ORS Newsletter

February 2022

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NEW NATIONAL INSTITUTES OF HEALTH (NIH) OTHER SUPPORT REQUIREMENTS

Effective as of January 25, 2022, due to growing concerns about inappropriate interference by foreign governments over federally-funded research, the National Institutes of Health (NIH) now requires applicants and awardees to disclose all resources made available to a researcher in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are based at the institution the researcher identifies for their current NIH grant. Examples:

INCLUDES	EXCLUDES
Resources and/or financial support from all domestic entities available to the researcher, including financial support for laboratory personnel and provision of high-value materials that are not freely available (e.g., biologics, chemical, model systems, technology).	Institutional resources, such as core facilities or shared equipment that are made broadly available (list under Facilities and Other Resources).
Consulting agreements when the project director/principal investigator or other senior/key personnel will be conducting research as part of consulting activities.	Non-research consulting activities.
In-kind contributions, including office or laboratory space, equipment, supplies, employees or students supported by an outside source.*	Training awards, prizes or gifts (resources provided with no expectation of anything in return, e.g., time, services, specific research activities, or money).

*Reasonable estimates must be provided if the time commitment or dollar value of the in-kind contribution is not readily ascertainable.

NEW NATIONAL INSTITUTES OF HEALTH (NIH) OTHER SUPPORT REQUIREMENTS (CONTINUED)

The timing of the required disclosures is as follows:

- All other support and affiliations must be reported at the Just-in-Time (JIT) stage via the Other Support document.

- Applicants are responsible for promptly notifying NIH of any substantive changes to previously submitted JIT information up to the time of award.

- Other support obtained after the initial NIH award period must be disclosed in the annual research performance progress report (RPPR).

Supporting documentation for disclosures must be provided for all foreign activities and resources reported in Other Support, including copies of contracts or agreements specific to senior/key personnel foreign appointments and/or employment with a foreign institution. If the contracts or agreements are not in English, recipients must provide translated copies.

Additional information on Other Support may be found in NIH's Grants Policy Statement at https://grants.nih.gov/grants/policy/nihgps/HTML5/section_2/2.5.1_just-in-time_procedures.htm.

Questions regarding the above may be directed to your assigned ORS Pre-Award Specialist: https://research.hawaii.edu/ors/ors-assignments/.

FISCAL YEAR 2021 SINGLE AUDIT

The fiscal year (FY) 2021 Single Audit and Financial Audits were presented to the Board of Regents in early December 2021, and posted to the Budget & Finance page at https://www.hawaii.edu/offices/budget-finance/.

Six control deficiency findings were included. A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. Five findings were related to the Student Financial Aid program. The sixth was for the Title VII Native Hawaiian Education program. It involved stipend underpayments totaling $70 to two participants, and was corrected in October 2021, soon after it was identified. Regular monitoring and additional scrutiny have been implemented to avoid future occurrences.

Thank you for your cooperation and timely responses to our audit requests and inquiries. This has allowed us to issue the Single Audit report in advance of the March 31, 2022 deadline.

COMMENTS AND OBSERVATIONS ON INTERNAL CONTROLS RELATED TO EXTRAMURAL AWARDS

In conducting the annual Single Audit, our external auditors provide comments and observations related to instances of noncompliance with University of Hawaii (UH) policies and procedures. These comments and observations are not required to be reported as findings but are presented to the BOR and management for internal use. The fiscal year 2021 report included comments and observations related to the following two (2) issues which are reported year after year. Efforts must be made to comply with the applicable UH and RCUH policies and procedures.

Untimely Execution of Purchase Orders

Seven purchase orders were executed and approved after the goods or services were received. An executed and approved purchase order serves as an indication that a formal agreement between the vendor and UH regarding the nature and price of the goods or services has been reached. The lack of an executed purchase order creates an undue risk for the misuse of public funds.

Untimely Submission of Travel Completion Report

A travel completion was submitted nearly eight months after the end date of the trip. According to UH Administrative Procedure 8.851—Employee Out-of-State and Intra-State Travel, travel completions must be submitted to the traveler's business office within 21 calendar days from the end date of the trip. Failure to submit travel completions in a timely manner exposes UH to the untimely receipt or disbursement of public funds, increasing the risk of misuse. In addition, if an employee fails to substantiate expenses within 60 days of the return date of the trip, UH may, under IRS regulations, report advance amounts as income to the employee.

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

Upon receipt of an Extramural Award Notice (EAN) from ORS Contracts & Grants Administration, the assigned ORS accountant will establish the award, initial account and initial sponsor-approved budget in the Kuali Financial System (KFS). The fiscal administrator (FA) will receive notification of award/account budget setup through KFS. The FA shall review all award and account attributes and the initial budget, and initiate changes, if any, through KFS.

Initial Project Accounts

Account Type	ORS Accountant	Fiscal Administrator
Initial account for an award	Initiates and blanket approves in KFS: • PRPL • ACCT • AWRD • SSBA—initial budget	• Reviews award and account attributes and budget for accuracy • Initiates changes, if any, in KFS
Cost share sub-account (if applicable)*	Initiates and approves in KFS: • SACC	• Reviews account attributes for accuracy • Approves SACC eDoc in KFS • Initiates changes, if any, in KFS

*The FA should ask ORS Accounting to set up the cost share sub-account if one is required but was not set up with the initial account. Only ORS can initiate cost share sub-accounts. ORS cannot blanket approve cost share sub-accounts.

Subsequent Changes to Awards, Accounts or Budgets

• The **FA** initiates the appropriate eDoc in KFS

• **If an agreement or modification is required, the FA shall not initiate the eDoc until receipt of an EAN from ORS Contracts & Grants Administration**

• The ORS accountant will review and approve the eDoc

Time Extensions

The PI may initiate a request for a no-cost extension (NCE) from the sponsor, which must include an endorsement by ORS. The format of the request may vary depending on the terms of the award. The PI should contact their assigned ORS specialist for assistance (https://research.hawaii.edu/ors/ors-assignments/).

If approvals are submitted to the PI, the PI should forward them to their assigned ORS specialist. After the EAN is received from ORS Contracts & Grants Administration, the FA should submit the ACCT eDoc to update the end date in KFS.

(Continued on next page.)

Account and Budget Maintenance

Transaction	Fiscal Administrator	ORS Accountant
Additional accounts	• Initiate ACCT eDoc with pseudo-account number • Initiate BA eDoc (To and From sections must be equal)	• Review, assign KFS account number • Approve • Add to award
Sub-account (other than cost-share sub-account) (sample eDoc 7303805)	Initiate SACC eDoc	(Not routed to ORS accountant)
Time extensions [including no-cost extensions (NCEs)] (sample eDoc 7267722)	Initiate ACCT eDoc	• Agree to award modification documents received from ORS Contracts & Grants • Approve
Incremental funding (sample eDoc 7265988)	Initiate SSBA eDoc	• Agree to award modification documents received from ORS Contracts & Grants • Approve • Update award
Re-budget (sample eDoc 7156462)	Initiate BA eDoc (To and From sections must be equal)	• Agree to award modification documents received from ORS Contracts & Grants, if applicable • Verify PI approval • Approve • Update award
PI change	Initiate ACCT eDoc	• Agree to award modification documents received from ORS Contracts & Grants • Approve • Update award
Deobligation (sample eDoc 7283173)	Initiate SSBA eDoc	• Agree to award modification documents received from ORS Contracts & Grants • Approve • Update award

Should you have any questions, please contact your assigned ORS accountant (https://research.hawaii.edu/files/ors/CG_AssignmentsBySponsor.pdf).

KUALI FINANCIAL SYSTEM EDOCS

For KFS eDocs requiring ORS approval, please indicate "CG##" in the first four characters of the Description field, where ## is the two-digit CG number found in the account's Contracts & Grants section in the CG Account Responsibility ID field. Having a consistent format allows ORS accountants to sort the Action List by the Title Column and quickly identify which eDocs they need to review and process.

For example:

CG27 002—Account creation
CG32—090 6106062
CG26—FA006 Change PI

Since it is important for the **first four characters to be consistent**, descriptions should **not** in formats as:

CG 27 002—Account creation
090 **CG32** 6016062
CG026—FA006 Change PI

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

SELF-SERVICE EXTRAMURAL PROPOSAL AND AWARD REPORTS

Do you need an award report for an extramural sponsor to submit with a proposal or for a continuation to an award? The reporting section of the ORS website offers a variety of proposal and award reports that are useful to faculty, research administration staff and management. Reports for posted awards can be generated for a specific person, unit, or sponsor. There is also a report that provides a listing of current and recently concluded awards by person which may be useful to show productivity or may be helpful for tenure review. These reports may be found here: https://research.hawaii.edu/ors/reports/.

Along with these up-to-date reports, the "Reports" section of the ORS website is home to two status reports. These status searches allow you to find the current status of a pending award or UH-issued subaward. Your UH login is required to access these reports.

Of particular interest may be the ORS Statistics infographics of monthly statistics for overall extramural activity compared to the previous month. The infographics reflect statistics such as the number of days ORS is given to review proposals before their due date and the percentage with less than the required five (5) business days for review; the number of days to it takes to formally accept extramural awards (categorized into grants and contracts); and the time it takes to create initial project accounts after an extramural award is formally accepted.

All of the above reports are self-service and available around the clock on the ORS website via the provided links.

As a note, the quarterly University of Hawaii (UH) Board of Regents (BOR) reports, annual UH executive managerial reports and RTRF reports have been relocated to the new Office of the Vice President for Research and Innovation (OVPRI) Reports website. Each annual report summarizes the extramural proposal and award activity of the UH system for the indicated fiscal year. The new link to these reports is https://research.hawaii.edu/reports/reports/.

Finally, if you have a unique reporting requirement and the up-to-date reports don't have the information that you are looking for, you may request a custom report by submitting an ORS support ticket. To request a custom report, go to http://go.hawaii.edu/eVP. If you are taken to the ticket grid, press the "Submit Ticket" button for ORS. Select "Report Request" as your ticket "Type", then fill out the requested data fields. Unique requirements should be added in the "Special Requests" section.

If you have any questions regarding the above, please contact Mike Morimoto, ORS Information Systems Services Manager, at mcmorimo@hawaii.edu, or (808) 956-4908.

CYBERSECURITY MATURITY MODEL CERTIFICATION

The U.S. Department of Defense (DoD) established Cybersecurity Maturity Model Certification (CMMC). It is a unifying standard for the implementation of cybersecurity, and is designed to provide increased assurance to the DoD that an entity can adequately protect Federal Contract Information (FCI) and Controlled Unclassified Information (CUI) within their unclassified networks. For Institutions of Higher Education such as the University of Hawaii (UH), this directly relates to research activities that either currently participate or plan to participate in sponsored research by agencies, offices and commands under the DoD.

The initial CMMC Model (CMMC 1.0) includes the following five (5) levels:

- CMMC Level 1: Safeguard FCI.
- CMMC Level 2: Serves as transition step in cybersecurity maturity progression to protect CUI.
- CMMC Level 3: Protect CUI.
- CMMC Levels 4 and 5: Project CUI and reduce risk of Advanced Persistent Threats (APTs).

The relevant Defense Federal Acquisition Regulations (DFARS) clauses are:

- DFARS 252.204-7012, Safeguarding Covered Defense Information and Cyber Incident Reporting

- DFARS 252.204-7019, Notice of NIST SP 800-171 DoD Assessment Requirements

- DFARS 252.204-7020, NIST SP 800-171 DoD Assessment Requirements

- DFARS 252.204-7021, Cybersecurity Maturity Model Certification Requirements

On November 2021, the DoD announced changes to CMMC 1.0. The revised model, CMMC 2.0, will replace the five-level model of CMMC 1.0 with three progressively more complex levels of cybersecurity requirements, each keyed to independently established standards (e.g., Federal Acquisition Regulation (FAR) requirements, and NIST requirements). The new model will also increase oversight of third-party assessors and eliminate all "maturity" requirements and CMMC-unique practices.

CMMC 2.0 will not be a contractual requirement until the DoD completes rulemaking to implement the program. The rulemaking process and timelines can take 9-24 months. CMMC 2.0 will become a contract requirement once rulemaking is completed.

Further detailed information about the current CMMC 1.0 is available at UH Information Security's website: https://www.hawaii.edu/infosec/minimum-standards/cmmc/.

To determine whether the relevant DFARS clauses appear in your solicitation or contract, please contact your assigned ORS Contract Specialist: https://research.hawaii.edu/ors/ors-assignments/.

OFFICE OF THE VICE PRESIDENT FOR RESEARCH AND INNOVATION WEBSITE REDESIGN

The website for the Office of the Vice President for Research and Innovation (OVPRI) has recently undergone a major redesign to solidly unify offices under the OVPRI with the same look and feel, layout and navigation. The website renovation focused on making content accessible and mobile/tablet friendly, while creating a uniform navigation experience among all OVPRI offices. Contact information for each office now appears on the left sidebar for ease of location, and staff directories are found on each office homepage. An "Explore OVPRI" menu is available on the upper right of each webpage, and provides overall site navigation.

The new website is split up into the seven areas below:

Lifecycle - Website providing an overview of each step in the extramural proposal and award process, with guidance on specific topics and responsibilities for various stages of an extramural project.

Services - Website for the Office of Research Services (ORS), Contract & Grants Certification Program, and the myGRANT and rCOI eRA systems. Contains detailed information on specific proposal, award, and accounting subjects and provides access to proposal and award reporting.

Compliance - Website for the Office of Research Compliance (ORC) covering a broad range of research compliance activities, including human subjects in research, the responsible care and use of animals in teaching and research, biological safety, export controls, conflicts of interest, and research integrity, which includes responding to allegations of research misconduct.

Innovation - Website for the Office of Innovation and Commercialization (OIC), which bridges the University of Hawaii (UH) with the community by building partnerships and opportunities around transformative innovation and entrepreneurship.

Reports - Website containing the collective reporting of the OVPRI, including Board of Regents (BOR) reports, annual reports, and Research and Training Revolving Fund (RTRF) reports. This site is overseen by OVPRI Cost Studies and Data Analytics, so also contains detailed information on facilities & administrative costs and fringe benefit rates.

Support - Website portal for research support for all offices under the OVPRI. This site is overseen by the Research Support Center and is also the new repository for the UH Institutional Profile that contains all the various identifiers, codes and pertinent information useful for extramural proposal submission.

As content has been relocated and repeated content consolidated, please check and update your bookmarks, If you find any broken links or encounter other issues with the website, please submit a ticket to ORS at http://go.hawaii.edu/eVP. Please use the "Other Issue" ticket type, and provide the broken link or issue in the "Description" field of the ticket.

What is ISAT?

ISAT is the University of Hawaii Information Security Awareness Training. Under UH Administrative Procedure 2.215—Mandatory Training on Data Privacy and Security (UH AP 2.215), approved on October 1, 2021, ALL UH employees, including students and graduate assistants, must complete the ISAT on an annual basis.

More information can be found here: https://www.hawaii.edu/infosec/training/.

Why does ORS require a copy of my ISAT certificate of completion in order to access myGRANT?

myGRANT is considered an "Institutional Data System" under UH AP 2.215, which requires that your ISAT training be current before access to Institutional Data Systems are granted.

Where can I find the ISAT?

The ISAT is available in Laulima at https://laulima.hawaii.edu/portal/site/80b6cfd5-ba0e-48b1-850a-39792c416f54 (UH login required).

How do I access my ISAT completion certificate?

Upon completion of the ISAT, you can access your completion certificate through the UH Acknowledgements and Certifications (ACER) website: https://www.hawaii.edu/its/acer/ (UH login required).

Look for "UH Information Security Awareness Training Certification", then click "print certificate".

✔	UH Information Security Awareness Training Certification **NOTE: Scores from Laulima are imported into ACER every day at 1:30am.**	2021-10-08 print certificate	Review Certification Re-certify

Once the certificate appears in your browser, you can take a screenshot, print and scan to .pdf format, or print directly to .pdf format.

Note that scores from Laulima are imported into ACER every day at 1:30 AM so certificates are usually not available until the day after ISAT completion.