 CFR 200, *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards* (Uniform Guidance). The Office of Management and Budget (OMB)-mandated implementation date is December 26, 2014. NSF has requested and received from OMB, approval to implement the Uniform Guidance through NSF's longstanding practice of implementing these requirements via use of a policy rather than regulation. In conjunction with the terms and conditions of the award, the PAPPG and its predecessors have served as NSF's implementation vehicle for OMB Circular A-110 since its initial issuance in 1976.

To facilitate review, text has been highlighted in yellow throughout the document that implements the Uniform Guidance. Inclusion of this highlighting appears in the following cases:

- Use of specific references to the Uniform Guidance;
- Direct replication of text from the Uniform Guidance; and
- NSF's implementation of requirements from the Uniform Guidance that are imposed on agencies.

NSF has formally requested from OMB deviations from the Uniform Guidance in only two areas:

- Limitation to two months' salary compensation for faculty; and

Also highlighted throughout are policy changes that are being made independent of the Foundation's implementation of the Uniform Guidance. These changes are highlighted in blue.

NSF is particularly interested in public comment on NSF's implementation of 2 CFR 200, as well as the policy changes that are identified in the PAPPG. Comments regarding the content of 2 CFR 200 should not be submitted, as the Uniform Guidance was formally issued by OMB as final guidance on December 26, 2013 (see [http://www.gpo.gov/fdsys/pkg/FR-2013-12-26/pdf/2013-30465.pdf](http://www.gpo.gov/fdsys/pkg/FR-2013-12-26/pdf/2013-30465.pdf)).

The following are links to the draft PAPPG and associated Federal Register Notice:

- [Draft PAPPG](#); and
- [Federal Register Notice](#).

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Request for Comments for Revisions to National Science Foundation (NSF) Proposal & Award Policies & Procedures Guide (continued)

Written comments regarding the information collection and requests for copies of the proposed information collection request should be addressed to Suzanne Plimpton, Reports Clearance Officer, National Science Foundation, 4201 Wilson Blvd. Rm 295, Arlington, VA 22230 or by email to splimpto@nsf.gov.

National Institutes of Health (NIH) and Agency for Healthcare Research and Quality (AHRQ) Announce Updated Policy for Application Submission

Previously, National Institutes of Health (NIH) and the Agency for Healthcare Research and Quality (AHRQ) had required that any new submission demonstrate significant changes in scientific direction compared to previous submissions. However, on April 17, 2014, NIH and AHRQ released an updated grant application submission policy. Effective immediately, this update reverses the “two strikes” policy adopted in 2009 and allows applicants to submit a new (A0) application following an unsuccessful resubmission (A1) without demonstrating substantial change in scientific direction.

Please note that this does not alter the policy in effect that duplicate or highly overlapping applications may not be under review at the same time. This means that a new A0 application may not be submitted before issuance of the summary statement of an overlapping A1 resubmission and vice versa.

On April 22, 2014, NIH and AHRQ announced clarifications to the policy for application submissions. Clarifications are provided below for certain key points that were raised in questions NIH received.

Clarifications:

Due Dates

NIH was asked whether a new (A0) application, following an unsuccessful resubmission (A1) application, could be submitted only for the next, appropriate due date. To clarify, following an unsuccessful resubmission (A1) application and release of the summary statement, an applicant may submit the same idea as a new (A0) application for any due date in the future that is appropriate for the grant mechanism and Funding Opportunity Announcement (FOA).

- An application that was reviewed before April 16, 2014, as well as any application submitted in the future, could be submitted as a new (A0) application for any subsequent, appropriate due date, if the previous summary statement has been released.

- If the FOA lists “standard dates apply”, then the appropriate due date for a competing application can be found on the NIH website (http://grants.nih.gov/grants/funding/submissionschedule.htm). If the FOA lists a different date, then the date(s) in the FOA is the appropriate due date.

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National Institutes of Health (NIH) and Agency for Healthcare Research and Quality (AHRQ) Announce Updated Policy for Application Submission (continued)

**Applicability**

The updated policy applies to major types of applications and activity codes - including applications for research grants, the NIH Small Business Innovation Research (SBIR) and Small Business Technology Transfer (STTR) programs, Career Development Awards, Individual Fellowships, Institutional Training Grants, Resource Grants, Program Projects, and Center Grants.

- Eligibility criteria and any other restrictions or requirements in the FOA prevail. For example, a fellowship candidate must meet the eligibility requirements for each fellowship application submission.

- An application that was not accepted previously for being too similar to a resubmission (A1) application that had been reviewed previously ("virtual A2s") can be submitted now as a new (A0) application.

**Options**

The updated policy allows an investigator to submit a new (A0) application following an unsuccessful resubmission (A1) application. Subsequent questions asked whether a time limit exists between an unsuccessful resubmission (A1) application and the subsequent new (A0) application, whether the number of such cycles is limited, and whether an intervening resubmission (A1) application is required in order to submit a new (A0) application again.

- The updated policy has no time limit between an unsuccessful resubmission (A1) application and a subsequent, new (A0) application, or between an unsuccessful new (A0) application and a subsequent new (A0) application. The time limit of thirty-seven months between an unsuccessful (A0) application and the subsequent resubmission (A1) application does remain in effect.

- The number of submission cycles is not limited, but NIH encourages applicants to update their applications to reflect the status of the field over the interim period and to incorporate new preliminary data, literature citations, letters of reference, etc. as time passes.

- The updated policy does not preclude submission of a new (A0) application following an unsuccessful new (A0) application, without an intervening resubmission (A1) application.

Should you have any questions, please contact Emmitt Ford, Contracts & Grants Manager, at emmitt@hawaii.edu or (808) 356-5764.
National Defense Authorization Act (NDAA) Pilot Whistleblower Program

The National Defense Authorization Act (NDAA) Pilot Whistleblower Program requires the University of Hawaii to notify all employees funded by federal contracts and grants awarded between July 1, 2013 through January 1, 2017 of these whistleblower protections. Additionally, these requirements must be flowed down to our subcontractors and sub-recipients. Forms to notify our employees are now available on the ORS Forms page at [http://www.ors.hawaii.edu/index.php/forms](http://www.ors.hawaii.edu/index.php/forms).

Requirements of this pilot program were included in the [February 2014 edition of the ORS newsletter](http://www.ors.hawaii.edu/index.php/ors-newsletter). For more information, please see [41 U.S.C. § 4712](http://www.ors.hawaii.edu/index.php/laws/41usc4712) and [48 CFR Parts 3 and 52](http://www.ors.hawaii.edu/index.php/laws/48cfrpart3and52) or contact Dawn Kim, Compliance Manager, at dawnkim@hawaii.edu or (808) 956-0396.

myGRANT Helpful Hints: Attaching the Sponsor Solicitation in “Abstracts and Attachments” Tab

Many sponsors supply standard application forms or have prescribed formats for proposal preparation. It is crucial to meet these requirements as applications not conforming to sponsor formatting requirements may jeopardize the proposal’s success.

Attaching the sponsor solicitation in the myGRANT “Abstracts and Attachments” “Internal Attachments” as part of the ORS review, helps us help you with submission requirements including:

- Identifying the method of submission – hard copy, email, electronic submission;
- Reviewing terms and conditions in the sponsor’s request;
- Complying with requirements and guidelines of the sponsor’s request. Such requirements include, but are not limited to:
  1. Award minimums/maximums.
  2. Page limitations.
  3. Font/margins.
  4. Electronic file type/size/naming conventions.
  5. Deadlines.
  6. Sponsor's online submission system/website.
  7. Completeness of proposal packet.
  8. Project periods.
  10. Certifications and assurances.

For more information, contact your assigned ORS Specialist. The school assignments can be found at: [http://www.ors.hawaii.edu/index.php/ors-assignments](http://www.ors.hawaii.edu/index.php/ors-assignments).

Should you have any questions, please contact Kathy Yoshinaga, Grants Specialist, at kyoshina@hawaii.edu, or (808) 956-4057.
Update to May 2014 Newsletter Article on Prior Approval Requirements for Rebudgeting

In last month's newsletter, ORS published an article entitled “Prior Approval Requirement for Rebudgeting of Participant Support Costs”. While the intent of the article was to remind projects to obtain prior written sponsor approval when deviating from the applicable budget and accompanying justifications, the examples used in the article created some confusion. The rebudgeting of certain categories of project costs require prior written sponsor approval. The scenarios provided in the previous article used “Participant Support Costs” and “Stipends paid to Post Doc Scholars” interchangeably. “Participant Support Costs” are an example of costs that would require such an approval if you are reducing funds allotted to this category.

To eliminate any confusion, and as requested by the field, ORS will be requesting a separate series of object codes in order to track post doc costs separately and obtain prior written sponsor approval when required.

For questions regarding prior approval requirements, please contact Dawn Kim, Compliance Manager, at dawnkim@hawaii.edu, or (808) 956-0396.

UH Entitlement to F&A on Federal Subawards

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (UG) issued on December 26, 2013 clarify the University of Hawaii’s (UH's) entitlement to facilities and administrative costs on federal subawards. The clarification was added because of concerns from the research community about passthrough entities that were arbitrarily limiting facilities and administrative (F&A) recovery for their subawardees.

Unless a federal sponsor cap or limitation is identified as being applicable to the award in the Request for Proposal or federal funding announcement, the university is entitled to recover its full federally negotiated rate. This is true no matter who the passthrough entity is.

Please be aware that some federal sponsor caps or limitations require the grantee to use the negotiated rate or a stated rate (e.g., 8% of modified total direct costs), whichever results in the least amount of F&A costs. Under a federal subaward, this means to use the university’s federally negotiated rate to perform the comparison. The passthrough entity’s rate has no bearing on this analysis.

Please note that even though caps or limitations do not exist, in certain circumstances, the university has accepted a lower F&A rate across the board for specific awarding agencies. These “blanket waivers” are identified as Sponsor Specific Rates on the ORS website.

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UH Entitlement to F&A on Federal Subawards (continued)

Please remember that as a general rule, the full federally negotiated F&A rate for UH is required to be used on federal subawards. To use less than the full federally negotiated F&A rate, you must obtain a written waiver. However, waiver requests are not required under the following circumstances:

1. Application of a federal sponsor cap or limitation.


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

ORS Helpline Frequently Asked Questions

In a myGRANT budget, what does “F&A Cost” mean?

The F&A Cost or Facilities and Administrative Cost, is synonymous with “indirect” cost or “overhead” cost. F&A costs are the expenses incurred by the University of Hawaii (UH) to develop and maintain the facilities and administrative infrastructure necessary to support extramurally funded research and non-research activities. The F&A costs can be calculated by dividing the total sponsor cost by \(1.0 + X\%\) (where \(X\) = F&A rate percentage), then subtracting the result from the total sponsor cost.

For more information, and to find your applicable F&A rate, please see the ORS website: http://www.ors.hawaii.edu/index.php/rates/102-quick-links/rates/97

I received an email with the subject “Proposal action (APPROVE) for…” What do I need to do?

In the email, click on the link under “To respond to this eDoc:” or copy it into the address bar in your web browser.
ORS Helpline Frequently Asked Questions (continued)

This link should take you directly into the myGRANT Proposal Development document. If you are not logged in, you may need to click on the link again after logging in.

Once you are in the Proposal Development document, you will be taken directly to the “Proposal Summary” tab. This single tab contains a summary of the entire proposal, including the budget, questions, attachments and key personnel information.

At the bottom of the “Proposal Summary” tab there should be two buttons:

- approve
- return for changes

Clicking “approve” will approve the proposal and the proposal will continue on to the next individual in the workflow.

Clicking “return for changes” will return the proposal to the initiator of the proposal so that revisions can be made. The proposal will need to be re-approved by all individuals in the workflow when it is resubmitted after revisions have been made.

Do you have a Question or Comment for ORS?

Please feel free to contact us at the ORS Helpline:

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