From the Director’s Office

Aloha kākou,

The deadline for applications for (FY) 2014 Designation as an Eligible Institution under the Title III and Title V programs of the Higher Education Act of 1965 was March 7, 2014. Our thanks go out to the Institutional Research Office (IRO) for providing the required student data and Educational and General (E&G) expenditures based on Fall 2012 IPEDS data for each campus. Centralizing the collection and distribution of data minimized the data collection burden on the individual campuses and ensured data consistency. With the exception of Honolulu Community College (HCC) and Leeward Community College (LCC), all campuses applied for designation under the Asian American and Native American Pacific Islander-Serving Institutions (AANAPISI) and Alaska Native And Native Hawaiian-Serving Institutions (ANNH) programs. HCC and LCC applied for ANNH and Strengthening Institutions Program (SIP) designations. Eligibility determinations will be made by the U.S. Department of Education anticipated before the end of March. Once eligibility is confirmed, we will update the university’s institution profile on the ORS website.

Mahalo nui to each of the ten (10) campus coordinators, and the IRO and ORS staff who helped prepare and submit the applications by the application deadline.

The myGRANT system was upgraded to 5.1.1 in January 2014. Since then, we have received much positive feedback about the new features. Thank you to everyone for your encouragement. In the meantime we also found some bugs through the feedback we received, most of which were addressed or fixed as they arose. However, some of them require further research on the needs of the functionality, since the features are new to our current practice. As part of the continuing improvement process, we appreciate everyone who took the time to provide the ORS Helpline with feedback which helps us to do our jobs better.

In this month’s articles, we would like to remind everyone about the preliminary proposal and/or white paper submission process and potential impact on cost sharing through the new OMB circular reform. Furthermore, we would like to share with you the common causes of delay for setting up an initial project account. Keeping communication open will help the business process become more effective and efficient.

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Finally, I am proud to share the article published by our very own contracts and grants specialist, Melody Bentz, in the March/April NCURA Magazine on pages 52-54. The news article is available [here](creditsto the National Council of University Research Administrators and NCURA Magazine). Thank you Melody for sharing your experiences with NCURA and being a good ambassador for UH.

Have a wonderful spring break!

Yaa-Yin Fong
Director

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**Pre-Proposals and White Papers Submission Reminder**

Many agencies are now requesting the submission of preliminary proposals (pre-proposals) or white papers for review before inviting principal investigators (PIs) to submit full proposals. The submission requirements vary greatly from agency to agency.

A myGRANT proposal development record is not required to be created at the preliminary proposal stage. However, if you are submitting a preliminary proposal to an agency that requires a formal submission such as the National Science Foundation (NSF) via FastLane and/or ORS Authorized Official Representative endorsement, it is recommended that a myGRANT proposal development record be created to ensure that all departmental approvals are documented. Please select “preliminary” as the proposal type when creating your proposal development document. This will allow you to copy your document if invited to submit a full proposal at a later date.

Prior to submission of a preliminary proposal or white paper to a sponsor, it is the PI's responsibility to obtain approval from both the chancellor/dean/director and department chair; as well as their fiscal administrator (as appropriate) of any resource commitments, including, but not limited to, time and effort and/or cost-sharing commitments. If the sponsor requires that the pre-proposal be endorsed by ORS, then approval of all such resource commitments (including but not limited to, time and effort and/or cost-sharing commitments, and third party commitments) must be provided to ORS prior to submission. Such documentation should be submitted to the PI's designated ORS Grants Specialist ([click here](school assignments) for school assignments).

If the sponsor does not require endorsement of the pre-proposal by the authorized institutional representative, the PI must retain the commitment approvals with the preliminary proposal at the departmental level and attach a copy of the pre-proposal package in the myGRANT proposal development document when submitting the full proposal.

If you have any questions regarding the above, please contact your assigned ORS Specialist for your unit or ORS Helpline at (808) 956-5198.

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Potential Impacts of Omni Guidance on Cost Sharing

On December 26, 2013, the Office of Management and Budget (OMB) issued the “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule” or what is referred to as the Omni Guidance (OG) by the Council on Governmental Relations (COGR).

Based on our preliminary review, it appears to be a mixed bag with respect to cost sharing. While the welcomed prohibition on voluntary cost sharing was included, the door was left open for awarding agencies to request voluntary cost sharing provided that its role in evaluating proposals was clearly defined in the application materials. Awarding agencies may no longer use the phrase “voluntary cost sharing is encouraged” due to its ambiguity. However, since cost sharing cannot be used in the merit review of the proposal, thus it is unclear why awarding agencies were allowed this leeway.

Another example of give and take is the OG position on cost sharing that must be included in the research base for calculating the facilities and administrative (F&A) cost rates for negotiation with the federal cognizant agency. As a reminder, a higher base will result in a lower calculated rate. The OG contains language that limits the cost sharing that must be added to the base to the cost sharing committed in the proposal or award budget, which would be favorable. However, in the Council on Financial Assistance Reform (COFAR) Uniform Guidance Training web cast on January 17, 2014, a speaker noted that the OMB Memo 01-6, which requires something called a minimum level of effort on research projects to be added to the base for F&A rate proposal purposes, still applies. This appears to indicate that other add-ons to the base by cognizant agencies are still in play.

Finally, while most of the language from OMB Circular A-110 (former guidance for institutions of higher educations on administrative requirements) made it to the OG, new language was added that impacts post award monitoring and reporting of cost sharing. Under section 200.308, "Revision of budget and program plans" (f.k.a. OMB A-110, Section 25), awarding agency prior approval is now required for “….changes in the amount of approved cost-sharing or matching provided by the non-Federal entity.” It does not say mandatory cost sharing and it does not specify the type of change. Thus, the inference is that if the University of Hawai`i cannot meet a voluntary cost sharing commitment made in the proposal or award, then awarding agency approval must be sought to change it.

Because awarding agencies have until December 26, 2014 to implement the guidance, more issues will continue to come to light. ORS will continue to monitor the Council on Financial Assistance Reform (COFAR), COGR, and other industry web pages and materials to clarify the real impact of the guidance going forward. In any case, the Office of Research Services would like to remind principal investigator and fiscal administrators that the University strongly discourages voluntary cost sharing unless it is clear what its role is in evaluating proposals.

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

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Common Causes for Delays in Establishing a Project Account

For new awards, the ORS accountant will establish the initial project account and input the budget as awarded by the sponsor when the award has been fully executed and accepted by the university. Generally, the ORS accountant will establish the initial account for a new award within three (3) business days, provided all of the required information is available in myGRANT and the Kuali Financial System (KFS). This includes the proper account attributes and approved sponsor budget. Please see the ORS web site for more details on award set up: http://www.ors.hawaii.edu/index.php/start-up-a-manage/project-account-set-up/awards-account-set-up.

Some common, although not an exhaustive list, of reasons why there may be a delay in establishing a project account include the following:

- Agreements are not reviewed and/or processed through ORS.
  
  All extramurally funded contracts or grants are required by APM A8.910 to be submitted through ORS for review and acceptance. Occasionally, the ORS project accountant is asked by the principal investigator (PI) and/or fiscal administrator (FA) about the status of the project account for their awards, only to find out from ORS that the reason the account was not set up is because the award agreement was neither reviewed nor accepted by ORS. This can result in a major setback for the project, since ORS has no record of the award, hence no account can be established until all the documentation is reviewed and accepted in accordance with required procedures.

- Award is pending IRB (or other approvals) and/or approval of the protocols is not conveyed to the applicable ORS Specialist once received.

  In general, if the proposal requires IRB approval, or other compliance approvals (IACUC, etc.), ORS will put the award on hold until the appropriate protocol has been received. This means that no project account can be set up until the required protocol approval is received. As a reminder, when the PI has obtained the necessary protocol approval(s), please send the approval(s) to the applicable ORS specialist to avoid delays with award acceptance and setting up the project account.

  Be aware that IRB review timelines vary based on the type of IRB application: For more information on the IRB application process and timelines please visit the IRB website (www.hawaii.edu/irb/).

- FA does not approve account and/or budget eDocs routed via the Kuali Financial System (KFS) workflow to finalize the account and budget establishment in KFS.

  Although the project account may be created and approved by ORS, expenses may not be charged to the project account until the FA has verified and approved the budget. Occasionally

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Common Causes for Delays in Establishing a Project Account (continued)

there is an issue related to specific budget elements due to the rebudgeting after the award. In these circumstances often a partial budget can be entered into KFS for the purpose of avoiding unnecessary delays in posting transactions to the budget lines that are not in question until the budget lines that are in question can be resolved between the sponsor, the FA and ORS accounting.

- Incorrect PI setup in KFS for project account.

Incorrect set up of a PI in the KFS system can delay setting up the project account. FAs should ensure that new PIs, lead, or other key personnel, who are new to the KFS as an account manager (or account supervisor) are setup as “Active” in KFS with the appropriate “Employee Type and Membership Roles”. Role 40 is the Contracts & Grants Project Director role needed for extramural Accounts. The FSO-40 form and instructions can be found under the UH KFS Forms link at: http://www.hawaii.edu/kualifinancial/?page=training.

Reminder of the University of Hawaii (UH) Annual Conflict of Interest (COI) Disclosure

The annual UH employee COI disclosure deadline of April 15, 2014 is approaching. Be on the watch for reminder memos to be released from Executive and Administrative Offices shortly. A form-fillable pdf version of the disclosure form can be found at: http://www.ors.hawaii.edu/index.php/fcoi-information.

Important dates:
April 15, 2014 – Individual disclosure forms due to immediate supervisors
June 30, 2014 – Unit summaries due to ORS Compliance

Any COI-related questions can be directed to ORS Compliance (compliance@ors.hawaii.edu).

ORS Helpline Frequently Asked Questions

I am an approver on multiple levels, (i.e., as a principal investigator (PI) and as a department chair) on the workflow routing for a myGRANT proposal development record. Will I need to approve the record more than once?

No, once you approve the proposal development record, you will not need to approve again if you are in the workflow more than once.

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ORS Helpline Frequently Asked Questions (continued)

What if our department requires the approval of a secondary chair/dean if the primary chair/dean is serving as the PI?

You will need to add the appropriate person as an ad-hoc approver.

To do so, go to the “proposal actions” tab and click show on the “Ad Hoc Recipients” section, set the “Action Requested” to “Approve” then use the magnifying glass to search for the appropriate person and click the “add” button. If the proposal has already been routed for approval you will need to click the “send ad hoc request” button at the bottom of the “proposal actions” tab.

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