Grants Management Handbook

OFFICE OF THE PROVOST

Office of Sponsored Programs & Research Integrity
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Section I: Sponsored Programs Overview

I. Introduction

The effective administration and management of a university's research endeavors are critical responsibilities, with significant long-term impacts on the public, the institution, and individuals involved. Like many higher education institutions, **Chaminade University of Honolulu (CUH)** has a structured ecosystem of roles and responsibilities.

CUH fosters a culture of research and innovation that spans all academic disciplines. This commitment arises from our dedication to advancing knowledge, educating both undergraduate and graduate students, and addressing the economic and cultural needs of our community.

Contained within this handbook are the officially approved policies and procedures of CUH concerning all activities associated with research, whether funded internally or externally. In conjunction with these university policies, it is imperative to account for the specific guidelines of funding agencies and the unique terms and conditions associated with each funded research endeavor. Additionally, funded research undertakings are bound by various federal and state regulations.

It is our aspiration and intent that the policies detailed in this handbook will undergo review and, when necessary, be adapted, revoked, or substituted following an annual policy assessment and subsequent endorsement by the Office of the Provost. Consequently, this handbook is conceived as a dynamic document, subject to periodic updates in response to changing regulatory landscapes.

Throughout this handbook, terms such as research, sponsored research, sponsored programs, and sponsored projects will be used interchangeably. These reflect the broad scope of exploration, creativity, and innovation across academic disciplines, including the sciences, technology, social and behavioral sciences, arts, and humanities.

II. Purpose

The CUH Grants Management Handbook serves as an educational resource and a comprehensive framework of knowledge for **Principal Investigators (PIs)**, **Project Directors (PDs)**, as well as employees and students involved in research activities, whether funded internally or externally (hereinafter referred to as "research" as defined in Appendix I). This handbook is intended to facilitate a clear understanding and effective execution of responsibilities for PIs, PDs, research staff, and those who provide support to research activities, including the Provost, College Deans, Academic Department Chairs, **Office of Sponsored Programs & Research Integrity (OSP)**, Business Office, Human Resources, IT, and Facilities.

The realm of grant management is extensive, and it is imperative for PIs and PDs to comprehend the specific duties associated with their roles.

PIs and PDs, often faculty or University employees, hold leadership positions in research projects. Upon receiving an award, PIs and PDs bear full responsibility for the implementation of the proposed research project. These responsibilities encompass compliance with award terms, project direction, adherence to proposed budgets, and meeting project deadlines. The PI/PD assumes the role of the primary contact for all research-related matters, with CUH administrative offices providing support to ensure the maintenance of regulatory compliance.

The financial and administrative obligations of PIs, PDs, and the institution are primarily governed by the **Office of Management and Budget (OMB)** Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, commonly known as the Uniform Guidance (2 CFR Part 200). These

regulations establish the standards for managing Federal awards and provide a comprehensive compliance framework.

Each Federal Awarding Agency may issue its own agency-specific policies, such as the National Institutes of Health (NIH) Grants Policy Statement and the National Science Foundation (NSF) Proposal and Award Policies and Procedures Guide (PAPPG). PIs and PDs must carefully review both the Uniform Guidance and relevant agency-specific guidelines to ensure compliance. Particular attention should be given to award dates, terms and conditions, and other factors that may affect funding authorization, reporting deadlines, and project deliverables.

The Uniform Guidance and related federal regulations govern core aspects of sponsored program administration, including:

- Allowable and unallowable costs (e.g., salaries, equipment, supplies, participant support)
- Financial management and reporting requirements
- Single Audit Requirements:
  - Institutions expending $750,000 or more in federal funds in a fiscal year must undergo a Single Audit under Subpart F of the Uniform Guidance.
  - CUH ensures compliance by maintaining adequate internal controls, preparing accurate financial statements, and addressing any audit findings through corrective action plans.
- Subrecipient monitoring and risk assessment
- Procurement standards and competitive bidding processes
- Research security and disclosure requirements, including federal mandates under Section 10634 of the CHIPS and Science Act of 2022 (42 U.S.C. §19234), which require appropriate training and disclosure of foreign affiliations, financial interests, and support.
- Recordkeeping and retention requirements for financial and programmatic documentation
- Conflicts of interest (COI) and conflicts of commitment (COC) policies

A. Data Management and Sharing Plans (DMSPs)

Federal agencies increasingly require PIs and PDs to demonstrate responsible stewardship of research data. For example:

- **NIH** requires a **Data Management and Sharing Plan** for all research proposals submitted on or after **January 25, 2023**, outlining how scientific data and metadata will be managed and shared.
- **NSF** requires a **Data Management Plan (DMP)** describing how data will be disseminated, preserved, and made accessible to the research community.

PI/PDs must ensure compliance with these policies and integrate them into proposal development and post-award management, coordinating with CUH's compliance and IT teams for secure data storage and transfer solutions.

B. Institutional Alignment

CUH has established institutional policies and procedures for sponsored projects that align with these federal regulations. These policies are designed to support PIs, PDs, and research staff in ensuring compliance throughout the **award lifecycle**, from proposal submission to project closeout.

PIs, PDs, research staff, and CUH administrative personnel are responsible for familiarizing themselves with the relevant regulations and internal procedures. CUH provides training, guidance, and resources to support compliance, including risk assessment, research integrity practices, and reporting mechanisms.

Throughout this handbook, the terms **"award," "grant," and "sponsored project"** are used interchangeably to refer to externally funded research and related activities managed by PIs and PDs.

III. CUH OSP Mission and Responsibilities

A. Mission Statement

As the university's Authorized Organization Representative, the mission of the Office of Sponsored Programs & Research Integrity (OSP) is to partner with our faculty and staff so that they can achieve their granting goals aligned with our schools' Marianist values and commitment to serving the Native Hawaiian people and culture. We strive to provide the highest quality research administration at all stages of the grant lifecycle.

B. Research Administration Roles & Responsibilities at Chaminade

The PI/PD has responsibility for designing, executing and managing the research project or program. The PI/PD oversees all research activities and is responsible for the oversight of the fiscal and administrative management of the research project or program. The PI/PD conducts research and sponsored project activities in an objective and unbiased manner in compliance with institutional policies and governmental regulations.

Each school at CUH has a **dean's office**, which includes the school dean and all members of the dean's administration. This office manages the research enterprise within a school. It provides local direction and resources for the training and implementation of federal regulations as well as sponsor and university policies and procedures.

Within each school are **departments**, which are overseen by a chair. The chair oversees the individuals engaged in research in the department or center and ensures that their unit's research objectives are consistent with those of the school and University.

OSP supports the PI/PD by providing financial and administrative management in accordance with all applicable regulations and policies.

OSP responsibilities include:
- Reviewing proposals developed by PIs/PDs for compliance, submitting and/or providing institutional endorsement of those proposals, and overseeing the financial and administrative management of awards, including the proper financial accounting of sponsored funds.
- Ensuring compliance with institutional policies and Federal regulations related to ethical concerns and safety practices. This includes ensuring the safety of animals and humans in the conduct of research as well as ensuring that research is conducted in an ethical and unbiased manner.
- Managing space and training in select shared and core facilities on campus.
- Facilitating external partnerships and sponsor identification, including developing sponsor relations and working to bring academic innovation to market.

OSP is responsible for the review, authorization, and submission of proposals, the negotiation and acceptance of awards, and non-financial post-award management. OSP reviews and negotiates agreements and provides institutional endorsement, including acceptance of an award. OSP assists PIs/PDs with financial reporting, collecting revenue, coordinating audits, and processing transactions related to sponsored projects.

C. Research Administration

Research administration is defined as the provision of guidance and support in the development, management, and implementation of research projects. Research administration encompasses a wide range of functions, including preparing and submitting proposals, negotiating contracts and accepting awards, post-award financial management, and ensuring completion of required institutional endorsements.

D. Sponsored Projects

Sponsored research can be defined as research and development activities (including training) that are externally funded and have specified project plans, accountability measures, and outputs. CUH enters into many

types of research agreements with sponsors, including the federal government, foundations, other universities, and industry.

E. Types of Sponsors

Sponsors can generally be classified into two broad categories: U.S. federal government sponsors and non-federal entities. Federal government sponsors include departments and agencies such as the National Institutes of Health (NIH), the National Science Foundation (NSF), and the Department of Defense (DoD). Non-federal sponsors encompass a range of entities, including state and local governments, foundations, nonprofits, industry partners, and international organizations.

You may encounter differences in solicitations based on the sponsor type and even among individual sponsors. Federal government solicitations tend to be more standardized, as all federal sponsors must adhere to laws and regulations that govern the use and management of federal funds, such as the Office of Management and Budget's Uniform Guidance. In contrast, solicitations from non-federal sponsors vary widely. They can range from public calls for proposals to direct email invitations to individual investigators.

IV. Overview of Funded & Non-Funded Agreements

Chaminade's relationships with sponsors are governed by a wide range of agreement types that define each party's rights and obligations in the relationship. Agreements sometimes contain restrictive language that may conflict with basic academic rights, intellectual property rights, and/or other terms that must be negotiated by OSP.

A. Non-Funded Agreements

Researchers often collaborate on research or share research data and materials with other scientists or institutions without receiving funding. For many non-funded (or unfunded) collaborations a written agreement is beneficial or necessary. Non-funded agreements set out expectations, terms, and requirements that protect the interests of the investigators and the participating organizations. Types of non-funded agreements include **Non-Disclosure Agreements (NDA)**, **Data Use Agreements (DUA)**, and **Material Transfer Agreements (MTA)**. It is important to note that non-funded agreements may involve the provision or exchange of something of value and are often incorporated within funded agreements.

B. Funded (or Sponsored Research) Agreements

Sponsored research agreements, including incoming subcontracts and clinical trials, usually require negotiation between the University and the sponsor, and always require the approval/signature of the **Authorized Organizational Representative (AOR)** in OSP.

C. Grant vs. Contract

Funding Mechanisms are the various formal means through which sponsors contract with recipient institutions to provide funding. The four most common types of funding mechanisms encountered in sponsored research are: grants, cooperative agreements, contracts, and subcontracts. Let's briefly look at each of these types.

A **grant** is a financial assistance mechanism where a sponsor gives funds or products to a recipient for a specific project. The sponsor providing the grant usually requires some level of reporting and compliance by the recipient. To receive a grant, a potential recipient typically must submit a funding proposal, either proactively or in response to a specific solicitation from a funder. At CUH, we typically receive grants from government agencies, foundations, and nonprofits.

A **cooperative agreement** is a second type of financial assistance mechanism, very similar to a grant. The difference between the two is that grants allow the PI to drive the project activity whereas sponsors are

significantly involved in the scientific or programmatic activities with cooperative agreements. Involvement could mean guidance, coordination, and/or participation in the work performed under the agreement.

A **contract** is a type of procurement mechanism where a sponsor provides funds to a recipient in exchange for a specified product. The contract outlines the performance requirements, such as project milestones and deliverables, and payment terms, is subject to one of two pricing methods: Fixed Rate/capitation and Cost Reimbursable.

Fixed rate contracts commit the recipient to completing a defined scope of work for a set amount. This is essentially a performance-based agreement whereby the sponsor is only obligated to pay when performance objectives are met. This is essentially a performance-based agreement whereby the sponsor is only obligated to pay when performance objectives are met. Financial reporting is not usually required with this type of contact, but a risk to the recipient is that any costs beyond the approved budget will NOT be reimbursed by the sponsor. Fixed price contracts are relatively rare but are more likely to come from industry or for clinical trials.

Cost reimbursable contracts provide funding based on actual expenditures, and the sponsor pays for all allowable costs incurred to execute the project. Cost- reimbursable contracts are more involved than fixed price contracts when it comes to invoicing terms and monitoring by the sponsor. Financial reporting is required for these contracts. Some cost reimbursable contracts will be straightforward (for example, a standard unilateral NIH or NSF agreement). Regardless of sponsor, most contracts received by CUH are cost reimbursable.

D. Gift vs. Grant

If a private industry partner wants to give funding to a CUH faculty member as gift not subject to the same requirements as sponsored research awards, then that gift must meet certain terms. Otherwise, the funding would be considered a sponsored award (likely a teaming agreement or contract) and subject to institutional requirements for sponsored awards. The following chart outlines the main differences between sponsored research agreements and gifts.

Sponsored Projects	Gifts
• May be granted following a researcher's response to a request for proposal • Will be issued as a contract or grant • Includes specific terms and conditions (e.g., intellectual property, publication), scope of work, and/or deliverables • Includes budgets (detailed or high-level) with defined funding periods • Requires financial reports, progress reports, and/or audit requirements • May require teaming, non-disclosure or confidentiality agreements • May include compliance such human or animal subjects	• May be given following a researcher's response to a request for proposal • Will be issued as a gift (usually as a letter) • Does not include terms and conditions for acceptance or require a specific scope of work, deliverable(s), or project activity • Does not include budgeting terms or conditions for payment • Does not request or require financial reporting, progress reports, and/or audits • Does not require teaming, non-disclosure or confidentiality agreements • Does not include compliance such as human or animal subjects

V. Sponsored Project Lifecycle

This cycle begins with a series of steps that are commonly referred to as **pre-award administration**. These steps include identifying funding opportunities, proposal development/submission, award negotiation and acceptance.

Award set-up – in other words, the point in the life cycle when an award is formally established – is a transitional step from pre-award administration to post-award administration. The post-award steps include award management and award closeout.

A. Identifying Funding Opportunities

Before an investigator prepares a proposal, they must first decide which opportunities to pursue. There are several ways that investigators become aware of funding opportunities and identify potential sponsors aligned with their research interests. Some sponsors proactively search for researchers and institutions that they believe will help them achieve their goals.

Investigators may become aware of an opportunity through their professional network (for example, through a pre-existing relationship with a corporate partner).

Perhaps most commonly are solicitations for proposals by sponsors. Sponsors often communicate their research priorities via public solicitations for research project proposals. Terminology can vary across sponsors, but common names for solicitations include **Funding Opportunity Announcements (FOAs), Notice of Funding Opportunities (NOFOs), Program Announcements (PAs), Requests for Applications (RFAs), and Requests for Proposals (RFPs)**.

B. Proposal Development & Submission

The next phase in the Sponsored Project Life Cycle is proposal development and submission. One of the primary functions of OSP is the campus-wide facilitation of proposal submission to external sponsors. During the proposal development process OSP will work closely with the PI/PD; OSP completes the administrative components of the proposal, and the PI/PD completes the technical portion. Before submitting the proposal to the sponsor, OSP will route it through the system to obtain any required reviews and approvals from departments and schools. OSP then reviews all proposals, requests any changes necessary to comply with institutional or agency guidelines, and then facilitates the submission of the proposal to the sponsor.

The sponsor receives the proposal and initiates a peer review process to double check accuracy of the science and research. If the sponsor decides to fund a proposal, they will notify OSP and the investigator. If an award notice is sent directly to a department or PI/PD, it is important to inform OSP as soon as possible. *OSP holds the institutional authority to review, negotiate, and endorse sponsored project agreements.*

C. Award Negotiation & Acceptance

All proposals must be reviewed by OSP. Although they may not all need to be negotiated before they can proceed to being set up at CUH, some may contain provisions that are unacceptable to the institution or will require documentation of special management. Awards that frequently require negotiation are foundation awards and federal contracts. OSP ensures that terms of awards align with the university's mission and with university policies. OSP manages the negotiation with the sponsor, working to secure acceptable - and sometimes more favorable - terms. OSP also provides institutional endorsement of award (i.e., institutional acceptance of an award and the associated terms of that award).

D. Award Setup

Once award negotiations are finalized and the award has been accepted, OSP will transition from pre-award to post-award administration. OSP receives, establishes, and processes awards, ensuring that all necessary conflicts of interest have been addressed. OSP then manages expenses associated with the project.

E. Award Management

Award management includes a wide variety of tasks and responsibilities and emphasizes compliance with the terms and conditions of each award. These include assigning, planning, charging, and monitoring expenses posted to a sponsored project to ensure alignment with the project's budget. Additionally, they involve making necessary project modifications, such as changes in the work scope or personnel, in compliance with the award's terms and sponsor policies. Ensuring that any required human or animal protocols undergo annual review and maintaining current approvals are also essential tasks. Finally, award management involves submitting technical and financial reports as required by the sponsor.

F. Award Closeout

The final stage is the award closeout. Each award includes a deadline for completing the project, both programmatically and financially. As the end of a project approaches, OSP works with PIs/PDs to ensure all project expenses are charged correctly and any deficits are resolved. OSP oversees the submission of final financial reports. With this, the Sponsored Project Life Cycle is complete.

G. Summary of Grant Lifecycle Stages and Responsibilities

Lifecycle Stage	Typical Supporting Administrative and/or Academic Support Personnel
Finding Funding Opportunities: Identifying and/or searching for applicable funding opportunities.	Senior Director of OSP
Proposal Development: Proposal solicitation review; proposal compliance; continuous and final proposal review and feedback; budget development.	Senior Director of OSP, Grants Specialist
Proposal Review & Submission: Review of budget; cost sharing/ matching; effort commitment; course release/buyout; authorized signature on proposal routing form and proposal; Electronic or hard copy submission to sponsor.	Senior Director of OSP, Grants Management Director, Grants Specialist, Vice Provost/Provost
Award Negotiation & Acceptance: Negotiation of terms and conditions of pending grant or contract award; acceptance of award on behalf of University by Authorized Official.	Senior Director of OSP, Grants Management Director, Grants Specialist, Vice Provost/Provost
Project Start-Up:	Senior Director of OSP, Grants Management Director, Grants Specialist, Vice Provost/Provost

Processing of award set-up; gaining necessary institutional approvals prior to project commencement.	
Award Management: Day to day project/program management; institutional compliance with sponsor requirements; institutional prior approval; contract continuations; modifications; and amendments.	Senior Director of OSP, Grants Management Director, Grants Specialist, Vice Provost/Provost
Award Closeout: Closing out of award; final reports.	Senior Director of OSP, Grants Specialist

VI. Communications with Sponsor

OSP manages all official sponsor communications on behalf of the university. Faculty are not authorized to legally bind the institution. For administrative matters, PIs or department staff must contact OSP, as some sponsors only accept communication from designated officials within OSP.

Faculty may communicate directly with program officers on technical matters. However, if discussions lead to changes in scope, budget, or compliance areas (e.g., IRB, COI, Export Control), OSP must be notified. Communications or approvals not processed through OSP are not final until reviewed and approved by the university.

Section II: Funding Opportunities and Pre-Proposal Requirements

Chaminade University receives external support from a range of sponsors, including federal and state agencies, major foundations, corporations, and private donors. These external funds are essential to advancing the university's mission in research, education, and service. While federal agencies have historically served as the primary sponsors of research and infrastructure development, faculty and staff are encouraged to pursue both governmental and non-governmental funding opportunities consistent with institutional priorities.

This policy applies to all external sources of funding, including grants, contracts, and cooperative agreements, regardless of the sponsor type. Non-governmental sponsors may include private foundations, corporations, associations, community organizations, and other philanthropic entities.

Pursuant to 2 CFR 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) and related federal sponsor guidelines, all proposals for external funding must be reviewed and approved by OSP prior to submission. This review ensures compliance with institutional, sponsor, and federal requirements, including eligibility verification, budget allowability, and resource availability.

Before preparing or submitting a proposal, faculty and staff must consult with OSP to confirm the following:
- The funding opportunity is open and submission deadlines are valid.
- The university and the Principal Investigator (PI) meet all sponsor eligibility criteria.
- The proposed project scope, budget, and timeline are feasible and align with sponsor and university requirements.
- Submission limits, if applicable, are observed.
- Any mandatory or voluntary cost-sharing or matching commitments are identified and approved.
- The proposed project does not require additional university resources, space, or renovations without prior authorization.

Early engagement with OSP is mandatory to ensure institutional compliance, proper routing, and endorsement by authorized officials prior to submission. Failure to obtain OSP review and approval may result in withdrawal of the proposal or non-acceptance of the award by the university.

Section III: Proposal Development

OSP is responsible for the coordination and facilitation of all proposal submissions to external sponsors on behalf of Chaminade University. OSP supports Principal Investigators (PIs) and Project Directors (PDs) in the preparation, review, and submission of proposals to ensure compliance with institutional, sponsor, and federal requirements.

Proposal development timelines vary based on the complexity of the project, sponsor requirements, and collaboration needs. Faculty and staff are expected to allocate sufficient time for proposal preparation, including internal reviews and necessary approvals. Adequate time must also be provided for review by the dean or direct supervisor, and for institutional review and endorsement by OSP.

To ensure compliance and timely submission, PIs should adhere to the university's proposal submission timeline as outlined in the OSP Pre-Award Procedures. Proposals submitted after internal deadlines may not receive full review and are at risk of being delayed or rejected.

PROJECT IDEA	FUNDING	DEVELOPMENT		SUBMISSION		
Anytime	Anytime	**8** Weeks	**4** Weeks	**3** Weeks	**2** Weeks	**3** Days
Before funder deadline						
• Identify project objectives • Conduct literature review • Identify team & partners	• Identify funding source • Determine eligibility	• Contact OSP to discuss project & develop budget • Draft proposal • Discuss with Dean • Submit *Intent to Apply form* in **eGrants**	• Revise proposal • Edit any other attachments • Obtain documentation & send for signatures	• Revise proposal & any other attachments • Work with OSP to finalize budget	• Confirm all signatures are obtained	• Send final proposal & signatures to OSP • OSP approves & submits to sponsor

Pre-award guidance and resources, including the **Intent to Apply Form** through **Key Solutions (eGrants)**, are available on the OSP website. This form must be completed and submitted in accordance with established OSP procedures before any proposal is formally submitted to an external sponsor.

I. Proposal Components

A **proposal** is a formal request for external funding to support research, instruction, training, service, or other scholarly and programmatic activities at Chaminade University. Each sponsor establishes specific requirements for proposal format, content, and submission. It is the responsibility of the PI or PD, in coordination with OSP to ensure that all proposal materials meet sponsor and institutional requirements.

While there is no single standardized format, most proposals include the following core components:
- **Cover Page:** Includes project title, sponsor information, Principal Investigator details, institutional information, and required institutional signatures.
- **Abstract or Summary:** A concise overview of the project's purpose, goals, and expected outcomes.
- **Project Description / Narrative / Research Strategy:** A detailed explanation of the project's objectives, significance, methodology, and alignment with sponsor priorities.
- **Budget and Budget Justification:** A complete and accurate financial plan outlining all project costs and a narrative explanation of each line item.
- **Cost Sharing (if applicable):** Documentation of any required or voluntary institutional or third-party contributions, subject to prior approval.

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- **Facilities and Administrative (F&A) Costs:** Inclusion of indirect costs in accordance with Chaminade's federally negotiated rate agreement or sponsor policy.
- **Additional Documents and Requirements:** Any other materials required by the sponsor, such as biographical sketches, letters of support, data management plans, or certifications.

All proposals must be reviewed and approved by OSP prior to submission to ensure compliance with institutional, sponsor, and federal requirements.

II. Proposal Types

There are two types of research proposals:

1. **Solicited Proposals:** prepared in response to a specific funding announcement, such as a **Request for Proposals (RFP)**, **Requests for Applications (RFAs), Broad Agency Announcement (BAA)**, or similar document issued by a sponsor. These solicitations identify particular research problems or programmatic needs for which the sponsor seeks solutions. Investigators may first submit a preliminary proposal, concept paper, white paper, or **Letter of Intent (LOI)**. If the sponsor expresses interest, a full proposal is requested for formal review and funding consideration.
2. **Unsolicited Proposals:** submitted at the initiative of the investigator rather than in response to a sponsor's formal solicitation. This type of proposal is typically used to present a new or innovative idea to a federal, state, or local governmental agency, or other funding organization, with the objective of securing support or a contract. Unsolicited proposals are not submitted in response to an RFP, BAA, Program Research and Development Announcement, or any other sponsor-initiated request.

All proposals, whether solicited or unsolicited, must be submitted through OSP for institutional review and approval prior to submission to ensure compliance with university, sponsor, and federal requirements.

III. Application Guidelines, RFPs, and RFAs

All proposals must follow the specific guidelines provided by the sponsor, including formatting, page limits, and required documents. Strict adherence is essential, as incomplete or non-compliant proposals may be rejected. **Solicited proposals** respond to specific funding announcements (RFPs or RFAs), while **unsolicited proposals** are investigator-initiated and align with the sponsor's broad priorities. RFPs often include review criteria, which should be addressed explicitly in the proposal.

Faculty and staff must review both the application instructions and sponsor guidelines carefully. All proposals must be submitted through the OSP for institutional review and approval to ensure compliance with:

- Sponsor requirements
- Chaminade University policies
- Federal regulations, including 2 CFR 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Resources for common federal sponsors include:

- NSF Proposal & Award Policies & Procedures Guide (PAPPG)
- NIH Grants Policy Statement and Application Guide

IV. Proposal Planning and Preparation

At Chaminade University, funded proposals become legally binding agreements once awarded. Therefore, it is critical that OSP is involved during the proposal stage to:

- Identify potential risks or compliance concerns.

- Develop solutions or mitigation plans for any issues or unfavorable terms and conditions that may arise at the award stage.

All proposals must adhere to the sponsor's instructions. Many sponsors have established policies, procedures, and required formats for proposal submission, including specific application forms or web-based electronic systems. Other sponsors may have less prescriptive requirements. In all cases, PIs/ PDs must obtain and follow the most current sponsor guidelines or solicitations. Proposal materials and related RFPs must be shared with OSP well in advance of the due date to allow sufficient time for internal review and processing. OSP reserves the right to withdraw proposals that include terms inconsistent with Chaminade University policies or standards.

The development of a new proposal typically requires two to three months or longer, while revisions, renewals, and resubmissions generally require less time but still demand significant effort. Successful PIs/ PDs begin the proposal preparation process well in advance of submission deadlines to:
- Confirm project feasibility, including available resources, space, facilities, and any anticipated F&A waiver or reduction.
- Engage with the OSP staff (i.e., Senior Director, Grants Specialist) early for guidance on budget preparation, sponsor guidelines, proposal formatting, compliance, and collaboration with subawardees or partner institutions.

Key administrative components to address during proposal preparation include:
- Formatting and submission requirements.
- Budget development and justification.
- External collaborations, subawards, and compliance requirements.
- Effort allocation consistent with sponsor and university policy.
- Use of sponsor-specific electronic submission systems and creation of required accounts.
- Compliance with Chaminade University's Conflict of Interest Policy for project personnel and subrecipients, as applicable.

PIs/PDs should identify elements that require additional support, approval, or lead time, such as subcontracts or compliance reviews.

All proposal preparation and submission activities must comply with federal and state regulations, including 2 CFR 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, as well as any applicable sponsor-specific guidelines.

V. Budget Development and Considerations

Chaminade University of Honolulu (CUH) is committed to maintaining the highest standards of financial integrity and compliance in the management of sponsored projects. It is CUH policy that only allowable, allocable, and reasonable costs, as defined under 2 CFR 200, Subpart E (Cost Principles), may be charged to sponsored awards. This policy applies to all federal and non-federal sponsored projects administered by the University.

A. Budget Considerations

When preparing a budget for a sponsored project, Principal Investigators (PIs) and Project Directors (PDs) must ensure that all proposed costs are reasonable, allowable, and allocable in accordance with federal regulations, sponsor requirements, and CUH policies and procedures. Budgets must accurately reflect the financial resources necessary to carry out the approved scope of work and comply with all applicable requirements.

Key considerations include:

- **University Policies and Procedures:** All budgets must comply with CUH's established cost accounting standards, financial policies, and procedures governing the budgeting, expenditure, and management of sponsored projects. These frameworks ensure consistency, integrity, and compliance in the allocation of institutional and sponsored funds.
- **Federal Regulations:** Budgets must adhere to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200), commonly referred to as the Uniform Guidance. These federal regulations define standards for allowable, allocable, and reasonable costs; indirect cost recovery; cost sharing; and documentation.
- **Sponsor-Specific Requirements:** Investigators must review and follow sponsor-specific policies and guidelines, such as the NIH Grants Policy Statement, NSF Proposal & Award Policies and Procedures Guide (PAPPG), or other agency manuals, to ensure that all proposed costs and budget justifications align with program expectations and restrictions.
- **Funding Opportunity Announcement (FOA) or Solicitation:** Each proposal must comply with the specific requirements outlined in the funding announcement or solicitation, including allowable budget categories, cost limitations, matching or cost-sharing obligations, and any special conditions or reporting expectations.
- **Scope of Work (SOW):** The proposed budget must directly correspond to the approved scope of work, reflecting the personnel effort, materials, travel, equipment, and other resources necessary to achieve project objectives.

OSP must review all budgets and justifications before submission to confirm adherence to institutional, sponsor, and federal requirements.

B. Allowable and Unallowable Costs

All expenditures charged to a sponsored project must:
1. **Conform to Federal Regulations** (2 CFR 200, Subpart E), sponsor-specific requirements, and University policy;
2. **Be necessary and reasonable** for the performance of the project;
3. **Be allocable** – directly benefit the specific project; and
4. **Be consistently treated** across all funding sources.

Unallowable costs include, but are not limited to, alcohol, entertainment, lobbying, fines or penalties, and goods or services for personal use. Such costs must be charged to appropriate non-sponsored institutional accounts.

C. Cost Transfers

Cost transfers are allowable only when they are timely, well-documented, and fully justified. Transfers must correct an error or properly allocate costs that benefit more than one project. They may not be used to circumvent sponsor restrictions, utilize unspent balances, or address budget shortfalls.

All cost transfers must:
- Be initiated within **90 days** of the original transaction date;
- Include a clear and auditable explanation of the reason for transfer; and
- Be approved by OSP before posting.

Late or inadequate justifications may result in disallowance of the cost and require departmental reimbursement from unrestricted funds.

D. Budget and Budget Justification

The budget and accompanying justification are critical components of a sponsored proposal. Principal Investigators (PIs) and Project Directors (PDs) are responsible for ensuring all proposed costs are clearly tied to the project's objectives and are calculated using reasonable, supportable methods.

The justification should:
- Explain how each cost supports specific project aims;
- Describe how cost estimates were determined;
- Provide sufficient detail for reviewers to understand necessity and reasonableness, particularly for specialized equipment or personnel; and
- Identify any institutional cost sharing or matching commitments, if applicable.

All proposed budgets must be developed in compliance with CUH's internal approval process, sponsor guidelines, and federal cost principles. OSP must review and approve the complete budget and justification before submission to ensure alignment with University and sponsor requirements.

E. Types of Costs

The total cost of a sponsored agreement consists of allowable direct costs plus the allowable portion of indirect costs (Facilities & Administrative Costs), as defined in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200, Subpart E – Cost Principles).

Direct Costs

Direct costs are those that can be specifically identified with a particular sponsored project or activity, and that can be assigned to that project with a high degree of accuracy. Direct costs must be:
- Allowable, allocable, reasonable, and consistently applied per 2 CFR 200.403–200.405.
- Necessary for the performance of the project and clearly documented in the proposal budget and justification.

Typical examples of direct costs include:
- Personnel expenses (e.g., faculty summer salary, graduate and undergraduate student wages, fringe benefits).
- Equipment and materials directly related to the project.
- Supplies and consumables.
- Travel directly related to the project's objectives.
- Consultant and professional service fees.
- Subawards and consortium costs.
- Participant support and tuition (when allowable by sponsor).

Certain cost categories, such as administrative or clerical support, office supplies, or general-purpose equipment, are generally unallowable as direct costs on federally sponsored projects unless explicitly justified and approved by the sponsor in accordance with 2 CFR 200.413.

Indirect (Facilities & Administrative) Costs

Indirect costs, also known as **Facilities and Administrative (F&A) costs**, are expenses incurred by the University for common or joint objectives that cannot be readily and specifically identified with any single sponsored project, instructional activity, or institutional program.

Examples include:
- Building and equipment depreciation.
- Operations and maintenance of facilities (utilities, custodial, and security services).

- Library and information technology services.
- General administrative support (e.g., payroll, human resources, sponsored programs administration).

Indirect costs are recovered through application of Chaminade University's federally negotiated F&A rate, as approved by the U.S. Department of Health and Human Services (DHHS), the University's cognizant agency for indirect cost negotiation.

CUH's **current federally negotiated indirect cost rate** for research and sponsored programs conducted **on campus** is **45% of Modified Total Direct Costs (MTDC)**. MTDC excludes certain expenses such as equipment purchases, tuition remission, participant support costs, and subaward amounts beyond the first $25,000, in accordance with 2 CFR 200.1 and 200.414.

For more information, refer to:
- 2 CFR 200 Subpart E – Cost Principles
- CUH Indirect Cost Rate Agreement (DHHS)
- CUH Office of Sponsored Programs and Research Integrity (OSP) Budget Development Guidelines

F. Limitations

Sponsors may impose limitations on a project budget's total costs (such as total funds-per-year ceiling), the direct costs (such as salary cap or maximum travel costs) or the F&A costs. The solicitation and sponsor guidelines as well as University policies should be reviewed regarding those limitations.

Budgeting for Data Management and Sharing

If you are applying to the **National Institutes of Health (NIH)** or another federal sponsor requiring a **Data Management and Sharing (DMS) Plan**, you may include reasonable, allocable, and allowable costs directly associated with implementing that plan in your project budget.

Allowable DMS-related costs may include, but are not limited to:
- **Data curation and management** (e.g., formatting, documentation, quality assurance)
- **Data storage and preservation** (e.g., repository fees, data hosting)
- **Personnel time** dedicated to preparing and submitting datasets for public access
- **Specialized software, hardware, or computing resources** required for data management

Unallowable costs include those associated with routine research activities (e.g., collecting or analyzing data) that would occur regardless of the DMS requirement.

Refer to the NIH Budgeting for Data Management and Sharing: Resource Guide (NIH 2024) and NIH Grants Policy Statement Section 11.01 for the most up-to-date cost guidance.

When developing your DMS budget and justification:
- Use NIH's DMS Plan Format Page to describe the scope of data to be shared and associated costs.
- Ensure that requested costs are incurred during the award period and are reasonable given the project scope.
- Include a clear explanation in the budget justification for each DMS-related cost.

Salary Cap

A **salary cap** limits the amount of direct salary that may be charged to federal grants, cooperative agreements, and contracts. While several federal agencies apply salary limitations, the **NIH salary cap** is the most common and applies to all NIH-funded awards.

The NIH salary cap is tied to the **Federal Executive Pay Scale, Level II**, as established by the **U.S. Office of Personnel Management (OPM)**. As of <u>**January 1, 2025**</u>, the salary cap for Executive Level II is **$225,700**.

NIH Salary Cap Guidance
- The NIH publishes updated salary cap notices annually in the <u>NIH Guide for Grants and Contracts</u>.
- Institutions may re-budget within existing award funds to accommodate a salary cap increase, provided it aligns with institutional base salary and total effort commitments.
- NIH will not provide additional funds to cover salary cap increases.

For current information, consult the <u>OPM Pay Tables for Executive and Senior Level Employees</u> and the <u>NIH Salary Cap Summary webpage</u>.

Institutional Base Salary (IBS)
The National Institutes of Health (NIH) defines *Institutional Base Salary (IBS)* as:

> *"The annual compensation paid by an organization for an individual's appointment, whether that individual's time is spent on research, teaching, administrative, or other activities. Institutional base salary excludes any income that an individual may earn outside of their duties to the organization."*

At Chaminade University of Honolulu (CUH), IBS refers to the annual compensation paid by the University for an employee's appointment, exclusive of fringe benefits, reimbursed expenses, or supplemental pay (e.g., consulting, bonuses, or honoraria). IBS forms the basis for calculating effort, salary distribution, and cost-sharing commitments.

G. Cost Exceptions and Indirect Cost Waivers

CUH applies its federally negotiated F&A rate to all sponsored projects, except in cases where the sponsor's published policy specifically limits or prohibits indirect cost recovery. This ensures compliance with 2 CFR 200.414(c), which requires that federal agencies accept an institution's negotiated rate unless an exception is required by statute or approved by the cognizant agency.

Exceptions Based on Sponsor Policy
An exception to the federally negotiated rate may be granted when a sponsor's written policy formally restricts the recovery of indirect costs. In such cases, the CUH Office of Sponsored Programs and Research Integrity (OSP) must verify and document the sponsor's restriction in the project record. The official published rate limitation must be cited in the proposal or funding announcement.

Internal Requests for Waiver or Reduction
Requests for an **F&A waiver or reduction** not based on sponsor policy (e.g., to increase project competitiveness or to support institutional priorities) require prior approval. The following process must be followed:
1. The **Principal Investigator (PI)** must submit an <u>**Indirect Cost (F&A) Waiver Request Form**</u> to OSP before proposal submission.
2. The request must include a clear justification, demonstrating the institutional benefit or strategic rationale for the waiver.
3. The **Dean or Supervisor** of the PI must endorse the request.
4. Final approval rests with the **Provost** or their designee.

Partial or full waivers are granted only under exceptional circumstances and must not result in the transfer of unallowable costs to other sponsored projects or institutional accounts.

Off-Campus Projects

Projects performed primarily **off-campus**, defined as those in which more than **50% of project activities** are conducted at a non-CUH location where space and facilities are **not owned or leased by CUH**, may qualify for an **off-campus indirect cost rate**. The current CUH off-campus F&A rate is **25% of Modified Total Direct Costs (MTDC)**, as stipulated in the University's negotiated rate agreement.

Cost Sharing and Institutional Commitments

When an F&A waiver or reduction is approved, the unrecovered portion of indirect costs may be treated as voluntary cost sharing, subject to 2 CFR 200.306. Any such commitment must be:
- Explicitly approved by OSP, the appropriate Dean/ Supervisor, and Provost,
- Documented in the proposal and internal routing forms, and
- Tracked and reported as part of CUH's official cost share obligations.

H. Effort and Compensation

CUH complies with the federal cost principles established under 2 CFR 200.430 – Compensation—Personal Services. Effort refers to the proportion of time an employee devotes to a sponsored project compared to their total institutional responsibilities (teaching, research, service, and administration).

- **Total Effort:** An individual's total effort allocation may not exceed **100%** of their institutional base salary (IBS).
- **Base Salary:** Effort is calculated using the individual's current annual IBS. For multi-year projects, salary projections may include a **3% annual escalation**, if allowable by the sponsor, for budgeting purposes only. Actual salary adjustments follow CUH's institutional compensation policies.
- **Academic Year Release Time:** Faculty may request release time from teaching or service duties to work on a sponsored project. Such requests must be approved by the **Dean/ Supervisor** and **Provost** in **Key Solutions (eGrants)** prior to proposal submission. Release time for faculty is usually expressed in terms of percentage of effort and is based on the 9-month academic year.
- **Summer Salary:** Faculty on a 9-month appointment may receive up to **three months (30%)** of additional salary from sponsored programs during the summer. The rate of pay must be consistent with the faculty member's academic-year rate. Compensation for summer teaching or research must comply with both sponsor and CUH policies.
  - **Summer Non-Teaching Activities Paid from Grants:** Faculty on 9- or 10-month appointments may receive compensation from grant funds for non-teaching activities conducted during the summer, such as research or program development. Compensation must be based on the faculty member's most recent academic-year base salary.
    - *Example*: A faculty member on a nine-month contract with an academic-year salary of $50,000 who works full-time on a grant-funded project for two months during the summer may earn $10,000. (Calculation: $50,000 ÷ 10 = $5,000 per month × 2 months = $10,000.)
    - All summer compensation must comply with sponsor restrictions and University policy.
- **Other Project Personnel:** Compensation for research assistants, student workers, and technical staff must be based on actual effort devoted to the project and consistent with CUH's HR policies and applicable wage rates.

Effort reporting is required for federally funded projects and is subject to internal and external audit. All effort must be documented in accordance with CUH's Effort Reporting Policy and Uniform Guidance §200.430(i).

I. Project Budget Development and Cost Principles

The project budget serves as the financial plan for achieving the objectives described in the proposal. All budgets must be accurate, reasonable, allocable, and allowable under 2 CFR 200, Subpart E (Cost Principles), and any applicable sponsor-specific guidelines.

Budget Period

A typical budget period is **12 months**, and multiple budget periods may comprise the full project period (period of performance). Each period must align with the sponsor's reporting and funding schedule.

Salaries and Wages

All personnel costs must reflect the **actual effort** committed to the sponsored project. Salary charges must be supported by certified effort reporting consistent with university policy and 2 CFR 200.430 (Compensation – Personal Services). Salary distribution must align with documented effort commitments and sponsor requirements (e.g., NIH salary cap).

Fringe Benefits

Fringe benefits are charged as direct costs and include FICA, retirement, health insurance, workers' compensation, and unemployment insurance.

CUH applies **actual fringe benefit rates** for federally sponsored projects and a **26% rate** for non-federal projects unless otherwise specified by the sponsor.

Travel

Travel must be necessary to achieve the project's objectives.
- **Domestic and Foreign Travel:** Allowable per-diem and lodging rates must follow federal standards (GSA, U.S. Department of State, or DoD).
- **Fly America Act:** Federally funded travel must comply with the Fly America Act (49 U.S.C. §40118), requiring the use of U.S. flag air carriers unless a regulatory exception applies (refer to 41 CFR 301-10.135–143).
- **Carbon-Conscious Travel:** When allowable, CUH encourages sustainable travel consistent with federal agency sustainability initiatives.

Equipment

As of **October 2024**, the **NIH and other federal agencies** have adopted a higher equipment threshold.
- **Capital Equipment** is defined as tangible, non-expendable property with a **useful life greater than one year** and an **acquisition cost of $10,000 or more per item** (NIH GPS §7.9; 2 CFR 200.1 – Equipment).
- Equipment purchases must be necessary, justified, and approved in the proposal.
- Federally funded equipment must comply with 2 CFR 200.313 (Equipment) and university property management procedures.

Supplies

Supplies include consumable materials and expendable items required for project completion.
- **Computing devices** under $10,000 are considered supplies under 2 CFR 200.453(c) if they are essential and allocable to the project.
- Supplies must be used solely for the performance of the sponsored project.

Publication and Dissemination Costs

Costs associated with publishing, open-access fees, and data sharing are allowable if directly related to the sponsored project and incurred during the award period. These align with 2 CFR 200.461 (Publication and Printing Costs) and current NIH Data Management and Sharing Policy (2023) requirements.

Indirect Costs (Facilities & Administrative Costs)

Indirect Costs (IDC or F&A) represent expenses that cannot be readily attributed to a single project, such as facility maintenance, utilities, and administrative support.

- CUH's **federally negotiated F&A rate** is **45% of Modified Total Direct Costs (MTDC)** for **on-campus projects**.
- **Off-campus projects** are assessed at **25% MTDC**.
- Any reduction or waiver of indirect costs requires an **approved** IDC Waiver Request, as described in CUH's Cost Exceptions and Waivers Policy.

Project Administration

Administrative or clerical salaries may be charged as **direct costs** only if all the following conditions are met (2 CFR 200.413(c)):

1. The services are integral to the project or activity;
2. The individuals involved can be specifically identified with the project;
3. The costs are explicitly included in the approved budget or have the prior written approval of the federal awarding agency; and
4. The costs are not also recovered as indirect costs.

Vacation and Leave

Vacation, sick, and other paid leave may be charged to a sponsored project only in proportion to the effort devoted to that project during the leave period, consistent with CUH's leave policies and 2 CFR 200.431 (Compensation – Fringe Benefits).

- **Accrued leave payouts** and **severance costs** are **unallowable** unless specifically authorized by the sponsor and consistent with institutional policy.

VI. Cost Sharing Policies and Procedures

A. Cost Sharing Definition

Cost Sharing represents project or program costs (both direct and indirect) that a sponsor would normally fund but are instead covered by CUH or a third party, such as a subcontractor or unfunded collaborator. The term **"cost matching"** is often used interchangeably but typically refers to agreements where the sponsor funding is contingent on a defined proportionate contribution (e.g., 1:1 match) from the University.

The Uniform Guidance (2 CFR 200.306) defines cost sharing or matching as that portion of project costs **not paid by Federal funds** (unless otherwise authorized by statute). It includes:

- **Cash contributions:** The recipient's outlay of cash, including third-party cash contributions.
- **In-kind contributions:** Non-cash contributions such as committed effort, real property, equipment, supplies, and other goods or services that are specifically identifiable to the project.

The Uniform Guidance does not distinguish formally between cost sharing and matching; however, "matching" usually denotes a specific ratio between award funds and recipient contributions.

B. Types of Cost Sharing

There are three main types of cost sharing:

1) *Mandatory Cost Sharing*

- Required by the sponsor as a condition of eligibility for an award.
- Must be explicitly stated in the solicitation or award document.

- Becomes a binding commitment upon award and must be documented and tracked in the University's financial and effort reporting systems for compliance and auditing purposes.

2) Voluntary Committed Cost Sharing
- Offered by the University even when not required by the sponsor.
- Becomes legally binding once included in the proposal.
- May include cash or in-kind contributions, such as faculty effort, departmental resources, or other institutional support.
- Must be approved internally, documented in the proposal budget, and tracked for cost accounting and compliance.
- Per 2 CFR 200.306, voluntary committed cost sharing cannot be assumed or anticipated unless explicitly outlined in the sponsor's funding opportunity announcement (FOA) or solicitation.

3) Voluntary Uncommitted Cost Sharing
- Support provided that is not required and not formally committed in the proposal.
- Not auditable or tracked; does not create a binding obligation.

C. Legal and Compliance Considerations
- **Binding Commitment:** Any committed cost-sharing, mandatory or voluntary, creates a legal obligation for CUH upon award. Cost sharing must be managed as carefully as any other project expense.
- **Effort and Resources:** Direct cost cost-sharing typically involves faculty or staff effort, departmental resources, or other University contributions. It may include associated indirect costs, if allowed by the sponsor.
- **Federal Restriction:** Cost sharing may not be drawn from other federal awards unless explicitly authorized by law.

D. Allowable Cost-Sharing Expenditures (Federal Awards)
All cost-sharing expenditures must meet the following criteria (2 CFR 200.403; 200.306):
1. **Verifiable** from University records.
2. **Not previously claimed** as cost sharing on another project.
3. **Necessary and reasonable** for the efficient accomplishment of the project.
4. **Allowable under the award** and Uniform Guidance cost principles.
5. **Incurred during the project period**, or pre-award phase if authorized by the sponsor.
6. **Not reimbursed** by another Federal award.

Examples of allowable cost sharing include:
- Faculty or staff effort beyond sponsor-paid effort.
- Fringe benefits associated with committed effort.
- Departmental supplies or materials directly identifiable to the project.
- Institutional support specifically committed to the project.

E. Unallowable Cost-Sharing Expenditures
The following **cannot** be offered as cost-sharing commitments:
1. Costs disallowed by the sponsor.
2. Costs unallowable under Uniform Guidance, including those outlined in 2 CFR 200 Subpart E, §200.420 (Selected Items of Cost).
3. Salaries exceeding the Federal salary cap, e.g., NIH Executive Level II limits.

4. **University facilities**, such as laboratory or classroom space; these may be cited as **available at no cost** but may **not be counted** as a cost-sharing contribution. PI/PDs should not commit the use of facilities as cost sharing, but rather characterize the facilities as "available for the performance of the sponsored agreement at no direct cost to the project."

F. Responsibilities

Principle Investigators (PI)/ Project Directors (PD):
- Identify all sources of funds or resources to cover cost sharing.
- Ensure that all cost-sharing commitments are documented and verifiable.
- Confirm that no federal funds from another award are used unless allowed.

Office of Sponsored Programs & Research Integrity (OSP)
- Review proposals for mandatory and voluntary committed cost sharing.
- Ensure cost sharing complies with 2 CFR 200, sponsor regulations, and CUH policy.
- Monitor post-award tracking and effort reporting for compliance.

VII. Data Management & Sharing (DMS) Plans

Chaminade University researchers applying for **NIH funding** that requires a **Data Management and Sharing (DMS) Plan** must submit the plan **at the time of application** to the relevant NIH Institute, Center, or Office (ICO). The plan must clearly outline how scientific data and associated metadata will be managed, preserved, and shared, including any potential restrictions or limitations.

A. Required Elements of a DMS Plan

The DMS Plan should address the following key elements:
1. **Data types** to be generated, managed, preserved, and shared.
2. **Tools, software, or code** required to access or manipulate shared data.
3. **Standards** applied to the data and associated metadata (if applicable).
4. **Timelines** for data preservation and access.
5. **Access, distribution, or reuse** considerations, including any restrictions.

B. Human Participant Data

For projects generating data from human participants, the DMS Plan must describe measures to protect privacy, rights, and confidentiality, including compliance with HIPAA, the Common Rule (45 CFR 46), and CUH Institutional Review Board (IRB) requirements.

C. Oversight and Compliance

The plan must include oversight procedures for ensuring adherence to the DMS Plan throughout the award period. The NIH ICO will review compliance during the funding period. Non-compliance with an approved DMS Plan may affect the University's eligibility for future NIH funding.

D. Budgeting for DMS

Researchers may request funds to cover reasonable costs associated with data management and sharing. Budget requests and justifications should be developed using NIH Data Management and Sharing Budgeting Resources and must comply with CUH and NIH policies on allowable direct costs.

VIII. Subrecipient Proposal Requirements

For all proposals involving **subrecipients**, Chaminade University requires a complete subaward package at the proposal stage to ensure compliance with federal regulations and facilitate timely review. The required package includes:

Subrecipient Commitment Documentation
- A **Letter of Intent** or **Subrecipient Commitment Form**, signed by an Authorized Organizational Representative (AOR) of the subrecipient.
- Must indicate:
    - Agreement to enter a subaward if the project is funded.
    - Compliance with applicable conflict of interest policies (federal and CUH).
    - Confirmation of the project title, period of performance, and proposed budget.
- Note: Use of a specific CUH form is not mandatory, provided that all essential elements above are included.

Scope of Work
- A detailed description of the subrecipient's activities, responsibilities, and deliverables for the project.

Subrecipient Budget
- Detailed budget prepared in the sponsor's required format.
- Must include a budget justification explaining the basis for proposed costs.

Additional Documentation (as applicable)
- Biographical sketches, facilities and equipment, other support, or additional sponsor-required documents.
- While these items may be part of the subrecipient's submission, OSP does not review these documents for compliance; **responsibility rests with the PI and subrecipient**.

A. Federal Compliance References
- **2 CFR 200.331**: Requirements for pass-through entities, subrecipient monitoring, and management.
- Subrecipients must comply with all applicable federal regulations, including:
    - Uniform Guidance for Financial and Programmatic Monitoring
    - Conflict of Interest policies (federal and institutional)
    - Accurate reporting of expenditures, effort, and deliverables

Section IV: Proposal Review and Submission

All proposals for external funding must undergo a comprehensive review by the Office of Sponsored Programs & Research Integrity (OSP) and the Provost's Office prior to submission. This review ensures that each proposal complies with sponsor guidelines, federal and state regulations, and Chaminade University policies and procedures.

The OSP review includes:
- Verification of proposal compliance with sponsor and federal requirements (e.g., format, content, certifications).
- Review of budgets for accuracy, allowability, allocability, and consistency with 2 CFR 200 (Uniform Guidance).
- Confirmation of internal commitments, cost sharing, and alignment with institutional priorities.
- Recommendations to enhance the clarity and competitiveness of the submission.

To facilitate a thorough review, **PIs/PDs are strongly encouraged to submit proposals to OSP at least seven business days prior to the sponsor's deadline**. Proposals received **less than three business days before the deadline** will receive a **limited review**, focused solely on budgetary compliance and required institutional components necessary for submission.

I. PI/PD Eligibility

At Chaminade University, eligibility to serve as a Principal Investigator (PI) or Project Director (PD) on externally sponsored projects is limited to individuals who hold continuing appointments and have the institutional authority to manage sponsored funds and ensure compliance with University and sponsor requirements. Eligible individuals generally include full-time faculty, professional staff, and research center directors.

Eligibility to serve as a PI or PD at CUH is limited to individuals who:
1. Hold a full-time faculty or staff appointment at Chaminade University;
2. Have the technical and administrative capability to conduct and manage the sponsored activity; and
3. Have the institutional authority and responsibility to comply with sponsor and University requirements.

Individuals who do not meet the eligibility criteria listed above (e.g., adjunct faculty, visiting faculty, postdoctoral fellows, students, or external collaborators) may not serve as PIs or PDs unless an exception is granted.

A. PI/PD Responsibilities

All PIs and PDs must complete required institutional training related to research integrity, conflict of interest, research security, and human/animal subjects protections, as applicable.

The PI/PD bears primary responsibility for the scientific, technical, administrative, and financial integrity of the sponsored project. Responsibilities include, but are not limited to:
*   Ensuring compliance with federal, state, sponsor, and University policies;
*   Overseeing project personnel and expenditures;
*   Submitting all technical and financial reports as required by the sponsor; and
*   Managing all aspects of research compliance, including conflicts of interest and research security.

B. Exceptions

Exceptions to the eligibility requirements may be granted on a case-by-case basis by the Provost, in consultation with the Senior Director of OSP.

Requests for exceptions must include:
*   A written justification from the applicant's supervisor or Dean;
*   A commitment from a full-time faculty or staff member to serve as Faculty Sponsor or Co-PI, assuming institutional oversight responsibility; and
*   Approval by the Provost prior to proposal submission.

C. Student Involvement

Students are not eligible to serve as PIs or PDs. However, students may serve in key personnel roles under the supervision of an eligible faculty member or staff PI. Projects that are student-led (e.g., undergraduate research, graduate thesis projects) must identify a CUH faculty member as the responsible PI.

II. Review and Approval Authority

- The Senior Director of OSP and the Provost must approve all proposals prior to submission.
- The Senior Director of OSP serves as Chaminade University's Authorized Organizational Representative (AOR) and is the official signatory for all externally sponsored proposal submissions.
- No proposal may be submitted to an external sponsor without prior review and institutional approval through OSP.

III. Proposal Development and Routing Forms

Chaminade University uses an automated **Intent to Apply Form** through **Key Solutions (eGrants)**, which records:

- PI/PD information, project title, and sponsor details
- Budget and cost-sharing commitments
- University resources and facilities to be used
- Alignment with Chaminade's Marianist and Native Hawaiian values and the United Nations Sustainable Development Goals (UN SDGs)

All proposals must begin with the **Intent to Apply Form** in **Key Solutions (eGrants)**, signed by the **Provost** and the **PI/PD's Dean or Direct Supervisor**, prior to submission.

Forms must be routed to OSP **at least seven business days before the submission deadline** to ensure timely institutional review and approval.

A. eGrants (Key Solutions)

eGrants is Chaminade's electronic grants and award management system (Key Solutions' eGrants module). It supports the full sponsored-project lifecycle: pre-award proposal development and routing, institutional approvals and compliance checks, award setup and amendments, post-award tracking, and reporting reminders/notifications.

How to Get Started

1. Confirm you have a CUH affiliation (employee or approved affiliate). Access to Key Solutions/eGrants requires CUH credentials; contact OSP if you do not have access.
2. Complete required trainings and declarations as needed (e.g., Responsible Conduct of Research (RCR), Research Security Training (RST), CITI if human subjects are involved, COI disclosure) before submitting proposals. PI/PD's must also discuss the potential sponsored project and any course-release time requests with their dean/ supervisor.
3. Fill out the **Intent to Apply Form**, which must be reviewed and approved by OSP to initiate routing. OSP will create the eGrants record and route it for departmental and Provost review.
4. Use eGrants' proposal/budget templates, attach required documentation (budget justification, Biographical sketches (biosketches), facilities & equipment info), and follow sponsor instructions. eGrants enforces institutional routing and captures required approvals.

Primary Uses

- Drafting, routing, and obtaining institutional approvals for proposals.
- Capturing sponsor deadlines, award terms, and reporting requirements.
- Initiating award setup and post-award modifications (re-budget requests, no-cost extensions where permitted).
- Tracking subawards, invoices, and financial reporting deadlines (in concert with the Business Office).

Responsibilities/ Roles

- **PI/PD:** ensure proposal content and budget are accurate; complete required trainings (CITI, COI disclosure); respond to OSP/Business Office review queries; certify reports and final deliverables.
- **Department/College Approvers:** review proposal for departmental commitments (cost-share, release time) before routing.
- **OSP:** reviews for sponsor compliance, institutional risk (export controls, research security), effort commitments, and programmatic approvals; negotiates and accepts award terms on behalf of the University.
- **Business Office (Grants Specialist):** coordinates financial setup, provides post-award financial management, and prepares/submits sponsor financial reports and invoices.

Summary of Roles & Workflow

STEP 1: Intent to Apply
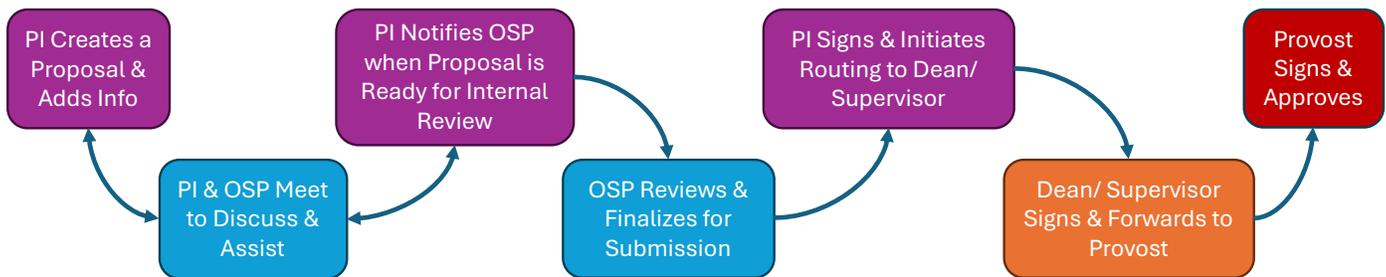
STEP 2: Application
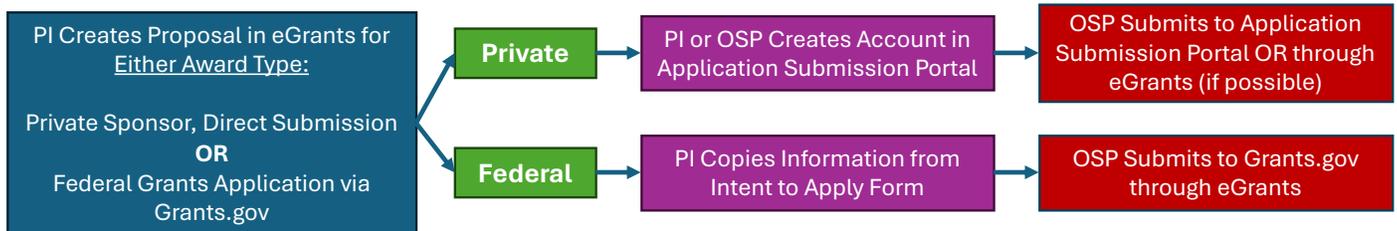
B. eProtocol (Key Solutions)

eProtocol is Chaminade's electronic compliance system for protocols (Key Solutions' Protocol Management System). It automates preparation, submission, routing, review, and archiving of IRB (human subjects) protocols. eProtocol provides reviewer workflows, automated reminders, and an audit-ready record of determinations and approvals.

When eProtocol is Required for Grants

Any proposal or funded activity that meets the regulatory definition of human-subjects research (see 45 CFR Part 46/Common Rule) must have an IRB determination and, where applicable, IRB approval or an exemption/ determination recorded in eProtocol. Sponsors vary: some require IRB approval at time of submission while others (e.g., NIH) permit institutional review after peer review but require IRB approval before funds are released or the project begins. Always confirm sponsor instructions and record IRB status in eGrants and eProtocol.

Official IRB Determination

In accordance with federal regulations (45 CFR 46.102 and 46.109), only the IRB Chair or designated Vice-Chair has the authority to make the official determination regarding whether a project constitutes human subjects research that requires IRB review and approval. PI/PDs and other research personnel may not self-determine

exemption or non-human subjects research status. All determinations must be documented in writing and retained in the IRB record using eProtocol.

OSP cannot submit grant materials or finalize an award setup until applicable human subjects protocols have received IRB approval. For the most up-to-date guidance, please refer to the CUH IRB Charter or contact the IRB Chair and Administrator at irb@chaminade.edu.

How to Get Started
1. Verify whether the planned activities meet the regulatory definition of human-subjects research (45 CFR Part 46/ NIH definitions). Consult the IRB Chair at irb@chaminade.edu and/or submit a protocol in eProtocol.
2. Complete required training (CITI Human Subjects) and COI disclosures; attach certificates during protocol submission. The IRB will not process protocols without required trainings in many cases.
3. Log into eProtocol with CUH credentials (PI/PD must be an affiliated CUH user). Complete the protocol application using the eProtocol smart form(s); attach consent documents, recruitment materials, data collection tools, and the proposal or grant application when relevant.
4. The IRB Chair and Administrator will conduct an initial review of the protocol.
5. The IRB Chair or designated Vice-Chair will make the official determination regarding whether the project constitutes human subject research that requires IRB review and approval.
6. The IRB Administrator will route the protocol for IRB review (exempt, expedited, or full board) through eProtocol. Monitor reviewer comments and submit responses/required modifications via eProtocol.

Responsibilities/ Roles
- **PI/PD:** prepare and submit protocol; ensure all personnel have required training; maintain compliance during the study (consent process, data security); submit amendments/continuing reviews/closures in eProtocol.
- **IRB Chair/ Administrator/ Committee:** review protocols, issue determinations (exempt, expedited, not-human-subjects, or approval), and require modifications as needed. All IRB communications and approval letters are archived in eProtocol.
- **OSP:** ensures that human-subjects compliance status is reflected in the eGrants record and that sponsor requirements are met before award activation or project start.
- **Business Office / Grants Specialist:** will not activate federally funded projects involving human subjects until OSP/IRB approvals (or sponsor-approved exceptions) are in place and documented.

Compliance
- **Attach an IRB determination/approval** to the eGrants proposal record when requested by the sponsor. If the sponsor does not require IRB approval at submission, be prepared to provide the IRB approval letter promptly after award (NIH requires IRB approval before release of funds).
- **Recordkeeping:** keep all IRB correspondence, consent forms, and approvals in eProtocol; these are subject to sponsor and federal audit (45 CFR Part 46).
- **Human Subjects Determinations:** If a project is determined to be *Not Human Subjects Research (NHSR)*, retain the IRB determination document in eProtocol and link it to the proposal in eGrants.

C. Checklist for Proposal Review and Submission

Before Proposal Submission
- PI/PD verifies CUH account and eGrants access.
- PI/PD meets with OSP's Senior Director and the Grants Specialist for an Award Kickoff Meeting
- PI/PD and all key personnel completes required trainings (RCR, RST, CITI, COI disclosure); attach certificates to eGrants.

- PI/PD completes Intent to Apply Form in eGrants and meets with OSP during the process as needed for assistance.
- eProtocol determination recorded (IRB review and approval required / IRB exempt / NHSR) and IRB protocol submitted in eProtocol if applicable.
- OSP reviews and finalizes Intent to Apply Form.
- PI signs and initiates routing to their dean/ supervisor.
- Dean/ supervisor signs and forwards to Provost.
- Provost signs and approves Intent to Apply Form.
- OSP assists PI/PD with application submission.

After Award (Pre-Activation)
- OSP has reviewed and negotiated/ accepted sponsor terms.
- Business Office has completed award setup (fund/account created).
- IRB approval (or exemption/determination) documented in eProtocol and linked in eGrants if human subjects are involved; **NO** human-subjects work may start before IRB approval and sponsor-required approvals are satisfied.

IV. Feedback and Resubmissions

The external funding environment is highly competitive. In cases where proposals are not funded, sponsors often provide peer-review feedback or scoring summaries. PIs/PDs are encouraged to use this feedback to strengthen resubmissions.

The OSP team is available to assist faculty and staff in:
- Interpreting sponsor reviews
- Incorporating feedback into revised proposals
- Strategically planning resubmissions to improve funding success rates

V. Pre-Proposals/ Letters of Intent (LOI)

A **pre-proposal**, also called a **letter of intent (LOI)**, **white paper**, or **concept paper**, is typically a summary of a proposed project used to gauge sponsor interest. It does **not** represent a binding commitment of Chaminade University of Honolulu (CUH) resources or require a full technical or budget submission.

Pre-proposals may include a total estimated cost but typically exclude a detailed, line-item budget. When providing a total project cost, Facilities and Administrative (F&A) costs should be included unless the sponsor specifically requests direct costs only.

Faculty and staff should OSP whenever they plan to submit a pre-proposal or LOI, regardless of sponsor requirements. Early communication allows OSP to assist with eligibility verification, compliance considerations, and institutional approvals if needed.

Pre-proposals must be routed through the OSP when any of the following apply:
- Institutional endorsement or signature is required;
- A detailed or itemized budget is included, or University resources (e.g., cost sharing, personnel time, or facilities) are proposed;
- Submission must occur through an institutional system (e.g., Grants.gov, Research.gov, NIH ASSIST); or
- Compliance certifications (e.g., conflict of interest, research security) are required.

If invited to submit a full proposal, a detailed line-item budget and justification must be prepared and routed to OSP for review and institutional approval, even if not required by the sponsor.

Section V: Award Negotiation and Acceptance

The Office of Sponsored Programs and Research Integrity (OSP) supports Chaminade University of Honolulu (CUH) faculty and staff in the review and negotiation of sponsored award agreements, including grants, cooperative agreements, and contracts, from federal and non-federal sponsors. OSP ensures that all awards comply with sponsor terms and conditions, University policies, and applicable federal and state regulations, including the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200).

I. Roles and Responsibilities

- OSP serves as the central administrative office responsible for negotiating award terms, coordinating with University Counsel as necessary, and ensuring compliance with institutional and federal requirements.
- The Provost (or designee) is the University official authorized to accept awards on behalf of CUH.
- Principal Investigators/Project Directors (PI/PDs) must promptly notify OSP when a sponsor indicates intent to fund or requests pre-award negotiations. No faculty or staff member may independently accept or sign an award, contract, or agreement binding the University.

Awards not reviewed and approved through OSP will be considered unauthorized and cannot be accepted by CUH. Any funds received under such circumstances will be returned to the sponsor.

II. Award Negotiation Process

Upon notification of a recommended award, OSP works with the PI/PD, sponsor representatives, and relevant University offices to:
- Review and negotiate terms and conditions to ensure institutional and regulatory compliance;
- Confirm that budget revisions or project modifications remain consistent with the approved proposal and University policies;
- Secure required institutional assurances (e.g., human subjects, animal care, financial conflict of interest, research security, or data management); and
- Coordinate execution of the agreement by the University's Authorized Institutional Official.

OSP may engage University Counsel, Risk Management, or other units as needed to address complex or high-risk terms.

III. Award Types

Grants represent a form of *financial assistance* in which the sponsor provides funds to support activities proposed by the PI/PD, such as research, education, or public service. Sponsors generally do not participate directly in project execution. Negotiations may involve adjustments to the scope of work, budget, or documentation required to substantiate costs or meet compliance conditions.

Most federal grants do not require a formal institutional signature for acceptance; acceptance is implied upon receipt of the **Notice of Award (NOA)** and commencement of project expenditures. Following acceptance, OSP establishes the award account and oversees post-award administration in accordance with sponsor and University requirements.

Cooperative agreements and **contracts** involve more substantial sponsor oversight and may require additional negotiation or prior approval before acceptance. These agreements will always be reviewed by OSP and executed by the Authorized Institutional Official.

A. Grants

When a sponsor indicates that a proposal is under consideration for funding, a negotiation period typically follows. During this time, the sponsoring agency and Chaminade University work together to finalize the terms and conditions of the award. For grants, this process often involves addressing programmatic or technical questions from the sponsor and may require revisions to the proposed budget, scope of work, or other supporting documentation. Sponsors may also request additional materials, such as institutional certifications, proof of insurance, or assurances of regulatory compliance, prior to award issuance.

As stated above, grants are considered a form of financial assistance in which the sponsor provides funds to support an approved project or activity that serves a public or collective good. Unlike contracts, grant sponsors do not direct the performance of project activities and do not typically participate in the conduct of the work. The PI/PD is responsible for carrying out the project as proposed, within the approved budget and timeframe, in compliance with sponsor and institutional policies.

For federal grants, the terms and conditions are governed by the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200). Acceptance of a federal grant award by Chaminade University generally occurs upon receipt of the award notice by the **Authorized Organizational Representative (AOR)**, unless the award requires a formal countersignature. Once accepted, OSP coordinates with the Business Office to establish a grant account and ensure compliance with all sponsor and federal requirements.

Drawdown Procedure

Chaminade University draws down federal funds on a **reimbursable basis**, consistent with 2 CFR §200.305. This ensures that funds are requested only for costs that have been incurred, verified, and properly recorded in the University's financial system.

Internal Controls and Review Process:
1. Expenditures related to sponsored awards are reviewed, approved, and posted to the appropriate general ledger accounts in accordance with Chaminade's internal controls and expenditure approval hierarchy.
2. On a monthly basis, the Grants Specialist reviews and reconciles all grant-related accounts in the general ledger.
3. Once reconciliations are complete, the Accounting Manager reviews and approves the official monthly close of the general ledger.
4. After the ledger is closed, the Grants Specialist may initiate the drawdown process.

Drawdown Calculation and Authorization
1. The Grants Specialist runs detailed general ledger reports for the closed month and calculates cumulative expenditures for each award.
2. The following formula is used to determine the current drawdown amount:
   (Cumulative Expenditures) – (Prior Drawdowns) = Current Drawdown Request
3. The calculated drawdown request is reviewed and approved by the Accounting Manager or Controller before funds are drawn from the sponsor's payment system.
4. Once the drawdown is executed, the Grants Specialist prepares a journal entry to record the receipt of funds.
5. The General Ledger Accountant reviews and posts the journal entry to the University's financial records (General Ledger).

All drawdowns must be supported by detailed documentation demonstrating that costs are allowable, allocable, reasonable, and consistently applied per 2 CFR §200.403–§200.405. Drawdown and reporting records are retained in accordance with Chaminade's Record Retention Policy and federal recordkeeping requirements (2 CFR §200.334).

B. Cooperative Agreements

Cooperative agreements are similar to grants in that they provide financial assistance to support projects serving a public or collective benefit. The primary difference is that the sponsor anticipates substantial involvement in the project after the award is made.

Examples of sponsor involvement include participation in project planning, review of progress, or joint decision-making on key activities. Cooperative agreements are governed by the same federal rules as grants, specifically 2 CFR 200, and must follow requirements for allowable, allocable, and reasonable costs.

The PI/PD manages day-to-day activities and maintains communication with the sponsor, while OSP provides administrative oversight to ensure compliance with all award terms. Any changes to the project scope, key personnel, or budget must be reviewed by OSP and approved by the sponsor, when required.

C. Contracts

Contracts are procurement mechanisms used when a sponsor (public or private) seeks specific goods, services, or deliverables that directly benefit the sponsor. Unlike grants or cooperative agreements, contracts are not considered financial assistance. They are binding agreements with specific performance and reporting requirements.

Key features of contracts include:
- A scope of work defined by the sponsor.
- Clearly identified deliverables and deadlines.
- Payment tied to the completion of milestones or deliverables.
- Terms governed by the Federal Acquisition Regulation (FAR) or Defense Federal Acquisition Regulation Supplement (DFARS) for federal contracts.

Contracts may include provisions related to publication restrictions, confidentiality, export controls, intellectual property, or security requirements. OSP works with University Counsel to review all terms to ensure they align with University policies and protect CUH's academic and legal interests.

The AOR is the only University official authorized to sign contract agreements. The PI/PD is responsible for fulfilling all deliverables, and OSP oversees compliance, reporting, and record retention in accordance with 2 CFR §200.334 and CUH's policies.

Compliance

All cooperative agreements and contracts are monitored jointly by OSP and the Business Office to ensure compliance with sponsor requirements, federal regulations, and University policies. Any issues or potential noncompliance must be reported to the Senior Director of Sponsored Programs and Research Integrity for review and resolution.

Notice of Award (NoA)

Upon approval of a grant or contract, sponsors issue a **Notice of Award (NoA)**, **Notice of Grant Agreement**, or other official documentation, typically through electronic notification. This notice serves as the authorizing document that establishes the legal framework for the award. It specifies the funding amount for the current budget period, the anticipated total award amount (if applicable), and the effective and end dates of the project.

The Notice of Award incorporates by reference all applicable terms and conditions, including those found in the sponsor's program announcement, the approved application, and federal regulations such as 2 CFR 200. It is essential that the PD/PI and relevant administrators carefully review the NoA to understand the sponsor's administrative, fiscal, and programmatic requirements.

Federal sponsors typically require technical and financial reporting, including periodic progress reports and final reports as specified in the award terms. The NoA will also outline budgetary restrictions, prior approval requirements, and conditions that affect programmatic changes, such as:
- Rebudgeting or transfer of funds among cost categories.
- Changes in key personnel or level of effort.
- Modifications to the project scope or objectives.
- Carryforward of unobligated balances.

Key Elements of an NoA
Each Notice of Award or Grant Agreement typically includes the following key elements:
- **Sponsor Award Number or Identifier:** For federal awards, this is referred to as the *Federal Award Identifying Number (FAIN).*
- **Sponsor or Pass-Through Entity Name:** Identifies the organization providing the funds or administering them on behalf of a federal sponsor.
- **PI/PD and Key Personnel:** Lists the individuals responsible for project oversight and execution.
- **Project Title:** The official title of the funded project.
- **Amount of Funds Awarded:** Indicates the total funding amount and may distinguish between *obligated* and *authorized* funds.
  - Note: Not all project funds may be released at the start of the award; funds are often authorized incrementally based on availability or satisfactory project progress. The sponsor is not legally obligated to provide funds that have not yet been obligated.
- **Cost Sharing (if applicable):** Specifies any required University contribution to the project. When cost sharing is mandatory, it must be properly documented, accounted for, and reported in compliance with sponsor and federal requirements.
- **Award Mechanism/Pricing Method:** Describes the type of award (e.g., grant, cooperative agreement, or contract) and the basis for reimbursement.
- **Period of Performance:** Defines the authorized start and end dates of the award. This may reflect only the current funding period or a multi-year project with anticipated future periods.
- **Scope of Work:** Outlines the approved objectives, activities, and deliverables of the project.
- **Accounting, Reporting, and Deliverable Requirements:** Specifies the required technical, financial, and administrative reports, including due dates.
- **Award Terms and Conditions:** Lists all applicable sponsor policies, federal regulations, and any special terms or restrictions that govern the award.

Upon receipt of the Notice of Award, the OSP and/or the PI/PD must forward the following documentation to the Grants Specialist and Business Office to facilitate post-award setup and financial management:
- A copy of the Notice of Award or fully executed grant/contract agreement specifying the terms and conditions.
- A copy of the final approved proposal submitted to the sponsor (if different from the reviewed version on file with OSP).
- A revised budget and budget justification, if the awarded amount differs from the proposed budget.

No project expenditures may be incurred prior to the official award start date unless pre-award spending has been explicitly authorized in writing by the sponsor and approved internally in accordance with federal prior approval requirements (2 CFR §200.308).

Subcontracts

Chaminade University frequently participates in collaborative sponsored projects involving external institutions or organizations. In such cases, the University may serve as either the **prime recipient (lead institution)** or a **subrecipient/subawardee** under another organization's award.

When Chaminade serves as the <u>prime recipient</u>, it is responsible for issuing subawards or subcontracts to collaborating institutions in compliance with <u>2 CFR §200.331–.333</u>, which outline subrecipient monitoring and management requirements. The University must ensure that subrecipients comply with all applicable federal regulations, sponsor terms, and institutional policies.

Responsibilities of the prime recipient include:
- Conducting risk assessments prior to issuing a subaward.
- Incorporating all required flow-down provisions from the prime award.
- Monitoring subrecipient performance and reviewing financial and technical reports.
- Ensuring timely submission of subrecipient invoices and reports.

When Chaminade is a <u>subrecipient</u>, it is bound by the terms and conditions established in the subaward agreement and those that flow down from the prime award. The University must comply with all applicable requirements, including cost principles, allowability, and reporting obligations, as stipulated by the prime recipient and federal regulations.

All subaward and subcontract agreements are reviewed and executed by the OSP in collaboration with the Business Office and the PI/PD to ensure compliance with sponsor and federal requirements prior to any expenditure of funds.

Regardless of the specific funding mechanism in place, the terms and conditions outlined in the primary agreement from the primary funding agency (e.g., NSF) generally extend to the subrecipient. In such situations, it falls upon the lead institution to directly negotiate with the primary sponsor, always considering the interests of their collaborators and promptly notifying any collaborator in the event of substantial changes that may affect the subcontractor.

IV. Cost Allowability

A proposed budget serves as the financial framework to achieve the objectives outlined in a sponsored project or research proposal. It must include the resources necessary to carry out the scope of work and comply with both institutional and federal regulations governing sponsored programs.

Chaminade University follows the <u>Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200, Subpart E)</u>, which establishes standards for determining the allowability, allocability, and reasonableness of costs charged to federal awards.

A. Reasonable Costs <u>(2 CFR §200.404)</u>

A cost is **reasonable** if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

When determining reasonableness, consideration must be given to:
- Whether the cost is generally recognized as necessary for the operation of the institution or performance of the sponsored project.
- The restraints or requirements imposed by sound business practices, arms-length bargaining, applicable laws and regulations, and the terms and conditions of the award.
- Market prices for comparable goods or services within the geographic area.

- Whether individuals acted prudently considering their responsibilities to the University, the sponsor, and the public.
- Whether institutional practices deviate significantly from established norms in ways that may increase costs to the federal award without justification.

B. Allocable Costs (2 CFR §200.405)

A cost is **allocable** to a particular federal award or cost objective if the goods or services involved are chargeable or assignable to that award in accordance with the relative benefits received.

A cost is allocable if it:
- Is incurred specifically for the award;
- Benefits both the award and other institutional activities, and can be distributed in reasonable proportion to the benefits received; or
- Is necessary for the overall operation of the institution and assignable in part to the award under federal cost principles.

Costs that benefit multiple projects must be allocated using a reasonable, documented method that reflects proportional benefit. Costs cannot be shifted between awards to overcome funding deficiencies or to avoid restrictions imposed by a sponsor.

C. Allowable Costs (2 CFR §200.403)

A cost is **allowable** under a federal award only if it meets all of the following criteria:
- Is necessary, reasonable, and allocable to the award;
- Conforms to any limitations or exclusions in the Uniform Guidance, federal agency-specific regulations, or the award terms and conditions;
- Is consistent with institutional policies and procedures that apply uniformly to both federally financed and non-federally financed activities;
- Is treated consistently as either a direct or indirect cost in similar circumstances;
- Is determined in accordance with Generally Accepted Accounting Principles (GAAP);
- Is not used to meet cost-sharing or matching requirements for any other federally financed program, unless specifically authorized; and
- Is adequately documented with supporting records (e.g., invoices, payroll certifications, travel receipts).

D. Consistency in Cost Application

Chaminade University applies uniform accounting practices to all sponsored and non-sponsored activities. Costs incurred for the same purpose and under like circumstances must be treated consistently, either as direct or indirect costs, but not both. This principle is critical for maintaining compliance with 2 CFR 200 Subpart E and ensuring institutional integrity and transparency in financial reporting.

E. Summary of Federal Cost Principles and Institutional Application

Under 2 CFR 200, federal cost principles require that all expenses charged to sponsored projects be:
1. **Reasonable:** Reflecting what a prudent person would pay under similar circumstances (e.g., adhering to federal domestic and foreign per diem travel rates).
2. **Allocable:** Directly benefiting the project being charged (e.g., materials or laboratory supplies purchased for the specific project).
3. **Consistently Treated:** Charged uniformly across all institutional activities.
4. **Allowable:** Meeting the specific terms of the sponsor and the Uniform Guidance.

Federal sponsors such as the National Science Foundation (NSF) and National Institutes of Health (NIH) issue agency-specific implementation guides, such as the NSF Proposal & Award Policies & Procedures Guide (PAPPG) and the NIH Grants Policy Statement (GPS), which provide further clarification on allowable and unallowable costs.

F. Additional Considerations

In developing and managing budgets, the following factors must also be evaluated:

- **Indirect (F&A) Costs:** Determine whether facilities and administrative (indirect) costs are allowed, restricted, or subject to a negotiated rate.
- **Cost Sharing/Matching:** Confirm whether cost sharing is required and ensure that University resources are available and appropriately documented to meet this requirement.
- **Budget Categories:** Clearly categorize project expenses (e.g., personnel, fringe benefits, travel, supplies, contractual/consulting services, equipment).
- **Subawards/Subcontracts:** Identify collaborative partners and determine whether subawards are required, ensuring compliance with federal subrecipient monitoring requirements (2 CFR §200.331– .333).
- **Institutional Commitments:** Obtain prior internal approvals for costs proposed as University contributions or cost-sharing commitments.

All proposed and actual expenditures are subject to review for allowability, allocability, and reasonableness in conformance with this policy.

V. Direct Costs vs. Indirect Costs

The total cost of a sponsored agreement is composed of allowable direct costs plus the allocable portion of indirect (Facilities and Administrative, or F&A) costs, in accordance with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200, Subpart E).

A. Direct Costs (2 CFR §200.413)

Direct costs are those expenses that can be specifically identified with a particular sponsored project or activity and are directly attributable to achieving the objectives of that project. These costs are charged to a specific award with a high degree of accuracy and without the need for allocation.

Examples of typical direct costs include:

- Salaries and wages of project personnel (e.g., faculty summer salary, graduate and undergraduate research assistants)
- Fringe benefits associated with project salaries
- Materials, laboratory supplies, and equipment directly used in the project
- Travel necessary to accomplish the project's objectives
- Tuition support for graduate students directly engaged in the project
- Consultant and professional service fees directly related to the sponsored activity
- Subawards to collaborating institutions performing project-specific work

All direct costs must be necessary, reasonable, allocable, and allowable under 2 CFR §§200.403–200.405 and must comply with both the sponsor's specific guidelines and Chaminade University's internal cost principles.

B. Indirect Costs (Facilities & Administrative Costs) (2 CFR §200.414)

Indirect costs, also referred to as **Facilities and Administrative (F&A) costs**, are expenses incurred for common or joint objectives that cannot be readily and specifically identified with a particular sponsored project, instructional activity, or other institutional function.

Indirect costs support the overall infrastructure that enables research, instruction, and public service activities, and typically include:
- Operation and maintenance of facilities (e.g., utilities, custodial services, building depreciation)
- General administrative and clerical support (e.g., finance, human resources, compliance, sponsored programs)
- Library services and research support infrastructure
- Departmental and central administrative services

Indirect costs are recovered through the **University's Federally Negotiated Indirect Cost Rate Agreement (NICRA)**, which is established with the U.S. Department of Health and Human Services (DHHS), the University's cognizant federal agency for indirect cost negotiations.

C. Chaminade University's Federally Negotiated Indirect Cost Rate

Chaminade University's current **federally negotiated indirect cost rate** for research and sponsored program activities conducted **on campus** is **45% of Modified Total Direct Costs (MTDC)**.

The MTDC base includes:
- All direct salaries and wages
- Applicable fringe benefits
- Materials and supplies
- Services
- Travel
- Subawards up to the **first $25,000** of each subaward (regardless of the period of performance)

The MTDC base **excludes**:
- Equipment (≥ $10,000 and having a useful life of more than one year)
- Capital expenditures
- Tuition remission
- Rental costs of off-site facilities
- Scholarships and fellowships
- The portion of each subaward exceeding $25,000

D. Application and Exceptions

Unless otherwise restricted by the sponsor, all proposals submitted by Chaminade University must include the current federally negotiated indirect cost rate.

Requests to apply a reduced or waived indirect cost rate must be:
- Supported by written documentation from the sponsor (e.g., published policy or award solicitation), and
- Approved in advance by OSP and the Provost.

Indirect cost recovery ensures that the University can sustain the facilities, personnel, and compliance infrastructure necessary to effectively manage sponsored projects in accordance with federal and institutional requirements.

E. Common Examples of Allowable vs. Unallowable Costs (Federal Grants/ Contracts)

Allowable	Unallowable
Summer Salary, AY Release/Course Release	Alcoholic beverages
GA Stipend, Tuition, UG/Graduate Wages	Advertising (unless recruitment of personnel)

Fringe Benefits	General office supplies and General-purpose equipment
Equipment	Local telephone rental
Travel	Travel Foreign Travel (unless approved by sponsor)
Materials/ Supplies	Housing and Personal Living Expenses
External Consultants/ Subcontractors	Entertainment Costs

Cost category	Common Allowable Examples	Common Unallowable Examples	Notes / Authority
Personnel (salaries, wages)	Salaries/wages for PI, co-PIs, postdocs, grad/undergrad research assistants, and administrative time if explicitly allocable and documented.	Personal use of institution-owned vehicles; salaries for activities unrelated to award.	Must be necessary, reasonable, allocable, and supported by records (time & effort).
Fringe benefits	Employer share of FICA, retirement, health insurance pro-rated to charged effort.	Fringe for personnel not actually performing award work or not documented.	Treated per institutional policy and GAAP; allocable to project.
Equipment (capital)	Equipment purchases used directly for project research (≥ institutional threshold) if approved by sponsor/policy.	Equipment purchased for general departmental use without project justification.	Some sponsors restrict equipment or require prior approval. Equipment is excluded from MTDC for F&A base.
Materials & supplies	Lab reagents, project-specific consumables, software licenses essential to project.	General office supplies charged where costs are covered by indirect costs or not project related.	Must be directly allocable or allocated reasonably. §200.453.
Travel	Travel for project fieldwork, conferences when travel is necessary and documented.	Local meals/entertainment for employees not in travel status; travel unrelated to project.	Follow federal per diem rules where applicable; sponsor rules may vary.
Subawards / Contracts	Payments to subrecipients for bona fide project work (with flow-down of terms).	Charging a subcontract where services are not performed or are duplicative.	Prime must perform subrecipient monitoring (2 CFR §200.331–333).
Consultant / Contractor fees	Consultant fees for specific deliverables tied to the project.	Excessive consultant fees (unreasonable) or fees for lobbying activity.	Must be procured via appropriate procurement and documented.
Tuition & student support	Tuition remission and stipends for students directly participating in research (if allowed by sponsor).	Tuition charged when sponsor prohibits or in conflict with sponsor terms.	Some sponsors restrict tuition as direct cost; check sponsor policy.
Indirect (F&A) costs	Negotiated F&A applied to allowed base (MTDC).	Attempting to claim F&A on costs excluded from MTDC when sponsor disallows it.	Use institution's NICRA; MTDC excludes equipment, participant support, scholarships, etc.
Participant support costs	Stipends, travel, materials for participants (when solicitation permits).	Charging participant support as regular F&A or when not authorized by award terms.	Participant support is handled per solicitation/award rules and may be excluded from MTDC.
Entertainment & social events	None; generally unallowable unless specific sponsor authorizes (rare).	Alcoholic beverages, entertainment (receptions, parties) are unallowable.	Uniform Guidance and agency policies disallow entertainment and alcoholic beverages.
Lobbying, advocacy & political activities	None; lobbying and many advocacy expenses are statutorily unallowable.	Lobbying, political campaign contributions, dues that fund lobbying.	Statutory and regulatory prohibitions apply; membership costs primarily for lobbying are unallowable. See agency guidance and recent reminders.

Advertising & public relations	Costs for programmatic dissemination (e.g., publicizing findings, recruitment of research participants) when directly related to award.	General publicity or alumni fundraising, promotional items not tied to award.	Communications that inform the public about project results are allowable if tied to award objectives.
Fines, penalties, interest, bad debt	Generally unallowable (e.g., penalties, fines, bad debts).	Fines, penalties, or legal costs for violations are unallowable unless allowed by statute or award.	See §200.455 and agency guidance. Exceptions are rare and must be justified/approved.
Memberships & subscriptions	Memberships in professional organizations that benefit the project (non-lobbying).	Memberships in country clubs, social/dining clubs, or organizations whose primary purpose is lobbying.	§200.454 gives rules; membership primarily for lobbying is unallowable.
Participant incentives / human subjects	Payments to human subjects for participation (when allowed and IRB approved).	Incentives without IRB approval or not documented / justified.	Must comply with IRB, sponsor rules, and procurement/accounting documentation.
Animal care and related costs	Animal purchase, husbandry, vet care, euthanasia/re-homing costs; **agency dependent** (NIH clarified some allowances 2025).	Costs disallowed by a sponsor's specific policy.	Agencies have updated policies (e.g., NIH allowed certain animal retirement/rehoming costs effective Oct 1, 2025); check agency notices.
Recruitment, advertising for personnel	Advertising for job postings, recruitment costs directly tied to hiring project staff.	General institutional recruiting/branding costs not allocable to project.	Must be reasonable and allocable.
Participant support vs. Indirect confusion	Participant support costs, when permitted, are direct and *excluded* from MTDC (affects F&A base).	Misclassifying participant support as F&A or charging it to F&A.	Follow solicitation and agency definitions carefully.

VI. Just-in-Time (JIT) and Pre-Award Requests

The award negotiation process may begin prior to receipt of a formal Notice of Award (NoA). This stage, often referred to as "**Just-in-Time (JIT)**", allows sponsors to request updated information required to finalize a funding decision. While the term "Just-in-Time" is most commonly used by the National Institutes of Health (NIH), many other federal and non-federal sponsors (including pass-through entities) follow similar procedures.

The purpose of this stage is to ensure that compliance, budget, and administrative details are current and accurate prior to issuing an award. Examples of commonly requested JIT materials include:
- Updated or revised budgets and budget justifications;
- Revised scope of work or project period dates;
- Current and pending (other) support for key personnel;
- Institutional certifications (e.g., conflict of interest, financial disclosure, or representations and assurances);
- IRB approval or verification of submission;
- Human subjects documentation;
- Updated equipment quotes, cost justifications, or other compliance documents.

All JIT and pre-award documentation must be reviewed and approved by OSP prior to submission to the sponsor. This ensures institutional compliance with federal regulations, including those outlined in 2 CFR 200 (Uniform Guidance), NSF Proposal & Award Policies and Procedures Guide (PAPPG), and NIH Grants Policy Statement.

A. Examples by Sponsor

- **NIH:**
  - An automated JIT notification may be issued through eRA Commons when an application receives an impact score within a certain range. This notification does not guarantee funding.
  - A subsequent email from the NIH Grants Management Specialist (GMS) indicates that the application is under active funding consideration. This second notification requires an institutional response coordinated through OSP.
- **NSF:** Revised budgets and current & pending support are commonly requested during pre-award review.
- **Department of Defense (DOD):** May conduct extensive pre-award reviews requiring certifications, detailed budgets, and institutional assurances.
- **Pass-through Entities/Subawards:** When CUH is a subrecipient, the prime recipient may request updated budget or scope of work documents to align with their adjusted award. These requests are treated as JIT and must be reviewed by OSP before submission.

B. Submission Procedures

- All JIT materials must be routed through OSP for review and institutional authorization before submission.
- Federal sponsors generally require that JIT information be submitted by the Authorized Organizational Representative (AOR), not directly by the PI/PD.
- For NIH, JIT information is typically uploaded to eRA Commons unless otherwise directed by the GMS. Other agencies may require submission via email or their respective electronic systems.
- When submitting a JIT request to OSP, the PI/PD (or departmental designee) must provide:
  - The sponsor's original JIT request or notification;
  - The internal proposal tracking or OSP reference number;
  - Identification of any sponsor deadlines for submission.

It is the responsibility of the PI/PD to notify OSP immediately upon receiving a JIT or pre-award information request and to provide sufficient lead time for institutional review and submission. OSP will not provide deadline reminders for JIT submissions.

C. Other Support (Current & Pending Support)

PIs/PDs at Chaminade University of Honolulu (CUH) are responsible for providing accurate and up-to-date *Other Support* (also referred to as *Current and Pending Support*) information whenever required by a sponsor, including during *Just-in-Time (JIT)* submission, progress reports, or renewal applications. This information is used by sponsors to assess potential scientific, budgetary, and commitment overlap, as well as to ensure compliance with federal research security requirements.

Other Support includes all resources, financial and in-kind, made available to a researcher in support of, or related to, all of their research efforts, regardless of whether they have monetary value or are based at CUH or another institution.

This includes, but is not limited to:
- Current and pending funding (federal, state, local, foreign, or private)
- Research contracts, cooperative agreements, or subawards
- In-kind contributions (e.g., access to laboratory space, equipment, supplies, or personnel)
- Visiting scholars or students supported by an external entity
- Startup packages or internal institutional support that includes research funding, if not universally available to all faculty

PI/PD Responsibilities

- **Accuracy and Completeness:** The PI/PD must ensure all relevant support, both domestic and foreign, is disclosed, including commitments of effort whether or not salary is requested.
- **Transparency:** When in doubt, *include the resource*. Sponsors emphasize transparency, and omissions (even unintentional) can lead to compliance findings or penalties.
- **Certification:** When required, PIs/PDs must sign or certify their Other Support form to confirm its completeness and accuracy.
- **Timeliness:** Updated Other Support must be submitted promptly upon sponsor request (e.g., during JIT or progress reporting stages).

False, fictitious, or fraudulent statements or omissions may result in administrative, civil, or criminal penalties under 18 U.S.C. § 1001 and related federal statutes.

Format and Submission

- PIs/PDs should use the sponsor's required format (e.g., NIH *Other Support* form, NSF *Current and Pending Support* form, or the Common Forms for Research Security Disclosures once fully implemented).
- Documents must include all active and pending funding, as well as in-kind resources.
- OSP will verify Other Support documents for consistency with university records before submission to the sponsor.
- For subrecipients, OSP will ensure documentation is collected but does not directly review subrecipient personnel Other Support unless required by the prime sponsor.

Review at Just-in-Time (JIT) Stage

At the JIT stage, CUH's OSP will:

1. Review Other Support documents for CUH personnel and compare them with institutional reports and available data (e.g., internal award tracking).
2. Flag discrepancies for clarification or correction by the PI/PD.
3. Confirm that the PI has disclosed any potential overlap or foreign components.
4. Ensure that any significant reduction in key personnel effort (≥ 25%) is routed through OSP for sponsor approval, per 2 CFR § 200.308(c)(2).

Minor differences in effort levels (below 25%), small funding adjustments, or non-reportable activities (e.g., fellowships, conferences) are typically acceptable. However, significant or repeated discrepancies must be corrected before submission.

D. IRB Requirements

Protocols requiring **Institutional Review Board (IRB)** review must be initiated as early as possible, ideally upon receiving a JIT request or notice of potential funding.

It is the PI/PD's responsibility to:

- Submit new or revised protocols in CUH's compliance system.
- Ensure approval prior to award activation.
- Maintain active compliance throughout the life of the project.

OSP cannot submit JIT materials or finalize an award setup until applicable human subjects protocols have received IRB approval. For the most up-to-date guidance, please refer to the CUH IRB Charter or contact the IRB Chair and Administrator at irb@chaminade.edu.

Section VI: Project Start-Up

I. Award Setup

Upon official notification and acceptance of an award, the PI/PD works in coordination with the OSP Grants Specialist to establish a project account. This account enables the PI/PD to initiate project-related expenditures in compliance with institutional and sponsor requirements.

Some sponsors disburse funds for multi-year projects incrementally, providing funding on an annual basis rather than the total award amount upfront. In such cases, the OSP Grants Specialist will set up the award account only for the currently authorized period and funding amount. When subsequent funds are released, the OSP will confirm the continuation of the project with the PI/PD and update the account accordingly.

To ensure strong fiscal and administrative management, PIs/PDs are expected to thoroughly review the Notice of Award (NOA), including all terms, conditions, and applicable federal regulations (e.g., 2 CFR 200 Uniform Guidance, NIH Grants Policy Statement, NSF PAPPG). For new investigators or projects involving multiple collaborators or compliance requirements, it is strongly recommended that an **Award Kickoff Meeting** be held with OSP's Senior Director and the Grants Specialist. These meetings may also include representatives from the Institutional Review Board (IRB), Business Office, Human Resources, and other relevant departments.

II. Institutional Prior Approval System

Many federal sponsors permit institutions to authorize pre-award costs up to **90 days prior** to the official start date, provided there is a valid programmatic justification and such costs are allowable, allocable, and reasonable under the award terms and 2 CFR 200.308.

To initiate a request for pre-award spending, the PI/PD should consult with the OSP Grants Specialist to ensure compliance with sponsor and institutional guidelines. Written approval (typically via email) must be obtained from OSP prior to incurring pre-award costs.

III. Compliance Requirements

Federal sponsors require institutions to maintain and certify compliance with key assurances and policies as a condition of receiving and retaining federal funding. The following areas are integral to award setup and ongoing management at Chaminade University of Honolulu (CUH):

A. Institutional Review Board (IRB)

All research involving human subjects, regardless of the source of funding (internal, external, or unfunded), must receive IRB approval **prior to the initiation of any research activities.** PIs must submit a protocol through CUH's electronic IRB system **(eProtocol)** and obtain formal approval before expending funds or enrolling participants.

Refer to the CUH IRB Handbook for the most up-to-date, detailed procedures and training requirements.

B. Financial Conflict of Interest (FCOI)

In compliance with 42 CFR Part 50, Subpart F and 2 CFR Part 200.112, CUH requires that all investigators involved in research funded by the Public Health Service (PHS), the National Science Foundation (NSF), and other federal agencies as applicable, disclose Significant Financial Interests (SFIs) that may present a potential or actual conflict of interest.

- Disclosures must be submitted **prior to proposal submission** and updated **annually** or within **30 days** of discovering or acquiring a new reportable SFI.
- The Provost and OSP will review disclosures and, if necessary, develop a Conflict Management Plan to mitigate potential bias.
- The [Financial Conflict of Interest Policy for Sponsored Research](#) and related disclosure forms are available on the [CUH OSP website](#) and embedded within the External Funding Request Approval Form and within **eGrants.**

Failure to disclose or manage conflicts appropriately may result in sanctions, up to and including suspension of project activities.

C. Responsible Conduct of Research (RCR)

CUH requires that all students, postdoctoral researchers, and faculty supported by NSF, NIH, and other applicable federal sponsors complete training in **Responsible Conduct of Research (RCR)**, as mandated by federal policy.
- CUH offers RCR training through the **Collaborative Institutional Training Initiative (CITI)** program, accessible via the IRB website.
- Faculty mentors are responsible for ensuring student researchers complete RCR training and adhere to ethical research standards.
- Certification of completion must be maintained in departmental and OSP records before project expenditures can begin.

D. Research Security and Foreign Disclosure Requirements

In accordance with [National Security Presidential Memorandum-33 (NSPM-33)](#) and subsequent federal directives, all PIs/PDs, key personnel, and senior staff engaged in federally funded research must complete **Research Security Training (RST)**.

This training ensures compliance with federal requirements related to foreign influence, cybersecurity, and research integrity.
- CUH requires completion of Research Security Training for all individuals listed as key personnel on any federal grant or cooperative agreement.
- PIs are also responsible for maintaining accurate and complete Other Support (Current and Pending Support)and foreign collaboration disclosures.
- Noncompliance with research security or disclosure requirements may result in suspension of project accounts, reporting to federal sponsors, or ineligibility for future federal awards.

The training consists of a one-hour condensed RST module designed to meet the federal government-wide requirement in Section 10634 of the CHIPS and Science Act of 2022 ([42 U.S.C. § 19234](#)). Completion of this module will satisfy the requirements for NSF, NIH, DOE, and the Department of Defense (DoD). The training will include elements relating to (1) cybersecurity; (2) foreign travel security; (3) research security training; and (4) export control training.

RST Resources
- [NIH Implementation of NIH Research Security Policies NIH NOT-OD-25-154](#)
- [NSF Important Notice No. 149: Updates to NSF Research Security Policies](#)
- [Department of Energy Research Security Training Requirement](#)

E. Institutional Assurances

Chaminade University maintains current **federalwide assurances** and certifications, including:

- FWA for Human Subjects Protection (IRB)
- Conflict of Interest and Research Security Policies
- Single Audit compliance ([2 CFR 200, Subpart F](#))

OSP ensures that all required certifications and assurances are current prior to award activation.

Section VII: Award Management

The Business Office at Chaminade University of Honolulu is tasked with overseeing the financial aspects of externally sponsored programs. This includes (1) preparing and submitting financial reports and invoices, (2) managing cash collections, (3) conducting expenditure compliance reviews (4) facilitating cost transfers, (5) maintaining accounts receivable, and (6) ensuring award closeout. These functions are carried out by the assigned Grants Specialist in the Business Office.

In addition, the Business Office is responsible for developing and disseminating policies and procedures to ensure adherence to both University and sponsor/regulatory requirements (including, but not limited to, the Uniform Guidance at 2 CFR Part 200). These policies are located in [Policy Manual Volume II: Campus Community Policies](#).

Principal Investigators/Project Directors (PI/PDs) should direct any financial management inquiries, including fund setup, available balances, cost eligibility, invoicing requirements, to the Grants Specialist in the Business Office. PI/PDs have view-only access to monthly summary expenditure reports in standard budget categories via the University's accounting system.

Simultaneously, the Office of Sponsored Programs and Research Integrity (OSP) provides support to faculty and staff in managing the non-financial aspects of their sponsored awards: internal and external approvals, sponsor terms and conditions, procedural/regulatory compliance, and oversight of project conduct in accord with the proposal, sponsor agreement, and applicable federal, state, and local regulations. OSP has the expertise and resources to assist PI/PDs in ensuring full compliance with all guiding documents and agreements.

I. Day-to-Day Management of a Sponsored Project

A. Personnel and Release Time

1. The PI/PD should coordinate with the Human Resources department to initiate personnel actions associated with the award. This includes student hires, part-time appointments, temporary staff, or full-time faculty/staff recruitment.
2. When an awarded budget incorporates academic year or course-release time support, the Grants Specialist, PI/PD, and the PI/PD's dean or supervisor (with Provost approval as required) will work together to allocate resources appropriately and ensure correct administrative coding.
   a. Note: OSP is not authorized to negotiate course-release time on behalf of the PI/PD. It is the responsibility of the PI/PD to discuss this with their dean or supervisor prior to approval by the Provost. Approval is documented by both the PI/PD's dean or supervisor and Provost in **eGrants**.

B. Processing Expenditures (Non-Travel)

Supplies
I. **Material and supplies:** All acquisitions for sponsored projects are processed through Self-Service, which is integrated with CUH's Ellucian Colleague system. The Business Office will coordinate training with PI/PDs on use of Self-Service for these transactions.
II. **Supplier invoice:** If payment is needed without a purchase order, complete a check-request via Self-Service and attach the supplier invoice.

III. **Equipment & services:** Procurement of single items of equipment valued at **$10,000 or more**, or acquisition of services (e.g., testing services) must follow CUH procurement policies as outlined in Policy Manual II.
IV. For all such procurements, the general procedures described in Policy Manual II apply. The PI/PD must adhere to these policies, and any questions about procurement should be directed to the Director of Finance (Business Office).
V. **Inventorial equipment** (i.e., equipment costing $10,000 or more) must be promptly tagged with a property number, documented on receipt, and the PI/PD must notify the Business Office of the item's location. The PI/PD and OSP must maintain current records of equipment movement so that any item can readily be located for inspection or inventory within a reasonable timeframe.

C. Processing Travel Expenses

I. Review the sponsored award and budget to confirm that travel is an approved activity and that funds are allocated for travel.
II. Prior to travel on a sponsored project, the PI/PD must complete a **Travel Authorization Form** (available in Policy Manual II) and obtain required approvals (PI/PD, departmental budget manager, etc.).
III. The "Fly America Act" requirement must be observed when federal funds are used for air travel: U.S.-flag air carrier economy class is required when traveling on grants or contracts funded by the U.S. Federal Government, unless a valid exception applies. Please consult the Grants Specialist for details.
IV. **Meals:** A per diem meal allowance may be reimbursed to the traveler under CUH policy. Receipts are not required for per diem meals. If a meal is included in the registration/conference fee or is paid by someone else, reimbursement is not permitted. GSA per diem rates apply; if the destination city is not listed, use the rate for the nearest listed city.
V. **After travel:**
  i. The PI/PD must submit original receipts along with the approved Travel Authorization Form for reimbursement or credit-card reconciliation (if the PI/PD holds a CUH purchasing card).
  ii. For transportation reimbursement (airline, rail, mileage, etc.), original receipts or appropriately documented proof (boarding passes, mileage printouts, etc.) must be retained and submitted. Only actual allowable expenses may be charged; the per diem approach is not allowed for transportation.
  iii. If a non-CUH employee supported by the award has not been reimbursed through the University previously, they must complete an IRS W-9 form.

D. Considerations for Closeout and Reporting

1. All costs must be posted to the award by the Final Action Date (FAD) specified in the award or by sponsor instructions. For example, publication costs may be incurred after the period of performance but must be charged to the final budget period.
2. The Business Office will coordinate final financial reports/invoices, ensuring compliance with sponsor requirements, University policy, and the Uniform Guidance (2 CFR Part 200).
3. After all required reports are submitted and requirements met, the Business Office will formally close out the award account and archive records in accordance with both sponsor and institutional retention policies.

E. Award Management Key Institutional Responsibilities

- **The Business Office:** financial stewardship, accounts oversight, reporting, cost-eligibility reviews, cost transfers, award closeout.
- **OSP:** regulatory/compliance oversight, sponsor agreement interpretation, internal/external approvals, guidance to PIs/PDs.

- **PI/PD:** responsible for executing the project in accord with the award, monitoring expenditures, maintaining documentation, ensuring personnel and procurement actions follow policy, and partnering with Business Office/OSP.
- **Human Resources/Departmental Administration:** executing personnel actions consistent with award terms and institutional policy.

II. Working with the Business Office (Financial Post-Award Management)

In most cases, the PI/PD of a sponsored project will work directly with the Grants Specialist in the Business Office for the financial management of the award.

Key responsibilities in this collaboration include:
- Reviewing, approving and monitoring project-related expenses.
- Determining cost-allowability and allocability in accordance with sponsor terms, institutional policy, and federal cost principles (e.g., 2 CFR Part 200 Subpart E).
- Processing cost transfers when necessary.
- Managing cost-sharing or matching obligations and related reporting (if applicable).
- Overseeing effort/commitment reporting and ensuring personnel costs align with the award.
- Handling billing/invoicing and accounts receivable as applicable to the project.
- Assuring timely submission of financial reports and facilitating award closeout.
- Maintaining compliance with the University's internal policies, sponsor terms and conditions, and federal/state/local regulations.

The PI/PD is responsible for ensuring that expenditures do not exceed the awarded funds (either in total or by designated budget categories such as personnel, equipment, or other direct costs). Should a cost overrun occur, the PI/PD works with the Grants Specialist and the Dean or direct supervisor to identify an institutional account (e.g., departmental or college account) that will absorb the excess cost. The Grants Specialist is physically located in the Business Office and acts as the primary financial liaison for post-award administration.

For complete guidance on fiscal policy as it relates to grants and sponsored projects, please refer to Policy Manual Volume II: Campus Community Policies.

A. Policy on Cost Transfers

A cost transfer is the reassignment of a cost after it was originally posted, either from a sponsored project account or to/from a departmental or other non-sponsored account. This policy covers federally-funded and non-federal sponsored projects alike.

Key points include:
- Unallowable costs mistakenly charged to a sponsored award must be promptly transferred to a departmental (non-sponsored) account.
- Transfers must be initiated within **90 calendar days** of the original transaction date in the accounting system to be classified as "current" cost transfers; transfers beyond 90 days are "non-current" and require enhanced justification.
- For a cost transfer to be allowable, the expense must:
    1. Be allowable under the project's terms, institutional policy, and sponsor policy.
    2. Be allocable to the award, meaning it provides a direct benefit to the project.
    3. Be incurred within the period of performance of the award (unless sponsor allows otherwise).
    4. Be treated consistently across similar situations.
    5. Be corrected as soon as the need is detected; delays beyond 90 days should be minimized.
- Cost transfers are **not allowed** when:
    - They are used to move costs that do not benefit the project;

- o They shift costs outside the period of performance (unless explicitly permitted);
- o They transfer institutional funds solely to spend down a sponsored project balance;
- o They transfer costs to another sponsored project to eliminate an overdraft, avoid award restrictions, or for convenience.

Roles and Responsibilities
- **PI/PD:** Monitors project expenditures, minimizes need for transfers, ensures cost transfers are legitimate and timely.
- **Grants Specialist (Business Office):** Reviews and reconciles expenditure activity, prepares and processes cost transfers, ensures transfers meet allowability/allocability criteria, maintains documentation, and initiates corrective action if needed.
- **OSP:** Maintains policy and procedures, responds to inquiries, approves cost transfers older than 90 days (or otherwise beyond standard departmental approvers).

Cost Transfer Process
1. Confirm that the transfer meets the allowability/allocability criteria.
2. Determine whether the transfer is **current (≤ 90 days)** or **non-current (> 90 days)** and whether additional documentation is required. Non-current transfers require additional documentation.
3. Complete a Colleague Journal Entry Form in the accounting system specifying the original transaction date, document number, explanation, and preparer's name.
4. Complete the formal Cost Transfer Form. The PI/PD signs to confirm the validity of the transfer; if unavailable, the Senior Director of OSP may sign on behalf of the PI/PD.
5. Retain all supporting documentation (journal entry, cost transfer form, justification memo, etc.) in accordance with institutional record-retention policy and available for audit.

All PI/PDs at Chaminade University of Honolulu involved in federally-funded awards must ensure compliance with this cost transfer policy. Inadequately supported transfers may be deemed unallowable by sponsors or auditors; the responsible unit must absorb such costs via unrestricted institutional funds.

B. Working with OSP (Non-Financial Post-Award Management)

The Office of Sponsored Programs supports the administrative and compliance aspects of award management. Activities for which PI/PDs typically engage OSP include:
- **Prior Approvals**: Some modifications to awards require sponsor prior approval. Typical examples include:
  - o **No-Cost Extension**: When additional time is needed to complete the project, OSP will assist the PI/PD in requesting the extension from the sponsor.
  - o **Rebudgeting**: When funds need to be reallocated across categories, the PI/PD should collaborate with OSP and the grants specialist. Some transfers may require sponsor approval; others may be allowable under institutional policy, but always with OSP engagement.
  - o **Change in Senior/Key Personnel**: Changes in PI, Co-PI, or other key personnel often require sponsor prior approval.
  - o **Subaward/Subcontract Modifications**: Adjustments to subrecipient scope of work, performance period, budget, or other terms must be documented and may require sponsor approval.

Section VIII: Award Closeout

As a sponsored project nears completion, the OSP staff, including the Senior Director and the Grants Specialist, collaborates with the PI/PD to ensure timely and compliant closeout of the award.

Closeout requirements and timelines are defined in the sponsor's terms and conditions, which typically include submission of final technical/programmatic, financial, property, and invention reports.

In accordance with federal Uniform Guidance (§ 200.344), all required closeout documentation must be submitted to the sponsor **no later than 120 calendar days** after the award end date (some sponsors, such as NSF, may still specify within 90 days of the project's end date).

I. Notice of Award Expiration

The PI/PD is responsible for ensuring that all technical and financial obligations under the award are completed. Approximately **two months before the award end date**, the PI/PD should consult with the Grants Specialist to:
- Review remaining balances and encumbrances;
- Confirm deadlines for final purchases and travel;
- Discuss pending invoices or payments from the sponsor; and
- Review allowability of any last-minute expenditures under 2 CFR § 200.403–405.

The Grants Specialist (Business Office) will review the project account, identify uncollected receivables, and coordinate billing or final invoicing.

All questions related to final balances, expenditures, or allowable costs should be directed to the Grants Specialist.

If a **no-cost extension (NCE)** is needed to complete project activities, the PI/PD must contact the Senior Director of OSP and the Grants Specialist **at least 30 days** before the current project end date. The NCE must be approved by the sponsor and formally processed before the expiration date.

II. Closeout Reporting Requirements

A. Financial Reports and Final Invoicing

The Grants Specialist prepares all financial reports and final invoices, which are routed to the PI/PD for review and certification prior to submission to the sponsor.

The PI/PD must verify that all costs are allowable, allocable, reasonable, and incurred within the approved project period.

The Business Office is responsible for reconciling expenditures, collecting outstanding payments, and submitting all financial closeout reports by the sponsor's deadline.

B. Technical and Programmatic Reports

The PI/PD is responsible for preparing and submitting all required technical/programmatic reports as outlined in the award agreement.

The OSP provides guidance and ensures that institutional submission protocols are followed.

In some cases (e.g., NIH eRA Commons), OSP staff must submit the report; in others (e.g., NSF Research.gov), the PI/PD submits directly with OSP oversight.

Example:
- **NSF Awards:** Annual, final, and project-outcomes reports must be submitted through Research.gov.

- Annual Reports: Due at least 90 days before the end of the reporting period unless otherwise specified.
- Final Project Report: Due within 120 days of the award end date.
- Project Outcomes Report: Due within 120 days of the end date and publicly posted via Research.gov.
- Reports must not include confidential, proprietary, unpublished, or personally identifiable information.

C. Property Reports

When required by the sponsor, the Grants Specialist works with the PI/PD to complete final property/equipment reports.

Equipment purchased with sponsored funds must be inventoried and retained in accordance with 2 CFR § 200.313 and institutional property policies.

Title to federally funded equipment vests with the University, subject to federal disposition requirements.

D. Invention Reports

Inventions resulting from federally sponsored projects are governed by the Bayh–Dole Act (37 CFR Part 401). The PI/PD and the University must disclose any invention to the sponsoring agency within two months of written disclosure to the institution.

Before closeout, a Final Invention Statement and Certification must be submitted, listing all subject inventions or affirming that no inventions were made during the project.

III. Record Retention

Records related to sponsored projects must be retained in accordance with federal and sponsor requirements, as well as the University's Record Retention Policy.

Per 2 CFR § 200.334–337, records for federal awards must be kept for **a minimum of three years** from the date of submission of the final financial report, unless the sponsor specifies a longer retention period.

Retention applies to all record types, including financial, administrative, technical, and electronic records (e-mail, digital files, and data).

Records must remain accessible, secure, and auditable throughout the retention period. Confidential and sensitive information must be stored in compliance with University data security standards.

IV. Disposition of Equipment

Under Uniform Guidance § 200.313, title to equipment purchased with federal funds vests in Chaminade University of Honolulu, subject to federal conditions.

At project closeout, equipment disposition must follow the applicable sponsor's and University's property management policies.

If the sponsor requires disposition instructions or reimbursement for residual equipment value, the Business Office and OSP will coordinate compliance.

V. Project Closeout Roles and Responsibilities Summary

Role	Key Responsibilities at Close-Out
PI/PD	Complete technical/programmatic reports; verify accuracy of expenditures; ensure all deliverables submitted; initiate no-cost extension requests; maintain communication with OSP and Business Office.
OSP (Senior Director)	Oversee compliance with sponsor and federal close-out requirements; coordinate with Business Office; ensure timely report submission; maintain award documentation.
Grants Specialist (Business Office)	Prepare and submit final financial reports/invoices; reconcile accounts; resolve outstanding receivables; assist with property and invention reports.
Department/Dean	Review over-expenditures and ensure deficits are covered by non-sponsored funds; support PI/PD in close-out process.

VI. Failure to Submit Final Reports

Failure to submit required close-out reports within the sponsor's deadline may result in:

- Suspension or delay of future funding to the PI/PD or institution;
- Withholding of final payments; or
- Designation of the award as delinquent in federal systems (e.g., NSF Research.gov, NIH Commons).

Timely coordination among the PI/PD, OSP, and the Business Office is essential to maintain institutional compliance and eligibility for future awards.

Appendix I: Sponsored Programs Glossary

- **Agreement:**
  A formal, legally binding document between the University and a sponsor to carry out a sponsored project. May include grants, contracts, or cooperative agreements.

- **Allocable Costs** (2 CFR §200.405)**:**
  A cost is allocable to a specific award if the goods or services involved are chargeable to that award in accordance with the relative benefits received.

  A cost is allocable if it:
  - Is incurred specifically for the award;
  - Benefits both the award and other work and can be reasonably distributed; or
  - Is necessary for overall operations and assignable in part to the award.

- **Allowable Costs** (2 CFR §200.403)**:**
  Costs that are reasonable, necessary, allocable, and in conformance with sponsor and federal regulations.

  To be allowable, costs must:
  - Be necessary and reasonable for performance of the award;
  - Conform to limitations in the award or federal regulations;
  - Be consistent with institutional policies applied uniformly;
  - Be treated consistently as either direct or indirect;
  - Follow Generally Accepted Accounting Principles (GAAP);
  - Not be used to meet cost sharing for another federally funded program; and
  - Be adequately documented.

- **Applied Research:**
  Systematic study to gain knowledge or understanding needed to determine how a recognized need may be met.

- **Audit:**
  A formal, independent review of financial and administrative records to verify compliance with applicable laws, regulations, and award terms.

- **Authorized Organizational Representative (AOR):**
  An individual authorized by the institution to submit proposals, negotiate, and accept awards on behalf of Chaminade University.

- **Award:**
  The provision of funds or other support by a sponsor, based on an approved proposal and budget, to carry out a specific project or activity.

- **Basic Research:**
  Systematic study directed toward fuller knowledge or understanding of fundamental phenomena without immediate application in mind.

- **Broad Agency Announcement (BAA):**
  A general announcement by a federal agency (e.g., DoD, NIH) describing research interests and inviting proposals within those areas.

- **Budget:**
  A detailed financial plan that itemizes project costs needed to support the scope of work described in a proposal or award.

- **Budget Period:**
  A specific interval (usually 12 months) for which sponsor funding has been authorized.

- **Certification:**
  A signed statement confirming compliance with certain conditions or restrictions as a prerequisite for receiving federal funds.

- **Closeout:**
  The process of completing all financial, technical, and administrative requirements of a sponsored award in accordance with federal regulations (2 CFR §200.344) and institutional policy.

- **Co-Investigator (Co-I):**
  An individual who works in collaboration with the Principal Investigator/Project Director (PI/PD) and contributes substantively to the scientific or scholarly development or execution of a project.

- **Consistency:**
  Uniform application of policies and procedures across all activities of an organization. Costs incurred for the same purpose under like circumstances must be treated consistently as either direct or indirect.

- **Consultant:**
  An independent individual or firm providing expert advice or professional services for a fee. Consultants are not typically involved in programmatic management of a project.

- **Contract:**
  A legally binding agreement to provide a product or service to the sponsor, generally for the sponsor's direct benefit. Federal contracts are governed by the Federal Acquisition Regulation (FAR).

- **Cooperative Agreement:**
  An award similar to a grant, but one that anticipates substantial sponsor involvement during project performance.

- **Cost Sharing or Matching:**
  Portions of project costs not paid by the sponsor, including cash or in-kind contributions from the institution or third parties.

- **Developmental Research:**
  Systematic application of knowledge to produce useful materials, devices, or systems and improve existing processes.

- **Direct Costs:**
  Expenses that can be clearly identified with a specific sponsored project (e.g., salaries, supplies, equipment).

- **Effort:**
  The proportion of time spent on a sponsored project relative to total institutional responsibilities, expressed as a percentage.

- **eGrants:**

The electronic grant and proposal management system created by Key Solutions. It supports the pre-award and post-award processes for sponsored projects. It is used by OSP for (1) developing and routing proposals for institutional approval before submission to sponsors, (2) managing budgets, compliance checks, and approvals (department, dean, OSP), (3) tracking award setup, amendments, and reporting deadlines, and (4) housing official proposal and award documents. Additionally, eGrants ensures proposals and awards are properly reviewed, approved, and compliant with institutional and sponsor requirements.

- **Encumbrance:**
Funds set aside or reserved for future payment of an approved obligation or purchase order.

- **End Date (Expiration Date):**
The official end of the approved period of performance for a sponsored award.

- **eProtocol:**
The research compliance management system created by Key Solutions, specifically for human subjects (IRB) protocols. It is used by OSP/ IRB for (1) creating, submitting, and tracking IRB protocols, (2) managing protocol reviews, amendments, renewals, and continuing reviews, (3) storing reviewer comments, determinations, and approval letters, and (4) maintaining compliance with federal and institutional regulations. Additionally, eProtocol ensures all research involving human participants is ethically reviewed and compliant with federal regulations (e.g., 45 CFR 46, PHS Policy, NIH Guidelines).

- **Equipment:**
Tangible personal property with a useful life of more than one year and a per-unit cost of $5,000 or more, consistent with University capitalization thresholds.

- **Expanded Authorities:**
Administrative flexibilities delegated by federal agencies to institutions, such as the ability to approve a one-time, no-cost extension without prior sponsor approval.

- **External Funding Request Approval Form:**
Institutional form previously required prior to submission of proposals to ensure necessary internal approvals and compliance checks. Managed by the Office of Sponsored Programs and Research Integrity (OSP). This has been replaced by the Intent to Apply Form in eGrants (Key Solutions).

- **Federal Acquisition Regulation (FAR):**
The primary set of rules governing the administration of federal procurement contracts.

- **Financial Conflict of Interest (FCOI):**
A significant financial interest that could directly and significantly affect the design, conduct, or reporting of federally funded research (42 CFR Part 50, Subpart F).

- **Financial Report:**
A report submitted to the sponsor detailing the financial status of an award, typically prepared by the Business Office and reviewed by the PI/PD.

- **Financial Status Report (FSR):**
A standard federal financial report summarizing expenditures and the balance of funds for an award. Often referred to as the Federal Financial Report (FFR).

- **Fringe Benefits:**

Employee benefits (e.g., health insurance, FICA, retirement) included as part of total compensation and charged as a percentage of salary costs.

- **Grant:**
Financial assistance to carry out a project or program for public benefit. Sponsors generally have limited involvement beyond monitoring progress.

- **Indirect Costs (Facilities & Administrative Costs or F&A):**
Expenses incurred for common or joint objectives that cannot be readily identified with a specific project (e.g., utilities, administrative support). Rates are negotiated with the federal cognizant agency.

- **Institutional Review Board (IRB):**
A University committee that reviews and monitors research involving human subjects to ensure compliance with ethical standards and federal regulations (45 CFR 46).

- **Key Personnel:**
Individuals essential to the successful conduct of a project, including the PI/PD, Co-Investigators, and others named in the award.

- **Key Solutions:**
A software products company that allows for continuous monitoring of sponsored programs (eProtocol) and IRB protocols (eProtocols).

- **Mandatory Cost Sharing:**
Cost sharing required by the sponsor as a condition of receiving an award.

- **Modified Total Direct Costs (MTDC):**
The base used to calculate F&A costs, excluding certain items such as equipment, tuition, subawards over $25,000, and participant support costs (2 CFR §200.1).

- **No-Cost Extension (NCE):**
Additional time, without additional sponsor funding, to complete project objectives using remaining funds.

- **Notice of Award (NOA):**
The official document from the sponsor that authorizes funding, sets terms and conditions, and establishes the period of performance.

- **Period of Performance:**
The time during which project activities are authorized and costs may be incurred (2 CFR §200.1).

- **Preliminary Proposal:**
A brief submission used by sponsors to assess eligibility and interest prior to inviting a full proposal.

- **Prime Award:**
An award made directly by a sponsor to a recipient institution. Subawards issued by the recipient are governed by the terms of the prime award.

- **Principal Investigator (PI)/Project Director (PD):**
The individual primarily responsible for the design, conduct, and oversight of a sponsored project, including compliance with sponsor and University policies.

- **Prior Approval:**

Written authorization from the sponsor's designated official required before making specific changes to an approved project or budget (2 CFR §200.308).

- **Program Announcement:**
  A sponsor-issued notice describing available funding opportunities, eligibility, and submission requirements.

- **Program Officer:**
  A sponsor representative responsible for overseeing the technical, scientific, or programmatic aspects of funded projects.

- **Progress Report:**
  A periodic update to the sponsor summarizing project accomplishments, challenges, and next steps.

- **Proposal:**
  A formal submission requesting external funding that includes a project narrative, budget, and other required documentation.

- **Proposal Development Form:**
  Institutional online tool previously used to collect required internal information for proposal routing and review. This has been replaced by the Intent to Apply Form in eGrants (Key Solutions).

- **Reasonable Costs** (2 CFR §200.404)**:**
  Costs that do not exceed what a prudent person would incur under similar circumstances. Factors include necessity, market prices, sound business practices, and institutional consistency.

- **Recipient:**
  An entity that receives a federal award directly from a sponsor to carry out a program or project (2 CFR §200.1).

- **Request for Applications (RFA):**
  Formal announcement inviting grant applications in specific areas of interest.

- **Request for Proposals (RFP):**
  Formal solicitation requesting submission of a proposal to provide a specific product or service, often resulting in a contract.

- **Request for Quotation (RFQ):**
  Sponsor request for pricing information or bids on specific goods or services.

- **Research Security:**
  Institutional and individual responsibility to safeguard research from foreign interference, cyber threats, or misuse, as required under federal research security programs (per NSPM-33 and CHIPS and Science Act of 2022).

- **Sponsor:**
  An external funding organization (federal, state, local government, foundation, or industry) that provides support for research, instruction, or service activities.

- **Statement of Work (SOW):**
  A detailed description of the project's objectives, tasks, deliverables, and performance timeline.

- **Subaward/Subcontract:**
  A formal agreement transferring a portion of the substantive work under an award to another organization ([2 CFR §200.332](#)).

- **Uniform Guidance** ([2 CFR Part 200](#))**:**
  Federal regulations that establish administrative, cost, and audit requirements for all federal awards to non-federal entities. The most recent revisions (effective October 1, 2024) enhance transparency, research security, and performance accountability.

- **Unsolicited Proposal:**
  A proposal submitted independently by an investigator to a sponsor without a formal solicitation.

- **Vendor:**
  A dealer or business providing goods or services necessary for project execution but not directly responsible for programmatic decision-making. Vendors are not considered subrecipients.

Appendix II: OSP & Related Staff and Administrators with Roles & Responsibilities

Name	Role	Phone	Email
Lance Askildson, Ph.D.	Provost	(808) 735-4825	lance.askildson@chaminade.edu
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