



ORS Newsletter

August 2018

CONTENTS

INCREASE IN LIMITS TO
FIXED AMOUNT
SUBAWARDS
(2 CFR 200.332)

REQUESTS FOR
PROPOSALS AND
SOLICITATIONS THAT
LIMIT THE NUMBER OF
SUBMISSIONS
UNIVERSITY OF HAWAII
CAN MAKE

MICRO-PURCHASE
THRESHOLD INCREASE
FOR TRANSACTIONS
PROCESSED THROUGH
RCUH

ANNUAL EFFORT
CERTIFICATIONS AND
COST SHARING EFFORT
CERTIFICATIONS

ORS HELPLINE
FREQUENTLY ASKED
QUESTIONS

INCREASE IN LIMITS TO FIXED AMOUNT SUBAWARDS (2 CFR 200.332)

With prior written approval from the federal awarding agency, a pass-through entity such as the University of Hawaii may provide subawards based on fixed amounts up to the Simplified Acquisition Threshold (SAT). The National Defense Authorization Act (NDAA) for 2018, which became law December 12, 2017, increased the SAT from \$100,000 to \$250,000. The NDAA noted that this higher threshold would not be effective until implemented in the Federal Acquisition Regulations (FAR). On June 20, 2018, the Office of Management and Budget (OMB) issued memorandum [M-18-18: Implementing Statutory Changes to the Micro-Purchase and the Simplified Acquisition Thresholds for Financial Assistance](#) granting an exception to allow recipients of federal assistance awards (grants and cooperative agreements) to use the higher SAT threshold in advance of revisions to the FAR and the Uniform Guidance. Based upon this exception, fixed amount subawards from federal grants and cooperative agreements up to \$250,000 are now allowed provided that the subaward meets the requirements for fixed amount awards in 2 CFR 200.201.

Note: For updates to RCUH's policies regarding application of the higher SAT thresholds, please refer to the [RCUH announcement](#) posted on June 26, 2018.

Should you have any questions, please contact ORS Compliance at compliance@hawaii.edu.

REQUESTS FOR PROPOSALS AND SOLICITATIONS THAT LIMIT THE NUMBER OF SUBMISSIONS UNIVERSITY OF HAWAII CAN MAKE

Recently, we have come across requests for proposal (RFP) or solicitations that are not identified by the sponsors as limited submissions, but are in fact, limited submissions.

For example, a first reading of the instruction, “The applicant can submit only one proposal per topic area” implies to the reader that a faculty member could submit only one proposal per topic area.

However, the applicant is not the individual faculty member, but the University of Hawaii. This is because the vast majority of grants are made between sponsors and institutions and not between sponsors and individuals. Thus, the correct reading is “The [University of Hawaii] can submit only one proposal per topic area.”

If two or more faculty members want to submit a proposal under a topic area and the sponsor permits per campus submissions, then we would have the respective campus chancellor’s office determine who can submit under the limited submission procedure. If the sponsor restricts submissions to one per institution, then a systemwide competition would be held to determine the principal investigator eligible to submit. If there is a question of whether limited submissions are per institution or per campus, please contact your assigned [ORS specialist](#) to obtain clarification from the sponsor. You may also contact your assigned ORS specialist if you have questions regarding whether the RFP or solicitation is in fact a limited submission or other questions about eligibility.

MICRO-PURCHASE THRESHOLD INCREASE FOR TRANSACTIONS PROCESSED THROUGH RCUH

Effective August 1, 2018, the Research Corporation of the University of Hawaii (RCUH) increased its micro-purchase threshold (MPT) from \$3,500 to \$10,000 for all purchases, with the exception of purchases made using federal **contract** funds. This change was made pursuant to the Office of Management and Budget (OMB) memorandum [M-18-18: Implementing Statutory Changes to the Micro-Purchase and the Simplified Acquisition Thresholds for Financial Assistance](#). This memo implements statutory changes under the National Defense Authorization Act (NDAA) of 2017 and the NDAA of 2018. Since OMB does not have the authority over federal contract funds, the existing \$3,500 threshold will remain in place for federal contracts until the \$10,000 threshold is adopted by the Federal Acquisition Regulation (FAR).

For additional information regarding these changes, please refer to the following RCUH announcements:

- [Update to RCUH’s Micro-Purchase Threshold](#) (July 30, 2018)
- [Future Update to RCUH’s Micro-Purchase Threshold](#) (July 11, 2018)

These thresholds apply only to procurement transactions processed through RCUH. Transactions processed through the University of Hawaii must comply with the existing State of Hawaii thresholds.

Should you have any questions, please contact ORS Compliance at compliance@hawaii.edu.

ANNUAL EFFORT CERTIFICATIONS AND COST SHARING EFFORT CERTIFICATIONS

Effort Certifications and Cost Sharing Effort Certifications were generated on **August 15, 2018** and are available for review and approval by principal investigators (PIs) and fiscal administrators (FAs). These certifications must be approved and finalized **by October 1, 2018**.

Effort Certifications

Salaries and wages paid from a project account and processed through the KFS Labor Ledger must be certified through KFS on the Effort Certification eDoc (EC). ECs were created for each University of Hawaii employee who was paid salaries and wages for services performed during FY2018 from a federal extramural account. These ECs are available in the PIs' action list for review and approval and will be subsequently routed to the FAs. If salary amounts are not correct, PIs can revise the amounts on the EC, which will automatically generate an Effort Certification Salary Transfer eDoc (ECST). The corresponding ECST will appear on the EC for the FA to prepare the appropriate adjustments. Please refer to the [Effort Reporting Training Manual](#) for detailed instructions on reviewing ECs and processing related ECSTs if applicable.

Cost Sharing Effort Certifications

In addition to the KFS ECs, PIs who have cost shared effort must certify these amounts for their extramural awards on an annual basis. For Cost Sharing effort (recorded through a DI in the KFS cost share sub-account), an online certification is available for the PIs to review and approve. PIs who are required to certify Cost Sharing effort should have received an email notification with instructions to access the online certification using their UH username and password. Although FAs are not required to approve these certifications, they are able to view outstanding certifications to assist their PIs.

ORS will follow up on all outstanding certifications and may escalate the matter to the appropriate deans / directors or suspend account activity, if necessary. For Cost Sharing Effort Certifications, FAQs have also been posted to the ORS website at http://www.ors.hawaii.edu/files/Cost_Sharing_Effort_Certifications_Instructions_and_FAQs.pdf.

Should you have any questions, please contact ORS Compliance at compliance@hawaii.edu.

ORS HELPLINE FREQUENTLY ASKED QUESTIONS

What is Grants.gov Workspace?

Grants.gov Workspace is the new online method to collaborate and apply for Grants.gov opportunities. The legacy PDF application package was discontinued as of December 31, 2017, so all new proposals must be submitted through Grants.gov Workspace.

Do I need a Grants.gov account to use Grants.gov Workspace?

Yes, you need to register with Grants.gov and your account must be approved by ORS before you can start a workspace proposal. We have posted instructions for getting registered with Grants.gov here:

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

Additionally, anyone else who needs access to the workspace (Co-Is, fiscal administrators, key personnel, etc.) will also need to register with Grants.gov.

How do I attach the proposal to myGRANT?

Once you have completed the forms in Grants.gov, you can download a PDF copy of the entire proposal. Attach this PDF to your myGRANT proposal development record as you would have using the legacy PDF form.