National Institutes of Health (NIH) Prior Approval for Proposals Over $500,000

A principal investigator (PI) needs to seek prior approval from the National Institutes of Health (NIH) before submitting a grant application with direct costs of $500,000 or more (excluding consortium facilities and administrative costs) for a single budget year.

Effective September 15, 2016, NIH has developed a way to provide you with an option to electronically submit these prior approval requests through eRA Commons.

Here is how it works:

**Invitation to Initiate a $500K Request**
The PI will reach out via email or phone to the Program Official (PO) at the Institute/Center (IC) with whom they have been working concerning the proposal seeking $500,000 or more, per current practice. The PO can then choose to invite the PI to initiate the prior approval request through eRA Commons. The initiation of the request will trigger an email notification to the PI and to the email address listed for receiving the Notice of Award (NoA) on the Institutional Profile screen.

**PI Action**
Upon receiving the email notification, the PI will go into eRA Commons and go to the Prior Approval tab along the top navigation menu. The PI will find two options and should click *List my Requests*. The PI will find the $500K Request under the column “Request Type”, with a status of “In Progress PI,” and should click the “Modify” link.

The Prior Approval Request $500K screen will open. The screen includes several required fields, such as Project Title, FOA number, and Anticipated Submission Date. The PI will need to provide a short justification (500 characters) for the request, with up to ten (10) supporting documents allowed. The PI can then submit the request directly to NIH.

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National Institutes of Health (NIH) Prior Approval for Proposals Over $500,000 (Continued)

**Signing Official (SO) Action**
Since the notice to submit the prior approval request is sent to the NoA address as well, the SO should login to eRA Commons and go to the “Prior Approval” tab. SOs should use the Search for Requests button and select the $500K Request under the “Request Type” drop-down menu. The SO has the ability to view the request, or if they choose, recall it, thus giving them the ability to modify and submit it.

**Next Steps**
If the request is approved by the PO at the IC, the PI will receive an email from the PO. When the error-free application is received by NIH, this application will be matched with the $500,000 approval from the IC and the application will move through the normal process.

For more information, please see Guide Notice NOT-OD-17-005.

According to the Uniform Guidance (2 CFR §200.459) while costs of professional and consultant services rendered by persons who are members of a particular profession or possess a special skill are an allowable charge to federal awards, such persons cannot be officers or employees of the University of Hawaii. Auditors have identified multiple instances in which UH employees have been paid consulting fees. While UH employees are generally entitled to extra service pay through UH payroll for work performed beyond his or her regular responsibilities, compensation should be based on a rate not to exceed the employee's institutional base salary.

Should you have any questions, please contact Dawn Kim, Compliance Manager at dawnkim@hawaii.edu or (808) 956-0396.
ORS is proud to announce the new Kuali Conflicts of Interest (COI) module in myGRANT. Effective November 28, 2016, researchers will be able to create and submit financial interest disclosures in myGRANT.

The new electronic disclosures will replace the paper disclosure forms that were required by UH Administrative Procedure A5.504, and will be applicable to investigators applying for and receiving extramural funds. In accordance with federal regulations and UH policy, COI disclosures are required at the time of, or prior to proposal submission, so ORS is urging investigators to submit a disclosure as early as possible. Starting on November 28, 2016, myGRANT users will see the icon to my COI Dashboard on the myGRANT home page. After completion, the disclosures will be routed to supervisors for primary review. Supervisors are responsible for recommending a disclosure disposition (e.g., no conflict) and completing their review, then the disclosure is routed to ORS Compliance for final disposition determination and disclosure approval. Similar to the current annual COI disclosure timing, electronic disclosures will be required at least once a year (i.e., expire one year from initial submission). However, investigators who have significant financial interests (SFI) may be required to update their disclosures more frequently.

Live workshops will be offered at UH Oahu campuses during the months of November and December, and virtual workshops for all other campuses will be offered concurrently. To sign up for either a live or virtual workshop, go to the ORS event sign up at: http://www.ors.hawaii.edu/index.php/coi-webinars.

If you have any questions, contact the ORS Compliance Section via coi@ors.hawaii.edu or (808) 956-9596.

ORS Helpline
Frequently Asked Questions

A principal investigator (PI) will often forward award notices to project staff that are monitoring awards and they do not have access because they are not a fiscal administrator. Can these project staff be granted access to the myGRANT award module?

Project staff can be granted access to an award record by the ORS Helpline with PI approval. The PI should request access for any additional unit administrators through the Helpline Support Portal. This will only allow the individual unit administrators to access the requested award.

If you need additional award viewers for an entire unit, please use the “Request Award Viewer Access” button on the Helpline Support Portal.

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I submitted a proposal in myGRANT. How do I check on the progress of the proposal?

If you open the proposal and navigate to the “Summary/Submit” section, you can view the status of your proposal using the “Route Log” button at the bottom of the screen. The Route Log is separated into three sections:

**Actions Taken:** This will list all of the users and the actions they have taken on the proposal. You will always see the initiator of the proposal listed here, but you might also see actions taken by the initiator or any subsequent approvers.

**Pending Action Requests:** This section will list the users or groups that currently need to approve the proposal.

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*