



# INSIGHT Newsletter

February 2024

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## MANDATORY INFORMATION SECURITY AWARENESS TRAINING

The Information Security Awareness Training (ISAT) is a mandatory annual requirement for University of Hawai'i (UH) and selected Research Corporation of the University of Hawai'i (RCUH) employees under the Gramm Leach Bliley Act (GLBA) and [UH Administrative Procedure 2.215](#). GLBA is a federal regulation that requires recurring employee security awareness training.

**Effective April 1, 2024**, you will need to have a current ISAT to log onto the myGRANT system. This means your most recent ISAT completion date must be less than a year old. If your ISAT completion date is more than a year old, or you have never taken the training, you will be redirected to a webpage with instructions on where to take the training and complete the required assessment.

ISAT results are updated in the [ACER](#) system the next day. If you have an urgent situation with an impending deadline, ACER contains a link that will update your ISAT results immediately after you have successfully completed the training, allowing you access to myGRANT.

**To minimize problems with proposal submission, we highly recommend that you keep your ISAT training current.**

The same login validation requirements will be implemented in four (4) other UH enterprise-wide information systems as of April 1, 2024: Banner, STAR, Kualii Financial System, and PeopleSoft. Announcements will be sent to the UH community to inform everyone of these upcoming changes.

Please see the [ISAT FAQ](#) page for more information. For other questions or issues, contact the [UH ITS Help Desk](#).

## CLOSEOUT CONFIRMATION REQUIREMENTS

This is a reminder about the crucial award closeout confirmation process outlined in [University of Hawai'i \(UH\) Administrative Procedure 12.412](#) and emphasized in the automated monthly "Closeout Final Notice" emails.

Please submit written close-out confirmations to the [designated ORS accountant](#) (CG) via email as follows:

- **Projects with a standard 90-day deadline:** No later than 30 days before the final financial report or invoice deadline.
- **Projects with a 60 to 89-day deadline:** No later than 20 days before the final financial report or invoice deadline.
- **Projects with less than a 60-day deadline:** Within 15 days before the final financial report or invoice deadline.

If you need more time for final transactions to post or confirm closeout, your school, department, or program (collectively, unit) must secure written approval from the extramural sponsor for an extension of the final invoice and/or financial report submission deadline. The unit shall contact the sponsor directly or communicate through their [assigned ORS specialist](#) to request an extension, and provide a copy of the sponsor's approval to the CG.

In the event that confirmation or extension is not received by the closeout deadline, ORS will prepare final invoices and/or final financial reports based on actual expenditures in the Kualii Financial System at that time. Outstanding encumbrances, transactions in the continuation account, and any unposted expenses (e.g., payroll or P-card transactions) shall be excluded. Fiscal administrators shall remove any excluded amounts from the project account.

Adhering to these timelines will ensure that required extramural sponsor deadlines are met.

If you have any questions, please contact Daniel Han, ORS Extramural Funds Accounting Manager, at [danhan@hawaii.edu](mailto:danhan@hawaii.edu) or (808) 956-4061.

# FEDERAL DEPARTMENT OF DEFENSE PUBLISHES CYBERSECURITY MATURITY MODEL CERTIFICATION 2.0 FOR PUBLIC COMMENT

On December 26, 2023 the Department of Defense (DoD) published [proposed rulemaking](#) that is currently open for public comment through February 26, 2024 on the implementation of the Cybersecurity Maturity Model Certification (CMMC) 2.0. As a DoD contractor, the University of Hawai'i (UH) will be required to comply with the certification program. CMMC was developed to enforce the protection of sensitive information that is entrusted to defense contractors by requiring certain cybersecurity measures.

**CMMC Levels:** CMMC requires that companies entrusted with national security information implement certain cybersecurity standards at progressively advanced levels, depending on the type and sensitivity of the information.

**Level 1:** Requires annual self-assessment and annual affirmation of compliance with 15 security controls;

**Level 2:** Requires triennial third-party assessment and annual affirmation of compliance with 110 security controls described in [NIST SP 800-171](#) and referenced in DFARS 252.204-7012 which provides controls for the protection of controlled unclassified information (CUI);

**Level 3:** Requires triennial government-led assessment and annual affirmation of compliance with 110 security controls described in [NIST SP 800-171](#) plus an additional 24 selected security controls from [NIST SP 800-172](#).

**Implementation through Contracts:** Once CMMC is fully implemented, certain DoD contractors that handle sensitive unclassified DoD information will be required to achieve a particular CMMC level as a condition of contract award. It will be critical for UH to be prepared to comply with the applicable CMMC level depending on the type of information involved in each DoD contract. More information will follow as full implementation of CMMC draws near.

If you have any questions, please email [uhoec@hawaii.edu](mailto:uhoec@hawaii.edu).

## UNIVERSITY OF HAWAII FISCAL YEAR 2023 SINGLE AUDIT

The University of Hawai'i's Fiscal Year 2023 Financial and Compliance Audit (Single Audit) was presented to the Board of Regents (BOR) Committee on Independent Audit at its December 7, 2023 meeting. The report is available at <https://www.hawaii.edu/offices/budget-finance/>.

As stated in the auditor's opinion, UH complied, in all material respects, with the compliance requirements that could have a direct and material effect on each of our major federal programs for the fiscal year ending on June 30, 2023. There were five (5) reportable findings identified. Two (2) related to Financial Aid Administration and three (3) related to Title IV Student Financial Aid. All findings were classified as control deficiencies, which exist 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 federal compliance requirement on a timely basis.

Thank you for your cooperation and timely responses to our audit requests and inquiries. This enabled us to issue the Single Audit report in advance of the March 31, 2024 deadline.

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

## UNIVERSITY OF HAWAII FISCAL YEAR 2023 INTERNAL CONTROL AND BUSINESS ISSUES REPORT

In conducting the University of Hawai'i's Financial and Compliance Audit (Single Audit), our external auditors prepared an Internal Controls and Business Issues Report (ICBIR), which includes comments and observations related to instances of noncompliance with UH policies and procedures.

The following two issues are identified year after year and we highly emphasize that efforts be made to comply with the applicable [UH](#) and [RCUH](#) policies and procedures.

### **Untimely Execution of Purchase Orders**

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**

According to [Administrative Procedure 8.851](#), travel completions must be submitted to the traveler's business office within 21 calendar days from the end date of the trip. Failure to promptly submit travel completions 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.

In addition to the above, the auditors also noted the following:

## **Improper Completion of a Purchase Order Payment Form**

Under two major federal programs, instances of the principal investigator approval were not formally documented on the RCUH Purchase Order payment form.

## **Untimely Submission of End of Year Report**

An End of the Year Report to the sponsor was submitted eight (8) days after the due date.

## **Improper Approval of Purchase Orders**

In two (2) instances, purchase orders were approved by an individual who had not received a formal delegation of authority to do so as of the purchase order date.

## **Inaccurately Listed Eligibility Requirements**

In seven (7) instances, students received a distribution of Higher Education Emergency Relief Fund student aid monies, which were not consistent with the award amounts stated on the website.

These comments and observations are not required to be reported as findings in our annual Single Audit but were presented for internal use to the BOR at its December 7, 2023 meeting.

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

## HELPLINE FREQUENTLY ASKED QUESTIONS

### I want to apply for a funding opportunity through Grants.gov. How do I register for an account so I can start a workspace?

Registering for Grants.gov is a two-step process as follows:

#### Create a Grants.gov Account

To create a Grants.gov account, go to <https://apply07.grants.gov/apply/register.faces>, fill out all required fields, then confirm your email address using the temporary code they send to your email. **You must register using your hawaii.edu email address so ORS can validate your identity and affiliation with UH.**

#### Add Your UH Campus as an Organization Applicant Profile to Your Account

To add your UH campus to your account, click on "MY ACCOUNT", then navigate to the "MANAGE PROFILES" tab. Once there, click the "Add Profile" button, fill out the required organization information, then click "Save". The Unique Entity ID (UEI) for your campus can be found on the [UH Institutional Profile](#) webpage.

**Add Profile**

Please select Add Profile option:

New Profile  From Existing Account

Please select Profile Type, enter required information, and click Save:

\*Profile Type:  Organization Applicant  
UEI:   
\*Required for Organization Applicant  
 Individual Applicant

\*Profile Name:

\*Job Title:

### **Grants.gov Registration Information (continued)**

Once you've added your campus to your account, Grants.gov will send an automated email to the Helpline to approve your UH affiliation and workspace access.

If you have any questions regarding your access or need assistance with the registration process, please submit an ORS ticket at <http://go.hawaii.edu/eVP>.

### **I want to apply for a funding opportunity through eRA Commons. How do I register for an account?**

To request an eRA Commons account, please submit an ORS ticket at <http://go.hawaii.edu/eVP> using ticket type "New eRA Commons Account" and completing all required fields. Once Helpline receives the ticket, your account will be created, and you should receive emails from eRA Commons with your account information and a temporary password.