HAWAIʻI PACIFIC UNIVERSITY

GRANT GUIDEBOOK

OFFICE OF SPONSORED PROJECTS

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About This Guidebook

The Hawai‘i Pacific University (HPU) Grant Guidebook serves as the definitive administrative and policy framework for all members of the university community engaged in the pursuit and management of externally funded projects. This document establishes a standardized approach to sponsored research, ensuring full compliance with federal, state, and private sponsor regulations while advancing the university’s mission of academic excellence and scholarly innovation. In the evolving landscape of higher education research administration, this Guidebook reflects a modern interpretation of the regulatory requirements established by the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, commonly referred to as the Uniform Guidance (2 CFR 200).

The primary purpose of this Guidebook is to provide faculty and staff with a clear, authoritative roadmap to support the university's commitment to transparency and equity for navigating the complexities of the grant lifecycle. It represents a commitment to transparency and equity in the management of sponsored activities. Central to this commitment is the adherence to the principles set forth in Section §200.403(c) of the Uniform Guidance, which requires that costs be consistent with institutional policies applied uniformly to both federally and non-federally funded activities. Furthermore, the Guidebook ensures compliance with Section §200.430(a)(1), stipulating that compensation practices conform to written policies applied consistently across all university operations. This ensures that HPU maintains a robust internal control environment that protects both the institution and the individual investigator from the risks associated with non-compliance.

The administrative structure of sponsored projects at HPU is divided into two distinct but interconnected domains. The Office of Sponsored Projects (OSP) holds primary responsibility for the Grant Seeking and Submission phase (Pre-Award), which encompasses identifying funding opportunities, coordinating proposal development, and facilitating institutional review. The second domain, Grant Project and Financial Management (Post-Award), involves a shared oversight model between OSP and the Business Office (BO). This dual oversight is designed to ensure that the programmatic success of a project is matched by rigorous fiscal stewardship and compliance with award-specific terms and conditions. Successful administration of these projects depends upon a cross-functional collaborative effort involving Human Resources, Financial Aid, Information Technology, and academic leadership, all working in concert to

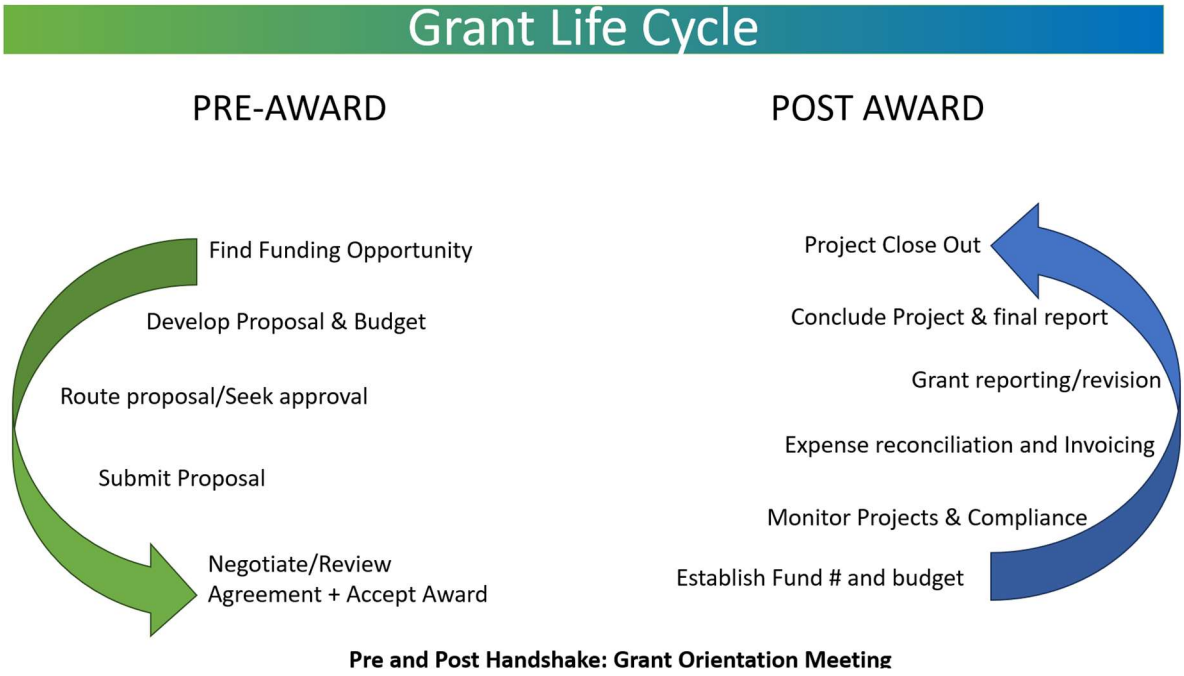
support the research enterprise.

The institutional hierarchy of governing policies is a critical guardrail for research administration. HPU policies take precedence over college or department-level guidelines, while federal, state, and local laws maintain ultimate precedence over university policies. For any externally funded project, the university and the sponsor's policies apply concurrently, provided they are compatible and incorporated into the formal award agreement or contract.

Collectively, these policies and procedures are designed to guide faculty and staff throughout every stage of the grant lifecycle—from concept development to project closeout—ensuring accountability, stewardship of resources, and the responsible advancement of HPU's mission through externally funded endeavors.

The Grant Life Cycle

The Grant Life Cycle at HPU is a continuous and iterative process that moves from the conceptualization of a project to its eventual closeout and the dissemination of results. This cycle is designed to provide a structured environment for researchers, allowing them to focus on the scholarly components of their work while administrative units manage the regulatory and fiscal complexities. The lifecycle is traditionally divided into pre-award and post-award phases, but it is best understood as an integrated progression where decisions made in the earliest stages of proposal development directly influence the management and reporting requirements in the final stages of the project.



Pre and Post Handshake: Grant Orientation Meeting

Stage	**Primary Objectives**	**Key Administrative Support**
Pre-Award Phase	Identifying funding, developing narratives, budgeting, and internal routing.	OSP
Proposal Submission	Final institutional review and electronic submission via sponsor portals.	OSP and Authorized Representative
Award Acceptance	Negotiation of terms, legal review, and official institutional sign-off.	OSP, University Counsel, and Provost
Post-Award Setup	Establishing Banner funds, budgets, and FOAPAL elements.	OSP
Award Management	Fiscal monitoring, invoicing/fund	PD/PI, OSP, and BO

	drawdown, procurement, personnel management, reporting and research compliance.	
Award Closeout	Final technical and financial reporting, reconciliation, and record retention.	PD/PI, OSP, and BO

Effective management of this cycle requires a "handshake" between the pre-award and post-award teams. This transition is formalized during the Grant Management Orientation meeting, where the commitments made during the proposal phase are translated into the operational realities of project management. By adhering to this lifecycle, HPU ensures that every sponsored project is conducted with a high degree of integrity and accountability, meeting the expectations of sponsors and the public alike.

Pre-Award

The pre-award phase represents the strategic and developmental foundation of any sponsored project. During this period, OSP acts as a primary facilitator, assisting faculty and staff in identifying relevant external funding sources that align with the university's research and programmatic goals. OSP provides comprehensive support, including guidance on navigating federal and state application portals, interpreting sponsor guidelines, and ensuring that all institutional commitments are appropriately vetted.

A fundamental requirement for any project is that only regular HPU faculty or full-time employees are eligible to serve as the Project Director/Principal Investigator (PD/PI) or Co-PI. This policy ensures that projects are led by individuals with a long-term professional interest in the institution and the capacity to oversee the rigorous compliance requirements associated with external funding. While requests for exceptions for other individuals may be considered on a case-by-case basis, the institution maintains this standard to protect the integrity of its research enterprise.

Effective pre-award management necessitates early and frequent communication. Prospective PD/PIs are required to discuss project drafts with their department dean and OSP as early as possible, ideally at least 30 days before the proposal deadline. This early engagement allows OSP to identify potential challenges related to budgeting, cost-sharing, or regulatory compliance before the internal review process begins. Faculty and staff are not authorized to seek external funding on behalf of the university without prior approval from OSP and academic leadership. Unauthorized commitments can lead to institutional liability, and the university reserves the right to decline any award resulting from an unapproved submission.

The internal review and routing process is a mandatory step for all grant and contract applications. OSP guides each proposal through this process to secure necessary approvals from chairs, deans, the Provost, and other directors as needed. This ensures that the proposed activity is aligned with the strategic priorities of the college and the university. Complete proposals must be submitted to OSP at least ten (10) business days before the sponsor's deadline. This timeline is critical to allow for a thorough review of the budget justification, compliance requirements, and any legal or human resources implications that may arise during the finalization of the application.

Finding Funding Opportunity

The search for extramural funding is a time-intensive but essential activity for the growth of HPU’s research capacity. Under the Uniform Guidance, federal agencies are required to publicly announce funding opportunities, providing potential applicants with the programmatic and administrative information necessary to develop a competitive proposal (2 CFR §200.203–204). These notices outline the merit review criteria and risk assessment processes that agencies will use to evaluate applicants.

Faculty are encouraged to take a proactive approach to funding searches by networking with colleagues, reviewing literature in their respective fields to identify previous sponsors of similar work, and attending professional conferences to engage with program officers. OSP serves as a resource hub in this regard, offering personalized support to match faculty research goals with suitable sponsors through targeted funding alerts and strategic consultations.

Finding a "good fit" requires an analysis of the sponsor’s mission and funding restrictions. It is not sufficient to simply identify a source of funding; the project must align with the sponsor's specific objectives and priorities. For research involving human subjects or vertebrate animals, PD/PIs must initiate communication with the Institutional Review Board (IRB) or the Institutional Animal Care and Use Committee (IACUC) chairs as soon as the research design is conceptualized. While most proposals may not require final IRB or IACUC approval at the time of submission, many sponsors make the release of funds contingent upon these approvals, making early compliance planning indispensable.

Proposal Development and Budgeting

The development of a grant proposal requires a transition from a conceptual idea to a specific, addressable problem or need. This process involves clear objective setting, peer review, and the translation of goals into a tangible timeline and budget. The narrative must be written for a broad audience, ensuring that reviewers who may not be experts in the specific academic sub-discipline can understand the project's significance and feasibility.

A well-constructed budget is the financial translation of the project’s scope of work. At HPU, all budgets must adhere to the Uniform Guidance principles of cost analysis. This means every budgeted cost must be necessary for the performance of the award, reasonable in its amount, and consistently treated across the institution.

Cost Principle	Operational Definition at HPU	Regulatory Reference
Allowable	Costs must be permitted under the specific terms of the award and institutional policy.	2 CFR §200.403
Allocable	Costs must directly benefit the project and be assignable in proportion to that benefit.	2 CFR §200.405
Reasonable	Costs must reflect what a prudent person would pay in a similar market environment.	2 CFR §200.404
Consistent	Costs must be treated as either direct or indirect (F&A) in the same manner for all funds.	2 CFR §200.412

During the budget development phase, PD/PIs must work with OSP to identify all eligible direct costs, including personnel, travel, equipment, and materials. Indirect costs (IDC) must be calculated in accordance with the university's federally negotiated rate agreement unless the sponsor has a published limitation. If a PD/PI believes an IDC waiver or reduction is necessary, they must submit the appropriate waiver form for institutional approval. It is critical to remember that IDC is a reimbursement to the university for actual infrastructure and administrative costs incurred during the project and is not a discretionary fee.

Cost-sharing, matching funds, and in-kind contributions are university resources and should only be included in a grant budget if they are explicitly required by the funding agency. Voluntary committed cost-sharing is generally not expected by federal agencies and does not influence the merit of an application; however, if included, it becomes a legally binding obligation for the university and must be approved by the dean and the Provost at the proposal stage.

Proposal Types and Funding Agreements/Contracts

HPU interacts with a wide variety of sponsors, ranging from federal agencies to private foundations, each utilizing different instruments to provide support. Understanding the specific

type of proposal and the nature of the resulting funding agreement is essential for determining the applicable compliance and reporting requirements.

Major Types of Proposals

The designation of a proposal type informs the administrative workflow and the level of review required both internally and by the sponsor.

- **Solicited Proposal:** Submitted in response to a specific announcement, such as a Request for Proposal (RFP), Request for Application (RFA), or Notice of Funding Opportunity (NOFO). These are governed by the strict guidelines and priorities of the agency.
- **Unsolicited Proposal:** Initiated by the PD/PI based on a subject of interest that aligns with a sponsor's general mission but was not specifically requested via a solicitation.
- **Pre-Proposal:** Often referred to as a Letter of Intent (LOI) or Phase I application, these are simplified submissions used by sponsors to screen projects before inviting a full proposal.
- **Renewal:** A competing proposal seeking additional funding for an existing project that is ending. These undergo full peer review and usually incorporate new work based on prior results.
- **Resubmission:** A previously reviewed proposal that has been revised to address the critical comments of initial reviewers.
- **Continuation:** A non-competing request for the next year of funding in a multi-year project, generally not subject to new peer review.

Major Types of Funding Agreements

The nature of the agreement dictates the level of institutional oversight and the flexibility allowed in the execution of the project.

Instrument	Level of Sponsor Involvement	Primary Characteristic
Grant	Minimal	Provides support for a project initiated by the applicant; formalized in a binding written agreement.

Contract	High	Procurement of goods or services to benefit the sponsor; funding is based on specific deliverables and milestones.
Cooperative Agreement	Substantial	Involves joint administration of the project by the sponsor and HPU; significant federal agency involvement expected.
Charitable Grant	Specific to Mission	Voluntary donations for religious, scientific, or educational purposes; managed by OSP and Advancement Office.
Congressionally Directed Spending Requests (Earmarks)	High	Targeted, legislator-driven funding for specific local projects, allocated outside the standard competitive grant process but subject to transparency and accountability rules.

Sponsored agreements are distinguished from private gifts based on several factors, including the sponsor's control over the scope of work, requirements for detailed deliverables or financial accounting, and the existence of license or publication review rights. All gift arrangements are managed through the Advancement Office (AO), while OSP and AO collaborate on private foundation grants.

Routing the Proposal

Internal routing is the mechanism by which HPU ensures that all proposed commitments have been vetted by the appropriate administrative and academic authorities. This process is a mandatory guardrail designed to protect the university's resources and the integrity of its research enterprise. All grant and contract applications, regardless of the sponsor, must undergo this review before they are officially submitted.

The routing process is initiated through OSP forms, which must be completed by the PD/PI and approved by the department chair and dean. This collaborative approach ensures that the grant proposal is in harmony with the strategic goals of the college and the university as a whole.

Prospective grant proposals should be discussed with leadership from the earliest stages of planning to ensure that the institutional commitments, such as lab space, faculty effort, or matching funds, are feasible.

Under the Uniform Guidance (2 CFR §200.303), institutions are required to maintain internal controls that include a system of institutional review. HPU's routing process fulfills this requirement by establishing a formal record of approvals from the PD/PI, Dean, OSP, and the Provost. Routing should begin at least twenty (20) business days before the sponsor's deadline to ensure that there is sufficient time for all parties to review the proposal attachments and financial forms.

For proposals involving subawards or subcontracts, additional time is required to conduct a subrecipient risk analysis as mandated by federal regulations. A Subrecipient Commitment Form must be completed and signed by the subrecipient, and OSP will evaluate the entity's financial stability and previous audit results before HPU can include them in the proposal. If a memorandum of understanding (MOU) or other complex legal agreement is required, the Office of University Counsel (OUC) may need up to two weeks for review and approval. Exceptions to these deadlines are granted only in rare circumstances and require the explicit approval of the Assistant Vice President of OSP.

Submitting the Proposal

The final step of the pre-award phase is the official submission of the proposal to the funding agency. At HPU, OSP is the designated entity for submitting all federal and state grant applications. Most agencies utilize online portals, such as Grants.gov Workspace, for the submission process. PD/PIs are responsible for ensuring that all sections of the proposal are accurate and formatted according to sponsor guidelines, but the final submission must be conducted through OSP.

This centralized submission model ensures that the university has conducted a final compliance check and that all institutional certifications are in place. Even minor errors in formatting, such as incorrect font sizes or margin widths, can lead to a proposal being disqualified without review by the funding agency. For applications to foundations or private corporations, OSP works in coordination with AO to ensure that the submission aligns with broader development goals.

If a proposal is submitted without the knowledge or approval of OSP, the university reserves the right to withdraw the application or refuse the award if it is determined that HPU cannot fulfill the

commitments made in the proposal. Following submission, OSP continues to support the PD/PI by managing communications with the sponsor, responding to requests for additional information, and resolving technical issues that may arise during the agency's review process.[1]

Just-in-Time (JIT) Procedures

Just-in-Time is a post-peer review, pre-award process used by many federal agencies, such as the NIH and NSF, to reduce the administrative burden on applicants. Under JIT, certain documents—such as current and pending support, institutional approvals for human or animal subjects, and updated budgets—are only requested for applications that are under serious consideration for funding.

Applicants should only submit JIT information when specifically requested by the funding agency. OSP will facilitate this process, working with the PD/PI to gather certifications of Human Subjects Education and to coordinate with the IRB to ensure timely review of the study protocol. It is important to note that a request for JIT information is not a guarantee of funding; it is a conditional checkpoint to ensure all compliance and financial details are resolved before an award is issued.

Agreement Negotiation/Review and Award Acceptance

The post-award lifecycle begins when HPU receives a formal Notice of Award (NoA) from a sponsor. This document specifies the terms and conditions under which the funding is provided and establishes the start and end dates of the project. All award notifications must be promptly forwarded to OSP to initiate the university's review and acceptance procedures.

The review process is governed by the Uniform Guidance (2 CFR §200.211 and §200.300), which requires recipients to comply with all federal award requirements. The PD/PI should review the agreement or NOA and approve the terms. OSP is responsible for evaluating the award to ensure its compatibility with university policies regarding intellectual property, publication rights, and financial liability. If the sponsor's terms are non-standard or complex, OSP will collaborate with the Office of University Counsel and the PD/PI to negotiate mutually acceptable terms.

Review Criterion	Responsible Party	Objective
Legal Review	OUC	Ensuring the university is not exposed to undue legal or financial risk.
Compliance Review	OSP	Verifying that all IRB, IACUC, and COI requirements are met before spending.
Programmatic Review	PD/PI	Confirming that the awarded scope of work and budget are feasible.
Final Approval	Provost	Official signature indicating HPU's legal acceptance of the award.

The President and the Provost are the only university officials with the authorized signature authority to accept grant agreements and contracts on behalf of HPU. PD/PIs, faculty, and staff are strictly prohibited from signing these documents. Any unauthorized signature can lead to the individual assuming personal legal liability for the performance of the project and adherence to all applicable laws and regulations.

Once an agreement is fully executed, OSP assigns a unique Grant ID and corresponding fund numbers in the Banner financial system. It is a fundamental compliance guardrail that one grant may not include funding from multiple sources; comingling of funds is strictly prohibited to maintain clear audit trails and avoid disallowed costs.

Grant Management Orientation (Handshake)

The Grant Management Orientation, or "Handshake," is the essential transition point where the project moves from the pre-award phase into implementation. Once a contract is fully executed and the project budget is entered into Banner, OSP schedules a meeting with the PD/PI and relevant departmental staff to review the management requirements of the award.

The orientation provides a comprehensive overview of the responsibilities associated with managing a sponsored project. Topics covered include:

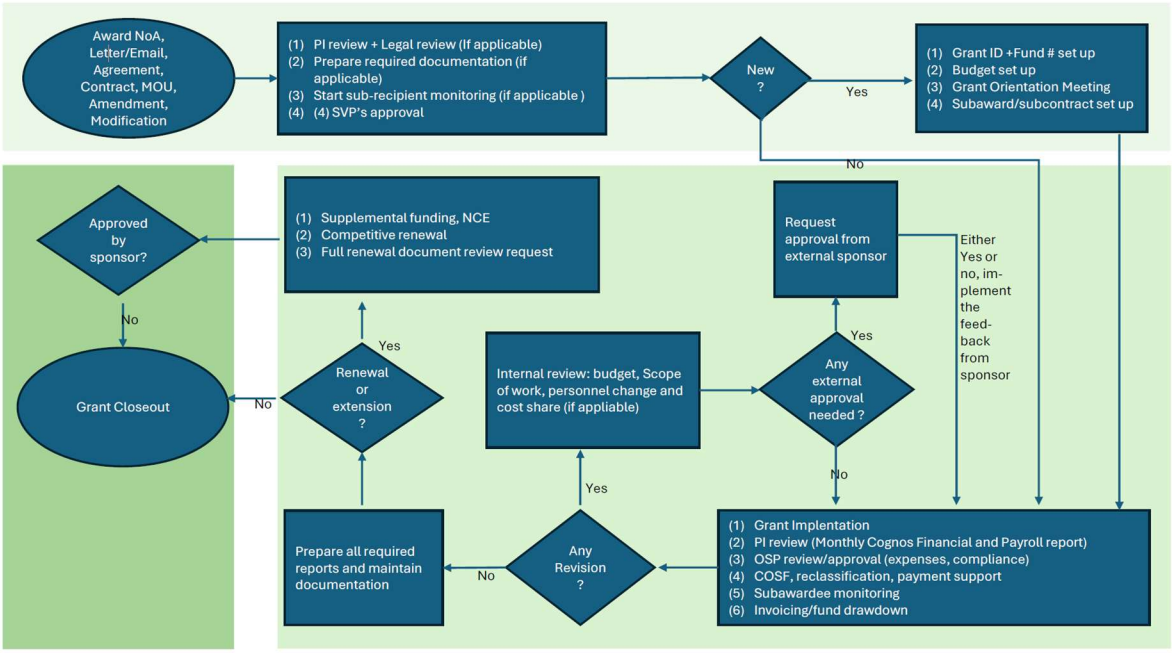
- **Award Terms and Conditions:** Reviewing specific sponsor requirements and reporting deadlines.
- **Project Management Plan:** Establishing a timeline for the scope of work and deliverables.
- **Financial Procedures:** Training in responsible spending, procurement standards/practices, and the use of the university's purchasing card (p-card).
- **Personnel and Payroll:** Best practices for hiring grant-funded employees and certifying their time and effort.
- **Research Compliance:** Ensuring all necessary training (RCR, COI) is completed and that IRB/IACUC protocols are active.

This meeting ensures that the PD/PI and their department are equipped with the information and tools necessary to maintain compliance with institutional and federal regulations, specifically the internal control requirements of 2 CFR §200.303.[1]

Post-Award

The post-award phase of a sponsored project encompasses the active management of the funded activity, from the initial establishment of financial accounts to the final closeout of the award. At HPU, this phase is characterized by a partnership between PD/PI, OSP, and BO. While the PD/PI maintains primary responsibility for the programmatic success of the project, OSP and BO provide the fiscal oversight and administrative support necessary to ensure that all expenditures are compliant with institutional and sponsor policies.

Post-award management is governed by the principles of the Uniform Guidance (2 CFR 200), which requires that the university maintain accurate and complete financial records for all federal awards (2 CFR §200.302). This includes the separate tracking of grant-specific expenditures and the implementation of internal controls that support accountabilities for all funds. Success during this phase depends on the PD/PI's proactive engagement with the monthly financial reporting and reconciliation processes provided by OSP.



Implementing and Monitoring Awards

The PD/PI is the primary individual accountable for the fiscal and programmatic performance of their project. This accountability includes the initiation and documentation of all project-related

purchases, the supervision of grant-funded personnel, and the timely submission of technical reports. PD/PIs must work closely with OSP to ensure that all activities remain within the approved scope of work and budget.

Fiscal Oversight and Internal Controls

HPU's internal control framework requires that all grant-related expenditures be reviewed for allowability, allocability, and reasonableness prior to finalization. Principal Directors/Principal Investigators (PDs/PIs) are responsible for initiating and providing prior approval for all project expenses, including payroll allocations, procurement of materials, and p-card transactions. OSP performs a secondary review to confirm compliance with sponsor requirements and the availability of budgeted funds.

In addition, all necessary supporting documentation must be completed and submitted before processing. This includes, but is not limited to, debarment verification through System for Award Management (SAM.gov) and the Vendor Justification Form, as applicable. All procurement activities must adhere to OSP's established policies and procedures.

Monitoring Activity	Frequency	Primary Responsibility
Monthly Reconciliations	Monthly	PD/PI and OSP
Effort Certification	Semi-Annually	PD/PI and OSP
Technical Reporting	Per Award Terms and Funding Agents' instruction	PD/PI
Financial Reporting	Per Award Terms	OSP and BO
Subrecipient Monitoring	Ongoing	PD/PI and OSP

The PDs/PIs and grant team members must complete all required compliance training. Failure to maintain compliance or meet reporting deadlines can endanger both current and future funding for the individual and the university.

Payment/Reimbursement Processing

Efficient payment and reimbursement processing is critical to the successful implementation of a

sponsored project. Because most federal grants at HPU operate under a cost-reimbursement model, the timely processing of expenses is necessary to ensure that the university can draw down funds from the sponsor. PD/PIs are responsible for submitting all vendor invoices, expense reimbursements, and p-card reconciliations to OSP in a timely manner.

All payment requests must be accompanied by a clear justification that explains how the expense directly benefits the project and is consistent with the approved budget. OSP reviews these requests to ensure they meet the Uniform Guidance cost principles (2 CFR §200.403–405) before forwarding them to the Business Office for final processing.

For p-card transactions, PD/PIs must ensure that all purchases are allowable and that itemized receipts are provided for reconciliation. PD/PIs must follow the BO's p-card reconciliation procedures to reconcile the transactions. OSP conducts post-transaction monitoring of all p-card charges monthly; if a charge is determined to be unallowable, the individual cardholder is responsible for reimbursing the university. It is best practice to initiate all high-value payments, such as subrecipient or contractor invoices, at least 3-4 weeks before the funds are needed to allow for the required administrative review.

Approval of each purchase or invoice is based on the invoice amount. Refer to the University's signatural policy.

Invoicing and Cash Drawdown

The BO and OSP jointly manage cash drawdowns from federal funding agencies, as well as invoicing for non-federal sponsors and federal subawards.

In accordance with the Uniform Guidance, cash drawdown requirements are governed primarily by 2 CFR §200.305 (Payment). HPU generally operates on a cost-reimbursable basis when billing federal awards. However, in limited and well-justified circumstances, advance drawdowns may be necessary. In such cases, HPU adheres to the principle of minimizing the time between the receipt of federal funds and their disbursement.

Federal funds are drawn only to meet immediate cash requirements for allowable program expenses. These immediate needs must be clearly measurable and reasonably predictable, such as short-term personnel costs or approved invoices for allowable expenditures with imminent payment due dates. Any decision to initiate an advance drawdown requires prior approval from institutional leadership.

Following any drawdown, HPU applies its established internal control procedures to ensure

accurate tracking of expenditures, proper documentation, and the maintenance of a complete audit trail in support of compliance and financial accountability.

Subrecipient Monitoring and Compliance

When HPU issues a subaward to an external entity, it assumes the role of a "pass-through entity" and is responsible for the oversight of the subrecipient's compliance with federal regulations (2 CFR §200.332). Subrecipient monitoring at HPU is a risk-based process that involves evaluation before the award is issued and continuous monitoring throughout the project period.

Pass-Through Entity Responsibilities

- **Risk Assessment:** OSP evaluates the subrecipient's financial stability, previous audit history, and internal control environment to determine the level of risk. This assessment informs the terms and conditions included in the subaward agreement.
- **Ongoing Monitoring:** PD/PIs are responsible for reviewing subrecipient programmatic progress and comparing it to the approved scope of work. OSP reviews subrecipient financial invoices to ensure that costs are allowable and consistent with the subaward budget.
- **Audit Verification:** OSP must verify that subrecipients expending more than $750,000 in federal funds annually have completed a Single Audit and must review the results for any findings that may impact HPU's award.

If compliance concerns are identified, HPU may implement additional monitoring measures, such as requiring more frequent reporting or increasing the level of documentation for financial transactions. In cases of significant non-compliance, the university may take remedial actions, including the termination of the subaward.

Grant-funded Physical Inventory

Under the Uniform Guidance (UG), specifically 2 CFR Part 200, inventory recording and management requirements apply primarily to equipment and certain supplies purchased with federal funds, with key provisions outlined in §200.313 (Equipment) and §200.314 (Supplies). Equipment—generally defined as tangible personal property with a useful life of more than one year and a per-unit acquisition cost of $5,000 or more—must be tracked through a formal

property record system. For each item, the institution is required to maintain complete and accurate records, including a description of the property, serial number or other unique identifier, source of funding (including the federal award number), acquisition date, cost, location, condition, and ultimate disposition data if the item is transferred, sold, or otherwise disposed of.

Physical inventory records are maintained by BO while OSP works in coordination with PD/PI to conduct a physical inventory count at least once every two years, in accordance with institutional inventory policies. This process ensures that recorded assets are verified, discrepancies are identified and resolved, and compliance with federal requirements is maintained.

When equipment is no longer needed for the originally authorized project or program, disposition must be properly documented in accordance with UG requirements. If the current per-unit fair market value of the equipment is $5,000 or less, the institution may retain, sell, or otherwise dispose of the equipment with no further obligation to the federal awarding agency. However, if the current value exceeds $5,000, the institution must request disposition instructions from the federal agency or pass-through entity before proceeding.

Change Requests

Unexpected changes are a common occurrence in sponsored research. When a project requires modifications—such as budget revision, a no-cost extension (NCE), a change in key personnel, or a shift in the scope of work—HPU must follow the specific procedures established by the funding agency and the university.

As soon as the need for change is identified, the PD/PI should contact OSP. The OSP team manages the preparation and submission of the formal change request to the sponsor. Many federal agencies allow for a one-time, no-cost extension of up to 12 months, provided that the request is submitted before the current project end date and that there is a compelling programmatic reason for the extension.

Significant budget revisions, particularly those involving the transfer of funds between categories or the movement of funds into restricted categories like participant support, often require prior written approval from the sponsor. PD/PIs must not implement any significant

changes to the project until the university has received formal authorization from the funding agency.

Closeout and Record Retention

Grant closeout is the final stage of the project lifecycle and is governed by 2 CFR §200.344. This phase requires the university to complete all programmatic, financial, and administrative requirements within a specific timeframe—typically 90 to 120 days—after the project end date.

Closeout Process

- **Final Reports:** The PD/PI is responsible for preparing and submitting the final technical report to the sponsor. OSP and the Business Office coordinate the submission of the final financial report and the final invoice.
- **Financial Reconciliation:** All project expenditures must be reviewed for allowability, and any encumbrances must be cleared. Any unspent funds on a cost-reimbursable grant must be returned to the sponsor.
- **Equipment and Inventory:** Final property reports must be submitted, and any equipment purchased with grant funds must be appropriately tagged and recorded in the university's inventory system.

Record Retention

Following award closeout, project records must be retained in accordance with the Uniform Guidance, specifically 2 CFR §§200.334–200.338. HPU requires that all grant-related records be maintained for a minimum of three (3) years from the date the final financial report is submitted. Where sponsor agreements specify longer or additional record retention requirements, HPU will comply with those terms.

Required records include, but are not limited to, the original proposal, notice of award, financial records and ledgers, technical and performance reports, correspondence with the sponsor, and all applicable compliance documentation. These records must be accessible for review by authorized representatives of the federal awarding agency, pass-through entities, and auditors. If any audit, litigation, or claim is initiated before the end of the retention period, all relevant records must be preserved until the matter is fully resolved and final action has been taken.

Appendix I: Guideline for Developing, Submitting Proposals and Accepting Awards

The success of the sponsored research enterprise at Hawai‘i Pacific University is dependent upon a clear division of labor and mutual accountability among the Principal Investigator, academic leadership, and administrative units.

The Principal Investigator (PD/PI)

The PD/PI is the visionary and operational leader of the sponsored project. Their primary duty is the conceptualization and drafting of the proposal narrative, ensuring it aligns with both the sponsor's priorities and the university's mission. The PD/PI is responsible for identifying the necessary research team, developing the preliminary budget in consultation with OSP, and securing all required approvals from ethics committees or institutional review boards (IRB/IACUC). Once an award is accepted, the PD/PI assumes full responsibility for the programmatic execution of the project, the supervision of grant-funded personnel, and the timely submission of all technical reports. They are the primary steward of the award's financial resources, ensuring that all expenditures are allowable, allocable, and reasonable.

The Department Dean

The Dean provides strategic oversight and ensures that the proposed grant activities are consistent with the long-term goals and resource capacity of the college. They review and approve all proposal routing forms, specifically vetting the commitment of faculty effort, lab space, and any required matching or cost-share funds. The Dean’s approval is a critical institutional gatekeeping function, confirming that the college can support the project if it is awarded. They also play a mentorship role, guiding faculty through the refining of research ideas and facilitating collaborations across departments.

Office of Sponsored Projects (OSP)

OSP serves as the university's central hub for both pre-award and post-award administrative support. In the pre-award phase, OSP provides guidance on sponsor requirements, assists with budget development, and manages the internal routing and electronic submission of proposals.

Post-award, OSP coordinates with the PD/PI and the Business Office to establish grant accounts, monitor expenditures for compliance with the Uniform Guidance, and facilitate award revisions or extensions. OSP is also responsible for ensuring that the institution maintains current certifications and registrations in federal systems like SAM.gov and Grants.gov.

University Leadership (Provost and Authorized Representatives)

The Provost holds the ultimate signature authority for all grant and contract agreements at HPU. Their review and approval of a proposal or award signify the institution's legal commitment to the project. University leadership ensures that the research enterprise is conducted with the highest ethical standards, appointing the Research Integrity Officer (RIO) and the Institutional Official (IO) to oversee compliance related to research misconduct, human subjects protection, and animal welfare. The leadership also advocates for the research project within the institution and engages with external stakeholders to enhance HPU’s national visibility and reputation.[1]

Appendix II: Roles And Responsibilities Matrix

Grant management involves seamless coordination among various administrative and academic units. The following table delineates the core responsibilities across the university.

Department	Primary Responsibilities
Business Office	Monitoring accounting transactions; reviewing and signing grant invoices; high-level financial oversight; managing fund drawdowns from federal agencies. Assessing risk management; providing insurance coverage; assisting with investigations and audits.
Academic Affairs	Designating the Authorizing Organization Representative (AOR); provost sign-off on agreements; RIO and IO appointments.
OSP	Proposal submission; establishing Banner accounts; reviewing budget-to-actual transactions; approving purchase requisitions; monitoring effort reporting; award closeout.
IRB / IACUC	Reviewing and approving research protocols involving human and animal subjects to ensure ethical compliance.
University Advancement	Collaborating with OSP on identifying and pursuing private or non-profit foundation grants.
Human Resources	Ensuring compliance with labor laws for grant-funded hiring of employees and independent contractors.
University Counsel (UC)	Legal review of grant agreements, subawards, contracts, and MOUs.
Information Technology (IT)	Managing hardware/software purchases; tagging grant-related technology inventory.
Financial Aid	Assisting with grant-related student financial aid matters and scholarship processing.

Appendix III Grant-funded Expenditure

Overall expense principle – “The Sunshine Rule” – expenses submitted for reimbursement should be able to withstand full and open scrutiny from peers, subordinates, superiors, auditors, donors and trustees.

HPU has Sponsored Programs Expenditure Guidelines and Travel and Expenses policy to guide spending grant funds. Also, Uniform Guidance states that costs must be necessary, reasonable, and allocable to the specific project, as outlined in §200.403 and §200.404. Spending must also comply with §200.405 (Allocable Costs) and §200.302 (Financial Management), which require institutions to maintain strong internal controls, accurate accounting systems, and clear audit trails. Charges to a federal award must be recorded in a timely manner, supported by source documentation (such as invoices, receipts, payroll records, and contracts), and aligned with the approved budget. If costs deviate from the original budget or involve categories that require prior approval—such as equipment purchases, participant support costs, or significant rebudgeting—institutions must follow sponsor requirements and obtain approval when necessary.

In general, there are three categories of expenses:
1. Direct Expenses – These expenses can normally be directly charged to federal awards. However, the terms and conditions of the sponsored award must be reviewed prior to determining the appropriateness of expenses for each individual project.
2. Indirect Costs – Sometimes referred to as facilities and administrative (F&A) costs or overhead, these expenses may not be charged as direct expenses to federal awards unless the costs meet the criteria outlined in the Uniform Guidance.
3. Unallowable Expenses – These costs may not be charged to a federal award either as a direct charge or indirectly as recovered through the F&A rate.

Pre-Award Expenses (2 CFR §200.209)

Pre-award expenses are costs incurred on grant awards typically during the 90 days prior to the award start date that are necessary for effective execution of the project. These expenses require sponsor approval and follow the same cost principles as expenses charged during the project period. For some federal sponsors with awards under expanded authorities, such as

NSF and NIH, the incurrence of pre-award expenses, up to 90 days, is allowed without sponsor approval. Any expenditure incurred while an account is in advance status is made at the colleges' or departments' risk.

Unallowable Expenses (2 CFR §200.410)

Payments made for costs determined to be unallowable (either as direct or indirect) must be refunded to the federal government. PIs and departments are responsible for working with OSP to ensure that direct and indirect funds relating to unallowable expenditures are either returned to the federal government or offset in the award.

Contributions and Donations (2 CFR §200.434)

The value (either monetary or in-kind) of donated services and property are unallowable and may not be charged as either a direct expense or an indirect cost.

Entertainment costs (2 CFR §200.438)

Costs of entertainment, including amusement, diversion, and social activities and any associated costs are unallowable, except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency.

Grant supported Travel Expenses

Travel expenses under grants must comply with both the Uniform Guidance and HPU Travel and Expenses Policy. Review the policy for details.

Air

Under 2 CFR Part 200 §200.475, which incorporates the requirements of the Fly America Act, all air travel charged to federally funded awards must be conducted using U.S. flag air carriers, such as United Airlines, Delta Air Lines, or American Airlines. This requirement applies regardless of whether a foreign airline offers lower cost, greater convenience, or whether the ticket is purchased through a travel agency, as compliance is determined by the airline

operating the flight rather than the ticket vendor.
Foreign air carriers may be used only when specific allowable exceptions apply and are properly justified and documented. Such exceptions include situations where no U.S. carrier service is available to the destination, where use of a U.S. carrier would result in a significant increase in travel time of 24 hours or more or require unreasonable connections, where medical or safety considerations necessitate an alternative, or where travel is supported under certain qualifying international agreements, such as limited Open Skies arrangements. In all cases, any exception must be clearly documented and retained to support audit and compliance requirements.

Lodging

Under the Uniform Guidance—specifically 2 CFR Part 200 §200.475. Institutions typically align lodging rates with federal per diem guidelines (such as those issued by the U.S. General Services Administration), but the Uniform Guidance does not strictly require adherence to those rates; rather, it emphasizes that costs must not be excessive and must be consistently applied in accordance with institutional travel policies.
Lodging must be incurred during authorized travel status and supported by appropriate documentation, including itemized hotel receipts that clearly show dates of stay, nightly rates, taxes, and total cost. Charges such as luxury accommodations, upgrades, or additional personal expenses (e.g., spa services, entertainment, or minibar purchases) are generally unallowable unless specifically justified as necessary for the project. If lodging costs exceed standard or institutional limits, a written justification is required and must demonstrate why the higher cost was necessary (for example, conference-designated hotels, safety considerations, or lack of alternative options).
In addition, lodging costs must comply with institutional pre-approval and reimbursement procedures, and any exceptions to standard rates or policies must be documented and retained for audit purposes. As with all travel costs under the Uniform Guidance, failure to adequately justify or document lodging expenses may result in disallowance of the cost.

Ground Transportation

Allowable costs generally include transportation between airports, hotels, and meeting locations; local travel required for project activities; and other forms of transit such as taxis, ride-share services, shuttles, public transportation, or rental vehicles. The selected mode of transportation should be cost-effective and appropriate to the circumstances, with consideration given to

safety, efficiency, and overall cost.
All ground transportation expenses must be supported by adequate documentation, such as receipts or detailed expense records, and must comply with institutional travel policies and approval procedures. Personal use costs, luxury services, or unnecessary upgrades are not allowable. For rental vehicles, the cost must be justified as more economical or practical than other transportation options, and only reasonable expenses such as base rental, fuel, and necessary insurance (if not otherwise covered) may be charged to the award. Mileage reimbursement for use of a personal vehicle is allowable when consistent with institutional policy and should follow established reimbursement rates.

Meals and Entertainment

Based on HPU travel policy, gratuity of 15% is recommended for meals expenses. Gratuities greater than 20% will not be reimbursed. • When two or more employees are eating together and do not request individual bills, the highest-ranking employee in attendance must pay the bill and claim it on his/her P-Card reconciliation.

Under the Uniform Guidance—specifically 2 CFR Part 200 §200.475 (Travel Costs) and §200.438 (Entertainment Costs)—meals and entertainment are treated differently for allowability purposes. Meals are generally allowable when they are incurred as part of approved travel necessary to carry out the federally funded project. These costs must be reasonable, not excessive, and consistent with the institution’s travel policies, which often align with federal per diem guidelines. Meal expenses must also be properly documented, either through per diem claims or itemized receipts, depending on institutional requirements. In certain limited circumstances, meals provided during conferences, workshops, or working meetings may also be allowable if they are necessary to achieve the objectives of the award and are explicitly justified and approved.
In contrast, entertainment costs are generally unallowable under §200.438. This includes expenses for amusement, diversion, social activities, or any associated costs such as tickets, meals, lodging, rentals, or gratuities that are primarily for entertainment purposes. The only exception is when such costs have a clear and direct programmatic purpose and are explicitly authorized either in the approved budget or with prior written approval from the federal awarding agency. Even in those rare cases, strong justification and detailed documentation are required. Overall, institutions must ensure that meal costs are directly tied to project-related travel or activities and that no portion of the expense is entertainment in nature. Any ambiguity or lack of

documentation may lead to disallowance during audit review.

Grant-supported Personnel Expenses and Fringe Benefits

All grant-supported personnel hiring, supplemental payments, and payroll distributions should be clearly planned in the award budget on an annual base. Multi-year grants should revisit the personnel arrangement annually.

Fringe Benefits will be assigned according to the employee categories such as faculty, staff members and student workers.

Most common Grant-supported Purchases/Services

Equipment (2 CFR §200.439, §200.33, §200.452)

Equipment, including fabricated items, with a total acquisition cost of $5,000 or greater is considered capital equipment and may only be charged as a direct expense when it is necessary for the performance of the sponsored award.

Equipment Repairs

Routine repair and maintenance of general purpose equipment are normally treated as indirect costs. Service, repairs or warranty costs for special purpose equipment dedicated to a sponsored project may be charged directly.

Supplies (2 CFR §200.314)

Supplies are defined as tangible personal property other than equipment, meaning items with a per-unit cost below $5,000 (or the institution’s capitalization threshold) and typically consumed during the course of the project.
All supply purchases must be properly documented with invoices or receipts and must follow institutional procurement and approval procedures. Costs must be consistently treated across the institution, and supplies should not be charged to a federal award if they are for general-purpose use or benefit multiple activities without appropriate allocation. In cases where supplies are used across more than one project or activity, the cost must be distributed proportionally

based on documented usage.
At the end of the project, if there is a residual inventory of unused supplies with an aggregate value exceeding $5,000 and the supplies are not needed for other federally funded activities, the institution may be required to compensate the federal government for its share of the remaining value. As with all costs under the Uniform Guidance, failure to adequately justify, allocate, or document supply expenses may result in disallowance during audit review.

Professional Service Costs (2 CFR §200.459, §200.435)

Costs of professional and consultant services are allowable as direct expenses when all the following conditions are met:

- The service has been determined as allowable and necessary for the federal award;
- The professional consultant is not an employee of HPU; and
- The expenses are reasonable in relation to the services rendered (i.e., the service cannot be performed more economically by direct employment).

All HPU employees must be budgeted as salary and cannot be included as consultants, advisors or vendors. Retainer fees for professional services must be supported by evidence of bona fide services available or rendered. Any professional service costs related to defense and prosecution in criminal and civil proceedings are unallowable.
Proper documentation is essential and must include a **written agreement or contract** outlining the scope of work, period of performance, deliverables, and payment terms. Supporting documentation such as invoices, proof of services rendered, and evidence of deliverables must be maintained. The procurement of professional services must follow the standards outlined in §200.317–§200.327, including requirements for competition, cost or price analysis (when applicable), and avoidance of conflicts of interest.
As with all costs under the Uniform Guidance, failure to properly justify, procure, document, or monitor professional service costs may result in disallowance during audit review.

All contracts may only be signed by authorized signatories, including the President, Senior Vice Presidents and the Provost. Faculty and staff members are not authorized to sign on behalf of the University.

Participant Support Costs (2 CFR §200.456)

Participant support costs are defined as direct costs paid to or on behalf of participants (but not employees) in connection with training, workshops, conferences, or other sponsored activities. These costs typically include stipends, subsistence allowances, travel, and registration fees provided to participants to enable their involvement in the project. The key distinction is that participants are beneficiaries of the program, not individuals providing services to the project. Participant support costs are allowable only when explicitly included in the approved budget or with prior written approval from the federal awarding agency. These funds must be used strictly for participant-related expenses and cannot be reallocated to other budget categories without sponsor approval. Likewise, other project funds generally cannot be moved into the participant support category without prior authorization.

A critical compliance requirement is that participant support costs are excluded from the Modified Total Direct Cost (MTDC) base, meaning they are not subject to indirect costs (F&A/IDC). Institutions must ensure these costs are separately identified, tracked, and reported in the financial system to avoid improper indirect cost charges.

Appendix IV: Forms and Useful Information

All official forms required for the administration of sponsored projects at Hawai‘i Pacific University are available for download on the OSP website. PD/PIs are responsible for utilizing the most current versions of these documents.

Pre-Award Forms (Most current version can be found on OSP website)

- **OSP Proposal Info and Budget Form:** The primary document was used to initiate proposal routing and secure dean/provost approval.
- **OSP Conflict of Interest (COI) Disclosure Form:** Required for each key personnel on the grant team to identify potential financial conflicts.
- **OSP IDC Waiver Form:** Necessary if a project proposes an indirect cost rate lower than the university's negotiated rate.
- **Subrecipient Commitment Form:** Required for all external entities included as subrecipients in a proposal.
- **HPU Financial Status Questionnaire:** Used to assess the financial risk of potential subrecipients who do not have a recent Single Audit report.

Post-Award Management Forms (Most current versions can be found on OSP website)

Subaward Monitoring Forms

- **Subaward Agreement Template:** The formal contract between HPU and a subrecipient.[1]
- **Subrecipient Monitoring Action Record:** Used by PD/PIs to document the ongoing monitoring of subrecipient progress.

Service Contractor/Consultant Form

- **Service Contract Template:** Standard agreement for hiring external consultants or independent contractors.[1]

- **Professional Services Information Sheet (OSP Form 10):** Supporting document for processing payments to contractors.
- **W-9 Form/W-8 Ben:** Required for all new vendors or non-employee payees.
- **Vendor Justification Form**
- **Self-certification Disbarment Form (sam.gov exemption)**
- **Non-domestic purchase Justification Form**

Payment/Reimbursement Forms

Travel and Reimbursement Forms

- **HPU Travel Request Form (TRF):** Mandatory pre-approval form for all grant-funded travel.
- **Federal Grant Travel Reimbursement Form:** Used to reconcile travel expenses in compliance with federal guidelines (e.g., Fly America Act).
- **Out of Pocket Reimbursement Request Form:** For non-travel grant expenses paid by the PI.

Payroll and Financial Adjustment Forms

- **Change of Status Form (COSF):** To update the funding source or effort percentage for a grant-funded employee.
- **Supplemental Payment Form:** For processing one-time payments or summer compensation for faculty.
- **General Ledger Expense Reclass Form:** Used to correct erroneous postings or move costs between grant funds (cost transfers).

Purchase Payment

- **W-9 Form/W-8 Ben:** Required for all new vendors or non-employee payees.
- **Vendor Justification Form**
- **Self-certification Disbarment Form (sam.gov exemption)**
- **Non-domestic purchase Justification Form**

Appendix V: University Research Compliance Matrix

HPU ensures that all research activities adhere to the rigorous regulatory and ethical standards governing higher education.

Focus Area	Oversight Agency	Key Duty	PI Best Practice
Human Subjects	HHS/OHRP	Protect human participants.	Complete CITI training; submit full IRB application before recruitment.
Animal Welfare	USDA / OLAW	Ensure humane animal care.	Obtain IACUC approval; follow approved protocols exactly; maintain care logs.
Conflict of Interest	NIH / NSF	Maintain research objectivity.	Disclose financial interests annually; follow management plans for identified conflicts.
Research Integrity	ORI / OIG	Prevent misconduct (FFP).	Maintain raw data for required retention period; report suspected misconduct to RIO.
Export Control	Commerce / State	Protect national security.	Screen foreign collaborators; consult Export Control Officer before sharing data abroad.

Biosafety	NIH / CDC	Manage biohazards.	Register projects involving recombinant DNA with the IBC; follow BSL standards.
Effort Reporting	OMB	Certify salary charges.	Certify effort and salary accurately; never overstate time spent on a project.
Intellectual Property	USPTO	Report inventions.	Disclose inventions promptly to the Office of Tech Transfer; acknowledge federal funding on publications.

Appendix VI: Technical Procedures and Financial System Data

This section outlines the specific technical workflows and tables used by OSP and BO to manage sponsored projects within the Banner system.

Banner Grant Module Setup

The establishment of a grant record in Banner ensures accurate financial tracking and alignment with the Uniform Guidance (2 CFR §200.302).

- **Grant Record Creation:** Utilizing form **FRAGRNT**, OSP enters the Grant ID, long and short titles, sponsor code, CFDA number, and project dates. The PD/PI is formally assigned as the responsible official.
- **Fund Code Establishment:** Form **FTMFUND** is used to create a unique fund number specific to the grant. This fund is linked to the department organization and the appropriate program code.
- **Budget Entry:** Approved budgets are recorded using form **FRABUDG**. Budgets are allocated by account category (e.g., personnel, travel, supplies) and by budget period for multi-year awards.
- **Indirect Cost (F&A) Setup:** OSP enters the F&A rate and applicable base (e.g., MTDC or TDC) in form **FTMFUND** to ensure Banner calculates indirect costs correctly for every transaction.

HPU Fringe Benefit Rates for Sponsored Programs

Fringe Benefits charged to grants are based on the Colleges and Universities rate agreement issued by the Department Health and Human Services (DHHS). The Fringe benefits include FICA, Workers Compensation, Medicare, Medical/Life/Drug/Vision/Dental Insurance, Unemployment Compensation, Temporary Disability Insurance, Retirement, And Tuition Waiver.

Fringe benefits are calculated for all salary lines, except when disallowed by sponsor guidelines. These rates are for budget purchase and the actual percentage charged is based on the annual Board of Trustee’s decision on the actual retirement contribution percentage.

Benefit	Faculty	FT Exempt Staff	FT Non-Exempt Staff	PT Staff	Student
FICA & Medicare	7.7%	7.7%	7.7%	7.7%	0%
Retirement	6%	6%	6%	0.0%	0%
Health Insurance (Medical/Drug/Vision/Dental)	5.6%	7.6%	16%	1.0%	0%
Unemployment Insurance	0.4%	0.4%	0.4%	0.4%	0%
Workers' Compensation Insurance	0.8%	0.8%	0.8%	0.8%	0%
Temporary Disability Insurance	0.1%	0.1%	0.1%	0.1%	0%
Life Insurance	0.2%	0.2%	0.2%	0.0%	0%
Tuition Waiver	1%	3%	3%	0.%	0%
Composite fringe rate	22%	26%	34%	10%	0%

Personnel Category	**Estimated Benefit Rate**	**Included Benefits**
Full-Time Faculty	22%	FICA, Medical/Drug/Life, Retirement, Tuition Waiver.
Full-Time Staff	29%	FICA, Medical/Drug/Life, Retirement, Workers Comp.
Part-Time Employees	10%	FICA, TDI, Workers Comp, Unemployment.
Student Workers	0%	No benefits typically assessed (except FICA in summer).

FOAP (Fund number/Organization/Account Code/Program number)

For all external-funded grant, the set up in the Banner system is as follows:

Fund number – six digit starting from 2,

Organization number –

180106 (federal-funded)

180107 (non-government funded)

180108 (No federal government funded)

Account Code

Most Commonly Used Banner Account Codes for Grant Expenditures

- **737080:** Consulting Services.
- **736070:** Other Contract Services.
- **736201:** External Subcontracts (Reserved for subaward agreements).
- **710000-719999:** Personnel and Salary Categories.
- **730000-739999:** Operating Costs and Supplies.
- **740000-749999:** Equipment and Capital Expenditures.
- **750000-759999:** Travel and Transportation.

Appendix VII: OSP Procurement Policy and Thresholds

Procurement on sponsored projects must follow the stricter of the sponsor guidelines or HPU policy. OSP has Procurement Policy for Purchase Using Federal Funds. This ensures compliance with the procurement standards of 2 CFR §200.317–327.

Purchase Amount	Procurement Requirement	Documentation Needed
$0 - $3,000	Micro-purchase; no quote required.	Itemized receipt and justification.
$3,001 - $5,000	Small purchase; single quote.	Itemized receipt and justification.
$5,001 - $10,000	Multiple quotes recommended.	SAM.gov debarment verification.
$10,001 - $50,000	Formal competitive bidding or VJF.	Vendor Justification Form (VJF); SAM.gov check.
Over $150,000	RFP competitive proposal process.	Full procurement file; institutional approval.

Refer to the policy for details.

Appendix VIII: Closeout Checklist and Record Retention

The closeout process is a critical final step to ensure the university fulfills its legal obligations to the sponsor. Failure to complete these steps can lead to audit findings and the disallowance of project costs.

Closeout Checklist

- [ ] Final Technical Report submitted to sponsor and OSP.
- [ ] All payroll distributions for the project period are verified and certified.
- [ ] All p-card transactions are reconciled and itemized receipts uploaded.
- [ ] All subrecipient final invoices are received, approved, and paid.
- [ ] All cost-sharing commitments are documented and verified by the Dean.
- [ ] Final property/inventory report for equipment >$5,000 submitted to IT and OSP.
- [ ] Any unspent funds encumbered for the project period are liquidated.
- [ ] Final financial report and final invoice submitted by Business Office.

Record Retention Schedule

All project-related files must be kept for a minimum of three (3) years from the date the final financial report is submitted (2 CFR §200.334).

Record Type	Retention Period	Format
Proposal & Award Notice	3 years post-closeout	Electronic (Official File)
Financial Ledgers & Receipts	3 years post-closeout	Electronic / Paper
Technical Reports	3 years post-closeout	Electronic
Compliance Certs (IRB/COI)	3 years post-closeout	Electronic
Subrecipient Files	3 years post-closeout	Electronic

Appendix IX: Contact Information and Communications

Effective grant administration relies on timely communication with the Office of Sponsored Projects and other university units.

Office of Sponsored Projects (OSP)

- **Josephine (Jody) Wong, MBA, CRA:** Assistant Vice President, Sponsored Projects. (808) 544-1489 | jowong@hpu.edu.
- **Louisa Chan:** Senior Grant Specialist – Pre-award/Grant Process. PREAWARD@hpu.edu | AWARDS@hpu.edu.
- **Justine Lafata:** Senior Grant Specialist – Grant Accounting. GRANT_PMT@hpu.edu.
- **Devyn Kamiya:** General Grant Specialist - OSP@hpu.edu.

Administrative Support Channels

- **Proposal Submissions:** All notice of intent to apply and draft proposals must be sent to PREAWARD@hpu.edu.
- **Payment Requests:** All grant-related invoices, reimbursements, and payment justifications must be sent to GRANT_PMT@hpu.edu.
- **General Inquiries:** For questions regarding policy, training, or system access, contact OSP@hpu.edu.
- **Sponsor Communication:** Official correspondence from sponsors (e.g., NoA, NCE approval) should be sent to AWARDS@hpu.edu.

Other Essential Units

- **Business Office:** For high-level financial questions and audit support.
- **Information Technology:** For grant-related hardware/software procurement and inventory.
- **Human Resources:** For assistance with the hiring of grant-funded personnel and independent contractors.
- **Financial Aid:** For processing of student stipends and scholarships funded by sponsored awards.