



Chaminade
University
OF HONOLULU

**Grants Management Handbook for the
Office of Sponsored Programs**

Office of the Provost
AY 2023-2024



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Section I: Sponsored Programs Overview

About

Chaminade University of Honolulu (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 Chaminade University of Honolulu (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 Provost's Office. Consequently, this handbook is conceived as a dynamic document, subject to periodic updates in response to changing regulatory landscapes.

Purpose

The CUH Grants 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 (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.

Principal Investigators and Project Directors, 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 OMB Uniform Guidance found in 2 CFR Part 200 (refer to Appendix III for Federal regulations and guidance). Hereinafter, these regulations will be collectively referred to as "Guidance." Additionally, each Federal Awarding Agency (Agency) may issue its own specific guidelines, such as the National Institutes of Health (NIH) Grants Policy Statement and the National Science Foundation (NSF) Proposal and Award Policies and Procedures Guide.

Particular emphasis should be placed on the award dates of each grant and the potential implications for funding authorization. These Regulations address the operational and financial practices of institutions of higher education, including how grant funds can be utilized (e.g., supporting research through salaries, equipment, supplies, etc.), reporting requirements, record-keeping, and conflict of interest considerations. CUH's institutional policies for sponsored projects are aligned with the Regulations and are supplemented by CUH's policies as needed. PIs, PDs, research staff, and CUH staff supporting research should familiarize themselves with the information contained in the Regulations.

Throughout this handbook, the terms "award," "grant," and "sponsored project" are used interchangeably to refer to the research activities of PIs and PDs.

Office of Sponsored Programs

The Office of Sponsored Programs (OSP) is a university administrative department committed to the coordination and oversight of various functions, including; the management of funding opportunities, development initiatives, pre-award assistance, and compliance, as well as post-award support and compliance. The dedicated team at OSP offers comprehensive assistance across the entire grant lifecycle, encompassing tasks such as identifying funding prospects, assisting with proposal development, reviewing and submitting proposals, negotiating and accepting awards, initiating project commencement, managing awards, and ensuring the proper closure of awards.

Heading the OSP is the Vice Provost, serving as a deputy to the Provost, with primary responsibility for OSP activities. The Vice Provost also holds the designation of an authorized signing official and an authorized institutional official.

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.	Managing Director of OSP, Director of Grants Development, Deans
Proposal Development: Proposal solicitation review; proposal compliance; continuous and final proposal review and feedback; budget development.	Managing Director of OSP, Director of Grants Development; Grants Specialist
Proposal Review & Submission: Electronic or hard copy submission to sponsor. Review of budget; cost-sharing/matching; effort commitment; course-release/buyout; authorized signature on proposal routing form and proposal.	Managing Director of OSP, Director of Grants Development, Director of OSP, 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.	Managing Director of OSP, Vice Provost/Provost
Project Start-Up: Processing of award set-up; gaining necessary institutional approvals prior to project commencement.	Managing Director of OSP, Vice Provost/Provost, Grants Specialist
Award Management: Day to day project/program management; institutional compliance with sponsor requirements; institutional prior approval; contract continuations; modifications; and amendments.	Managing Director of OSP, Grants Specialist, Deans, Vice Provost/Provost
Award Close-Out: Closing out of award; final reports.	Managing Director of OSP, Grants Specialist

Sponsored Programs Roles & Responsibilities Matrix

	Task	Role/Responsibility									
		PI/PD	OSP Managin g Director	OSP Director	Director, Grants Management	Grant Specialist	Director of Finance	HR	Dean	Provost	University Council
Pre-Award	Identify and communicate funding opportunities.	X	X		X				X	X	
	Review proposal guidelines.	X	X	X	X						
	Proposal preparation/development, budgets	X	X								
	Proposal review & modifications	X	X	X		X			X		
	OSP External Funding Form	X	X			X					
	Subrecipient commitment forms received and reviewed.	X	X								
	Review for regulatory compliance issues (FCOI, export control, human subjects)	X	X	X							X
	Proposal submitted per CUH policy	X	X								
Post-Award	Award negotiation and review	X	X							X	X
	Subrecipient award set-up			X		X					
	Cost-sharing approval	X	X			X	X		X	X	
	Implement projects/program activities	X									
	Process employment actions	X	X			X		X			
	Process expenditures	X				X	X		X	X	
	Enter into subaward/subcontract agreements with external institutions						X			X	X
	Review accounts, regularly monitor, review and approve expenditures	X				X	X				
	Draw down funds, bill for project expenses and accounts					X					
	Process indirect cost distribution					X					
	Monitor subawardees/contractors	X				X					
	Coordinating award changes that require sponsor approval	X	X			X					
	Fulfill sponsor periodic program reporting requirements	X	X			X					
	Ensure program compliance	X	X			X					
	Prepare and submit final technical reports	X	X			X					
Prepare and submit final financial reports	X	X			X						

Section II: External Funding for Projects or Program

Chaminade University has been fortunate to receive support from a variety of sources, including; federal funding, major foundations, and private donors. These contributions continue to play a crucial role in the success of our students and the advancement of initiatives that cater to evolving opportunities. While the Federal Government has historically been the primary sponsor for research and infrastructure development, there are diverse government and non-government funding options accessible to our faculty and staff. This handbook encompasses all external funding sources applicable to grants and awards.

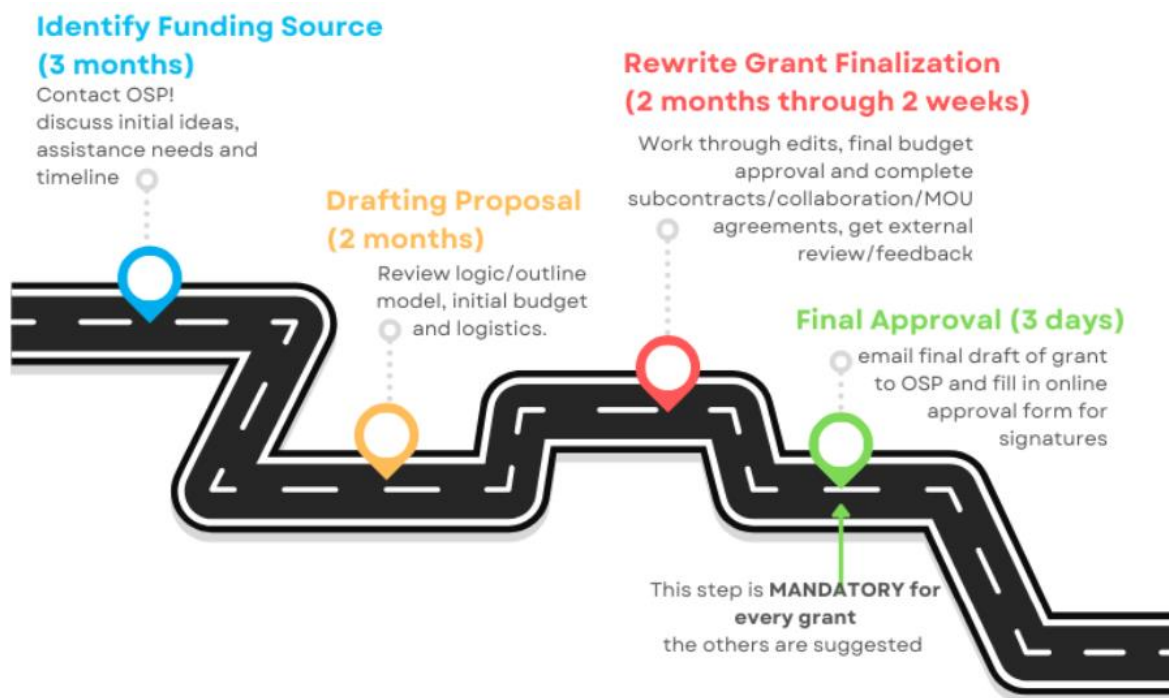
In addition to Federal and State funding, numerous private and non-governmental funding avenues are available. These encompass foundations, corporations, associations, community foundations, direct philanthropic contributions, voluntary organizations, and community groups. Our Managing Director of OSP and Director of Grants Development are readily available to assist faculty and staff in identifying suitable funding opportunities.

Before embarking on a proposal, it is advisable for faculty and staff to engage with the OSP team for guidance and clarification on the following points:

- ✓ Is the funding opportunity still open, and what are the associated deadlines?
- ✓ Is the university eligible to submit a proposal?
- ✓ Is the individual proposing eligible to submit?
- ✓ Can the proposed project be completed within the available time frame and within suggested budget guidelines?
- ✓ Are there limitations on the number of submissions per institution?
- ✓ Does the opportunity entail mandated or implied cost-sharing?
- ✓ Will the project require additional university resources, physical space, or renovations?

Section III: Proposal Development

Proposal development projects vary in their time requirements, with some being swiftly executed, while others demand substantial time and effort. Faculty and staff are strongly encouraged to allocate sufficient time for their writing process. It is also essential to allow ample time for the dean or direct supervisor, as well as the OSP team, to engage in thoughtful review and consideration. Below is a recommended timeline for the proposal development process:



A listing of pre-award resources is available on the [OSP website](#), and include the proposal development form, external funding request approval form, and IDC Waiver Request Survey.

Application Guidelines/RFPs/RFAs

The structure of your proposal should adhere to the specific guidelines established by each sponsor, which can exhibit significant variations across different sponsors and programs. For example, certain sponsors might enforce limitations on the word count within your project abstract, or they may stipulate particular requirements concerning font size and margins. In today's fiercely competitive environment, where numerous applications vie for limited funding, strict adherence to these guidelines is of utmost importance. We strongly recommend that applicants obtain and review the sponsor's guidelines, whether by downloading them or acquiring a printed copy for easy reference.

It is imperative to meticulously read and comprehend both the application instructions and the sponsor's guidelines, as the success of your application largely hinges on your ability to adhere to

these program-specific and formatting directives.

Federal and state agencies, as well as many private organizations, often delineate specific areas of interest in Requests for Proposals (RFPs) or similar documents, such as Requests for Applications (RFAs). RFP requirements generally take precedence over the funding agency's general guidelines, and it's common to be obliged to comply with both sets of requirements. These guidelines must be followed with precision, as most agencies typically do not consider incomplete, non-compliant, or tardy proposals.

Furthermore, RFPs often encompass a section outlining the criteria that reviewers will employ to assess proposals. To craft a compelling proposal, it is essential to painstakingly review and address each facet of the review criteria as detailed in the proposal preparation guide. This approach will enable you to align your proposal with the expectations and priorities of the reviewers.

You can access general guidelines for common funding sources through the following links: [NSF Guidelines](#), [NIH Guidelines](#). It is also critical to distinguish between solicited and unsolicited proposals. Solicited requests are funding announcements that explicitly seek proposals for specific purposes, whereas unsolicited proposals should align with a funding agency's overarching priorities without being tethered to a predefined project.

Budget Development

Chaminade University of Honolulu (CUH) is committed to maintaining the highest standards of financial integrity in the management of sponsored projects. As such, it is Chaminade's policy to charge only allowable costs to funding received from donors. This policy outlines Chaminade's approach to handling unallowable costs and the procedures for executing cost transfers in compliance with the 2 CFR 200, Subpart E, Cost Principles. It applies to all federal and non-federal sponsored projects at CUH.

The budget justification stands as one of the proposal's most critical segments. Principal Investigators (PIs) and Project Directors (PDs) are entrusted with the responsibility of substantiating the expenses <https://grants.nih.gov/grants/how-to-apply-application-guide.html> earmarked for the project's execution. Within this justification, each cost is explicitly linked to the project's needs, and the method used to estimate these costs is elaborated. Sometimes, the need for specific equipment or expenses might be implied in the project description, but these implications may not be readily apparent to a reviewer without specialized knowledge. It is imperative that these needs be explicitly clarified, and the budget justification is the designated space for this purpose.

The proposed budget, at its core, is a financial blueprint crafted to fulfill the objectives outlined in the research proposal narrative. It should encompass the necessary resources to fully execute the planned research endeavor. Chaminade has adopted 2 CFR 200 standards for the definitions of reasonable, allocable, and allowable. All costs in the proposed budget must be allowable as specified in Section V, please refer to this section for information regarding allowable costs.

Direct Costs vs. Indirect Costs

The cost of a sponsored agreement consists of the allowable direct costs plus the allowable portion of the Indirect Costs of the institution.

- a. *Direct costs*: Costs directly needed to accomplish the specific project (e.g., summer salary, GA assistants, graduate, and undergraduate student workers, fringe benefits, equipment, materials, supplies, travel, external consultants, sub-awards, tuition).
- b. *Indirect costs*: Costs that the University incurs to support all research/sponsored program activities on campus (e.g., maintenance of university facilities, utilities, University administration, library, sponsored programs).

CUH's Federally Negotiated Indirect Cost Rate for research and sponsored programs on campus is currently 45% of a project's modified total direct costs.

- a. **Effort**: Project personnel may not work more than 100% of their time, nor can they be paid more than 100% of their base salary rate as is specified under Uniform Guidance 2 CFR 200.430. In other words, the total allocation of time to University teaching, service, research, and other activities (e.g., advising) may not exceed 100%. Faculty may request reimbursement for academic year release time and compensation for summer salary.

The dollar value of effort should be computed using the individual's current annual base salary. For multi-year budgets or projects with a period of performance that crosses fiscal years, the budget for salaries and benefits should be increased by three percent for each subsequent year IF allowable by the relevant Agency. Note that the three percent increase is only an estimate for budget purposes. The actual salary increases for individuals receiving compensation from grants is determined using the same process as all other University employees.

- b. **Budget**: The budget should include those costs associated with the successful completion of the project. It must be as accurate as possible, based on estimated costs.
 - a. *Budget Period*: Usually 12 months; one or more budget periods make up the "Project Period" or "Period of Performance."
 - b. *Salaries and Wages*: Payment for academic year or summer time allocated to a sponsored project.
 - i. Academic Year Release Time: Release time is time away from teaching, service, and/or administrative responsibilities by the University to conduct research or other activities during the academic year. Faculty members must receive the approval of their Dean followed by the Provost when applying for release time. Release time for faculty is usually expressed in terms of percentage of effort and is based on the nine-month academic year.

- ii. Faculty compensation: A faculty member may be approved by the Provost or relevant Academic Dean to charge a portion of his or her salary and benefits to a grant fund. The percentage charged to a grant fund should represent the actual work performed by the faculty member on the grant project compared to all work performed by the faculty member over a period of time. No faculty member may exceed 1.0 FTE.
 - i. Summer Salary Faculty on a standard 9-month appointment can receive up to 3 months of compensation for sponsored programs each year, or 30% of their academic year base salary. University policies govern summer teaching pay rates. Compensation to faculty members for summer teaching activities from grant funds is permissible provided the rate of pay is equal to that paid to faculty for teaching activities that are not grant funded.

Summer non-teaching activities paid from grants: Nine or 10 month faculty may also receive compensation for non-teaching activities attributable to a grant and performed during the summer, calculated in the faculty member's most recent academic year base salary. For example, a faculty member on a 9 month contract with a salary of \$50,000 who will work full time on a grant-funded project for two months during the summer may earn \$10,000. ($\$50,000 / 10 = \$5,000$ monthly salary x 2 months = \$10,000.) Summer compensation rates may be further restricted by granting agencies and University policy.
- iii. Other Project Personnel: Such as student research assistants, graduate assistants, undergraduate/graduate student workers, and/or other technical personnel may be included in the budget when those costs are directly related to the project.
- iv. Vacation Pay: Vacation pay and pay for other types of approved leave may be charged to a grant during the period of that grant's award, and only while the employee is an active participant in the activities of that grant. Percentage contributions shall be calculated for vacation/other paid leave using the same calculation as for regular working weeks. Unpaid vacation or other leave pay accrued during a person's employment prior to a grant award shall not be paid from the grant if that person terminates employment from the University during the grant award period (i.e., the grant is only liable for vacation or other leave pay accrued during the grant award period and for the period of the grant for which the employee was an active participant on that grant, whichever is the shorter). Unpaid vacation or other leave pay for which an employee is eligible that is accrued during a grant award, but payable after the period of that award (i.e. through later termination of employment with the University) is not to be charged to the grant and is the responsibility of the University. No component of a severance package, including unpaid leave may be charged to a grant.
- v. Project Administration: Under the Uniform Guidance, in some instances, project administration may be an allowable cost provided such costs are integral

to the project and the individuals involved can be specifically identified to the project or activity. Such cases must be explicitly stated in the budget and have the prior written approval of the awarding agency.

- I. *Fringe Benefit*: Fringe benefits are direct costs associated with salaries and wages and includes: FICA (Social Security); retirement; insurance for medical, dental, life, unemployment insurance, and worker's compensation. CUH actual fringe benefit costs are calculated each month for faculty or staff paid through grant funding. In non-federal grants, fringe is charged at 26%.
- II. *Travel*: All travel attributable to the project should be itemized. Domestic per-diem travel rates can be estimated using U.S. General Services Administration (GSA) Rates; foreign per diem travel rates can be estimated using State Department Rates. Please note that most government agencies require the use of a domestic carrier for travel both in the U.S. and abroad, except under very specific circumstances. For more detailed information see the [Fly America Act](#). See the following for specific per diem rates: US GSA (<https://www.gsa.gov/>), State Department (https://aoprals.state.gov/content.asp?content_id=184&menu_id=78) and Department of Defense for rates for Alaska, Hawaii, U.S. Territories and Possessions (<https://www.travel.dod.mil/>).
- III. *Equipment*: Often otherwise defined by a funding agency, for CUH purposes, capital equipment is defined as a non-expendable item with a use life of more than one year. The acquisition cost threshold is typically \$5,000 or more for grant reporting purposes. The definition of equipment will vary depending on the specific grant program or funding agency.
- IV. *Supplies*: Identify all consumable supplies needed for the project. Supplies are defined as items of expendable equipment that do not meet the definition of permanent equipment. These include laboratory supplies, chemicals, books, and computer supplies. Some sponsors will request itemization (Rate x Qty.) for these types of costs. On federal grants, computing devices are treated as supplies, provided their cost is less than \$5,000. Computing devices are those devices “that acquire, store, analyze, process, and publish data and other information electronically, including accessories (or ‘peripherals’) for printing, transmitting and receiving, or storing electronic information.”
- V. *Publication Costs*: If a publication is one of the expected results of the project, a brief synopsis of the expected publication content and its costs should be detailed.
- VI. *Indirect Costs*: IDC refers to those expenses related to research that cannot be easily identified with a particular sponsored project, instructional activity, or any other institutional activity. These costs are classified under two broad categories:
 - i. Facilities (depreciation and use allowances, equipment, operation and maintenance, and library expenses)
 - ii. Administrative (general, sponsored projects, departmental, and school administration, and student administration and services)

Indirect costs (IDC) are normally an element of every proposal budget unless it is disallowed by the sponsor. The federally negotiated IDC rate for CUH is 45% of total direct costs. PI/PDs may request a waiver of this rate using the [IDC Waiver Request form](#).

Cost Sharing

Definition: [Federal Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#) defines cost-sharing or matching as that portion of project costs not paid by Federal funds (unless otherwise authorized by Federal statute). It includes both cash and in-kind contributions that a recipient makes to an award:

- a. Cash contributions: The recipient's cash outlay, including the outlay of cash contributed to the recipient by third parties.
- b. In-kind contributions: Non-cash contributions in the form of committed effort, real property, equipment, supplies, and other expendable property, and the value of goods and services benefitting and specifically identifiable to the project or program.

The Uniform Guidance makes no distinction between cost-sharing and matching. However, matching usually refers to the specific ratio between the amount of the award and the amount committed by the recipient, such as a dollar-for-dollar match (1:1). Generally, cost sharing is:

- Mandatory if it is required by the sponsor as a condition of the award.
- Voluntary if it is offered by the institution when no mandatory cost-sharing requirements exist or is in excess of mandatory cost-sharing requirements.

Cost-sharing arises when a portion of the overall expenses for a sponsored project is covered by the University, rather than the sponsor. Whether the sponsor mandates cost-sharing or it's offered voluntarily by the recipient, it transforms into a binding commitment for the University, legally obligating it once the award is granted. As per the [Uniform Guidance, Subpart D \(§200.306\)](#) (effective as of 08/13/2020), voluntary committed cost-sharing is not anticipated. Furthermore, it should not be factored into the merit review of applications or proposals, except when it aligns with federal awarding agency regulations and is explicitly outlined in a notice of funding opportunity. The notice of funding opportunity should detail the criteria for considering voluntarily committed cost-sharing and any other program policy factors used to determine federal award recipients. Importantly, no pre-committed matching on an active award will be allowed without prior sponsor approval.

Committed cost-sharing, which encompasses quantifiable cost-sharing disclosed in any section of a submitted proposal, creates a binding legal commitment for the University. It should be managed akin to any other direct or indirect expenses, whether covered by the sponsor or shared by the University. Cost-sharing of direct expenditures signifies a dedication of departmental, program, or University resources to support a sponsored project or program.

- III. **Source of Funds:** The Principal Investigator or Project Director (PI/PD) bears the responsibility of identifying all funding sources for covering direct cost cost-sharing. It's

important to note that the PI/PD cannot draw upon funds from an existing federal award as the source of cost-sharing, unless explicitly authorized by law. Typically, cost-sharing is financed through contributions such as academic year time and effort, accompanied by associated fringe benefits, or other department-designated resources. In some cases, cost-sharing may also encompass indirect costs linked to the identified direct costs, provided that the sponsor permits the inclusion of indirect costs in the cost-sharing.

- IV. **Allowable Cost-Sharing Expenditures on Federal Awards:** Cost-sharing expenditures must satisfy all of the following criteria:
- a. Verifiable from the official University records;
 - b. Not previously used as cost-sharing for another project (the same cost-sharing expenditures cannot be used for multiple projects);
 - c. Necessary and reasonable for proper and efficient accomplishment of the project;
 - d. Allowable under the terms of the award (e.g., in compliance with the Uniform Guidance, Subpart E (§200.403) Factors affecting allowability of costs.
 - e. Incurred during the effective dates of the grant or during the pre-award phase when authorized by the sponsor; and
 - f. Not paid by the Federal Government under another award.
- V. **Unallowable Cost-Sharing Expenditures on Federal Awards:** The following expenditures cannot be offered as cost-sharing commitments in sponsored project proposals:
- a. Costs considered unallowable by the sponsor;
 - b. Costs considered unallowable under the [Uniform Guidance, Subpart E \(§200.420\) Considerations for Selected Items of Cost](#);
 - c. Salary amounts exceeding a regulatory salary cap (e.g., National Institutes of Health);
 - d. University facilities such as laboratory space. 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.”

Section IV: Proposal Review and Submission

Prior to submission, all proposals must undergo a comprehensive review conducted by the Office of Sponsored Programs (OSP) and the Provost. The OSP team will conduct a thorough examination of the entire proposal to ensure alignment with program guidelines, federal and state regulations, and University policies. Feedback will be provided by OSP, including required edits and suggestions to enhance the competitiveness of the proposals. It is strongly recommended that proposals be submitted well in advance of the submission deadline, as this allows OSP to offer more comprehensive feedback and analysis.

For proposals arriving after the three-day deadline, OSP will only focus on reviewing the budget and the essential proposal requirements necessary for submission. The budget is reviewed by the grants specialist to ensure compliance with CUH policies and any federal guidelines.

The Director of Sponsored Programs holds the position of CUH's Authorized Institutional Official. The final approval for proposal submissions through the Office of Sponsored Programs is granted by the Managing Director of OSP, in consultation with the Provost. Subsequently, the Director of OSP assumes the role of the ultimate electronic signatory for approved proposal submissions.

OSP Proposal Submission Policy

All proposals routed through the Office of Sponsored Programs must adhere to the [posted grant proposal and submission guidelines](#). The review conducted by OSP goes beyond just budgetary considerations. Numerous sponsors stipulate precise content and formatting prerequisites, and, in certain instances, deviations from these requirements can lead to a proposal being rejected without evaluation. These guidelines have been established to avert such scenarios and, as previously mentioned, are designed to guide proposal applicants in the submission of a fully compliant and top-quality proposal.

Institutional Processing Forms

Chaminade utilizes an automated proposal development form, available [here](#). The form is used to record and document the PI/PD's proposed activities, budget, committed cost sharing, and other important considerations and/or commitments by the University on a proposed project. It is also used by OSP to track and report data on each proposal submission. In addition, the pre-proposal form allows CUH the ability to report on alignment with our Native Hawaiian / Marianist values as well as with the United Nations Sustainable Development Goals.

Prior to submission, a **mandatory review of all grant applications is imperative**. The PI/PD must complete the External Funding Request Approval Form, found [here](#), and obtain signatures from the Provost and the relevant School Dean or Direct Report of the PI/PD. Ideally, this should be accomplished at least seven business days before the proposal submission deadline. PI/PDs are strongly encouraged to promptly submit the Proposal Development Form to the Managing Director of OSP as soon as they identify a specific grant opportunity.

Receiving Reviews, Proposal Scoring, Planning Resubmissions

The funding landscape is highly competitive, and not every proposal will secure funding. Nevertheless, a majority of federal agencies and numerous other sponsors furnish feedback on your application following the peer-review process. For proposals that do not secure funding, this presents an opportunity to leverage the peer review feedback received and resubmit the proposal, addressing the concerns and recommendations raised during the peer-review process. It is infrequent for Principal Investigators or Project Directors to receive an award on their initial submission; instead, their chances of success tend to improve with second and third attempts. OSP is available to guide faculty and staff in reviewing these evaluations and offer suggestions for enhancement before any resubmission.

Section V: Award Negotiation and Acceptance

The Office of Sponsored Programs (OSP) is dedicated to providing support for University faculty and staff during the negotiation of their sponsored award agreements, whether they are federal or non-federal. OSP staff possess the expertise required to guide Principal Investigators/Project Directors (PI/PDs) through the intricate terms and conditions commonly associated with these awards. They also help ensure the responsible management of awards in compliance with sponsor terms, as well as applicable federal and state regulations.

While OSP aids in the negotiation of awards, the Provost is responsible for accepting awards on behalf of the university, regardless of the award level. Grant applications or contracts that do not go through the OSP for approval and signature will be rejected, resulting in the return of funding to the agency.

Grants, Cooperative Agreements, and Contracts all serve as distinct "mechanisms" of external funding. Each of these mechanisms has unique processes for negotiation before the award and for administration once the award is granted. It is crucial that PI/PDs promptly inform OSP when they receive initial contact from a sponsor indicating a recommended award, as this initiates negotiations. OSP assists PI/PDs in ensuring that any modifications to the project or budget are consistent with university policy and in compliance with federal and state regulations. During the negotiation phase, OSP frequently collaborates with various parties, including the PI/PD, University Counsel, and other administrative and academic units and personnel, to safeguard the interests of both the PI/PD and the University.

- I. **Grants:** When a sponsor indicates that a proposal is under consideration for funding, it often initiates a negotiation period during which the sponsoring agency and the awardee work together to establish the terms and conditions of the grant agreement. In the case of grants, these negotiations frequently involve addressing technical or program-related inquiries from the review panel and/or program officer. This process may also include adjustments to the proposed budget and the corresponding scope of work. In some instances, prior to award, sponsors may request additional documentation to substantiate costs within the proposed budget, or they may stipulate other requirements, such as proof of insurance and institutional certifications/representations, as prerequisites for proceeding.

Grants, in particular, offer a high degree of autonomy and flexibility in how a project's activities are executed. Sponsors issuing grants typically do not directly participate in the research or work to be conducted. Consequently, grants are considered a form of "financial assistance," wherein the sponsor provides funding based on a previously approved proposal for research or other activities, such as instructional or educational endeavors. Grants often serve a public or collective "good" or purpose, and there is no legally binding obligation to achieve specific outcomes. For most federal grants, a formal signature from the University's Authorized Official is typically not required for award acceptance. Implicit acceptance occurs when the award notice is received without objection. The grant is subsequently set up, and expenses are typically reimbursed through a "drawdown" process.

Drawdown Procedure: Chaminade’s policy for drawdowns on federal expenditures is on a reimbursable basis. As a part of CUH internal controls these expenditures are processed, reviewed, approved, paid, and posted to appropriate general ledger accounts. On a monthly basis, the Grants Specialist reviews and reconciles the grant related accounts in the general ledger. Once all reconciliation tasks are completed by the Business office team, the Accounting Manager approves the official closing of the general ledger for the month. Once closed, the Grants Specialist is approved to proceed with the drawdown process.

Drawdown calculations: The Grants Specialist runs the general ledger details for the closed months, as well as the cumulative expenditures for the grant year. The Grants Specialist then runs the following calculation: Cumulative expenditures less prior drawdowns, equals the current period drawdown. The Grants Specialist performs the calculation, and presents it to the Accounting Manager or the Controller for approval of the drawdown amount. Once approved, the Grants Specialist executes the drawdown of funds and prepares the journal entry to record the transaction. The General Ledger accountant then reviews and posts the journal entry to the General Ledger.

Cost Allowability

The proposed budget, at its core, is a financial blueprint crafted to fulfill the objectives outlined in the research proposal narrative. It should encompass the necessary resources to fully execute the planned research endeavor. Chaminade has adopted 2 CFR 200 standards for the definitions of reasonable, allocable, and allowable costs as follows:

Reasonable Costs (2 CFR 200.404): A cost is considered 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. The question of reasonableness is particularly important when the non-federal entity is predominantly federally-funded. In determining the reasonableness of a given cost, consideration shall be given to:

- Whether the cost is of a type generally recognized as necessary for the operation of the non-federal entity or the performance of the federal award.
- The restraints or requirements imposed by such factors as sound business practices, arms-length bargaining, federal, state, and other laws and regulations, and terms and conditions of the federal award.
- Market prices for comparable goods or services for the geographic area.
- Whether the individuals concerned acted with prudence in the circumstances, considering their responsibilities to the non-federal entity, its employees, where applicable, its students, the federal government, and the public at large.
- Whether the non-federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the federal award's cost.

Allocable Costs (2 CFR 200.405): A cost is allocable to a particular federal award or other cost objective if the goods or services involved are chargeable or assignable to that federal award or cost objective in accordance with relative benefits received. This standard is met if the cost:

- Is incurred specifically for the federal award.

- Benefits both the federal award and other work and can be distributed in reasonable proportion to the benefits received.
- Is necessary to the overall operation of the organization and is assignable in part to the federal award in accordance with the principles in 2 CFR 200.

Allowable Costs (2 CFR 200.403): A cost is allowable under a federal award only if it meets the following criteria:

- Be necessary and reasonable for the performance of the federal award and be allocable thereto under these principles.
- Conform to any limitations or exclusions set forth in these principles or in the federal award as to types or amounts of cost items.
- Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-federal entity.
- Be accorded consistent treatment. A cost cannot be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost.
- Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in 2 CFR Part 200.
- Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period.
- Be adequately documented.

For the purposes of the grant management process at Chaminade, consistent refers to the application of uniform policies and procedures to all activities of an organization, ensuring that costs are charged and documented in the same manner across all projects or programs. This includes treating all costs incurred for the same purpose, in like circumstances, either as direct costs only or as indirect costs only, with respect to the basic considerations of being necessary, reasonable, allocable, and allowable under federal regulations and the specific terms of each grant or contract. Consistency is crucial for maintaining compliance with federal regulations, such as those outlined in 2 CFR 200, and for supporting the integrity and accountability of the grant management process. All proposed expenses will be reviewed for allowability in conformance with Section 5.

- I. **Summary of Federal Cost Principles and Allowability:** The "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards," often referred to as the "Uniform Guidance," is regulated by the Federal Office of Management and Budget (OMB). It articulates the principles guiding the determination of cost allowability for research and development, training, and other sponsored activities conducted by educational institutions under grants, contracts, and agreements with the Federal Government. These agreements are commonly known as sponsored agreements. The criteria for cost allowability under these principles are as follows:
 - II. They must be reasonable, aligning with what a prudent person would do in similar circumstances (e.g., adhering to federal domestic and foreign per-diem travel rates is generally considered "reasonable" in federal grants).
 - III. They must be allocable to the particular sponsored project under consideration (e.g., the

purchase of specific materials and laboratory supplies must be directly linked to the specific sponsored grant or project being charged).

IV. Factors Affecting Allowability of Costs: With the exception of situations authorized by statute, costs must meet the following general criteria to be considered allowable under Federal awards:

- a. Be necessary and reasonable for the performance of the federal award and directly allocable to it under these principles.
- b. Conform to any limitations or exclusions specified in these principles or the federal award regarding the types or amounts of cost items.
- c. Comply with policies and procedures that apply consistently to both federally-financed and other activities of the non-federal entity.
- d. Be treated consistently. A cost cannot be assigned to a federal award as a direct cost if another cost incurred for the same purpose under similar circumstances has been allocated to the federal award as an indirect cost.
- e. Be determined in accordance with generally accepted accounting principles (GAAP).
- f. Not be counted as a cost or used to meet cost sharing or matching requirements for any other federally-financed program in either the present or a prior period. Federal sponsors, such as the NSF and NIH, provide their implementing guidelines under the Uniform Guidance, e.g., the NSF's Proposal & Award Policies & Procedures Guide.

V. Additional Factors to Consider:

- a. Determine if facilities and administrative (F&A) or Indirect Cost Recovery is allowed or restricted.
- b. Assess whether cost-sharing is mandated and if CUH possesses the necessary resources to fulfill this requirement.
- c. Examine the proposal narrative and identify activities requiring funding.
- d. Categorize activities into budget categories such as; salaries and wages, benefits, travel, supplies, contractual/consulting services, equipment, and others.
- e. Recognize instances where sub-awards are warranted and will be necessary.
- f. Identify costs to be covered with existing university resources (if required) and secure approval for their inclusion.
- g. Cost-sharing allowability factors should match what was written in the budget proposal. See Section V for more additional detail on cost-sharing allowability and non-allowability.

Direct Costs vs. Indirect Costs

The cost of a sponsored agreement consists of the allowable direct costs plus the allowable portion of the Indirect Costs of the institution.

- c. *Direct costs:* Costs directly needed to accomplish the specific project (e.g., summer salary, GA assistants, graduate, and undergraduate student workers, fringe benefits, equipment, materials, supplies, travel, external consultants, sub-awards, tuition).

- d. *Indirect costs*: Costs that the University incurs to support all research/sponsored program activities on campus (e.g., maintenance of university facilities, utilities, University administration, library, sponsored programs).

CUH's Federally Negotiated Indirect Cost Rate for research and sponsored programs on campus is currently 45% of a project's modified total direct costs.

Common Examples of Allowable and Unallowable Costs on 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	Foreign Travel (unless approved by sponsor)
Materials/Supplies	Housing and Personal Living Expenses
External Consultants / Subcontractors	Entertainment Costs

- II. **Cooperative Agreements**: Cooperative Agreements share similarities with grants in that they generally serve as a means of financial support from the sponsor to advance a public or collective good or objective. However, these types of agreements differ in that the sponsor foresees significant participation in the research or other program-related activities upon award.
- III. **Contracts**: In a contractual agreement, the sponsor typically commits to a fixed payment to the contractor for the provision of goods or services that directly benefit the sponsor. The scope of work is typically outlined by the sponsor (in contrast to a grant, where the applicant proposes the scope of work). The proposal specifies well-defined "deliverables," and a timetable for their delivery is often a requirement. Payment may be contingent on achieving specific "milestones" or "deliverables." Government procurement contracts can be notably intricate, with terms governed by the [Federal Acquisition Regulation \(FAR\)](#). Federal acquisition contracts, especially those from U.S. Department of Defense agencies, may include provisions that restrict publication and impose export control requirements, among other considerations, which may limit the individuals who can work on the project.

OSP collaborates with University Counsel to effectively negotiate and navigate the complex

terms and conditions of federal, state, or local contract agreements. In the case of private sponsors, particularly those from industrial or corporate sectors, negotiations often revolve around aspects such as intellectual property, confidentiality, publication, and payment. Agreements between industry and the university can be intricate and time-consuming to negotiate

Notice of Award

Upon being granted an award, sponsors frequently issue a "notice of award," "notice of grant agreement," or contract through electronic notification or regular mail. This notice generally specifies the funding amount for the current year and the expected funding for subsequent years. It incorporates, or "incorporates by reference," the terms and conditions of the award. It is vital for the Principal Investigator or Project Director (PI/PD) to carefully review these terms to acquaint themselves with the sponsor's expectations and project requirements. Federal sponsors, for instance, often anticipate both periodic and final technical reports. The notice of award also delineates any budgetary or programmatic constraints and outlines the circumstances under which sponsor approval is necessary for any project changes, such as alterations in key personnel.

Following the acceptance of an award, OSP and/or the PI/PD forwards the following documents to the Finance Office:

- ✓ The notice of award, the executed grant agreement, or a similar document from the granting agency outlining the award's terms and conditions.
- ✓ A copy of the proposal submitted to the granting agency. If this is identical to the original proposal submitted by the PI/PD and reviewed by the Grants Specialist, no additional copy is required.
- ✓ A revised grant budget (and budget justification), if the award amount differs from the proposal budget.

Subcontracts

Chaminade University frequently engages in sponsored activities that involve collaboration with external organizations or entities. In some cases, CUH may take on the role of the "lead" institution in a collaborative research project, working alongside one or more additional partners. Alternatively, CUH may act as a "subcontractor," playing a significant role in a collaborative effort that involves multiple institutions. 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.

Section VI: Project Start-Up

Award Setup

Upon the official acknowledgment of an award, the Principal Investigator or Project Director (PI/PD) collaborates with the grants specialist to set up the project's account, enabling the PI/PD to initiate project-related expenses. Some sponsors disburse funding for multi-year awards incrementally, providing one year of funding at a time instead of supplying the entire funding upfront. In these instances, the grants specialist will initiate the award setup solely for the designated year and amount. When subsequent funding is received, the grants specialist will confirm this with the PI/PD.

Effectively managing a grant project demands a thorough review of the funding agency's policies, terms, conditions, and procedural requirements by the PI/PD. It is highly advisable, particularly for new investigators and project managers, to conduct "award kick-off" meetings in conjunction with OSP's Managing Director and grants specialist. These meetings may also include members of the Institutional Review Board (IRB) and other relevant academic/administrative units, as well as faculty and staff participating in the newly sponsored project.

Institutional Prior Approval System

Several federal sponsors grant universities the autonomy to unilaterally approve incurring pre-award expenses up to ninety days before the expected commencement date, as long as there exists a valid programmatic justification for initiating project-related work ahead of schedule. The Principal Investigator or Project Director (PI/PD) can collaborate with the grants specialist to seek permission to incur pre-award costs, aligning with the sponsor's terms and conditions (this is typically managed through email). The projected costs must be reasonable and in accordance with allowable expenses.

Compliance

Federal regulations mandate that institutions seeking federal funds must provide assurance to the relevant federal agency that specific conditions and policies are effectively implemented within the applicant institution. Failure to adhere to these critical assurances places federal funding for the entire University in jeopardy.

- I. **Institutional Review Board (IRB):** CUH requires that the use of human subjects in research regardless of the source of funds (college funds, gifts, federal, etc.) must receive IRB approval prior to the PI/PD initiating the research. The use of human subjects in a research proposal must be reviewed and approved by the IRB. This is accomplished by submission of a human subjects protocol to the IRB. Refer to the CUH [IRB handbook](#) for more detail.
- II. **Financial Conflict of Interest (FCOI):** Funding from any Public Health Service Agency (PHS), the National Science Foundation (NSF), and as indicated in other Federal agency funding announcements or terms and conditions, necessitates that the University establishes and enforces policies and procedures to ensure that investigators disclose any

significant financial interests that could create an actual or potential conflict of interest concerning externally sponsored projects. These disclosures must be made before submitting a funding proposal, and institutions must institute specific mechanisms to assess and appropriately manage, mitigate, or resolve conflicts of interest before accepting an award. Furthermore, if a new significant conflict of interest subject to reporting emerges at any point from the proposal submission phase through the award period, it must also be disclosed.

The Financial Conflict of Interest Policy for Sponsored Research and the Financial Conflict of Interest Disclosure Form can be accessed as components of the External Funding Request Approval form available [here](#) for Principal Investigators and Project Directors. If a COI is identified, the Vice Provost, PI/PD and OSP personnel will develop and implement a Conflict Management Plan.

III. Responsible Conduct of Research: As of October 1, 2009, the NSF instituted a requirement that all students and post-doctoral fellows benefiting from NSF funding must undergo training in Responsible Conduct of Research (RCR). Faculty members overseeing students engaged in research projects are expected to be well-versed in these guidelines to guarantee their proper application by students. You can access the online CITI Module on Responsible Conduct of Research and instructions for completing the training through the [IRB website](#).

Section VII: Award Management

The Chaminade Finance Office is tasked with overseeing the financial aspects of externally sponsored programs, encompassing tasks such as preparing and submitting financial reports and invoices, managing cash collections, conducting expenditure compliance reviews, facilitating cost transfers, maintaining accounts receivable, and ensuring award closure, all of which are handled by the grants specialist. Furthermore, the Finance Office is responsible for creating and disseminating policies and procedures to guarantee adherence to both University and funding agency regulations. These can be found in [Policy Manual II](#). Any inquiries that Principal Investigators/Project Directors (PI/PDs) may have concerning the financial management of their sponsored projects, including fund setup, balances, cost eligibility, and invoicing, should be directed to the grants specialist within the Finance Office. PI/PDs have view-only access to monthly summary expenditure reports in standard budget categories on Chaminade's accounting system.

On the other hand, the Managing Director of OSP provides support to faculty and staff in managing the non-financial aspects of their awards, encompassing internal and external procedures, sponsor approvals, and regulations. They ensure that sponsored projects are conducted efficiently and in accordance with the proposal's terms, sponsor agreements, and all applicable federal, state, and local regulations. OSP possesses the expertise and resources needed to aid PIs/PDs in their sponsored projects, ensuring compliance with all relevant guidelines and agreements.

Day-to-Day Management of a Sponsored Project

- I. The Principal Investigator or Project Director (PI/PD) should collaborate with the Human Resources department to initiate personnel hiring requests associated with the award. This encompasses various types of hires, including student hires, part-time positions, temporary appointments, and full-time staff or faculty recruitment. In cases where the awarded budget incorporates academic year or course release time, the grants specialist works closely with the PI/PD and the PI/PD's dean (subject to Provost approval) to appropriately allocate the grant resources for the specified release time duration.
- II. Processing Expenditures (non-travel)
 - a. Supplies:
 - i. *Material and Supplies*: All acquisitions made for sponsored projects are processed through Self-Service, which is integrated with Chaminade's Ellucian Colleague information system. The Finance Office collaborates with Principal Investigators/Project Directors (PI/PDs) to provide training on how to utilize Self-Service for financial transactions.
 - ii. *Supplier Invoice*: If you need to request a payment without a purchase order, you must complete a check request via Self Service and include the supplier invoice.
 - iii. *Equipment and Services*: The procurement of single items of equipment valued at \$5,000 or higher, as well as the acquisition of services such as testing services, is subject to CUH procurement policies outlined in [Policy Manual II](#).

The general procedures for equipment, services, or similar procurement are detailed in [Policy Manual II](#), and it is expected that the PI/PD adheres to these policies. For any inquiries or concerns regarding procurement policies, please direct them to the Director of Finance.

Inventorial equipment (equipment over \$5,000) is promptly identified, labeled with a property number, and documented upon receipt. The PI/PD is responsible for notifying the Business Office about the location of each piece of inventorial equipment. Current records tracking the movement of equipment should be maintained by the PI and OSP such that any item can be readily located for inspection or inventorial purposes within a reasonable timeframe.

- VI. Processing Travel Expenses: Review the sponsored award and budget to ensure that travel is approved by the sponsor and the budget includes travel funds. Before any travel can take place on a sponsored project, the PI/PD needs to complete a Travel Authorization Form which can be found in [Policy Manual II](#) along with CUH policies for employee travel.
- a. *Fly America Act*: [The Fly America Act](#) requires the use of a U.S. flag air carrier service in economy class for all air travel, including travel on grants and contracts funded by the U.S. Federal Government. There are certain exceptions to this rule (e.g., no domestic air carrier travels to your intended destination). Please contact the grants specialist for more information.
 - b. Before making travel arrangements, PIs/PDs will need to complete a travel authorization form which outlines anticipated expenses and must be approved by the direct supervision and budget manager (PI/PD for faculty and staff supported by the award).
 - a. Meals: A per diem meal allowance shall be reimbursed to the traveler. Only the per diem amount will be paid to the traveler regardless of the amount actually spent by the traveler. Receipts are not required. Please visit the [U.S. General Services Administration](#) website to find the per diem rates for the destination city. If the city you are visiting is not listed, utilize the current approved per diem rates for the nearest city. If a meal is included in the registration/conference fee, or if paid for by someone else, reimbursement shall not be made.
 - b. After travel:
 - i. PI/PD will submit receipts, along with the travel authorization form, for reimbursement or credit card reconciliation if the PI/PD holds a CUH purchasing card.
 - ii. In order to be reimbursed for transportation, original receipts, train stubs, airline boarding passes, map printout of mileage, etc., must be retained and submitted. Only actual expenses are allowable; per diem rates are not allowable. Original receipts must be provided.
 - iii. If a non-CUH employee has been supported by the award and has not been reimbursed by the University previously, he or she must complete a W-9 Form.

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

In most cases, the Principal Investigator or Project Director (PI/PD) of a sponsored project will directly liaise with the grants specialist to address financial aspects of their projects. This includes responsibilities such as receiving, reviewing, and approving project expenses, determining cost-allowability, handling cost transfers, managing cost-sharing and match reporting, overseeing effort reporting, handling billing and accounts receivable collections, managing financial reporting, and conducting award close-out procedures. This collaboration ensures adherence to relevant University policies, as well as federal, state, and local regulations and ensures that the PI/PD does not exceed awarded funds overall or by specific categories (e.g., equipment, personnel, etc.). In the event of a cost overrun, the PI/PD will work with the grants specialist and the Dean or Direct Supervisor to determine the appropriate institutional account that will cover the cost overrun. The grants specialist, an integral member of the OSP team, is physically situated within the Business Office.

For comprehensive information regarding fiscal policies related to grants, please consult [Policy Manual II](#).

1. CUH Policy on Cost Transfers:

A cost transfer involves reassigning an unallowable cost from a restricted account to an unrestricted account, or correcting a keying error after the initial recording. Ideally, costs should be charged to the appropriate sponsored award account that benefits from these costs. However, there are situations where it becomes necessary to make cost transfers from a sponsored project after the initial recording of the cost.

Unallowable costs, mistakenly charged to an award, must be promptly transferred to a departmental account in the Chaminade University operating budget (please see section V for more detail on cost allowability). This policy on cost transfers applies to all federal and non-federal sponsored projects. Under this policy, transfers must be submitted within 90 calendar days of the original transaction date in Colleague to be considered a current cost transfer. Current cost transfers refer to those that are initiated during the accounting period in which the charges were originally recorded in Colleague, or within 90 calendar days of the original transaction date in Colleague. Non-current cost transfers are those processed more than 90 calendar days after the original transaction date in Colleague. Non-current transfers require additional explanation. If there are questions, please contact Andrew Perez, the Grants Specialist.

In order for cost transfers to be allowable, the expense must be:

1. An allowable charge to the project as defined by Chaminade policy, sponsor's policy, and the terms and conditions of the award;
2. Allocable as a direct charge to the project and provide benefit to the project;
3. Incurred during the period of performance;
4. Treated consistently across like circumstances; and

5. Cost transfers should be completed as soon as the need is detected and non-current transfers (older than 90 calendar days) should be kept to an absolute minimum.

Cost transfers are not allowed if they are done to:

- Move costs that do not directly benefit the project.
- Move costs that are incurred outside of the period of performance (unless specifically allowed by the sponsor).
- Transfer expenses from any source, including institutional funds, solely to spend unused sponsored project balances.
- Transfer costs to another sponsored project for one or more of the following:
 - Eliminate an overdraft caused by overruns or other financial considerations, such as budget constraints, project completion date, or early termination;
 - Avoid restrictions imposed by law or by the terms of the sponsored agreement; or
 - For other reasons of convenience.

Roles & Responsibilities

PI/PDS bear the primary responsibility for managing their sponsored projects. This includes minimizing the need for cost transfers, ensuring compliance with federal regulations, monitoring expenditures, promptly correcting errors, and properly allocating expenses. In instances where errors occur, PIs and PDs must ensure that any necessary cost transfers to their sponsored projects are legitimate corrections and that these transfers are executed promptly upon detecting errors.

The Grant Specialist supports PIs/PDs by reviewing and reconciling expenditures promptly, preparing cost transfers, and ensuring all involved in the management of federally funded awards understand this policy. They guarantee that transferred costs are allocable, allowable, and reasonable. They also handle the preparation and submission of the Cost Transfer Form and, if necessary, a Corrective Action Plan, adhering to the university's record retention guidelines. The Office of Sponsored Programs is responsible for maintaining the policy and the accompanying procedures, addressing questions regarding the policy, approving the over 90-day cost transfers, and approving under 90-day cost transfers in the absence of a school or department level approver.

Cost Transfer Process for Sponsored Projects

1. Determine if the transfer is allowable as outlined in this policy.
2. Determine the need to process a current or non-current cost transfer. As a reminder, cost transfers should be completed as soon as the need is detected and non-current transfers (older than 90 calendar days) should be kept to an absolute minimum. Non-current transfers require additional documentation.

Current Cost Transfers are those initiated during the accounting period in which the charges were originally recorded in Colleague, or within 90 calendar days of the original transaction date in Colleague.

Non-Current Cost Transfers are those processed more than 90 calendar days after the original transaction date in Colleague. Non-current transfers require additional explanation on the Cost Transfer Form.

3. Use the Colleague Journal Entry Form which includes an explanation for the cost transfer, the original date of the transaction, original transaction document number, preparer's name.
4. For all cost-transfers, complete a [Cost Transfer Form](#). The PI/PD signs the form to confirm that the charges are allowable, proper, and approved by them. If the PI/PD is not available, the Managing Director for the Office of Sponsored Programs can sign on behalf of the PI/PD.
5. Retain copies of supporting documentation for all cost transfers, including the Colleague Journal Entry Form, Cost Transfer Form, and other relevant supporting documentation.

All PI/PDs at Chaminade University, regardless of school or department, who are involved with the administration and conduct federally-funded sponsored awards must comply with this policy.

The documentation for cost transfers must be retained for the period stipulated in the record retention schedule and be made available for verification during the course of an audit or other review. If a cost transfer does not have adequate supporting documentation, it may be deemed unallowable by the sponsor, auditors, or the university sponsored programs post-award office. If that happens, the unit is responsible for covering the unallowable costs with unrestricted funds from sources such as the departmental account in the Chaminade operating budget.

Working with the Office of Sponsored Programs (Non-Financial Post-Award Management)

- I. **Prior Approvals:** While conducting a sponsored project, unanticipated situations can occur that were not initially foreseen. Consequently, the Principal Investigator or Project Director (PI/PD) may find it necessary to seek modifications to their project. In certain scenarios, obtaining approval from the sponsor may be a requisite step, but there are also cases where it is not mandated (see exceptions below). The primary instances where obtaining prior approval from the sponsor may be essential include:
 - a. **No-Cost Extension:** The PI/PD may need more time to finish his/her project due to unanticipated circumstances. OSP will work with the PI/PD and the sponsoring agency to request a no-cost extension.
 - b. **Rebudget:** During the performance of the project, a PI/PD may discover that he/she needs to allocate funds approved for one purpose to another purpose. In some cases, this can be done without sponsor approval. However, they should always be performed in collaboration with OSP and the grants specialist. The PI/PD typically either emails the

request to the program officer, or sends a memo via email. If approved by the program officer, the PI/PD completes a request for budget change form (located in CUH Policy Manual II). If approved by the immediate supervisor (e.g., Dean, VP, etc.) and the provost, will be implemented by the grants specialist.

- c. Change in Senior/Key Personnel: Changes in key personnel, to include the PI and Co-PI, almost always require sponsor approval.

II. Modifications of Subawards and Subcontracts: Modifications or amendments may become necessary for a subaward or subcontract with another organization or institution during the project's performance period. These modifications could include extending the performance duration, adjusting the funding allocated to the subrecipient, revising the scope of work, or making changes to other terms and conditions. Requests for modifications should include pertinent documentation, such as an updated scope of work or revised budget provided by the external subcontractor. While the Office of Sponsored Programs (OSP) can provide assistance with these requests, they should be initiated directly by the Principal Investigator or Project Director (PI/PD).

Section VIII: Award Close-Out

As a sponsored project approaches its conclusion, the Office of Sponsored Programs staff, comprising the Managing Director and the grants specialist, collaborate with the Principal Investigator or Project Director (PI/PD) to ensure a thorough and proper closeout of the award. The specific requirements for award closeout, along with the stipulated time frame for document submission, are typically outlined in the sponsored award's terms and conditions. These requirements often entail the submission of final technical and financial reports, and in some cases, property and invention reports or other associated documentation. Federal sponsors, as a general practice, require the submission of closeout documents within 90 days of the project's end date.

Notice of Award Expiration

After receiving an award, it becomes the responsibility of the Principal Investigator or Project Director (PI/PD) to ensure full compliance with both the technical and financial reporting obligations associated with the award. Consistent with previous phases of the sponsored project's lifecycle, the PI/PD will maintain close collaboration with the grants specialist to guarantee the proper closure of the project, adhering to the University's policies, procedures, and state and federal guidelines.

As the award approaches its conclusion, two months before the award end date, the PI/PD should engage with the grants specialist to obtain specific information regarding any remaining encumbrances, guidance on final purchases, and invoicing. The grants specialist will conduct a thorough review of the award to identify any outstanding invoices and facilitate the collection of unpaid invoices or pending funds from the sponsor. Should any inquiries arise concerning the financial aspects of the award's closure, including matters such as balances, encumbrances, final expenditures, specific expense transactions, as well as allowable and unallowable costs, it is advisable to reach out directly to the grants specialist.

In cases where the PI/PD is considering a no-cost extension (an extension of the project's performance period without additional sponsor funding), it is essential to initiate communication with both the Managing Director of OSP and the grants specialist.

Close-out Reporting Requirements

- I. *Financial Reports/Invoices*: The grants specialist will be responsible for preparing financial reports, whether they are interim or final, which will subsequently be forwarded to the Principal Investigator or Project Director (PI/PD) for their review and approval. Additionally, the grants specialist will meticulously examine the award to identify any outstanding invoices, actively collaborating with the PI/PD to facilitate the collection of unpaid invoices and any funds that remain outstanding from the sponsor. Subsequently, the grants specialist will proceed to submit the financial report to the respective sponsor for further processing.
- II. *Technical/Programmatic Reports*: Principal Investigators/Project Directors (PI/PDs) bear the responsibility of fulfilling and submitting all programmatic reports as mandated by the

stipulations outlined in the award agreement. Should any uncertainties or inquiries arise during this procedure, the Office of Sponsored Programs (OSP) personnel are readily available to provide guidance and support. In certain scenarios, the PI/PD may choose to transmit the final technical report to OSP for comprehensive review, endorsement, and subsequent submission, while there are also circumstances that permit the PI/PD to directly submit the final technical report, as exemplified by NSF Research.gov, among others. The PI/PD should work closely with OSP to review submission guidelines (e.g., NIH funding will require OSP staff to submit, not the PI/PD).

- a. NSF Reporting: Every recipient of an NSF award is obligated to furnish annual, final, and project outcomes reports through Research.gov. PIs will receive email notifications from NSF, which will serve as reminders about the deadlines for report submissions. In the absence of specific terms in the award notice, Annual Project Reports are expected to be submitted a minimum of three months before the conclusion of the existing reporting period. For NSF awards, it is mandatory for PIs to provide a Final Project Report within 90 days following the termination of the award.
- b. Project Outcomes Report: In the absence of specific award conditions to the contrary, the submission of project outcomes reports should be carried out electronically through Research.gov within a period of 90 days following the grant's termination date. This report will be presented in its original form within the Research Spending and Results segment of the Research.gov website.

Principal Investigators (PIs) are entrusted with the responsibility of ensuring that the report excludes any information that is confidential, contains proprietary business data, unpublished findings, or data that could potentially hinder the publication of research results in academic literature, as well as any invention disclosures that may have detrimental effects on patent rights. It is of utmost importance that these reports do not contain any personal, personally identifiable data, including home contact details, individual demographic information, or individually identifiable data acquired from human research participants.

- c. Property Reports: The grants specialist will work in conjunction with PI/PDs to complete any property reports required as per the terms and conditions of the award.
- d. Invention Reports: Rights to inventions made under a federally sponsored grant or contract are governed by [37 CFR Part 401](#), "Rights to Inventions Made by Nonprofit Organizations and Small Business Firms," more commonly known as the "Bayh-Dole Act." The provisions apply to all inventions conceived or first actually reduced to practice in the performance of a federal grant, contract, or cooperative agreement. Universities are obligated under 37 CFR Part 401 to disclose each new invention to the federal funding agency within two months after the inventor discloses it in writing to the University. Under this act, the PI/PD and University must provide a final invention statement and certification prior to award close-out, listing all subject inventions or, alternatively, stating that no inventions were created in the performance of the project.

Record Retention

Records related to sponsored projects are retained in accordance with sponsor requirements. Most records produced under Federal, State or other granting agencies have specific retention period expressed in the contract. Those grant requirements must be adhered to even if they are longer than the normal University retention period.

The Office of Sponsored Programs (OSP) Record Retention Policy ensures the systematic review, retention, and destruction of documents received or created in the administration of sponsored programs. Documents must be retained for a period consistent with federal and sponsor requirements, typically a minimum of three years after the final financial report is submitted, unless longer retention is mandated by specific terms and conditions. For federal awards, record retention requirements are governed under the [Uniform Guidance Subpart D Record Retention and Access \(§200.333-§337\)](#). The policy covers all record types, including electronic records and email, related to grant management. Records must be accessible for audit purposes, with confidentiality and security measures in place to protect sensitive information.

Disposition of Equipment

Under Uniform Guidance, title to equipment purchased with federal funds “shall vest in the recipient,” (the University, as the legal recipient of the award) subject to the conditions set forth in [Uniform Guidance Subpart D \(§200.313\)](#).

Sponsored Programs Glossary

Agreement: A generic name for a grant, contract, or other sponsored agreement.

Allocable costs (2 CFR 200.405): A cost is allocable to a particular federal award or other cost objective if the goods or services involved are chargeable or assignable to that federal award or cost objective in accordance with relative benefits received. This standard is met if the cost:

- Is incurred specifically for the federal award.
- Benefits both the federal award and other work and can be distributed in reasonable proportion to the benefits received.
- Is necessary to the overall operation of the organization and is assignable in part to the federal award in accordance with the principles in 2 CFR 200.

Allowable Costs (2 CFR 200.403): A cost is allowable under a federal award only if it meets the following criteria:

- Be necessary and reasonable for the performance of the federal award and be allocable thereto under these principles.
- Conform to any limitations or exclusions set forth in these principles or in the federal award as to types or amounts of cost items.
- Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-federal entity.
- Be accorded consistent treatment. A cost cannot be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost.
- Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in 2 CFR Part 200.
- Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period.
- Be adequately documented.

Applied Research: Systematic study to gain knowledge or understanding necessary to determine how a recognized and specific need may be met.

Audit: A formal examination of an organization or individual's accounts or financial situation. An audit may also include an examination of compliance with applicable award terms, laws, regulations, and policies.

Authorized Official: The individual(s) authorized to bind the institution to grants, contracts, cooperative agreements, and other agreements.

Award: The provision of funds by a sponsor, based on an approved proposal and budget, to an organizational entity or individual to carry out an activity or project.

Basic Research: Systematic study directed toward fuller knowledge or understanding of the fundamental aspects of phenomena and observable facts without specific applications towards processes

or products in mind.

Broad Agency Announcement (BAA): An announcement of a federal agency's general research interests that invites proposals and specifies the general terms and conditions under which an award can be made (e.g., Department of Defense agencies such as ONR, AFOSR, and ARL issue BAA's).

Budget: A detailed financial statement of project costs that are needed to support work described in a grant or contract proposal. The proposal budget is often called the "fiscal expression" of a sponsored project.

Budget Period: A period of funding, usually expressed incrementally, e.g., Year 1 of an incrementally sponsored project, or the first 12 months.

Certification: A statement, signed by an applicant or recipient as a prerequisite for receiving federal funds, that (1) meets or will adhere to certain conditions and/or (2) will undertake or not undertake certain actions.

Closeout: The programmatic and administrative process during which the PI/PD, OSP, and the Office of Grant Accounting complete all required work of a sponsored project and undertake all necessary administrative to complete the project per university policy, sponsor's requirements, and federal and state rules and regulations

Co-Investigator: The individual involved with the PD/PI in the development or execution of a project. The co-investigator (collaborator) may be employed by, or be affiliated with, the applicant/grantee organization or another organization participating in the project under a consortium agreement. A co-investigator typically devotes a specified percentage of time to the project and is considered senior/key personnel.

Consistent: The application of uniform policies and procedures to all activities of an organization, ensuring that costs are charged and documented in the same manner across all projects or programs. This includes treating all costs incurred for the same purpose, in like circumstances, either as direct costs only or as indirect costs only, with respect to the basic considerations of being necessary, reasonable, allocable, and allowable under federal regulations and the specific terms of each grant or contract. Consistency is crucial for maintaining compliance with federal regulations, such as those outlined in 2 CFR 200, and for supporting the integrity and accountability of the grant management process.

Consultant: An individual independently hired to provide routine professional services on a sponsored project for a fee, but generally not as a university employee. Consultants are typically not involved in the programmatic direction or management of a project.

Contract: A binding agreement between the sponsor and contractor for the provision or purchase of a product or service of direct benefit to the sponsor. The administration of federal contracts is governed by Federal Acquisition Regulation (FAR).

Cooperative agreement: An award similar to a grant, but in which the sponsor's staff may be actively involved in proposal preparation, and anticipates having substantial involvement in research activities

once the award has been made.

Cost-sharing or matching: Costs of a sponsored project not borne directly by the sponsor. Cost-sharing, or matching, are either “in-kind” or “cash” contributions by the recipient of the sponsored project or by a third party.

Developmental Research: Systematic application of knowledge or understanding, directed toward the production of useful materials, devices, and systems or methods, including design, development, and improvement of prototypes and new processes to meet specific requirements.

Direct Costs: Costs that can be specifically identified with a particular project, program, or activity.

Effort: The time devoted to a particular sponsored activity, expressed as a percentage of the total time spent on CUH teaching, research, and service activities.

Encumbrance: Those funds that have been set aside or “claimed” for projected expenses pending the actual expenditure of the funds.

End Date: The date signifying the end of the period of performance, typically indicated on the notice of award; may also be called “Expiration Date.”

Equipment: A tangible article that has a useful life of more than one year and an acquisition cost of \$5,000 or more. Each piece of equipment requested should be described and justified fully in the budget justification section of a proposal. Quotes may be required.

Expanded Authorities: The delegation of prior approval directly to the institution. Many federal agencies allow universities to exercise expanded authorities for specific actions, e.g., an initial request for a no cost extension provided sufficient programmatic justification.

External Funding Request Approval Form: A form required to ensure that all relevant parties are aware of, and have a chance to review and approve, a submission of external grants, contracts, or other forms of financial support. The form is available [here](#).

Federal Acquisition Regulation (FAR): The system of federal rules and regulations that govern the administration of government procurement contracts.

Financial Conflict of Interest (FCOI): A significant financial interest that could directly and significantly impact the design, conduct, and reporting of the research.

Financial Report: Periodic, scheduled financial reports required by the sponsor showing the financial status of awarded funds for a specific period. PIs/PDs will work directly with the Office of Grant Accounting to ensure that periodic and final financial reports are submitted on time and in compliance with the sponsor’s guidelines.

Financial Status Report (FSR): A standard, government-wide report that recipients must submit to the federal funding agency that identifies the status of funds for a specific grant or cooperative agreement (40 CFR Part 31).

Fringe Benefits: Employee benefits paid by the employer, e.g., health insurance, F.I.C.A., Worker’s Compensation. Fringe benefit rates are calculated using fixed percentages that vary depending on the employee’s classification and may change from year to year.

Grant: Financial assistance provided to complete a project, generally with a public purpose, need, or “public good” in mind. There is usually limited involvement from the federal government in the project except to convey the funds. Policies governing the management of grants from federal sponsors are covered in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

Indirect Costs: Synonymous with “Facilities and Administrative Costs,” or “F&A.” Costs an organization incurs in the conduct of research or other externally sponsored activity which cannot readily and specifically be identified with a particular sponsored project or other institutional activity (e.g., facilities maintenance, plant operation, library services, utilities, general administration, sponsored projects administration).

Institutional Review Board (IRB): An administrative body established to protect the rights and welfare of human research subjects recruited to participate in research activities conducted under the auspices of the organization with which it is affiliated. The Institutional Review Board has the authority to approve, require modifications in, or disapprove all research activities that fall within its jurisdiction.

Key Personnel: Personnel of primary importance in carrying out a research or other sponsored project; typically senior personnel (e.g., Co-Investigator).

Mandatory Cost-Sharing: Cost-Sharing that is required or mandated by the sponsor as a condition of receiving a sponsored award.

Modified Total Direct Costs (MTDC): The cost-base for calculating F&A costs (Indirect Costs) incurred on a sponsored project. MTDC is a subset of direct costs and typically excludes equipment, tuition, scholarships/fellowships, renovations, space rental, and subawards over \$25K from being charged F&A.

No-Cost Extension: An additional period authorized by the sponsor to complete work on an approved grant or contract at no additional cost to the sponsor. An extension allows previously allocated, remaining funds to be spent during the extension period, provided sufficient programmatic justification. On many federal awards, the University may authorize an extension unilaterally without sponsor prior approval for a one-time period of up to twelve months if the award terms allow for this action under “Expanded Authorities.”

Notice of Grant Award/Notice of Award: The official, legally binding document, signed (or the electronic equivalent of signature) by a Grants Officer and/or Program Officer that: (1) notifies the recipient of the award of a grant; (2) contains or references all the terms and conditions of the grant and funding limits and obligations; and (3) provides the documentary basis for recording the obligation of funds.

Period of Performance: Time interval between the approved start date and the end date of a project.

This is the period in which the sponsor has authorized the award recipient to conduct the scope of work. The period of performance may be made of one or more budget periods, typically of uniform length (e.g., twelve months).

Preliminary Proposal: A brief presentation by the PI of goals, methods, personnel, and overall budget submitted to a funding agency. Pre-proposals are used by funding agencies to determine the eligibility of the applicant and the suitability of the proposed project for support.

Prime Award: In the context of sub-awards or subcontracts, the prime award is the award made directly from the sponsor to the recipient institution. When a recipient institution makes a sub-award or subcontract under the terms and conditions of the award to a second organization, the sponsor's award is labeled the prime award and the terms and conditions are generally included as part of the agreement to the subaward or subcontract site.

Principal Investigator (PI)/Project Director (PD): The PI/PD is the person primarily responsible for the technical and fiscal management of a sponsored project.

Prior Approval: Written approval from the sponsor's designated Grants Officer. Sponsor approval may be required for specified post-award changes in the approved project or budget. Such approval must be obtained before undertaking the proposed activity or spending funds.

Program Announcement: Describes the existence of a funding opportunity. A formal statement about a new or ongoing activity or program. It may serve as a reminder of continuing interest in a research area, describe modification in an activity or program, and/or invite applications for grant support.

Program Officer: Program office staff person responsible for (1) developing program regulations, application notices, and application packages; (2) overseeing the review and ranking of applications submitted under their programs; (3) providing detailed funding recommendations to the Grants Division for applications; (4) participating in negotiations, as necessary; (5) providing technical assistance to applicants and recipients; (6) monitoring funded projects; and (7) making recommendations to the Grants Division about recipients' requests for revisions to project activities and budgets.

Progress Report: Periodic, scheduled reports required by the sponsor summarizing research or project progress to date.

Proposal: A set of documents containing a descriptive narrative of an idea and a budget to be submitted to a funding agency for sponsored support. Some agencies require that proposals be submitted on preprinted forms, while others have no specific format.

Proposal Development Form: A tool used by CUH to help PI/PDs systematically gather and organize the necessary information and data required for the preparation of a research proposal or grant application. This form, available [here](#), is an online submission that collects essential details and ensures that the proposal complies with both the institution's and the funding agency's guidelines.

Reasonable Costs (2 CFR 200.404): A cost is considered 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. The question of reasonableness is particularly

important when the non-federal entity is predominantly federally-funded. In determining the reasonableness of a given cost, consideration shall be given to:

- Whether the cost is of a type generally recognized as necessary for the operation of the non-federal entity or the performance of the federal award.
- The restraints or requirements imposed by such factors as sound business practices, arms-length bargaining, federal, state, and other laws and regulations, and terms and conditions of the federal award.
- Market prices for comparable goods or services for the geographic area.
- Whether the individuals concerned acted with prudence in the circumstances, considering their responsibilities to the non-federal entity, its employees, where applicable, its students, the federal government, and the public at large.
- Whether the non-federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the federal award's cost.

Recipient: Organizational entity or individual receiving a grant or cooperative agreement. Typically the organizational entity is the legal recipient of a grant, contract, or cooperative agreement.

Request for Applications (RFA): An RFA is a formal statement that solicits grant or cooperative agreement applications in a well-defined scientific area to accomplish specific program objectives. An RFA indicates the estimated amount of funds set aside for the competition, the estimated number of awards to be made, whether cost-sharing is required, and the application submission date(s).

Request for Proposal (RFP): Announcements that specify a topic of research, methods to be used, product to be delivered, and appropriate applicants sought. Proposals submitted in response to RFPs generally result in a contract award.

Request for Quotation (RFQ): A formal request from a sponsor for solicitation of a proposal to provide the sponsor a good, or service of direct benefit to the sponsor (e.g., a corporate or industry sponsor typically will issue an RFQ).

Sponsor: An external funding agency that enters into an agreement with the University to support research, instruction, public service, or other sponsored activities. Sponsors include private businesses, corporations, foundations and other not-for-profit organizations, other universities, and federal, state, and local governments.

Statement of Work/Scope of Work: A summary description of the work to be performed and completed on a project or sponsored activity.

Subaward/Subcontract: A document written under the authority of, and consistent with, the terms and conditions of an award (e.g., a grant, contract, or cooperative agreement), that transfers a portion of the research or substantive effort of the prime award to another institution or organization.

Uniform Guidance: Established in 2013 (effective 8/13/2020), the Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards establishes uniform administrative requirements, cost principles, and audit requirements for Federal awards to non-Federal entities.

Unsolicited Proposal: A proposal submitted to a sponsor that is not in response to an RFP, RFA, or program announcement. **Vendor:** A dealer, distributor, merchant, or other seller providing goods or services that are required for the conduct of a Federal/State program. These goods or services may be for an organization's own use or for the use of beneficiaries of the Federal/State program. (*see checklist above for further clarification between the two types)

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