



ORS Newsletter

April 2018

CONTENTS

NATIONAL INSTITUTES OF HEALTH (NIH) REVISION TO POLICY AND GUIDELINES ON THE INCLUSION OF INDIVIDUALS OF ALL AGES AS PARTICIPANTS IN RESEARCH INVOLVING HUMAN SUBJECTS

PREPARING FOR FISCAL YEAR END (FYE) 2018

FISCAL YEAR-END REMINDERS FOR COST SHARING

CHANGE IN PAYMENT UPON EXECUTION PROCESS

FIXED PRICE RESIDUAL BALANCE CLOSEOUT FORM

CHARGING OF FACILITIES AND ADMINISTRATIVE (F&A) TYPE COSTS DIRECTLY TO A PROJECT

ORS HELPLINE FREQUENTLY ASKED QUESTIONS

NATIONAL INSTITUTES OF HEALTH (NIH) REVISION TO POLICY AND GUIDELINES ON THE INCLUSION OF INDIVIDUALS OF ALL AGES AS PARTICIPANTS IN RESEARCH INVOLVING HUMAN SUBJECTS

The National Institutes of Health (NIH) has had a long-standing policy that children (individuals under the age of 18) must be included in all human subjects research conducted or supported by the NIH unless there are scientific or ethical reason to not include them. This policy was developed due to concerns that not including children in such studies resulted in insufficient data to establish the effectiveness of treatments in children.

The revised policy will apply to all competing grant applications or solicitations for R&D contracts with due dates on or after January 25, 2019. NIH will require the participation of children and older adults in all human subjects research conducted or supported by the NIH in compliance with all applicable subparts of 45 CFR 46, as well as other pertinent federal laws and regulations. Ongoing, non-competing awards will not be expected to comply with the revised policy until the grantee submits a competing renewal application.

Under the revised policy, applications or proposals for research involving human subjects must include a description of plans for including individuals cross the lifespan, including a rationale for selecting the specific age range justified in the context of the scientific question proposed. If individuals will be excluded from the research based on age, acceptable justification must be provided for the exclusion. Examples of acceptable reasons for excluding individuals based on age may be found in NIH Notice NOT-OD-18-116 at <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-18-116.html>.

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NATIONAL INSTITUTES OF HEALTH (NIH) REVISION TO POLICY AND GUIDELINES ON THE INCLUSION OF INDIVIDUALS OF ALL AGES AS PARTICIPANTS IN RESEARCH INVOLVING HUMAN SUBJECTS (CONTINUED)

Scientific review groups at NIH will assess each proposal as being “acceptable” or “unacceptable” with regard to the age-appropriate inclusion or exclusion of individuals in the research project, and will also evaluate the plans for conducting the research consistent with the policy.

If awarded, NIH recipients must submit data on participant age at enrollment in progress reports. Investigators should therefore design their studies in such a way that de-identified individual-level participant data on sex/gender, race, ethnicity and age at enrollment may be provided to NIH in progress reports. NIH recipients will also be responsible for ensuring that informed consent documents allow the submission of such de-identified individual-level data to NIH.

Inquiries regarding this policy should be directed to the NIH Inclusion Policy Officer, Office of Extramural Research (OER) at inclusion@od.nih.gov or (301) 435-0921.

PREPARING FOR FISCAL YEAR END (FYE) 2018

In preparation for fiscal year end (FYE), please perform the following prior to the scheduled year end cutoff dates:

- Reclassify transactions posted to continuation accounts to the intended account.
- Clear account deficits.
- Review and reconcile payroll transactions and process salary transfers prior to creation of the annual Effort and Cost Shared Effort Certifications. Once the annual Effort Certifications and Cost Shared Effort Certifications are certified, salary transfers cannot be processed.
- Record all FY 2018 cost shared amounts. Refer to “Fiscal Year-End Reminders for Cost Sharing” article below.
- Submit requests to extend advance accounts ending on or before June 30, 2018 prior to the advance account expiration date, as appropriate. Advance accounts expiring on or prior to June 30, 2018 that are not being extended should be closed per the requirements of [AP 12.405 "Advanced Funding Accounts for Externally Financed Programs and Activities"](#).
- Complete and confirm closeout of awards and accounts in a timely manner.
- Reallocate PCard transactions - refer to Fiscal Year End Closing Schedule available on the FMO website under "[General Accounting - Overview - Fiscal Year Calendar of Events](#)".

Note: For additional guidance, please refer to [AP 8.926 "Administrative and Financial Management Requirements for Extramurally Financed Research and Training Programs/Activities of the University of Hawaii"](#).

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

FISCAL YEAR-END REMINDERS FOR COST SHARING

The last day to submit Distribution of Income Expense (DI) eDocs to record cost sharing in the Kualii Financial System (KFS) for fiscal year (FY) 2018 is Friday, June 22, 2018. ORS requests that all accounts with committed cost sharing be reviewed and any necessary cost sharing eDocs be submitted as soon as possible. As a reminder, please note the following:

- Cost sharing for direct costs is based on expenses recorded to the KFS source account during the fiscal year and should be recorded in the applicable fiscal year.
- Cost sharing for UH personnel salaries and fringe should reflect payroll dates through June 30, 2018. Estimates may be used for the June 15, 2018 and June 30, 2018 pay periods, if necessary.
- Annual certification of cost sharing effort for FY 2018 is required and will be due by October 1, 2018 (further information regarding the certification process will be forthcoming).
- Do not include cost sharing for periods beyond June 30, 2018.
- Please review your accounts to ensure that cost sharing is recorded in the CS001 subaccount and cost sharing object codes are used appropriately. If transactions were posted to cost sharing object codes incorrectly, please make corrections prior to fiscal year-end.

Should you have any questions, please contact Bob Roberts, Projects Fiscal Accounting Manager, at rroberts@hawaii.edu, or (808) 956-6959.

CHANGE IN PAYMENT UPON EXECUTION PROCESS

Since July 2010, the ORS Accounting Projects Financial Accounting (PFA) Section has followed a procedure for awards from non-governmental sponsors when the terms and conditions of the award provide that a payment will be made upon the execution of the award (PUE). In these instances, ORS PFA would delay opening a project account until initial payment from the sponsor was received by ORS.

To improve efficiency and reduce administrative burden, this process will be changed effective immediately. Upon execution of a PUE award, ORS Accounting will open a project account per its usual procedures. Receipt of the initial payment from the sponsor will be tracked by ORS Accounting to ensure that the sponsor is complying with the terms and conditions of the award. As required for all awards, principal investigators, (PIs) and fiscal administrators (FAs) are expected to monitor their projects regularly, including the cash and accounts receivable balances. If any potential issues with invoicing or sponsor payments are noticed, the FA should contact their ORS Accountant for follow-up on a timely basis. If no payment is received from the sponsor within 30 days of award execution, ORS Accounting will contact the PI and FA to follow up.

If you have any questions regarding this change, please contact Bob Roberts, Projects Fiscal Accounting Manager, at rroberts@hawaii.edu or (808) 956-6959.

FIXED PRICE RESIDUAL BALANCE CLOSEOUT FORM

A new version of the Fixed Price Transfer to Departmental Account Request Form is now available, effective today, April 19, 2018. The title of the form has also been changed to “Fixed Price – Residual Balance Closeout Form” and the new form may be found here http://www.ors.hawaii.edu/files/Fixed_Price-Residual_Balance_Closeout_Form.pdf. Please use the new form for closeout requests submitted on a go-forward basis. There will be a one month grace period in which ORS will continue to process any requests submitted on the old form. However, on a go-forward basis, if the amount requested to be transferred is “significant” (defined as \$3,000 or more, or more than 20% of the total amount awarded), you will be asked to resubmit your request on the updated form.

The form has been revised to improve efficiency and reduce administrative burden by more clearly specifying up front, the information that ORS requires in order to approve fixed price transfers, particularly, “significant” residual balances. In instances when the requested transfer is for a “significant” residual balance, an explanation for the reason(s) that led to the underspending on the account is required before the transfer will be approved. The form now contains a field in which to provide this information and additional sheets may be attached. Next, if there are significant differences between the budgeted personnel costs and the actual personnel costs, a detailed explanation must be provided. Further, if costs that were budgeted in the fixed price project account being closed were charged to a different project account then a [Declaration of Project Relatedness](#) must be submitted with the form. Finally, the signature of the dean/director is required for “significant” residual balance transfer requests.

Other changes include making the form “form-fillable”, programming the form to accommodate digital signatures (although handwritten/signed forms are also acceptable), and clarifying and condensing the request criteria. Otherwise, the information required for the request is the same as with the previous form.

If you have questions about the new form, please contact Bob Roberts, Projects Fiscal Accounting Manager, at rroberts@hawaii.edu or (808) 956-6959.

CHARGING OF FACILITIES AND ADMINISTRATIVE (F&A) TYPE COSTS DIRECTLY TO A PROJECT

Recently one of our sponsors questioned facilities and administrative (F&A) type costs that were being charged directly to a project. Another private institution was also questioned by the National Science Foundation's Office of the Inspector General for directly charging supplies to their projects.

By definition, F&A costs are costs incurred for common or joint objectives that cannot be readily identified with an individual project. Facilities operation and maintenance costs, depreciation, and administrative expenses (i.e., materials, supplies and computing devices) are examples of costs that usually are treated as F&A costs. According to the Uniform Guidance (2 CFR 200.453), materials and supplies used for the performance of an award may be charged as direct costs. Computing devices may also be charged directly if such items are essential and allocable, although not solely dedicated, to the performance of an award.

To avoid such questioned costs, projects should ensure that F&A type costs being charged directly to a project are reasonable, necessary, allocable and allowable. Duplicate purchases should not be made if items (i.e., computers, supplies) are adequately available for use by the project. Furthermore, approved budgets should include sufficient detail to justify the direct charging of F&A type costs.

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

ORS HELPLINE FREQUENTLY ASKED QUESTIONS

How do I register for Grants.gov Workspace?

Detailed instructions can be found on the ORS website:

<http://www.ors.hawaii.edu/index.php/apply/proposal-development/grantsgov-for-new-users>.

How do I give other people access to my Grants.gov Workspace?

After creating your Workspace, click the "Participants" tab, then click the "Add from Workspace Organization" button. You can then search and add the user that you want to access your Workspace. You will need to add your assigned ORS Specialist to the Workspace so that they can view and submit the proposal.