

CONTENTS

- **Federal Funding Accountability & Transparency Act (FFATA) of 2006 and Subsequent 2008 Amendments**
- **National Science Foundation (NSF) New Proposal and Award Policies & Procedures Guide Effective January 18, 2011**
- **Funding Under Minority Programs**
- **Change from Social Security Number to University of Hawai'i Identification Numbers for Cost Sharing System**
- **ORS Website – Vacation Reserve Updates**
- **ORS Helpline Frequently Asked Questions**

From the Director's Office

Aloha Kākou,

We had a very exciting and busy first quarter. As a result of everyone's hard work, the total awards at the University of Hawai'i (UH) concluded at \$251 million for the first quarter. This is indeed a great start for fiscal year 2011. We appreciate the tireless efforts of the ORS staff, as well as the field's cooperation during this extraordinary peak period. As we all know, the awards do not come without responsibilities. The ORS staff will continue to work with principal investigators and fiscal officers in managing these awards.

We have recently received multiple communications from various federal agencies regarding the Federal Funding Accountability and Transparency Act (FFATA) requirements. Information on the interim rule was included in ORS' August newsletter. This month, we have included finalized FFATA guidelines from the Office of Management and Budget (OMB). ORS is currently finalizing the internal procedure for UH and will post it when it has been completed.

The National Science Foundation (NSF) also announced that effective as of January 18, 2011, it will require that new proposals include a "Data Management Plan", and FastLane will not permit submissions of a proposal if the Data Management Plan has not been included. In addition, NSF's mandatory cost sharing will only be required when explicitly authorized by the NSF Director, and voluntary cost sharing will be prohibited.

This month's newsletter also provides clarification of the Department of Education (ED) Minority and Native Hawaiian Institution designations and application processes. The time to apply for Title III designations for the next fiscal year is approaching soon. ORS will send out an announcement after the information is posted on the ED website. Each campus at UH is eligible to submit its own application through ORS so please see the detailed information in the article below.

We hope that you find the information on vacation reserves and our FAQ useful. If you have any pictures from your laboratory that you would like to share on our website, please contact the ORS Helpline at helpline@ors.hawaii.edu or (808) 956-5198, or Linda Fong, Assistant to the Director, at llfong@hawaii.edu or (808) 956-8259.

Mahalo!
Yaa-Yin Fong
Director

Federal Funding Accountability and Transparency Act (FFATA) of 2006 and Subsequent 2008 Amendments

Effective as of October 1, 2010, as required by the Federal Funding Accountability and Transparency Act (FFATA) and subsequent Office of Management and Budget (OMB) guidelines, prime awardees are required to report selected information (including compensation of highly compensated executives) on their first-tier subrecipients related to federal contracts and grants. This information must be made publicly available at USASpending.gov and may include the following, as applicable:

- Executive compensation data for both the prime awardee and first-tier subawardee. A prime awardee is required to report the names and total compensation of the five most highly compensated officers of a prime or subawardee entity if the entity in the preceding fiscal year received eighty percent (80%) or more of its annual gross revenues in federal awards and \$25,000,000 or more in annual gross revenues from federal awards; and the public does not have access to this executive compensation information through periodic reports filed under the Securities and Exchange Act of 1934 or Section 6104 of the Internal Revenue Code of 1986; and
- Subaward information such as entity name DUNS number, address, date and amount of subaward, CFDA number and program title, name of the federal prime sponsor, principal place of performance, subaward number and project description.

For prime contracts of \$25,000 or more, reporting on first-tier subawards is as follows:

- o Phase 1: Reporting subawards of prime awards valued greater than \$20 million began in July 2010;
- o Phase 2: Reporting subawards of prime awards valued greater than \$550,000 began on October 1, 2010; and
- o Phase 3: Reporting subawards of prime awards valued at \$25,000 or more will begin on March 1, 2011.

For prime grants of \$25,000 or more, reporting on first-tier subawards (sub-grants only) is required for all awards made on or after October 1, 2010.

“Subawards” are defined as either subcontracts or grants-specific subawards. A “subcontract” means a subcontract awarded directly by a contractor to furnish supplies or services (including construction) for performance of a prime contract, but excludes supplier agreements with vendors such as long-term arrangements for materials or supplies that would normally be applied to a contractor’s general and administrative expenses or indirect costs. For grants, a “subaward” means a legal instrument to provide support for the performance of any portion of the substantive project or program for which an award was received and that (a) the prime recipient awards to an eligible sub-recipient; or (b) sub-recipient at one tier awards to a sub-recipient at the next lower tier.

(Continued on next page)

Federal Funding Accountability and Transparency Act (FFATA) of 2006 and Subsequent 2008 Amendments (continued)

All awardees must report by the end of the month following the month the award or obligation was made. The first reporting will be done on November 30, 2010. Classified information remains exempt from the prime and subaward reporting requirements.

ORS is developing an online reporting tool to aid in the collection of information required for reporting. ORS will also be working with both the Research Corporation of the University of Hawai'i (RCUH) and the University of Hawai'i Office of Procurement and Real Property Management (OPRPM) to develop the reporting process. Information will be distributed as soon as the process is finalized, so please stay tuned.

For additional information, please refer to the Federal Spending Transparency website at <http://www.whitehouse.gov/omb/open>.

National Science Foundation (NSF) New Proposal and Award Policies & Procedures Guide Effective January 18, 2011

The National Science Foundation (NSF) has issued a revised Proposal and Award Policies and Procedures Guide (PAPPG) effective for proposals submitted or due on or after January 18, 2011.

Clarifications and changes include:

- **Special Information and Supplementary Documentation:** All proposals must describe plans for data management and sharing of the products of research, or assert the absence of the need for such plans. FastLane will not permit submission of a proposal missing the Data Management Plan. This is a clarification of NSF's long standing policy (Chapter II.C.2.j).
- **Cost Sharing:** Inclusion of voluntary cost sharing is prohibited. All organizational resources necessary for the project must be described in the Facilities, Equipment and Other Resources section of the proposal (Chapter II.C.2.g.). The description should be narrative in nature and must not include any quantifiable financial information. Mandatory cost sharing will only be required when explicitly authorized by the NSF Director.
- **Cover Sheet:** The Cover Sheet has been revised to replace the Performing/Research Organization with Project/Performance Site Primary Location information. If the project will be performed at a location other than the awardee, additional geographic information must be provided.

If you have any questions regarding these changes, please contact the NSF Policy Office at (703) 292-8243 or e-mail them at policy@nsf.gov.

Funding Under Minority Programs

When considering applications with minority requirements, please keep in mind that different agencies and even different programs within the same agency may use different definitions.

(Continued on next page)

Funding Under Minority Programs (continued)

The minority definition is generally based on the Title III - Part E of the Higher Education Act (HEA) [20 U.S.C. 1067k(3), Sec. 365 (2), (3), and (5)]. To qualify, an institution must have an enrollment of a single minority group or a combination of minority groups that exceeds fifty percent (50%) of its total enrollment. However, minority groups that are not underrepresented in science and engineering are excluded from being counted as a minority. The United States Department of Education (ED) states that Asians are not underrepresented in science and engineering in the US, therefore all UH campuses currently do not qualify for minority status.

However, not all agencies use this definition of “minority.” For instance, ED Title III - Part A and Part F programs count Asians as a minority group, and all UH campuses meet the criteria for designation as minority institutions under ED Title III. Another example is the Clinical Research Center of Hawaii (UH-CRC), which is an National Institutes of Health minority-funded infrastructure program. Please check with ORS if you want to know whether your campus qualifies for a solicitation requiring “minority” status.

Strategizing ED Title III Applications

Under ED Title III, institutions must annually apply for or renew their minority designation prior to being eligible to apply for funding, and the designation is limited to a certain group of minorities. Although all ten UH campuses meet the requirements to apply under the Native-Hawaiian/Native Alaskan and the Asian/Pacific Islander Title III programs, ED only allows one application per campus under each program. Each campus is eligible to submit its own application through ORS.

Ultimately, the decision to apply for a particular designation should be with the Chancellor’s office if there is a conflict as to which designation to apply for. However, to maximize the funding opportunities under both programs, it would be preferable for some of the UH campuses to apply under the Asian/Pacific Islander category while others apply under the Native-Hawaiian category. Each of the ED Title III programs is funded separately by Congress -- i.e., funding for the Asian/Pacific Islander program is separate from funding for Native Hawaiians. By coordinating the applications of the campuses, the UH system as a whole could increase opportunities of available funds by collaborating on proposal submissions among campuses.

Information on ED Title III designation applications for the next fiscal year will be sent out by ORS once the information is available on the ED website.

For questions or comments related to minority requirements or ED Title III programs, please contact Dr. Susanna Tsai, Associate Director at 956-7800 or susanna.tsai@hawaii.edu

Change from Social Security Number to University of Hawai`i Identification Number for Cost Sharing System

Effective October 2010, the social security number (SSN) will be replaced with the University of Hawai`i (UH) identification number (UH Alt ID) in the Research Corporation of the University of Hawai`i (RCUH) Fast Track Cost Sharing system.

(Continued on next page)

Change from Social Security Number to University of Hawai'i Identification Number for Cost Sharing System (continued)

To accommodate the modifications to Fast Track and the Cost Sharing Record System, Fast Track will be temporarily disabled after the September 2010 cost sharing data has been processed so that the data can be converted to the new format. During this time, your patience will be appreciated as it will not be possible to input any cost sharing forms during the downtime. Once Fast Track is re-enabled for data entry, the fiscal officers (FOs) will be informed via the UH FO listserv. Fast Track will be affected as follows:

- On the form, the SSN will be called the UH Alt ID and will be a single nine-digit field. Data must be entered as zero ("0") followed by the employee's eight-digit UH Alt ID (e.g., 012345678).
- The Master Cost Sharing Record will return to its unmasked format.
- Forms "Submitted to CSR" will be masked (e.g., xxx-xx-nnnn).

Although the SSN will be replaced with the UH Alt ID, COBOL cannot be reprogrammed to unmask the reports. Thus, Page Center reports (e.g., 1914A, 1915A, etc.) will continue to be masked (xxx-xx-nnnn).

Should you have any questions, please contact Kevin Hanaoka, Cost Studies Manager, at (808) 956-9242, or hanaokak@hawaii.edu.

ORS Website – Vacation Reserve Updates

The ORS Vacation Reserve web page at <http://www.ors.hawaii.edu/vacation-reserve.asp> has been updated. The web page now contains background information on the vacation reserve, as well as information on how to process journal vouchers and make credit transfers.

Should you have any questions, please contact Kevin Hanaoka, cost Studies Manager, at (808) 956-9242, or hanaokak@hawaii.edu.

ORS Helpline Frequently Asked Questions

What is a "Human Subject"?

A "human subject" is a living individual about whom an investigator conducting research obtains data through interaction or intervention with the individual or identifiable private information.

How do I get approval for human subject research?

An application for human subject research must be submitted to the Committee on Human Studies (CHS) office before the proposal is submitted to ORS. Application instructions can be found at: http://www.hawaii.edu/irb/html/hta_inst.htm

(Continued on next page)

ORS Helpline Frequently Asked Questions (continued)

If the proposal is for NIH funding (including flow-through NIH funds), all project personnel must complete the NIH Training Module at http://www.hawaii.edu/irb/html/train_cal.htm

How long does it typically take for CHS review?

A full committee review may take up to two months or longer depending on the number of amendments or additional material that is required. If your project qualifies for an exempt or expedited review, it normally takes about seven days once all required information and documents are provided.

Do you have a Question or Comment for ORS?

Please feel free to contact us at the ORS Helpline:

Email: helpline@ors.hawaii.edu or Phone: (808) 956-5198