



ORS Newsletter

November 2021

CONTENTS

MY PROPOSAL
DASHBOARD RELEASED
IN MYGRANT

IMPLEMENTATION OF
EXECUTIVE ORDER
14042, ENSURING
ADEQUATE COVID
SAFETY PROTOCOLS
FOR FEDERAL
CONTRACTORS

NATIONAL SCIENCE
FOUNDATION (NSF)
DESK REVIEW

REQUIREMENTS FOR
PASS THROUGH
ENTITIES (PTES) ON UH-
ISSUED SUBAWARDS

ORS HELPLINE
FREQUENTLY ASKED
QUESTIONS

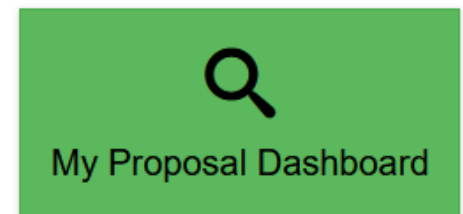
MY PROPOSAL DASHBOARD RELEASED IN myGRANT

A new My Proposal Dashboard has been created to make it easier for myGRANT users to search for and locate their proposal development records. The dashboard is a significant improvement to the current “Find My Proposals” search function as it provides more advanced searching and reporting capabilities.

Here are a few highlights of the new My Proposal Dashboard.

- Locates both created proposals and ones on which you are listed as a key person
- Fast response time
- Removes the 200 proposals viewing limit
- Contains sort and filter functions
- Exportable to an Excel spreadsheet
- Printable proposal listing

Get started



The new My Proposal Dashboard can be found replacing the “Find My Proposal” button on the myGRANT homepage, or in the “Researcher” menu. (Note that the previous “Find My Proposals” search function will continue to be accessible from the link in the “Researcher” tab).

If you have any questions about or issues with the new My Proposal Dashboard, please submit a ticket to ORS at <http://go.hawaii.edu/eVP>. Please use the “Other Issue” ticket type, and provide the question in the “Description” field of the ticket.

IMPLEMENTATION OF EXECUTIVE ORDER 14042, ENSURING ADEQUATE COVID SAFETY PROTOCOLS FOR FEDERAL CONTRACTORS

On September 9, 2021, President Biden signed Executive Order 14042, Ensuring Adequate COVID Safety Protocols for Federal Contractors. The Executive Order directs executive departments and agencies to ensure that contracts and contract-like instruments covered by the Executive Order include a clause requiring federal contractors (and their subcontractors at any tier) to, comply with all guidance for contractor or subcontractor workplace locations published by the Safer Federal Workforce Taskforce, for the duration of the contract. Pursuant to the Executive Order, the Federal Government issued Federal Acquisition Regulation (FAR 52.223-99) and Defense Federal Acquisition Regulation Supplement (DFARS 252.223-7999), along with the “Safer Federal Workforce Task Force COVID-19 Workplace Safety: Guidance for Federal Contractors and Subcontractors.” The Task Force Guidance, as well as Frequently Asked Questions for Federal Contractors, are available for review at <https://www.saferfederalworkforce.gov/contractors/>.

Under the Task Force Guidance for Federal Contractors and Subcontractors, covered contractors must ensure that all covered contractor employees are fully vaccinated for COVID-19, unless the employee is legally entitled to an accommodation. Please refer to the Guidelines and FAQs from the link mentioned above for the latest information on relevant deadlines.

The Task Force Guidance also provides that covered contractors must ensure that all individuals, including covered contractor employees and visitors, comply with published Centers for Disease Control and Prevention (CDC) guidance for masking and physical distancing at a covered contractor workplace, as further described in the Guidance.

The Task Force Guidance applies to any full-time or part-time employee of a covered contractor working on or in connection with a covered contract or working at a covered contractor workplace. This includes employees of covered contractors who are not themselves working on or in connection with a covered contract, such as human resources, billing, and legal review. The Guidance defines “covered contractor workplace” as “a location controlled by a covered contractor at which any employee of a covered contractor working on or in connection with a covered contract is likely to be present during the period of performance for a covered contract. A covered contractor workplace does not include a covered contractor employee’s residence.”

We anticipate that the Safer Federal Workforce Taskforce to issue FAQs or additional guidance to implement the information contained in the White House Fact Sheet. Please periodically check the Safer Federal Workforce Taskforce website linked above.

If you have any questions regarding the new FAR and DFARS clauses and their applicability to your federal contract or subcontract, please contact your assigned ORS Contracts Specialist (<https://research.hawaii.edu/ors/ors-assignments/>).

NATIONAL SCIENCE FOUNDATION (NSF) DESK REVIEW

The National Science Foundation (NSF) recently completed a desk review of the University of Hawaii (UH) which included an assessment of our award-related management practices, a review of the accounting and financial systems, and a review of our procedures for calculating drawdowns.

The following concerns were identified:

1. Although UH articulated its accounting treatment for an unallowable cost that was mistakenly charged to a grant, it has not documented its guidance in writing. The absence of documented guidance may lead to the inconsistent accounting treatment of project-related costs and may potentially result in unallowable costs being charged to awards.
2. Although UH provided policies and procedures for grant-related drawdowns, it has not fully documented its guidance in writing. Specifically, UH has not documented who approves drawdown requests.

For concern #1, UH has added “Unallowable charges should be transferred to a non-extramural or departmental account.” to AP 12.404 Administrative and Financial Management Requirements for Extramurally Financed Research and Training Programs/Activities of the University of Hawaii (UH). This was formerly AP 8.926 and is currently being transferred to Chapter 12 Research.

The Extramural Funds Accounting section of ORS has satisfactorily addressed concern #2 by updating its internal drawdown policy to include approval requirements.

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

REQUIREMENTS FOR PASS THROUGH ENTITIES (PTES) ON UH ISSUED SUBAWARDS

When the University of Hawaii (UH) issues a subaward, we must comply with the requirements outlined at [2 CFR 200.332 “Requirements for pass-through entities”](#). While there are a number of items that must be included in the subaward, a key requirement is for the subrecipient name to match the name associated with its unique entity identifier (UEI). Note that the UEI has recently replaced the DUNS and should be listed in System for Award Management (SAM). This name should also be reflected in the subrecipient’s SAM record. When submitting subaward documents, please ensure that all required documentation match the name that corresponds with the UEI and/or SAM record.

REQUIREMENTS FOR PASS THROUGH ENTITIES (PTES) ON UH-ISSUED SUBAWARDS (CONTINUED)

Although this is not a new requirement we've recently noticed subaward documentation being submitted with inconsistent names or entities that do not match the UEI provided.

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

PARTICIPANT SUPPORT COSTS – REMINDERS

Participant support costs are exempt from federal negotiated indirect cost rate agreement (NICRA) Modified Total Direct Costs (MTDC), as defined under the Office of Management and Uniform Guidance (UG) 2 C.F.R. §200.68.

C.F.R. § 200.75 states, "Participant support costs means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects."

Separate accounts are to be established for participant support costs. Establishing a separate account allows participant support costs to be identified more easily for NICRA computations.

1. Some costs may not be exempt as a standard from NICRA MTDC, except as participant support costs. A separate account for those specific costs allows them to be setup as exempt from Facilities and Administrative (F&A) costs. Non-federal UG sponsors/programs may have varying definitions of participant support costs, so their policies would need be followed.
2. Separate accounts will assist fiscal administrators (FAs)/programs to monitor participant support cost budgets, and rebudgets. These costs must be permitted by the sponsor's guidelines and approved by the sponsor. Sponsor approval is required to rebudget these costs to other categories, unless there is specific authorization from the sponsor. Fixed price agreements would be an exception to the budget/rebudget approval requirement for standard fixed price agreements which should not require rebudget approvals.
3. In addition to setting up the initial account for a new award, if applicable, the ORS accountant will also create the corresponding participant support account based on the awarded budgeted amount. The front of the Account Title is to include "PSUPP-", or "Internship Stipends-", for internship stipends (not salaries/wages via payroll) which are considered a type of participant support.

PARTICIPANT SUPPORT COSTS – REMINDERS (CONTINUED)

4. If a participant support account has not been set up when expected/needed, the FA would submit a new account request, working with their ORS accountant as appropriate. There are times these types of costs may not be clear in the proposal/award budgets, and object codes actually charged may create F&A issues.

If you have any questions, please contact Suzanne Eghan, ORS Extramural Funds Accounting Manager, at efhans@hawaii.edu or (808) 956-4061.

ORS HELPLINE FREQUENTLY ASKED QUESTIONS

How do I request myGRANT approval routing changes?

A ticket should be submitted for a myGRANT approval routing change request (<http://go.hawaii.edu/eVP>). Please attach a memo request signed by from the highest level approver. The memo should specify the unit, person and roles to be changed. For example, the department chair must sign the change request for a department FA change, and the dean must sign the change request for a college-wide FA or department chair change.

How can I gain access to a specific proposal if the principal investigator is no longer with my unit?

After a proposal has been submitted, only proposal viewers can be added to a myGRANT proposal development record (PD). Only someone with aggregator access to the PD can add a proposal viewer. The ORS Helpline can assist you with identifying PD aggregators so that you can request access from them. Please submit a ticket to request assistance <http://go.hawaii.edu/eVP>.