



ORS Newsletter

May 2021

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ORS HELPLINE COMMITMENT TO EXCEPTIONAL CUSTOMER SUPPORT

At the beginning of this fiscal year and in the middle of work from home orders, the ORS Helpline pivoted its support channels and funneled all requests from telephone and direct email inquiries into a new ticketing system. Approaching one year of its service, the ticketing system is more robust than the previous system, and allows efficient customer service to continue while working remotely.

One of the new features includes the creation of specialized forms to efficiently capture required information for common ticket requests. This eliminates the need to ask the ticket submitter for more information, and allows for quicker turnaround times. Additional features include improved tracking of open requests to ensure that none fall through the cracks; and expanding ticketing support to other offices in the Office of the Vice President for Research and Innovation (OVPRI) such as the Office of Research Compliance, the Office of Technology Transfer, and the Research Support Center.

The following are statistics from the first ten (10) months of use of the new ticketing system:

- A total of 1,045 support requests were received.
- Forty percent (40%) of the tickets were considered high priority.
- The average ticket response was within 23 minutes of receipt.
- Sixty-four percent (64%) of the common ticketing requests were resolved on the first response.

ORS HELPLINE COMMITMENT TO EXCEPTIONAL CUSTOMER SUPPORT (CONTINUED)

As ORS continues to use the ticketing system, data will be collected to help identify subject areas that can be highlighted in future training sessions and/or ticketing documentation. Future plans include expanding the ticketing system to include a knowledge base of collected articles and answers to allow the University of Hawaii (UH) research community to obtain answers to commonly received ticketed questions at any time of day, and keep moving their research forward.

In addition to the new ticketing system, a short customer service survey has been developed to intake feedback of support experience with the hopes of identifying areas of improvement. If you have a few minutes, please consider visiting <http://go.hawaii.edu/AAP> to complete the survey. Your feedback and input will be invaluable in assisting ORS Helpline in providing the best possible service to the UH research community. Note that the survey is anonymous with no way to tell who submitted it. However, a field has been provided for you to include your name and contact information if you would like personalized follow-up to any reported issue. The survey may also be filled out at any time you wish to submit feedback, and is posted on the ORS website under the "Contact" section here: <https://www.ors.hawaii.edu/contact/>.

To submit a service ticket to ORS Helpline, please visit <https://www.ors.hawaii.edu/helpline/>. To submit a ticket for other OVPRI offices, please visit <http://go.hawaii.edu/PA3>.

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

UNIFORM GUIDANCE (2 CFR 200) FREQUENTLY ASKED QUESTIONS

To address common questions regarding the Uniform Guidance including the implementation of updates made in 2020, the Office of Management and Budget (OMB) recently issued FAQs at <http://go.hawaii.edu/P3E>. A summary of the 2020 updates was included in the November 2020 edition of the ORS Newsletter posted here: <http://go.hawaii.edu/B3P>. While we encourage you to review the FAQs, the following should be noted:

- **Unique Entity Identifier (UEI) and System for Award Management:** Beginning in April 2022, the UEI will be replacing the current Data Universal Numbering System (DUNS). While subrecipients are not required to complete a full SAM.gov registration, they are required to obtain a UEI through SAM.gov and provide it to the University of Hawaii.

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UNIFORM GUIDANCE (2 CFR 200) FREQUENTLY ASKED QUESTIONS (CONTINUED)

- **Fixed Amount Subawards:** Fixed amount subawards are appropriate when the work that is to be performed can be determined with a reasonable degree of certainty. In accordance with 2 CFR 200.333, with prior written approval from the federal awarding agency, fixed amount subawards can be provided up to the simplified acquisition threshold, which is currently set at \$250,000.
- **Prohibition on Covered Telecommunications and Video Surveillance Services and Equipment:** Section 889 of the National Defense Authorization Act of 2019 defines “covered telecommunications equipment or services” to mean telecommunications and video surveillance equipment or service produced by Huawei Technologies Company, ZTE Corporation, Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities). It also includes such equipment or services provided by an entity that the Secretary of Defense, in consultation with the Director of the National Intelligence or Director of the Federal Bureau of Investigation, reasonably believes to be an entity that is owned or controlled by the government of a covered foreign country (The People’s Republic of China). Although a recipient may use covered telecommunications and video surveillance services or equipment, the federal award cannot be used to pay for the such prohibited items.

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

STATUS OF FISCAL YEAR 2020 SINGLE AUDIT AND COMMENCEMENT OF FISCAL YEAR 2021 SINGLE AUDIT

As an entity that expends more than \$750,000 in federal funds, the University of Hawaii (UH) is required to receive an annual Single Audit. The purpose of this audit is to provide assurance to the federal government that we are capable of managing our federal awards in accordance with laws, regulations, policies and procedures as well as terms and conditions of such awards.

UH’s fiscal year (FY) 2020 Single Audit will be completed by June 30, 2021 and posted at <http://www.hawaii.edu/offices/budget-finance/>. While this audit was originally due on March 31, 2021 (nine months after the end of the audit period), an automatic three-month extension was made available by the Office of Management and Budget to any recipient or subrecipient of COVID-19 funds. For a summary of preliminary findings, please refer to the February 2021 edition of the ORS Newsletter posted here: <http://go.hawaii.edu/P3q>.

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STATUS OF FISCAL YEAR 2020 SINGLE AUDIT AND COMMENCEMENT OF FISCAL YEAR 2021 SINGLE AUDIT (CONTINUED)

UH has once again engaged Accuity LLP Certified Public Accountants (Accuity) to perform our FY2021 Single Audit. As in prior years, ORS will be coordinating the audit requests and will be working with the appropriate UH staff. Starting from late May through mid-November, you may be contacted for documentation, inquiries and follow up requests. In order for Accuity to complete the audit and present the audit report to the Board of Regents as scheduled, we need your cooperation in meeting all requests and deadlines.

If you are unable to fulfill audit requests in a timely manner, we ask that you notify ORS as soon as possible so that accommodations can be arranged with our auditors.

We thank you in advance for your assistance and cooperation and look forward to a smooth FY2021 Single Audit. For questions, please contact Dawn Kim, ORS Financial Compliance Manager, at dawnkim@hawaii.edu or (808) 956-0396.

PREPARING FOR FISCAL YEAR-END 2021

In preparation for fiscal year end (FYE), please perform the following prior to the University of Hawaii Fiscal Management Office FYE closing schedule (posted at <http://go.hawaii.edu/93P>) ("FYE Closing Schedule"):

- Reclassify transactions posted to continuation accounts to the intended account.
- Clear account deficits.
- Review and reconcile payroll transactions and process salary transfers prior to creation of the annual Effort and Cost Shared Effort Certifications. **Once the annual Effort Certifications and Cost Shared Effort Certifications are certified, salary transfers cannot be processed.**
- Record all FY2021 cost shared amounts. Refer to the article on Fiscal Year-End Reminders for Cost Sharing in this newsletter .
- Submit requests to extend advance accounts ending on or before June 30, 2021 prior to the advance account expiration date, as appropriate. Advance accounts expiring on or prior to June 30, 2021 that are not being extended should be closed per the requirements of AP 12.405 "Advanced Funding Accounts for Externally Financed Programs and Activities" (posted at <http://go.hawaii.edu/P3h>).

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PREPARING FOR FISCAL YEAR-END 2021 (CONTINUED)

- Complete and confirm closeout of awards and accounts in a timely manner.
- Reallocate PCard transactions per the FYE Closing Schedule.

Note: For additional guidance, please refer to AP 8.926 “Administrative and Financial Management Requirements for Extramurally Financed Research and Training Programs/ Activities at the University of Hawaii (posted at <http://go.hawaii.edu/43P>).

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

FISCAL YEAR-END REMINDERS FOR COST SHARING

Distribution of Income and Expense (DI) eDocs to record cost sharing must be PROCESSED or FINAL in the Kualii Financial System (KFS) **by June 29, 2021 at 5:00 pm**. ORS requests that all accounts with committed cost sharing be reviewed and any necessary cost sharing eDocs be submitted as soon as possible. As reminders, please note the following:

- Cost sharing for direct costs is based on expenses recorded to the KFS source account during the fiscal year and should be recorded in the applicable fiscal year (FY).
- Cost sharing for UH personnel salaries and fringe should reflect payroll dates through June 30, 2021; therefore, estimates may be used for the June 15, 2021 and June 30, 2021 pay periods, if necessary.
- Annual certification of cost sharing effort for FY 2021 is required and will be due **by September 30, 2021** (further information regarding the certification process will be forthcoming).
- Do not include cost sharing for periods beyond June 30, 2021.
- Please review your accounts to ensure that cost sharing is recorded in the CS001 subaccount and cost sharing object codes are used appropriately. **If transactions were incorrectly posted to cost sharing object codes, please make corrections prior to fiscal year-end.**

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

VOLUNTARY COMMITTED COST SHARING

The portion of the cost that the University of Hawaii (UH) will contribute to the total cost of a project is commonly called “cost sharing” (also known as “in-kind” or “matching costs”). Cost sharing can be either mandatory or voluntary. **Mandatory cost sharing** is required by the sponsor as a condition of award, while **voluntary cost sharing** is cost sharing that is pledged where it is not a sponsor requirement. Cost sharing is categorized as “committed” when described in writing within an extramural proposal. Regardless of whether the cost sharing was mandatory or voluntary, voluntary committed cost sharing becomes a binding commitment on UH should the proposal be funded. Prior approval from the sponsor must be obtained for any changes to cost sharing commitments.

Committed cost sharing must be budgeted, accounted for, and recorded properly in UH’s financial system. UH is also responsible for documenting and tracking any third-party commitments that are included in a submitted proposal. Fiscal administrators are responsible for maintaining and updating the cost sharing subaccount in the UH financial system on a timely basis so that cost sharing information is available for ORS Accounting to report when required for interim financial reporting purposes or closeout.

UH highly discourages the use of voluntary committed cost sharing due to the administrative burden of tracking and documenting this type of commitment. It is a common misconception that a sponsor will look more favorably upon proposals with cost sharing commitments. In particular, for research grants from U.S. federal agencies, the Uniform Guidance, 2 CFR 200, states that voluntary cost sharing is not expected and cannot be used as a factor during the merit review of applications or proposals unless specifically mentioned in the solicitation.

Cost sharing can also be inadvertently committed by the way UH resources are described in a proposal narrative. However, there are ways to describe UH resources to be used on a project without making a cost sharing commitment. Sample language is posted on the ORS website at <http://go.hawaii.edu/83P> (or manually navigate by going to <https://www.ors.hawaii.edu/>, then Apply, Cost Sharing, Frequently Asked Questions, then Attachment A).

More cost sharing information is available at <https://www.ors.hawaii.edu/apply/cost-sharing/>, or if you have specific questions about cost sharing for your extramural proposal, please contact your assigned ORS Pre-Award Specialist (<https://www.ors.hawaii.edu/ors-assignments/>).

FIXED-PRICE RESIDUAL BALANCE TRANSFERS AND INTERNAL ACCOUNT EXTENSIONS

University of Hawaii Administrative Procedure (AP) AP 12.412, "Extramural Closeout Procedures" (posted at <http://go.hawaii.edu/fjP>) has been updated effective February 2021. Updates to the policy include:

- Recovery of fully negotiated indirect cost on fixed price residual balances, even if a lower rate was approved for the award; and
- Transfer of significant net residual balances (in excess of 20%) to the dean or director for further review and resolution.

These updates increase recovery of indirect costs, improve accountability for budgeting and cost accounting, decrease processing time for fixed price residual balance transfers, and limit the university's exposure for unrelated business income tax.

The Office of Research Services (ORS) Forms 2 and 3 related to this AP have also been updated. Effective immediately, if requesting a fixed-price residual balance transfer or an internal account extension, please use the applicable updated ORS Form 2- Fixed-Price Residual Balance Closeout Form (posted at <http://go.hawaii.edu/PJG>) or ORS Form 3 - Fixed Price – Internal Account Extension Request (posted at <http://go.hawaii.edu/AJP>). Although direct links are being provided here, to ensure you submit the most current version of the form, please use the forms posted on the ORS website at: <http://www.ors.hawaii.edu/index.php/apply/forms>.

For Fixed-Price Residual Balance Closeout forms received on or after July 1, 2021, full indirect cost will be recovered per AP 12.412 and significant residual balances will be transferred to the appropriate dean/director/chancellor's fixed-price account for further review and consideration.

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

What is the Unique Entity Identifier (UEI)?

The Unique Entity Identifier, or the UEI, is the official name of the “new, non-proprietary identifier” that will replace the Dun and Bradstreet Data Universal Numbering System (DUNS) as the official identifier for doing business with the federal government.

How will the UEI be used by federal grant applicants?

The UEI will be used in the same way that the current DUNS is used. Any form fields that are currently labeled “DUNS” will be updated to “UEI”.

When will the UEI be required?

The transition date from DUNS to UEI has been shifted to April of 2022.

Currently, any form field that asks for the UEI can be filled with our DUNS. The appropriate DUNS/UEI for each campus can be found on the ORS website here:

<https://www.ors.hawaii.edu/apply/institutional-profile/>.

Will the DUNS and UEI numbers be the same?

The UEI is expected to be different from the DUNS. As of this newsletter, UH has not yet been assigned a UEI through SAM.gov.