Reminder—Conflicts of Interest (COI) Disclosures

As of November 28, 2016, UH Investigators have been able to submit Conflicts of Interest (COI) disclosures in the new myGRANT COI module. The new module is for Investigators who conduct extramurally-funded activities.

In accordance with UH Policy and Procedures, any Investigator or Key Person listed on the proposal must complete requisite COI disclosures. UH employees should submit their disclosures through the myGRANT COI module, and non-UH employees should complete the ORS FCOI Form for Non-UH Employees (http://www.ors.hawaii.edu/files/FCOI-1_non-UH_form.pdf).

The annual paper disclosure forms collected in 2016 will expire soon on April 15, 2017, so ORS is encouraging UH Investigators to complete a COI disclosure in the new module as soon as possible to prevent the delay of any proposals or awards, as all COI disclosures must be submitted prior to any proposal submission to extramural sponsors.

Please be advised that after April 15, 2017, proposals will not be submitted to extramural sponsors unless all Investigators and Key Persons listed on the proposal have completed the requisite disclosures described above.

UH employees can access the COI module by logging in to myGRANT and navigating to the my COI Dashboard (red button) as shown below:

(Continued on next page)
Reminder—Conflicts of Interest (COI) Disclosures (continued)

The following are resources if you require additional information:

1. Webinar recording of initial training session
2. User guide for investigators
3. User guide for supervisors
4. myGRANT Conflicts of Interest (COI) FAQs
5. UH Executive Policy E12.214 – Conflicts of Interest and Commitment
6. UH Administrative Procedure A5.504 – Procedures for Disclosing and Addressing Conflicts of Interest and Commitment
7. UH Administrative Procedure A8.956 - Financial Conflicts of Interest (FCOI) for Public Health Services (PHS) Grants, Cooperative Agreements and Contracts

Please contact coi@ors.hawaii.edu if you have any questions.
The Policy Office in the Division of Institution & Award Support at the National Science Foundation is pleased to announce the release of a new quarterly publication designed to provide information about upcoming changes and clarifications to policies and procedures that affect how you prepare and submit proposals and manage NSF awards. The first issue of the NSF Proposal & Award Policy Newsletter is now available on the Policy Office website.

If you have any feedback or questions, please email policy@nsf.gov.

The Office of Management and Budget has published the final Research Terms and Conditions (RTC) to address the Uniform Guidance. Please see the Federal Register notice at https://www.gpo.gov/fdsys/pkg/FR-2017-03-14/html/2017-04955.htm for more information.

Background

The Office of Management and Budget’s (OMB) regulations under 2 CFR § 200, known as “Uniform Guidance”, govern the “uniform administrative requirements, cost principles, and audit requirements for federal awards.” The thrust of Uniform Guidance was to provide a cohesive framework of regulations for awards issued under all federal agencies. Parallel to that effort, several federal sponsors also convened a working group to review agency-specific Research Terms and Conditions (RTCs) with the goal of standardizing them across the agencies, and bringing them in line with Uniform Guidance. Effective April 3, 2017, the National Science Foundation, the Department of Energy, and the National Institutes of Health will become the first of the agencies in the working group to adopt new standardized RTCs. It is anticipated that the other agencies involved in the working group will roll-out the RTCs successively.

(Continued on next page)
Implementation of Research Terms and Conditions to Comply with Uniform Guidance (continued)

Agency Implementation Schedule

<table>
<thead>
<tr>
<th>Agency</th>
<th>Planned Implementation Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Science Foundation</td>
<td>April 3, 2017</td>
</tr>
<tr>
<td>U.S. Department of Energy</td>
<td>April 3, 2017</td>
</tr>
<tr>
<td>U.S. Department of Health and Human Services/National Institutes of Health</td>
<td>April 3, 2017</td>
</tr>
<tr>
<td>U.S. Department of Agriculture/National Institute of Food and Agriculture</td>
<td>June 1, 2017</td>
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<tr>
<td>U.S. Department of Commerce/National Oceanic and Atmospheric Administration</td>
<td>October 1, 2017</td>
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<tr>
<td>National Aeronautics and Space Administration</td>
<td>October 1, 2017</td>
</tr>
<tr>
<td>U.S. Department of Transportation/Federal Aviation Administration</td>
<td>October 1, 2017</td>
</tr>
<tr>
<td>National Institute of Standards and Technology</td>
<td>To be determined</td>
</tr>
<tr>
<td>U.S. Environmental Protection Agency</td>
<td>To be determined</td>
</tr>
<tr>
<td>U.S. Department of Homeland Security</td>
<td>To be determined</td>
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</tbody>
</table>

Framework of Regulations, Terms/Conditions and Their Applicability

- **UG:** Uniform Guidance drives the overall principles of federal award administration, and apply to an extramural award when incorporated by reference into a grant, contract, or cooperative agreement.

- **NPR:** National Policy Requirements implement federal laws and regulations that apply broadly to federal awards (e.g., environmental standards, nondiscrimination laws, etc.), and apply to extramural award when incorporated by reference into a grant, contract, or cooperative agreement.

- **RTC:** Research Terms and Conditions implement Uniform Guidance at a sponsoring agency level, and include certain exceptions or exemptions that are agency specific, and are applicable to an extramural award when incorporated by reference into a grant, contract, or cooperative agreement, unless otherwise stated by an agency.

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Implementation of Research Terms and Conditions to Comply with Uniform Guidance (continued)

Other Applicable Rules and Regulations

In addition to UG, NPR, and RTC, agencies will also incorporate rules and regulations into their awards for the following particular scenarios:

- **Subaward Rules** for when UH as an “Institution of Higher Education” acts as a pass-through entity for a subrecipient; and/or
- **Prior Approval Rules** for when UH needs to request approval from a federal sponsor or another pass-through entity to make changes to a project.

For additional information and guidance, please contact Dawn Kim, Compliance Manager, at dawnkim@hawaii.edu or (808) 956-0396.

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.

(Continued on next page)
ORS Helpline
Frequently Asked Questions
(continued)

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

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

To do so, go to the “Summary/Submit” section and click on the “Ad Hoc Recipients” button, 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 “Summary/Submit” section.

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 draft 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 “Details/replace” button under that particular attachment on the “Attachments” section. Please work with your ORS Contracts & Grants specialist to ensure that only the final version of your proposal is submitted to the sponsor. You can find the Contracts & Grants Specialist assigned to your unit here: http://www.ors.hawaii.edu/index.php/ors-assignments

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