



# ORS Newsletter

March 2019

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## NATIONAL SCIENCE FOUNDATION (NSF) OFFICE OF INSPECTOR GENERAL (OIG) AUDIT REPORT

In an audit report issued last December on the University of Wyoming (UW), the NSF OIG identified three types of questioned costs and recommended that UW implement stronger internal controls in three specific areas.

### Questioned Costs

The auditors questioned \$441,683 of costs claimed by UW during the audit period (Oct. 1, 2011 through September 30, 2014). Specifically, the auditors found \$44,330 in unallowable payroll and non-payroll costs incurred due to lack of supporting documentation, \$15,581 in unallowable relocation costs, and \$381,772 of inadequate support for transfer of transactions between awards within and outside of period of performance. UW agreed with the majority of the findings in the report and agreed to repay \$206,279, but disagreed with a portion of the questioned costs related to cost transfers.

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### Internal Controls

In addition, the auditors found significant deficiencies related to internal controls in the following three areas: (1) personnel activity reports and timesheets were not properly approved; (2) personnel activity reports were submitted more than 60 days after the period of performance ended; and (3) purchase card (p-card) transaction limits of \$1,500 were exceeded without proper approval. UW agreed with the first two internal control findings and responded that its new Human Capital Management system should ensure that the deficiencies should not reoccur. UW did not agree that it violated processes pertaining to the \$1,500 threshold on p-cards.

For details on the findings, recommendations and responses, please refer to “Performance Report of Incurred Costs – University of Wyoming” posted at:

[https://www.nsf.gov/oig/\\_pdf/19-1-002\\_Wyoming.pdf](https://www.nsf.gov/oig/_pdf/19-1-002_Wyoming.pdf).

While these findings were specific to UW, as recipients of NSF awards, it underscores the importance of complying with laws, regulations, award terms and conditions, and university policies, procedures, deadlines and thresholds.

If you have any questions, please contact Dawn Kim, ORS Compliance Manager, at [dawnkim@hawaii.edu](mailto:dawnkim@hawaii.edu) or (808) 956-0396.

## NEW ADMINISTRATIVE PROCEDURE, AP 12.304 - PROCEDURES FOR DISCLOSING AND ADDRESSING CONFLICTS OF INTEREST RELATED WITH EXTRAMURALLY-FUNDED ACTIVITIES

As of March 2019, [AP 12.304](#) is in effect and has replaced APM 8.956. Briefly, some of the major changes are as follows:

- Eliminates reference to the U.S. Public Health Service (PHS), and expands the scope of the procedure to make the same Conflicts of Interest (COI) standards and procedures applicable to all extramurally-funded awards regardless of sponsor.
- Covers and defines "Investigators", as opposed to "UH Employees".
- Creates a new definition of "Extramurally-Funded Activity" to cover the scope of "Research" as defined in A5.504 and broadens it to cover all extramural funds.
- Introduces the role and responsibilities of the Office of Research Compliance (ORC) in COI matters.

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## NEW ADMINISTRATIVE PROCEDURE, AP 12.304 - PROCEDURES FOR DISCLOSING AND ADDRESSING CONFLICTS OF INTEREST RELATED WITH EXTRAMURALLY-FUNDED ACTIVITIES (CONTINUED)

- Brings the title of the “Vice President of Research and Innovation” (VPRI) up to date (formerly “Vice President for Research” in A5.504 and A8.956).
- Takes the definition of “Significant Financial Interest” (SFI) from both A8.956 and A5.504 which were substantially similar, but carves out travel remuneration as being specific to PHS-funded Investigators.
- Changes supervisor review of the disclosure form to include the immediate supervisor and the next level above to now achieve two levels of review.
- Makes Financial Conflicts of Interest (FCOI) information available to the public upon written request.

With the implementation of AP 12.304, outdated AP 8.956 – FCOI for PHS Grants, Cooperative Agreements and Contracts is duplicative, so has been abolished.

COI information related to extramurally-funded activities can be found at [ORC - Conflicts of Interest](#).

If you have any questions regarding COI or AP 12.304, please contact Renee Harada, Office of Research Compliance, Compliance Specialist, at [coi@hawaii.edu](mailto:coi@hawaii.edu).

## CONFLICTS OF INTEREST TRAINING FOR INVESTIGATORS FUNDED BY PUBLIC HEALTH SERVICE (PHS) AGENCIES

In accordance with 42 CFR Part 50, Subpart F – Promoting Objectivity in Research, the University of Hawai`i (UH) is utilizing the Collaborative Institutional Training Initiative (CITI) Conflicts of Interest (COI) Training module to fulfill the requirement that United States Department of Health and Human Services Public Health Service (PHS) investigators funded by the complete COI training prior to engaging in any research activities or expenditure of any research funds.

Under 42 CFR § 50.604 and UH AP 12.304, COI training must be completed at least once every four (4) years, and immediately when:

- The UH COI policy/procedures are revised;
- An investigator is new to UH or newly added to an ongoing PHS-funded research project;  
or
- An investigator is not in compliance with UH policy/procedures, or a COI management plan.

## CONFLICTS OF INTEREST TRAINING FOR INVESTIGATORS FUNDED BY PUBLIC HEALTH SERVICE (PHS) AGENCIES (CONTINUED)

The CITI COI Training module can be accessed at [CITI - UH Conflicts of Interest Training](#). Site access is provided with your UH username and password. If you do not have a CITI account, you may create one by affiliating with UH as your institution.

If you have any questions, please contact Renee Harada, Office of Research Compliance, Compliance Specialist, at [coi@hawaii.edu](mailto:coi@hawaii.edu).

## ORS HELPLINE FREQUENTLY ASKED QUESTIONS

**I am an approver on multiple levels for a myGRANT proposal development record, (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 even if you are in the workflow more than once.

**What if our department requires the approval of a secondary chair/dean if the primary chair/dean is serving as the principal investigator?**

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 myGRANT proposal development record 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 myGRANT proposal development record 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 assigned ORS Specialist to ensure that only the final version of your proposal is submitted to the sponsor. You can find your assigned ORS Specialist here: <http://www.ors.hawaii.edu/index.php/ors-assignments>.