ORS Newsletter
October & November 2019

CONTENTS

CLARIFICATION OF PROCEDURES - ROUTING OF KFS EDOC IN PLACE OF PAT FORM

In our June 2019 newsletter, ORS determined that the "Post Award Termination (PAT)" form would no longer be required for transactions that were processed through the UH Disbursing Office on extramural accounts after the award termination date. Instead all required reviews and approvals, along with the reason for processing after the award termination date would be included on the KFS eDoc.

To clarify our original guidance: **once the FA approves, the department should ad hoc route the KFS eDoc to the "UH ORS Compliance" group for review and approval**. Upon approval by the UH ORS Compliance group, the KFS eDoc will route to UH Disbursing Office for final release and check production.

If you have any questions regarding this, please contact Dawn Kim, ORS Compliance at dawnkim@hawaii.edu or (808) 956-0396.

PROGRAM INCOME - ORS ACCOUNTING

Program income is not common across all extramural funding, but it is important to understand to be in compliance when it is applicable for Federal or non-Federal funding. It has been covered in ORS' recent Contracts & Grants Certification Program, Compliance Module 2.

NSF in particular has recently re-emphasized the importance of properly accounting for and reporting program income, stating that for their awards, the "Failure to report program income or to validate that no program income was earned/expended could result in suspension of future grant payments."

According to 2 CFR 200.80 (Uniform Guidance), program income means income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance. It would generally include things such as fees for services performed, use or rental of real property acquired under the grant, sale of commodities or items fabricated under the grant, and fees charged to register participants for a workshop or conference.

Program income generally would not include things such as income from license fees, royalties for copyrighted material, patents, patent applications, trademarks, and inventions produced under an award unless the awarding agency or award terms and conditions state otherwise (OMB Joint Interim Final Rule-12/19/14 and 37 CFR Part 401, a.k.a. Bayh-Dole Act).

The Fiscal Administrator (FA) is responsible for requesting/obtaining a separate "companion" Program Income account from their ORS Contracts & Grants Accountant (CG) when its existence is known, from the initial proposal and award, or later during the award period. Generally, the setup would be the same as for the sponsored funds, including indirect costs. Program income must be spent in accordance with the terms and conditions of the sponsor award it's tied to, i.e. they must be allowable, allocable and reasonable in relation to the activity supported by the sponsor.

In general, program income should be used before sponsor funds. Generally, there should not be a program income balance at the end of the project.

The 3 basic ways program income would be treated are below, a combination could apply. The treatment would be determined by the sponsor and is usually stated in the award document, sponsor policies, or other specific instructions:

1. Additive: added to the sponsor funds committed to be used to further project objectives. Generally for research awards.
2. Deductive: amount of sponsor funds available to expend **is reduced by the program income amount**, therefore it is very important for FAs to record program income and expenditures timely in their program income account, and reduce sponsor funded budgets accordingly. Generally for non-research awards.
3. Matching/Cost Share: usually when there is Mandatory Cost Sharing.

If program income is earned after the period of performance, the awarding agency regulations or terms and conditions of our award should be followed. The sponsor should be contacted in the absence of any such requirements. The funds earned should be deposited pursuant to AP 8.701 "Receipting and Depositing Funds Received by the University".

If you have any questions regarding this, please contact Suzanne Efhan, ORS Project Fiscal Services Manager at efhans@hawaii.edu or (808) 956-4061.

Often a PI will 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 access the *my*GRANT award module?

Project staff can be allowed access to an award by the ORS Helpline. Please have the PI request access for any additional unit administrators by emailing orshelp@hawaii.edu. This will only allow the additional unit administrators to access the requested award.

If you need additional award viewers for an entire college or unit, please submit a memo signed by the department chair or dean depending on the level of access requested to the ORS Helpline.

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 "View Route Log" button at the bottom of the screen. The Route Log is separated into 3 sections:

Actions Taken: This will list all of the users and the action they have taken on the proposal. You will always see the initiator of the proposal listed here, but you might also see the initiator as "Completed" or a list of any subsequent approvals.

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

Future Action Requests: This section will list the users or groups in order that will need to approve the proposal once it moves forward in the workflow. If this section is blank, it has been approved by ORS and the proposal has reached the end of the workflow.