From the Director’s Office

Aloha kākou,

On Tuesday, March 10, 2015, Victoria Collin, Senior Policy Analyst at the Office of Management and Budget (OMB), came to UH to present on the OMB Uniform Guidance (UG) and to answer our questions and concerns. There was a great turnout with insightful questions and we also received a lot of positive feedback. If you missed the presentation, the powerpoint is available on our website (http://www.ors.hawaii.edu/files/2015-03_OMB_Update-Uniform_Guidance_Presentation.pdf).

To improve project communications for property reporting requirements during closeout, ORS enhanced the award notification process to notify principal investigators, fiscal administrators and the Property and Funds Management Office (PFMO) when property reporting is required at closeout. Please see details in the article below. This month’s issue also includes a summary of upgrades to Grants.gov.

Next, the National Institutes of Health (NIH) issued Interim General Grant Conditions for NIH grant awards. The document highlights UG grant-related changes to previous NIH policies.

Finally, this month’s newsletter also provides additional information on OMB UG updates to the ORS website, and assessments and payouts of terminal vacation leave compensation.

Yaa-Yin Fong
Director
Grants.gov Upgrade

Grants.gov has recently upgraded to version 14.0. There were some very exciting features in this release and the Powerpoint detailing the 14.0 release notes can be found at http://www.grants.gov/web/grants/outreach/releases.html.

One of the new features that will help you in reviewing Funding Opportunity information is an enhancement to the “Apply for Grants” display. Now it will show the entire opportunity including the synopsis and details if available.

A summary of upgrades are:

- The “Full Announcement” tab has been renamed to “Related Documents” for clarity
- If there is only opportunity that matches your search, you will be directed immediately to the “View Grant Opportunity” page
- If there are multiple opportunities that match your search criteria, a grid will be displayed that will be linked to the “View Grant Opportunity” page
- In the Application Package Tab, the link has been changed from “Download” to “Select Application Package to Download”
- A reference has been added to Applicant FAQ on the Application Package tab
National Institutes of Health (NIH) Issues Interim General Grant Conditions Implementing New Health and Human Services Grants Regulations (Uniform Guidance) and FAQs

On February 5, 2015, the National Institutes of Health (NIH) issued Interim General Grant Conditions of NIH grant awards aligned with the U.S. Department of Health and Human Services regulations implementing the Office of Management and Budget Uniform Guidance at 45 CFR Part 75.

The document highlights UG grant-related changes to previous NIH grant policies that went into effect on December 26, 2014. It also summarizes selected policies that remain in effect to provide the reader with further context. However, the guidance is not designed to be a full delineation of the comprehensive terms contained in the annual NIH Grants Policy Statement (GPS). NIH will release a revised version of the NIH GPS after the comment period on Interim Final Regulation is over, and final revisions, if any, have been made to the regulation.

There will be interagency standard terms of award for participating federal research agencies under the UG. NIH intends and will adopt the research and related “overlay” of terms and conditions. The overlay will provide research-specific clarifications for select UG provisions where appropriate and consistent with government-wide research policy. It will be published on the National Science Foundation’s (NSF) website once released.

NIH has also published new Frequently Asked Questions: Uniform Guidance and NIH Interim Grant Conditions that will be of interest to University of Hawaii’s NIH researchers and administrators. See http://grants.nih.gov/grants/policy/faq_grants_uniformguidance.htm.


For questions or more information, contact Emmitt Ford, Contracts and Grants Manager, Kaka’ako Service Center, at emmitt@hawaii.edu or (808) 356-5764.

The Office of Management and Budget's (OMB) Uniform Guidance (UG): Updates to the ORS Website

The following pages on our website have been updated for UG related requirements:

- **Subaward Process** (Start-up & Manage / Project Account Set-up) - Requirements for making case-by-case subrecipient or contractor determinations; clearly identifying subawards and providing required information; using the subrecipient's approved federally negotiated indirect cost rate or a de minimis indirect cost rate (currently 10%); and determining the appropriate subrecipient monitoring activities based on an evaluation of a subrecipients' risk level have been added.

(Continued on next page)
The Office of Management and Budget's (OMB) Uniform Guidance (UG): Updates to the ORS Website (continued)

- **Subrecipient Monitoring** (Start-up & Manage / Manage Award) - Requirements have been added for monitoring the activities of our subrecipients to ensure (1) each subaward is used for authorized purposes; (2) each subaward is conducted in compliance with federal statutes, regulations, and the terms and conditions of the subaward; and (3) that subaward performance goals are achieved. A list of required monitoring activities has also been added.

- **FDP Subaward Templates** (Forms / Agreement Templates) - The FDP subaward templates have been updated for the UG. For subawards, UG applicability is based on the federal award from which the subaward is made. The requirements for a subaward, no matter when made, flow from the requirements of the original federal award from the federal awarding agency. If the award is not subject to UG, the Non-UG FDP templates should be utilized. The ORS website has been updated to more readily distinguish between the UG and non-UG forms.

- **Sponsor Specific Rates** (Rates / Sponsor Specific Rates) - Updates to the sponsor specific rates have been made to reflect the UG requirement that federal awarding agencies (including pass-through entities) accept our negotiated rates. A different rate may be used only when required by federal statute or regulation or when approved by a federal awarding agency head.

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

**Terminal Vacation Leave Compensation – Assessments and Payouts**

Currently, a terminal vacation fringe rate is assessed on project accounts. As payroll expense is recorded, the applicable rate is applied and the fringe benefit expense recorded as a project expense to the project account, with the corresponding offset amount recorded to the Extramural Vacation Reserve pool account. A Salary Transfer (ST) eDoc is submitted to transfer any terminal vacation compensation recorded under the project account (object code 2030) to the pool account.

Under the Office of Management and Budget Uniform Guidance, 2 CFR 200.431, terminal vacation leave compensation must be handled consistently under an equitable method established for all funding sources. As the current process does not apply to all funds, the process must be revised to be in compliance with federal requirements. University of Hawaii administration has decided that effective as of the beginning of fiscal year 2016, no terminal vacation fringe will be assessed. Any terminal vacation compensation must be charged against institutional funds and cannot be charged to a project account.

Fiscal administrators should ensure that any current fiscal year ST entries related to transfers of terminal vacation payouts recorded on project accounts, be reconciled and submitted as soon as possible, but no later than June 15, 2015. Transfer entries will be allowed as funds are available in the pool account. ST entries submitted in FY 2016 will not record any adjustments related to fiscal year 2015 vacation assessments and charges to the vacation reserve pool will not be allowed.

Should you have any questions, please contact Joanne Yama, Projects Financial Services Manager, at jyama@hawaii.edu or (808) 956-8163.
**Property Report Reminder**

On Monday, March 16, 2015, enhancements were implemented to assist researchers and the Property and Funds Management Office (PFMO) with awards that have property report requirements.

If your award requires that a final inventory or property report be provided to the sponsor at the closeout of your project, upon acceptance of the initial award, your Extramural Award Notice will include a reminder to notify the University of Hawaii Property and Fund Management Office (PFMO) of this requirement sixty (60) days prior to your project end date.

In addition, for these new awards, upon KFS project account creation, PFMO, the principal investigator, and the fiscal administrator will receive an additional email notification of the inventory or property report requirement.

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

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**ORS Helpline Frequently Asked Questions (FAQs)**

For a *myGRANT* proposal, I am an approver on multiple levels, (i.e., as principal investigator and as department chair). Will I need to approve the proposal more than once?

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

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**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

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

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”, use the magnifying glass to search for the appropriate person, then 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.

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ORS Helpline Frequently Asked Questions (FAQs) (continued)

I am still working on my proposal narrative. Can I route the proposal for approvals?

Yes, if your budget and all of the required fields have been filled out, you may upload a copy of your current narrative and route the proposal for approval. At any time during the approval process you may replace the existing narrative by using the “replace” button under that particular attachment on the “Abstracts and Attachments” tab. Please work with your assigned ORS specialist to ensure that only the final version of your proposal is submitted to the sponsor. You can find the ORS specialist assigned to your unit here: http://www.ors.hawaii.edu/index.php/ors-assignments.