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## From the Director's Office

Aloha kākou,

Once more, the federal year end rush has been demanding and challenging. Thanks to the ORS Contracts and Grants specialists' dedication, we have finished a strong first quarter for fiscal year (FY) 2015 with total awards of \$191 million, which is about a 15% increase from FY 2014. Congratulations to all principal investigators who have received awards. We wish you much success with your projects.

In October, we successfully implemented a revised institutional questionnaire in *myGRANT* for proposal development. The new questionnaire has consolidated and reworded questions to make them easier to understand and more transparent. We hope you find the enhancement helpful.

In this month's articles, we provide additional information with regard to the Office of Management and Budget (OMB) Uniform Guidance (UG) on the timely closeout of awards, useful information on the timely transfer your awards from other institutions to the University of Hawaii, information on eRA validation checks for grant applications, and a reminder for Financial Conflict of Interest disclosure when submitting proposals in *myGRANT*. There is also information for Fiscal Administrators in regard to the vacation transfer and tiered IDC rate ID in KFS.

Happy Discovery!

Yaa-Yin Fong



## National Institute of Health (NIH) eRA Systems Systematic Application Compliance Checking– What It Is and What It Is Not

Automated enforcement of business rules by National Institutes of Health (NIH) eRA systems plays an important role in the application submission process. Understanding what that role covers can be the difference between an application moving forward to review or not.

System-enforced application validations are a strategy for providing users with the opportunity to identify and fix many showstopper errors prior to submission deadlines and a mechanism to reduce the number of applications NIH staff has to return for noncompliance. They provide an efficient method of ensuring large numbers of applications follow the same general rules and that the rules are enforced with consistency and fairness. It is also a way to ensure application information is formatted appropriately for NIH systems and can be assembled into a consolidated application image for review.

System-enforced application validations are not a way to reduce the number of applications received to bump up NIH success rates or a substitute for following the instructions provided in Funding Opportunity Announcements (FOAs), or application guides and notices in the [NIH Guide for Grants and Contracts](#). In addition, the validations are not helpful unless you submit early enough (as in days, not hours or minutes) to have time to fix identified errors.

The most important point is that although an application cannot move forward to review without first passing systematic compliance checks, the opposite is not necessarily true. Passing the system-enforced checks does not guarantee your application will be accepted for review and funding consideration.

NIH tries to use automated validations to catch as many showstopper conditions as possible. However, there are a number of manual checks done by NIH staff after submission that can also prevent an application from moving forward. Some of these examples are below:

- NIH staff can reject an application for not following font, margin and page size requirements outlined in the application guide. Automated validations will give an error for a 15-page Research Strategy on an R01 application, but not for a 12-page Research Strategy with 9 point font.
- Programmatic or funding opportunity announcement specific requirements, especially those listed in FOA Section IV - Application and Submission Information, are typically highly specialized and manually validated.
- NIH staff can reject an application for issues with application attachment content, like including additional Research Strategy information in other attachments not restricted by page (NIH staff internally call this ‘overstuffing’ an application).

As you submit your application, keep in mind what system-enforced application validations do and do not provide, then accept them for what they are and use good submission practices to avoid potential problems they cannot and will not guard against.

For questions or more information, contact Emmitt Ford, Contracts and Grants Manager, Kaka`ako Service Center, at [emmitt@hawaii.edu](mailto:emmitt@hawaii.edu) or (808) 356-5764.

## Office of Management and Budget's (OMB's) Uniform Guidance and Timely Closeout of Awards

The September ORS Newsletter included an article on the Office of Management and Budget's new Uniform Guidance (UG). Included in that article was mention that timely closeout of awards is an area of emphasis in the UG. To reduce the risk of unrecoverable costs on federal awards due to federal agencies' suspension of payments after the 90 day closeout period, ORS Projects Fiscal Accounting (PFA) is planning several strategies:

CG Accountants have been instructed to obtain fiscal administrator (FA) closeout confirmation that all expenditures are recorded in time to be drawn with at least 2 planned weekly draws in advance of the 90 day cutoff so that unanticipated delays (i.e., key personnel out sick) do not cause the award to go past 90 days after expiration with unreimbursed costs.

For awards nearing 90 days after award end date, CG Accountants will monitor these awards & make sure that the final draw occurs no later than the earlier of 90 days, or when the 90-day final/annual report is submitted, if required.

ORS PFA will draw on Letter of Credit awards more frequently than once per week for awards that are nearing the 90 day cutoff. If necessary, a separate draw will be done on awards with unreimbursed costs where the next scheduled draw would not occur until past the 90 day closeout period.

CG Accountants have been instructed to complete final draws no less than 2 days prior to the end of the 90 day closeout period due to time-zone differences. Final draws will be earlier if additional limits from the federal agency are anticipated (i.e., sponsor system periodic early shut-downs, etc.).

If you have any questions on these changes please contact Bob Roberts, Projects Fiscal Accounting Manager, at [rroberts@hawaii.edu](mailto:rroberts@hawaii.edu) or (808) 956-6959.

## Avoiding Delays in Award Transfers

Since awards are granted to the institution and not the individual principal investigator (PI), transfers of extramural awards require the involvement of the sponsored research office of both the receiving and the transferring institutions. If you have accepted a position with the University of Hawaii (UH), and would like to transfer your existing award(s) here from your former institution, discuss the transfer with the sponsoring agency, your former institution, your department chair, your dean/director, your fiscal administrator and your assigned Office of Research Services (ORS) Specialist (<http://www.ors.hawaii.edu/index.php/ors-assignments>).

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## Avoiding Delays in Award Transfers (continued)

Each sponsor may have their own award transfer procedures, so the PI should follow the sponsor's specific terms and conditions regarding their award. If they are not addressed in the award, the PI should contact the sponsor to confirm transfer procedures. To avoid delays in transfers, these are some general guidelines to be followed.

From your former institution:

1. Obtain approval from your current institution to relinquish the award. The PI, department head and dean must agree that the award should transfer with the PI. All Co-PIs must also be notified of the transfer. The relinquishment letter from the PI/former institution needs to be submitted to the sponsor for approval along with the other sponsor required documents. Some of the agency specific procedures can be found at: <http://www.ors.hawaii.edu/index.php/start-up-a-manage/manage-award/principal-investigator-pi-award-transfer-procedures>;
2. Confirm the status of cost-sharing commitment made by your former institution;
3. Discuss any technology developments with the Technology Transfer Office;
4. Determine the exact amount of unexpended or unobligated funds with your former Business Office to transfer to your new award;
5. Capitalized equipment purchased on the current award may move with the PI to the new institution. Contact your former institution's Property Office;
6. Any active subawardees should be notified of the move and that their current award may be terminated;
7. Many sponsors will closeout the original award and issue a new award to the new institution. This requires completing and submitting final technical reports, financial reports, invention statements, and property reports before the sponsor will award the new institution.

From the University of Hawaii:

1. A proposal from the University of Hawaii may be required by the sponsor to transfer the balance of your original award. Work with your department Fiscal Administrator and your ORS Specialist (<http://www.ors.hawaii.edu/index.php/ors-assignments>) to create a proposal development record in myGRANT (<http://www.ors.hawaii.edu/index.php/mygrant-link>) to route for departmental approval. The proposal will be the scope of work yet to be accomplished on the project. Your budget will be the unexpended/unobligated funds from your original award. Once the request is submitted to the sponsor for the amount, it will be difficult to change if a mistake has been made;
2. Any compliance approvals for your research will need to be acquired from the appropriate office (<http://www.ors.hawaii.edu/index.php/uh-related-offices>) before you can start your new project;
3. Once awarded, ORS will notify you and your Fiscal Administrator so you can open your account with the ORS Accounting Section.

Please feel free to contact your assigned ORS Specialist (<http://www.ors.hawaii.edu/index.php/ors-assignments>) if you have any questions.

## Reminders About Significant Financial Interest (SFI) and Conflicts of Interest (COI) Disclosure and ORS Disclosure Forms Changes

ORS is committed to assisting the University of Hawaii (UH) in promoting integrity and objectivity in research and scholarly activities as maintained in UH Executive Policy E5.214, and Administrative Procedures A5.504 and A8.956. As such, financial conflicts of interest (FCOI) information is posted on the ORS webpage at <http://www.ors.hawaii.edu/index.php/fcoi>, and includes UH Policy and Procedures (including the UH employee annual disclosure form), ORS forms regarding SFI/COI disclosures, link to ORS FCOI training, as well as additional informational links. ORS also has recently created a confidential email account for all COI-related questions, issues, or concerns – [coi@ors.hawaii.edu](mailto:coi@ors.hawaii.edu).

When proposals are created in the *myGRANT* Proposal Development module, a response to the following FCOI certification question is required from all UH-employed (including RCUH) Investigators and Key Personnel:

*Do you, or any members of your immediate family, have any Significant Financial Interests (SFI) or other Conflicts of Interest (COI), as defined by UH Executive Policy E5.214 and APM A5.504, which could reasonably appear to be related to your Institutional responsibilities?*

If you answer “yes” to having an SFI or other COI you MUST attach a copy of:

1. Your signed UH annual disclosure form OR
2. The ORS FCOI-UH Employee disclosure update form (to update or revise a previously submitted annual disclosure form). The form may be found here: [FCOI - UH Employee Form "Significant Financial Interest Report"](#).

Non-UH Investigators and Key Personnel listed on any UH proposal MUST complete the ORS FCOI-Non-UH Employee disclosure form, which must be attached to the *myGRANT* record. The form may be found here: [FCOI - Non UH Employee Form "Significant Financial Interest Report"](#).

**EXCEPTION:** Federal employees listed as Investigator/Key Personnel are exempt from having to submit a disclosure form. Federal agencies have their own COI requirements and are excluded from UH disclosure requirements.

Please contact ORS Compliance at [coi@ors.hawaii.edu](mailto:coi@ors.hawaii.edu) if you have any COI-related questions.

## Reminder: Ad Hoc Route Vacation Reserve Account (SW 6650497) eDocs to ORS Cost Studies

ORS Cost Studies can no longer take action on eDocs submitted to UH ORS Accounting. Fiscal administrators (FAs) must ad hoc route Salary Expense Transfer (ST), Distribution of Income and Expense (DI) and Disbursement Voucher (DV) involving the vacation reserve account (SW 6650497) to UH ORS Cost Studies (Group ID 20021). If the eDoc is submitted to UH ORS Accounting by mistake, the FA should contact ORS Accounting staff to disapprove the eDoc.

Should you have any questions, please contact Cindy Lee, Cost Studies and Rate Analyst, at [chancind@hawaii.edu](mailto:chancind@hawaii.edu) or (808) 956-3377.

## Facilities & Administrative (F&A) Rate ID for Project Accounts in KFS

As a result of the Facilities & Administrative (F&A) rate agreement that became effective in Fiscal Year (FY) 2014, many extramural accounts required a change in indirect cost (IDC) rate at the start of the 2015 fiscal year. This was a complex process that involved a considerable amount of time and effort to make this transition work, on the part of both ORS Accountants and Fiscal Administrators. Because certain F&A rates are also changing at the start of FY 2016 and FY 2017 (see <http://www.ors.hawaii.edu/index.php/apply/budget-development/indirect-costs>), the process that was used at the end of FY 2014 may have needed to be repeated prior to the start of these fiscal years as well. However, because KFS uses IDC Rate IDs that can be activated and/or inactivated on a fiscal year basis, a more efficient way was created to handle the changing F&A rates.

New IDC Rate IDs were created in the Kualii Financial System (KFS) for each of the possible IDC tiers that could be applied to an extramural account.

Therefore, instead of repeating the lengthy review process at the start of each fiscal year on each affected extramural account, new KFS Rate IDs were automatically applied to the project accounts that will change to the new F&A rate at the start of each new fiscal year.

The following table is a list of the current tiered KFS IDC Rate IDs and the IDC rate for those Rate IDs for each fiscal year:

KFS IDC Rate ID	FY2014	FY2015	FY2016	FY2017
901	40%	41%	41%	41%
902	51%	52%	52%	52%
903	40%	41%	41.5%	41.5%
904	51%	52%	53%	53%
905	51%	52%	53%	54%

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## Facilities & Administrative (F&A) Rate ID for Project Accounts in KFS (continued)

If you have any questions on the IDC rates please contact Bob Roberts, ORS Projects Fiscal Accounting Manager at [rroberts@hawaii.edu](mailto:rroberts@hawaii.edu) or (808) 956-6959.

### ORS Helpline Frequently Asked Questions (FAQs)

#### I need help with filling out a Grants.gov SF424 R&R form.

Please see the quick reference guide for filling out the SF424 R&R form:

[http://www.ors.hawaii.edu/files/SF424\\_Instructions.pdf](http://www.ors.hawaii.edu/files/SF424_Instructions.pdf)

You may also contact the ORS Helpline for additional assistance at [helpline@ors.hawaii.edu](mailto:helpline@ors.hawaii.edu) or (808) 956-5198.

#### How do I transmit the SF424 application package to ORS for approval and submission?

Please attach the SF424 application package to your *myGRANT* proposal development record in the Abstracts and Attachments section. Use the attachment type “Grants.gov Application Package (Non S2S)” and make sure to fill out a short description of the attachment.

#### Do you have a guide for submitting Grants.gov or other proposals in *myGRANT*?

You can find several guides on the *myGRANT* Help tab:

<https://mygrant.ors.hawaii.edu/mygrant/portal.do?selectedTab=portalHelpBody>

If you are submitting a proposal via a Grants.gov application package (PDF), the “General Guide” will help you step-by-step through the entire *myGRANT* process.

#### **Do you have a Question or Comment for ORS?**

*Please feel free to contact us at the ORS Helpline:*

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