AZUSA PACIFIC
UNIVERSITY

OFFICE OF RESEARCH AND GRANTS

Grants Handbook:
Policies and Procedures for Extramural Funding

CONTENTS

GENERAL INFORMATION

APU encourages faculty and staff to seek external funding for research and programmatic projects and activities that will support and enrich our institutional mission. The Office of the Provost through the Office of Research and Grants (ORG) in collaboration with the Business Office provides this *Grants Handbook* to assist APU constituents to prepare grant applications and proposals for research, service, curricular development, training, and other program operations supported by external funding.

The Office of Research and Grants (ORG) promotes, supports, and celebrates research and grant opportunities to advance the scholarship cornerstone of Azusa Pacific University.
ORG core values are:
- Empowering others
- Serving those we work with
- Helping others make connections
- Embracing and promoting accountability

The Grants Handbook outlines policies and procedures relating to APU faculty and staff involved in sponsored research and programs at APU. In the event of any inconsistency or conflict, applicable law supersedes university policies and university policies supersede college, department, or lower unit bylaws, policies, or guidelines. Externally funded projects are subject to APU policies and funders' grant policies, provided the funders' policies are in the grant agreement or other contract(s) and consistent with APU policies.
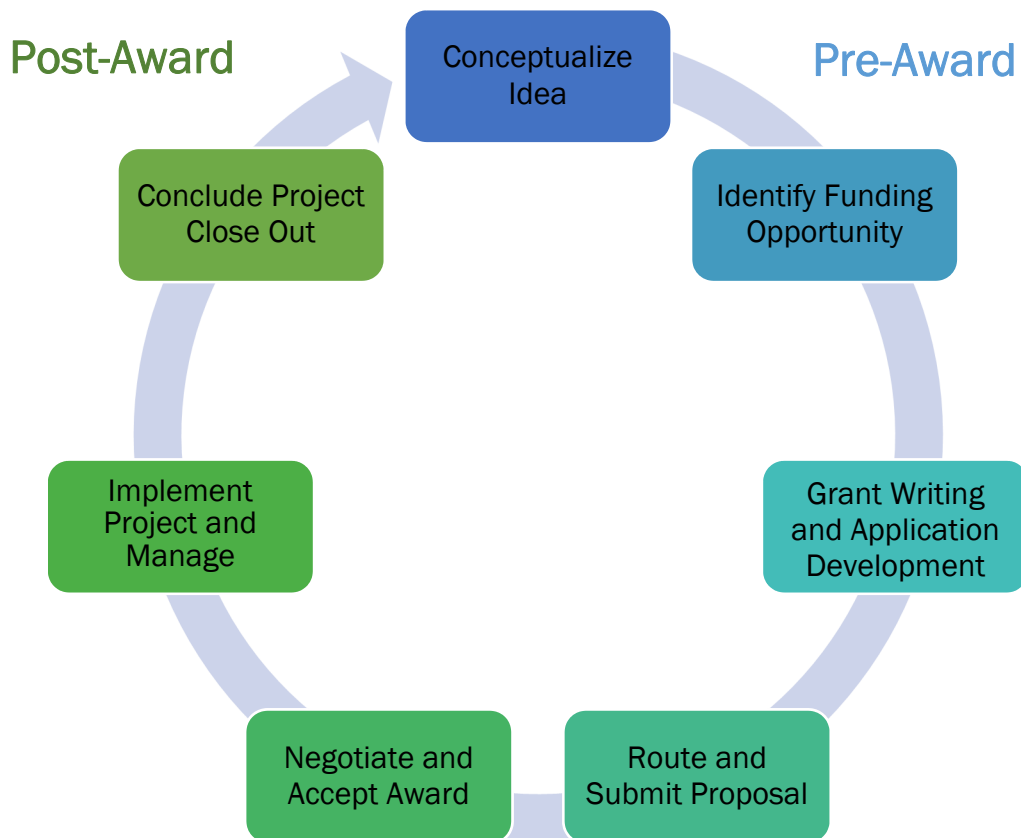
The Policy and Process for Grants Handbook Infractions is in effect and included in Appendix I.

Resources for APU faculty, academic administrators, and staff to learn more about grant submission and management include the APU Grants website, www.apu.edu/researchandgrants/ and the ORG google site, grants.apu.edu.

grants.apu.edu

THE GRANT CYCLE

Post-Award   **Pre-Award**

Conceptualize Idea

Identify Funding Opportunity

Conclude Project Close Out

Grant Writing and Application Development

Implement Project and Manage

Negotiate and Accept Award

Route and Submit Proposal

PRE-AWARD SUPPORT

An important goal of the Office of Research and Grants **(ORG)** is to help in the process of securing external funding for research, equipment acquisition, professional and program development, and service projects. The pre-award team (director of Sponsored Research, other pre-award staff) guides faculty, administration, and other full-time employees of APU in identifying appropriate funding sources and provides guidance for grant applications submissions to federal and state departments, foundations and nonprofit agencies, professional and scholarly organizations, private corporations, and other sponsors offering funding opportunities for private higher education institutions. The director of Sponsored Research reviews and guides grant applications through the APU routing system and coordinates timely submission of proposals to funding agencies. These support services assume those pursuing extramural funding are doing so in ways that benefit colleges and schools per the agenda set forth by University leadership. Accordingly, prospective grant proposals should be initiated in consultation with chairs, deans, or other leaders at the beginning stages.

Project Director/Principal Investigator (PD/PI). To ensure sponsored research and programs are conducted by those with requisite preparation and that there are appropriate institutional relationships with those pursuing external funding, ORG typically supports proposals for projects coming from PD/PIs who are full-time APU

faculty or staff, part-time APU faculty, or APU senior adjuncts on part-time contracts. On occasion, other adjunct faculty may be supported by special permission upon recommendation of the dean and approval of the ORG executive director.

Exceptions to the normal PD/PI guidelines are initiated by prospective PD/PIs providing to their dean:
1. Name of person requesting PD/PI status and relationship to department/college/school.
2. Title of project and brief description (one paragraph). If no formal title, provide a brief descriptive of intended activities.
3. Name of funding agency, if known. If not known, indicate types of funders to be sought out.
4. Approximate dates during which the project will take place if funded.

If in favor, the dean's office forwards the above to the ORG executive director along with:
1. Compelling reason for an exemption to the PD/PI policy.
2. Likelihood proposed PD/PI will continue current or similar association with the University throughout expected dates of project.
3. Brief assessment of department/college/school's willingness and ability to provide normal grant support services offered to full-time faculty and staff who receive external awards.

Once the ORG executive director receives the above information and communicates approval of an exception in writing back to the dean, the prospective PD/PI can access ORG grant-support services as outlined in this handbook. Ensuing activities on grant proposals would come under guidelines cited in the *Pre-Award Services* section of this handbook, including standard routing expectations.

Pre-Award Services. Once a funding opportunity has been identified, the pre-award team will provide support with the following:

- Discuss and analyze the funding opportunity announcement with the PD/PI and identify APU internal routing and sponsor deadlines, with the expectation that the PD/PI has the support of University leadership for the prospective proposal.
- Provide access to samples, templates, and other resources for sections of the application, when available
- Provide guidance and feedback on developing the budget and budget narrative
- Provide feedback on the proposal narrative, specifically the opportunity match, the application requirements, and editorial suggestions as needed
- Guide the APU online grant routing process and coordinate application updates

- Coordinate submission of completed and approved grant application to sponsor.

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Develop idea and          Fill out forms and        Submit application
discuss with              get chair and dean        and forms to ORG
colleagues/mentors        approval                  for APU routing
/APU leadership

Determine possible        Continue to discuss       Incorporate
funding sources           with and get input        feedback from APU
                          from chair and dean       routing process

Connect with ORG,         Draft application,        Submission of
plan proposal             get feedback,             application
development,              update
get help
```

ORG makes training available to faculty, administrators, staff, departments, and schools by hosting workshops on finding funding opportunities, proposal development, grant writing, grant budgeting, and other topics. Additionally, ORG works with faculty individually upon request to identify funding opportunities. In support of the grant effort, ORG issues periodic grant funding alerts that identify recently announced funding opportunities. Grant resources and forms are posted on the ORG webpages (www.apu.edu/researchandgrants) and ORG google site (grants.apu.edu).

PROPOSAL PLANNING AND FINDING FUNDING OPPORTUNITIES

All grant and contract applications require APU internal review and approval prior to submission by the University to the funding agency. ORG guides the grant proposal through APU's routing and approval process as described in Appendix IV. APU faculty, administrators, or staff are not authorized to solicit grants or any type of external funding on behalf of the university without prior approval. Even though procedurally, the dean (or equivalent) is required to review and sign-off during the ten-day grant routing (see below), ideas leading to extramural funding applications are expected to have buy-in, support, and input from APU leadership, i.e., chairs, deans, and key directors, early in the process of developing a proposal. It is important that grant proposals reflect institutional, college, and department priorities.

Complete proposals should be submitted to ORG **at least ten (10) business days** before the sponsor deadline. At that time, the proposal will be submitted for grant routing in Cayuse SP, an online platform (apu.cayuse424.com) that facilitates the approval process and ensures a timely transfer to post-award in the event the grant is funded.

The ORG pre-award team will be available to meet with PD/PIs as needed before the internal APU/ORG submission deadline to coordinate the grant application elements and to clarify commitments by ORG and expectations from the PD/PIs during the final routing process. Also, Appendix II includes information on the typical Roles and Responsibilities assumed by different parties.

If a memorandum of understanding (MOU), subagreement, or subcontract is required to be submitted with the grant proposal, additional time (up to additional two weeks) may be required for APU's legal counsel's review

and approval of the documents. Per federal regulations, subawards and subcontracts also require a subrecipient risk analysis done in the pre-award phase.

Written requests for an exception to the ten business day deadline may be considered in rare cases. Requests may be emailed to the director of Sponsored Research.

Submitting a protocol application to the APU Institutional Review Board (IRB) is an important component for research that involves human subjects. Similarly, APU Institutional Animal Care and Use Committee (IACUC) review and approval are needed if the project includes research with animals. Compliance reviews take time; PD/PIs should plan on communicating with the IRB/IACUC coordinator as soon as they have an idea of the research design. Most proposals will not need review and approval by IRB/IACUC before being submitted. However, draft protocols should be available in the event the project is funded as funding is often conditioned by IRB/IACUC approvals being in place. Information on compliance aspects are included in Appendix VII.

TYPES OF PROPOSALS AND FUNDING AGREEMENTS/CONTRACTS

A proposal is a request for financial support for a research project or training program. The proposals (funding requests) are classified as follows:

- **Solicited Proposal**: This proposal is submitted in response to a request (Request for Proposal: RFP or Request for Application - RFA) by a funding agency for research, training or program grants.
- **Unsolicited Proposal**: An unsolicited proposal is a proposal on a subject of interest to the faculty member who makes it, which the targeted funding agency may find of interest as well because it is on a topic that might be deemed as priority.
- **Pre-Proposal**: In some instances the funding agencies require an initial simpler proposal and if selected, the institution will be invited to submit a full proposal. Other terms used for this type of submission (especially for foundation grants) are: Letter of Inquiry Intent (LOI), Phase I application, Online Funding Inquiry.
- **Renewal**: This type of submission is usually a competing renewal for additional funding for a project that is currently funded but the period of performance is ending. Competing renewals generally include new work based on the results of the existing grant (subject to peer review).
- **Resubmission**: This is usually a proposal that has been reviewed before. The updated application should include revisions in response to critical comments from initial reviewers.
- **Revision**: A revision is a request to an agency for additional support for an existing project to expand the project's scope or to meet unforeseen expenses. A revision may be submitted to request support for a significant expansion or a project's scope or research protocol. An administrative revision, also known as "supplement", is a request for additional funding to cover the increased costs that are within the scope of the approved application (on the condition that the new costs were not foreseen when the new or competing renewal application was submitted).
- **Continuation**: This is a non-competing request for additional funding. The application is not subject to peer review.

Grants, contracts, cooperative agreements, and gifts are the major types of extramural funds that the university can acquire. The funding proposals that are generally awarded after a competitive review process, also known as **Sponsored Projects**, are subject to routing through APU Office of Research and Grants. The following are included:

- **Grant.** This is the instrument for providing support for a specified purpose initiated by the applicant that falls within the guidelines and priorities of the funding agency. Grants are defined as funding provided in exchange for the recipient performing a specified activity (scope of work) within a certain amount of time, such as conducting a program, research project, or training project. A sponsored grant (often just

referred to as grant) is typically formalized in a written agreement that is legally binding with regard to budgetary restrictions, agreements for cost-sharing, reporting, and other stipulations. Extramural sponsors include federal, state and local agencies, foundations, other nonprofits, and corporations.

- **Contract.** This is the instrument by which entities/recipient institutions are considered a contractor/vendor when they provide goods and services within normal business operations and operate in a competitive environment. Contracts are defined as funding based on specific deliverables and milestones being met and guide how the contracting parties will interact with each other. Contracts are usually designed to benefit the sponsor.
- **Cooperative Agreement.** This is an undertaking in which the program, research or training project is jointly administered by the sponsor/funding agency and the recipient institution. This mechanism is distinguished from a grant in that it provides for substantial involvement between the federal awarding agency or pass-through entity and the non-Federal entity in carrying out the activity laid out in the federal award. Cooperative agreements are defined as legal instruments of financial assistance between a federal agency and a non-federal entity with the expectation of substantial involvement from the federal agency in carrying out the project scope of work.

A gift/donation is a unilateral transfer of money, property, or other assets from a donor to the recipient, usually has fewer constraints than a sponsored program/grant. The gifts and donations are processed through the Office of University Advancement and they are outside the purview of this handbook. If unclear on the type of funding request, PD/PIs should contact the Office of Research and Grants to discuss and clarify whether the proposal will result in a sponsored program/grant, contract, or gift.

A proposal is a request for financial support for a research or program/training grant. The proposals can be solicited or unsolicited, new applications, renewals or resubmissions, and so on. It is important to correctly identify the types of proposals.

PLANNING AND DEVELOPING THE IDEA

Planning is the key to attracting financial support for a project as the most commonly cited reason for not writing a proposal is the lack of time. A competitive proposal may take several months to plan, develop, and submit to a funding source. The key to securing funding is to begin planning well in advance of the submission deadline because successful proposals are typically those that are carefully planned and written. The following three steps will assist in this process:

Step One: Take a vague idea and identify a specific problem or need associated with it. Funding sources want to help solve problems, not finance the chasing of ideas. Next, objectives should be defined. It is important to focus on the product, the end result or what it will accomplish, rather than on a need such as equipment or time. Activities should be clearly outlined. PD/PIs should consult with chair, dean, or other persons in supervisory roles to ensure the idea promotes the direction that APU leadership has set.

Step Two: Seek constructive criticism from colleagues, mentors or faculty in other disciplines. Constructive criticism often indicates ways the project and its presentation can be strengthened. Establishing professional collaborations often increase the number of sources for support.

Step Three: The idea should be transferred into a tangible, fundable project. Goals should be broken down into concrete objectives and corresponding activities. A clear timeline and reasonable budget that show the project was thought through increase the chances of the project being funded.
Following are things to consider during the planning process:
- What is the purpose/need and who will benefit from the project?
- What are the goals and activities and how much will it cost?
- What are possible funding agencies/sponsors?

- When is funding needed? (6-12 months before the start is reasonable)
- Will this project be done independently or in collaboration?
- Are matching funds from University or other sources necessary?

FINDING FUNDING OPPORTUNITIES

ORG works with PD/PIs to match research and program ideas to potential funding sources. APU subscribes to funding opportunities databases such as Pivot (pivot.proquest.com). ORG provides tools, training and assists faculty, staff and students in accessing Pivot (Quick Start guide is available at grants.apu.edu/finding-funding). ORG also provides guidance to PD/PIs on narrowing the search requests and helping to identify viable funding sources. In support of finding funding opportunities, ORG publishes a periodical Grant Funding Alert at grants.apu.edu/finding-funding.

The following aspects should be considered when searching for funding opportunities: match (topic, team, budget, and organizational), eligibility, funding conditions. It is also helpful to contact the funding agency to verify the match, eliminate any lack of clarity, and establish rapport with the program officers. ORG can also communicate with the funding agency on behalf of the project team upon mutual agreement between the PD/PI and ORG pre-award team.

PROPOSAL DEVELOPMENT

WRITING THE PROPOSAL

The project narrative should be written such that someone unfamiliar with the proposed project/program can obtain a complete picture of what it plans to accomplish, how it will be accomplished, how it will be evaluated, how much it will cost, how long it will take to accomplish the goals and objectives, and what benefits it will provide. Grant reviewers are often not familiar with the specific academic areas, thus narratives should be written for intelligent, but uninformed, readers.

While PD/PIs are expected to write the grant proposals, the ORG pre-award team is committed to providing feedback on the grant narrative and supporting documentation with the scope to strengthen the application and increase chances of success. Grant writing resources and training are available on the ORG google site (grants.apu.edu).

DEVELOPING THE BUDGET

The majority of grant applications submitted to an external sponsor require a budget explaining the intended use of the funds. A well-planned budget is essential to enhancing the quality of a proposal. If the proposal is successfully funded, the budget will become the project financial plan.

The OMB Uniform Guidance (2 CFR Part 200) streamlines and consolidates federal requirements for receiving and using federal awards. It also clarifies costs principles and audit requirements for federal awards. The university will apply the OMB Uniform Guidance consistently for all awards. When preparing a budget involving federal government grants, keep in mind the government uses uniform procedures in dealing with cost analysis, such as consultant fees, international costs, per diem, and travel. Foundations have more freedom in what projects they fund and how they fund them, but must meet the standards set by the Internal Revenue Service to maintain their tax-exempt status. Most sponsors (federal, state, or private) have well developed

budget guidelines which should be analyzed before starting work on the project budget. The guidelines could include significant details to costs that are allowable or non-allowable, but they could also contain information regarding limitations on budget amounts, percentages, payments, and so on. Only projects closely following the guidelines will have a chance to be funded.

Besides the sponsors' guidelines, all PD/PI should take into consideration the APU policies and guidelines when developing a budget. Budget templates that adhere to APU guidelines and also align with federal and other types of grant submissions are posted on the ORG site (grants.apu.edu/proposal-development).

Direct Costs

The direct costs are expenditures that are directly linked with the project or a specific activity in the project. The following are highlights related to direct costs. This section is not all inclusive and Appendix V should be reviewed for more details:

- Personnel costs include salaries for new and existing positions, salary supplements (including summer salary), faculty buyout (also known as course release), and fringe benefits.

- A reasonable workload should be maintained to carry out university appointments and all sponsored research projects. The Policy on Faculty Compensation from Grants (see list of policies in Appendix III) includes information on institutional salary cap (137.5%), faculty buyout calculation, and other particulars, and it should inform the budget decisions. PD/PIs should explicitly state in the Budget section of the routing application (in Cayuse SP) whether grant funding is intended to underwrite current salary or if it will be considered as overload.

- If the grant application includes faculty buyout or the assignment of units to research, this should be clearly articulated and approved by the faculty member's department chair and dean using the Current and Pending Support form (available at grants.apu.edu/proposal-routing). Similarly, the time and effort contributions of additional faculty members (e.g. statisticians, consultants, translators, etc.) and staff contributing to the project should be explained in the budget justification portion of the grant application.

- Fringe benefits rates are estimated at 26% for full time positions and 10% for part time positions. The rate should also be applied when calculating faculty buyout.

- Travel under all grants should be calculated in accordance with the APU Travel and Business Expense Policy (HR Total Access under APU Forms & Policies).

- Rates for mileage, phone reimbursement, and some other items are assessed annually, and ORG can provide these updates for use in budget estimations.

- Equipment and software are subject to APU Information and Media Technology (IMT) approval. ORG can provide the appropriate rate for use in budget estimations.

- Research subjects' incentives should be modest (check rates used in similar studies) and should be cleared with APU's Human Resources department.

Allowability of costs should be determined early in the process to avoid the need to adjust the budget. For more details regarding the direct and indirect costs, please refer to Appendix V.

Indirect Costs

The university has a federally negotiated indirect cost (F&A) rate of 30% applicable to modified total direct costs (MTDC) base. Unless the sponsor has established a lower indirect cost rate or does not allow any indirect cost charge, all budget proposals should include the indirect cost charge of 30% MTDC. Rare exceptions of indirect costs partial or total waiver may be allowed by request. To request a waiver, PD/PIs need to submit an Indirect Costs Waiver form as part of the online routing process. This form is available on the ORG google site

(grants.apu.edu/proposal-routing). Requests will be evaluated by the ORG executive director. Please refer to the direct costs and indirect costs section in the Appendix V for additional details.

Cost-Share, Matching Funds, and In-Kind Contributions

Institutional contributions (cost-share, matching funds, in-kind contributions) should be included in grant budgets only if the funding agency requires those contributions. Voluntary committed cost-sharing is not encouraged or expected and it usually does not influence the merit of an application (OMB 200.306). If cost-share contributions are included, explicit information, including department fund number, should be provided in the Budget section of the Cayuse SP routing application.

Cost-sharing is defined as any project costs that are not reimbursed by the sponsor to support the scope of work defined by the funding agency (federal or non-federal). As specified in the OMB Uniform Guidance (OMB §200.306), voluntary committed cost-sharing is not expected under federal research proposals, and it is not to be used as a factor in the review of applications. Cost-sharing can be funded by APU or, in some cases, a third party resource. In either case, details related to expected amounts and accounts to charge must be listed in the routing application and clear communication (letters of support in certain circumstances) from the department/school should be provided to justify the claim.

Matching funds are occasionally required as a condition of the award. A synonym term for matching funds is "mandatory cost-sharing". The matching funds must be explicitly stated in the proposal budget sheet and must receive prior clearance from the dean and the Business Office. The matching funds must be documented in pre-award similar to the cost-sharing (see description in the paragraph above).

In-kind contributions represent time, space and operational expenses incurred by the department or the University in support of the proposed project. These funds should be reasonably quantified.

Funding Restrictions

State grants limitations: California state agencies receive part of their funding from the state legislature which responds to societal needs in education, public health, and social services. APU is able to accept awards up to, but not including, $100,000 per fiscal year per state agency in California.

PROPOSAL ROUTING AND SUBMISSION PROCESS

All grant applications are required to go through the APU routing process during which the application passes through review by pertinent University offices and senior administration. The grant routing process is facilitated by the director of Sponsored Research and the pre-award team.

ROUTING THE PROPOSAL

The routing process takes place through the Cayuse Research Suite, specifically Cayuse SP, an online platform available to all APU employees through single sign on at apu.cayuse424.com. The PD/PI or their designated department administrator should start the routing proposal in a timely manner to allow approvals to come through. Details on how to create and complete a proposal in Cayuse SP are provided on the ORG google site.

The proposal should be submitted for routing and dean approval at least ten (10) business days prior to the grant submission deadline (a.k.a. sponsor deadline). Besides the proposal attachments, there are additional forms required at the time of

Cayuse SP
Proposals Quick Start Guide Link

routing submission depending on the particular proposal. The table below outlines special circumstances and forms required at routing submission.

Circumstance prompting additional forms	Form	Required
Project involves research	Potential Conflict of Interest Form	Yes
Faculty salary/course release is included in the project budget	Current and Pending Support Form - Faculty	Yes
Staff salary/buyout is included in the project budget	Current and Pending Support Form - Staff	Yes
Subaward to another institution is included as part of the budget	Subrecipient Information Form	Yes
Indirect cost rate - PD/PI asking to use a lower or no IDC than sponsor allowed rate	Indirect Cost (IDC) Waiver/Reduction	Yes
NIH grant submission	NIH PI Assurance Certification	Yes

As mentioned in Appendix III, all forms are available online at www.apu.edu/researchandgrants/grants/ and https://sites.google.com/apu.edu/grants/proposal-routing.

A more detailed look at the APU grant routing process is included in Appendix IV. The Policy and Process for Grants Handbook Infractions is also in effect and it is included in Appendix I.

Subrecipient Information

Subaward recipient candidates will be asked to submit the Subrecipient Information form, the scope of work, the budget, the budget justification, and biosketches for their project (form available online at www.apu.edu/researchandgrants/grants/). If an agreement contract or MOU are required at the time of the application submission, the Office of General Counsel will conduct a legal review of the proposed contract terms and the authorizing organization representative, ORG, and PD/PIs must review and approve the scope of work and the budget. Review of legal documents could add extra days to the grant routing process, hence the potential subrecipients should be contacted well in advance.

As part of the routing process, the director of Sponsored Research will conduct a subrecipient risk analysis in accordance with the OMB Uniform Guidance 2 CFR Part 200.205. More information on the procedures related to subawards and subrecipients are attached in Appendix VI: Subrecipient Information. After determining the level of risk associated with the subrecipient, the director of Sponsored Research will communicate with the PD/PI and all parties involved regarding the plan of action.

SUBMITTING THE PROPOSAL

Online Submissions

Most funding agencies require grants to be submitted through online portals. APU federal grant applications are always submitted through ORG. APU ORG uses an online system-to-system interface, Cayuse 424/Proposals, for federal grant applications submissions. It is important that PD/PIs consult with ORG regarding a grant application well before the submission deadline. Upon notice of intent to apply, the pre-award team in ORG

will create the application, connect it with the Cayuse SP routing proposal and assist in uploading all required proposal sections into Cayuse 424/Proposals. The interface will not allow a proposal to be submitted if it contains errors. Cayuse Research Suite (including Cayuse 424/Proposals and Cayuse SP) training is available upon request.

The following should be noted:

- While PD/PIs and other grant personnel may upload sections of a proposal on their own, all online grants must be submitted through ORG.

- All grant application materials, including biographical sketches/CVs, the project narrative, budget, and other attachments must be uploaded in Cayuse SP as part of the routing process and they will be transferred by team or ORG in Cayuse 424/Proposals when documents are finalized.

Other applications (state, foundations, private corporations, etc.) are submitted by principal investigators in coordination with ORG only after the routing process is complete and the approval of the application package is confirmed by the director of Sponsored Research.

Other Submissions

- Occasionally, applications are required to be submitted by mail, email, or combination of mail and email. Some funding agencies require communication and submission be done exclusively through the central grants office. Independent of the specific agency requirements, ORG will coordinate the grant submission with PD/PIs or their designated staff.

AFTER SUBMISSION

The pre-award team will attend to any required additional steps following the application submission. This includes providing more requested information, checking and resolving error messages, planning and hosting sponsors' site visits, and communicating with the funding agency.

Just-in-Time (JIT) Procedures

Specifically for NIH submissions, the Just-in-Time procedure allows applicants to submit additional information at a later date in the application process (after the peer review). The application must have an impact score of 40 or less to be considered. Applicants should only submit this information when it is requested by the funding agency.

The JIT package usually includes information on IRB and IACUC approval, other support documentation, certification of Human Subjects Education. More details are provided on the NIH website: http://era.nih.gov/services_for_applicants/application_tracking_and_award/just_in_time.cfm

The director of Sponsored Research will communicate with the IRB to coordinate the submission and review of the IRB study protocol. The principal investigator is expected to complete the IRB application and submit it to IRB in a timely manner. The IRB study protocol will be compared with the study design as submitted in the grant application.

Certain applications might require a Data Monitoring and Safety Plan (DSMP). This will be generated by the principal investigator and reviewed and signed by the APU Research Integrity Officer. NIH provides policies and guidance on DSMPs at the following link: https://grants.nih.gov/policy/humansubjects/policies-and-regulations/data-safety.htm

ORG will also support the principal investigator in gathering the information for the Other Support form and the Human Subject Education, preparing any correspondence that might be required, and uploading and submitting the JIT documents.

Resolution

In the event of Notice of Award, the director of Sponsored Research will coordinate with the director of Grants Management to transfer the application to post-award. More details are specified in the following section on Negotiating and Accepting the Award.

All funding sources have a limited base of support, and because sponsors receive hundreds or thousands of worthy proposals, they cannot possibly fund all applications. In case the grant is not funded, it is recommended that the principal investigator study the reviewers' comments, revise the application, and re-submit the proposal during the next funding cycle. There are often other possible sources of funding. ORG will support principal investigators' efforts to determine other viable funding sources.

POST-AWARD SUPPORT
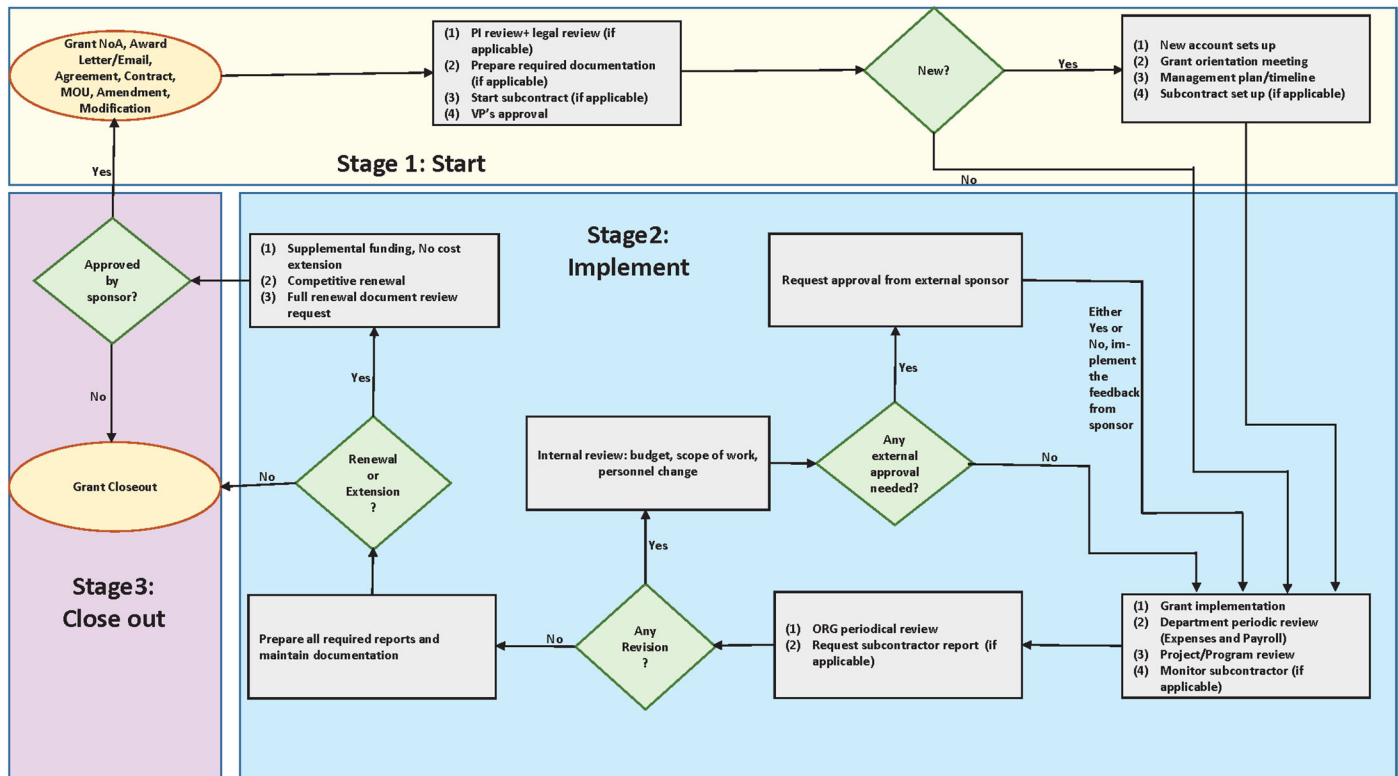
NEGOTIATING AND ACCEPTING THE AWARD

The post-award process starts with a notice of award (NoA) from the funder. Any correspondence, such as award notification letters, from funders should be immediately forwarded to the director of Grants Management for a timely response to the funder from APU. When award payment checks are received, they should be sent to the Grant Accounting manager

Based on the complexity of grant/contract agreement from funders, the director of Grants Management will forward the agreement to the General Counsel for legal review along with a review checklist list. The legal review process takes approximately 10 business days. Communication between APU's and funders' legal counsels will be established if needed.

Concurrently, the director of Grants Management will work with the PD/PI to review the agreement and the awarded budget and project plan to determine if any budget revisions are required or if any terms and conditions need to be addressed with funders. If the awarded program has a grant administrator, the administrator will be included in the team.

With the General Counsel and PD/PI approval, the agreement is forwarded to the Authorizing Organization Representative (AOR) for review and approval. The AOR is the authorized signer for APU. PD/PIs cannot represent APU in signing grant agreements and contracts.

Establish a Restricted Project Account

When the Business Office receives a copy of the contract, a restricted project account will be established. One account may not include funding from more than one funding source. Co-mingling of funds is strictly prohibited and could lead to disallowed costs. Funds for an extension and/or renewal of the same program/project with the same sponsor(s) are, however, not considered co-mingled if placed in the same account and such an arrangement is permissible upon the recommendation of the director of Grants Management.

Grant Management Orientation

The director of Grants Management will host one grant orientation meeting with the PD/PIs. Depending on the complexity of the award agreement, the department chair, department research administrator/support staff /department designee, and Business Office and IMT representatives may also be invited to attend the meeting. The orientation provides the PD/PI and their departments' vital information pertinent to the successful implementation of the grant with topics including:

- Creation of a project management plan/timeline
- PD/PI responsibilities as to grant policies and regulatory compliance, along with reporting expectations
- APU expenditure coding and monitoring
- Guidelines on purchasing, including equipment, supplies, and travel
- Guidelines on hiring both long- and short-term employees funded by a grant, as well as external consultants and contractors
- Subaward monitoring plan, if applicable
- Indirect cost distribution
- Grant management tools such as multiple year financial budgets and expense reports, Cayuse documentation hub, other useful resources found in grants.apu.edu

Setting up Subaward Recipients and Monitoring (as needed)

If subaward recipients are included in the project, an APU subaward recipient contract needs to be prepared.

As a pass-through entity of extramural awards, APU is responsible for monitoring the subrecipient(s) to ensure proper stewardship of the funds. APU is responsible to:

- Inform the subrecipient of all applicable federal laws and regulations and all appropriate flow-down provisions from the prime agreement
- Review the sub-recipients' audit results via the Federal Audit Clearinghouse
- Review any corrective actions cited by sub-recipients in response to their audit findings, where the audit findings are related to APU's awards to the sub-recipients
- Issue a management decision on a sub-recipient's audit findings within six months after receipt of the audit results and ensure the subrecipient takes appropriate and timely corrective action

Details on handling a subrecipient award are found in Appendix VI: Subrecipient Information.

When APU receives a subaward from a prime recipient institution, APU will follow the same process described above in "Negotiating and Accepting the Award." In most cases, APU will need to agree to adhere to the policies of both the prime sponsor and the prime recipient institution.

IMPLEMENTING AND MONITORING AWARDS

PROJECT DIRECTOR/PRINCIPAL INVESTIGATOR (PD/PI) RESPONSIBILITIES

Faculty MUST fully understand their responsibilities as a PD/PI. The PD/PI oversees fiscal and programmatic performance and is responsible for the overall management of the grant. The PD/PI must partner with the Grant Accounting manager and the director of Grants Management to ensure compliance with applicable federal, state, and local regulations. These management expectations include completion of all required reports and submission of in-house documentation (i.e., requests to transfer funds, personnel requisitions, and budget modifications). If the project spending is related to any reimbursement to the PD/PI, the request must have chair/dean approval. All expenses and cost transfers should be well-documented and filed. Furthermore, all grant project expenses should be approved by the PD/PI in advance.

The PD/PI should review and approve all outgoing invoices before the Grant Accounting manager sends invoices to the funder. Additional project and financial management assistance can be found in APU Grants Hub grants.apu.edu.

The PD/PI is responsible for complying with the sponsor and APU's policies and guidelines including training (Responsible Conduct of Research, Conflicts of Interest, IRB and IACUC compliance), effort reporting, inventory reporting, and periodic program and financial reports. Failure to meet deadlines can have a serious impact on the funding stream and future funding possibilities and, in some cases, it can hold up awards of future grants to APU. The Grant Accounting manager is to provide necessary data in a timely way to complete the monthly, quarterly and annual financial reports through PeopleSoft Report Manager. These reports give the PD/PI timely and accurate information to manage their program/project and complete the required financial analysis.

The PD/PI monitors the subrecipient's activities to ensure they fulfill the project goals and all related policies and guidelines. If questions or concerns arise, the PD/PI should contact the director of Grants Management.

The PD/PI may occasionally be asked to work with the Office of University Advancement if foundations or funding source representatives are invited to campus. This could include coordinating a site visit and giving presentations to the funding agency.

More details on roles and responsibilities of different parties are included in Appendix II.

SETTING UP AN IMPLEMENTATION PLAN

Depending on the complexity of the grant, the funder agreement reporting due date, terms and conditions, and approved scope of work, a management plan will be set to keep track of key tasks such as process reports.

External funding projects need to observe both APU and the sponsors' policies and guidelines (see Appendix VII on Compliance). This may raise questions about which policies to follow in the event of conflict. If the contract governing the parties' relationship specifies which institution's policies and procedures take precedent in the event of conflict, the contract should be followed. If the contract is silent, the rule of thumb is to follow the strictest requirements. However, as stated in the General Information section, federal and state laws and rules supersede university policies and university policies, and guidelines supersede school, department or lower unit bylaws, policies or guidelines. The PD/PIs are always encouraged to contact the director of Grants Management or the Office of General Counsel to discuss a specific situation.

Federal and state funding sources set strict policies and guidelines for awardees. The OMB has issued the "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards"

(Uniform Guidance) (2 CFR Chapter I, Chapter II, Part 200, et al.) in December 2013. A copy of the OMB Uniform Guidance can be downloaded from http://www.gpo.gov/fdsys/pkg/FR-2013-12-26/pdf/2013-30465.pdf

Budget

Using the budget submitted with the proposal and any related revisions, the Grant Accounting manager will work with the PD/PI to manage fiscal activity and financial reporting and audit aspects of the project. The Grant Accounting manager is available to answer fiscal questions raised by PD/PIs concerning project expenditures, payroll expenses, indirect costs, etc. The grant budget and actual expenses reports can be downloaded through home.apu.edu.

Any budget revision should observe both APU policy and the sponsor's terms and conditions. For example, some sponsors may only have a percentage budget revision without prior approval from them. Periodical reconciliation by the PD/PI is highly recommended.

Personnel

Personnel are vital to the success of most grants. The process of hiring new positions or reassigning existing positions, and paying faculty/staff within APU need to comply with both the funders' and APU's policies. Recruiting external contractors and consultants needs similar compliance.

Hiring/Monitoring/Paying Contractors/Vendors

Please confer with the director of Grants Management before hiring a consultant or contractor, as employment consideration can vary from grant to grant. All contractor-related forms for grants are listed on the Human Resources webpage. Also, Human Resource forms can be accessed through the APU HR Total Access portal.

To proceed with a new hire, complete a form detailing the external contractor/consultant's credentials and qualifications for the role to be performed in the project, and the purpose of the proposed hire. Follow the procedures listed on the form for approval. More information can be found in Appendix V.

Relatives of PD/PIs and other key grant personnel may not be hired as contractors since that would constitute a conflict of interest.

For policy details refer to APU Employee Handbook through home.apu.edu/ HR Total Access. Click on Everyday Links and choose "Forms" and "Show only Human Resources forms".

Also, click on "Add New Request" under Service Request System and select "Independent Contractor for a non-APU employee" to follow the instruction to submit the request.

Purchase, Reimbursement, and Travel

After PD/PIs develop management plans and budgets, they can start spending awarded funding within the conditions allowed by the award contract. It is emphasized that grant awardees need to follow both sponsors' and APU's policies and procedures. Sponsors usually list their requirements in the call for proposal, award letter, and grant agreement.

Depending on each school/college structure, a school/college/department grant support staff may be available to assist the PD/PI with purchase, travel, and reimbursement requests through the project account. The PD/PI or support staff members follow APU policies to process payment and reimbursement and can contact the Grant Accounting manager or director of Grants Management with questions. All requested expenses need to be reviewed and approved by the PD/PI, and in some cases, by the dean as well.

It is crucial to document how project expenditures benefit the project. Without reasonable justification and correct approval, requests for payments may not be processed. One suggestion: When spending for a grant, PD/PIs should consider how to complete the following, "This purchase or use of funds is necessary and beneficial to the grant because . . ."

The grant.apu.edu google site includes grant related forms and policies related to purchases, travel, and reimbursement. The policies and guidelines include those from both APU and major federal funding sources. PD/PIs should be familiar with allowable and unallowable costs for their projects.

There are four helpful rules to follow. Costs must be:

(1) **Reasonable** (using the prudent person test),
(2) **Allocable** (using the proportional benefit and the interrelationship rules),
(3) **Consistent** and treated uniformly in like circumstances, and
(4) **Allowable** with any limitation or exclusion in the agreement.

These rules can be reviewed during the grant management orientation. Questions may be directed to the director of Grants Management.

Grant funds cannot be used as replacement funds for the department's operating budget. In most cases, that is considered to be "supplanting" which is not allowed. Grant funds should ONLY be used for expenditures and purchases related to the specific grant for which they are designated. Check with the Grant Accounting manager and the director of Grants Management if there are any questions or doubts.

When APU purchasing cards (Wells Fargo, Catering cards, Amazon business cards and Office Depot cards) are used for a sponsored project payment, the PD/PI and support staff members should ensure the university credit card transaction is allowable by the sponsor and by APU policies. All related backup documents should be filed with all project-related expense documents. Any unauthorized expenses will be transferred to the department or the university credit card holder's personal liability. If the PD/PI or the department have questions about the use of a university purchasing card for certain sponsored project expenses, they should consult with the Grant Accounting manager in advance.

Additional details on spending procedures are found in Appendix V.

Computer Purchase

Computer purchases should be pre-approved by IMT before proposal submission as part of the application routing process using the Cayuse system. If a computer purchase is requested after a grant is awarded, PD/PIs should contact the director of Grants Management to consider if it is allowed by the funder, if it is possible budget-wise, and if so, how to adjust the budget. The director will also assist in coordinating the purchase request with IMT.

Purchasing Equipment and Non-Common Items

Purchases of equipment and non-common items need prior approval by both APU and the sponsor. APU approval is usually done through the Cayuse proposal routing (pre-award) online process. After full execution of an agreement, fund re-purposing plans need consultation with the director of Grants Management and then submission to the sponsor to obtain their approval.

Travel

Travel arrangements that will be paid by a grant need to be written into the project budget and approved before travel commences. PD/PIs need to ensure they follow the procedure on the form to get all needed approval signatures before travel. Refer to Appendix V for more information.

Expenditure Monitoring

Account expenditures should be reviewed periodically to identify under- or overspending and errors. The grant budget and actual expenses reports can be downloaded through home.apu.edu. The report is updated daily and the PIs and any grant designated personnel can access the report through APU's single-sign-on (SSO) system. Assistance with SSO access can be requested from the director of Grants Management if necessary. A regular meeting with the director of Grants Management will be scheduled to review expenses, cost-sharing, payroll

redistribution, subaward management, and project income and revenue reconciliation. The Grant Accounting manager, who works on indirect cost recovery reconciliation and prepares invoices for income and revenue collection and fund drawdowns, will join these meetings as needed.

Equipment and property purchased using grant funding needs to be inventoried. The Business Office maintains an inventory log for all equipment and properties. Transfer and disposals need to be properly documented. Per OMB 2 CFR 200.313 (d) (2), a physical inventory of property purchased from federal grant funds must be taken and reconciled with the property records at least once every two years. In accordance with OMB 2 CFR 200.303, APU has an effective internal control in compliance with the Committee of Sponsoring Organizations of the Treadway Commission's Standards for Internal Control in the Federal Government pertinent to Federal awards and any pass-through Federal awards.

Cost Transfer involves a transfer of an expense from a non-federally funded account to a federally-funded sponsored award or vice versa. The process requires prior institutional approval. In accordance with OMB, PD/PIs should explain and justify transfers of charges to sponsored awards when the original charges were previously recorded elsewhere on APU's general ledger. Timeliness and completeness of the explanation of the transfer are important factors in supporting allowability and allocability in accordance with federal requirements.

Cost-share Monitoring

Any mandatory and voluntary committed cost-share commitment budgeted in the awarded proposal should be documented and monitored.

Reporting

PD/PIs should attend to all required reporting deadlines such as financial reports, performance reports and non-competing continuation reports. Some sponsors have templates or preferred formats for their grant reports. PD/PIs can work with the school or department grant staff team, where available, the Business Office, and the director of Grants Management to complete reporting functions.

Funder Site Visit and Evaluation Team Visits

Depending on sponsors' policies and requirements, there may be a sponsor site visit during which a sponsor learns more about a project's progress, success, and continued potential. In some rare cases, the sponsor may conduct an audit. When a PD/PI receives notification about an impending visit, the director of Grants Management should be notified immediately. Working as a team, the PD/PI, the director of Grants Management, and the Grant Accounting manager will develop a visit agenda, identify the individuals to be included, and determine locations to be visited. If the sponsors are foundations, the Office of University Advancement will usually join in.

A project evaluation is similar to a site visit, but it is more complex and is directed by the sponsor. Sponsors will instruct PD/PIs as to what they want to see, the topics to discuss, and whom they want to meet. The focus will usually be on deliverables, outcomes, objectives, and impact of the project. Sponsors may also ask for information on other APU grants in order to evaluate prospects of partnering on other research projects.

Audit Preparation

Making preparation for audits, either internal or external, is an important responsibility of PD/PIs. PD/PIs should keep a copy of project-related paperwork for audit purposes. APU will perform periodic audits of externally funded projects to ensure compliance with policies. PD/PIs and their teams must cooperate fully in all such internal audits.

Copies of the contract should be available in ORG. Expenditure reports should be available from the PD/PI and the Grant Accounting manager. Human Resources records should be accessed directly from the Human Resources department and the Payroll department as necessary.

Media Communication

University Relations should address any media requests about the grant. PD/PIs and their grant teams should observe any terms from funders on announcing grant-related events, products, and public communication.

Policy and Guideline Compliance

Externally funded projects need to observe both APU and the sponsors' policies and guidelines (see Appendix VII on Compliance). Questions may arise on which policies to follow in the event of conflict. If a contract specifies which entity's policies and procedures take precedent in the event of conflict, the contract should be followed. If the contract is silent, the general guideline is to follow the strictest requirements. However, as stated in the General Information section, federal and state laws and rules supersede university policies, and university policies and guidelines supersede school, department or lower unit bylaws, policies or guidelines. PD/PIs are encouraged to contact the director of Grants Management and the Office of General Counsel to discuss specific situations.

Federal and State funding sources set strict policies and guidelines for awardees to follow.

The Office of Management and Budget (OMB) has issued the "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" (Uniform Guidance) (2 CFR Chapter I, Chapter II, Part 200, et al.) in December 2013. The OMB Uniform Guidance supersedes and streamlines requirements from eight OMB circulars, A-21, A-87, A-110, A-122, A-89, A102, A-133 and A-50 into one documents. A copy of the Uniform Guidance can be downloaded from http://www.gpo.gov/fdsys/pkg/FR-2013-12-26/pdf/2013-30465.pdf

For National Science Foundation (NSF), a copy of the Grant Policy can be downloaded from http://www.nsf.gov/pubs/manuals/gpm05_131/gpm05_131.pdf

For National Institutes of Health (NIH) projects, the policy manual can be found in http://grants.nih.gov/grants/policy/nihgps_2012/index.htm.

For U.S. Department of Health and Human Services (HHS), the grant management guidance is available for reference at https://www.hhs.gov/grants/grants/grants-policies-regulations/index.html.

APU follows federal and state policies, rules, and guidelines.

Collaborative Institutional Training Initiative (CITI) and Responsible Conduct of Research (RCR) training

All APU researchers are encouraged to participate in the online Collaborative Institutional Training Initiative (CITI) training at https://www.citiprogram.org/. Details regarding APU's Responsible Conduct of Research (RCR) program are found at http://www.apu.edu/researchandgrants/training/.

National Science Foundation (NSF), National Institute of Health (NIH), and USDA National Institute of Food and Agriculture (NIFA) require researchers and their teams (including students) supported by funding from these entities to complete RCR training. Some components of RCR may be done online, but there are required face-to-face parts as well. The objectives of RCR training are to:

- Encourage best practices in the conduct of research and scientific investigations
- Foster an ability to recognize an ethical choice and the ability to make a principled decision
- Provide accessible educational opportunities and resources designed to help students and postdoctoral researchers meet the America COMPETES Act section 7009 requirements

APU provides RCR workshops for faculty, staff, and student participation as needed. Contact the director of Grants Management with any questions.

Effort Reporting

Effort reporting is a federal compliance requirement. The Uniform Guidance 2 CFR 200 Subpart E §200.430 contains the federal regulatory requirements for internal controls over certifying time expended on sponsored projects. Details are provided in the Business Office Grants Internal Control Policy which can be found at: https//hrtotalaccess.apu.edu/hr/totalaccess/index.cfm?switch=megaForm&cal=t&docfamily=Business%20Offic e&category=Policy.

Conflict of Interest (COI) Training

Investigators and key research personnel on federal Human Health Services (HHS), Public Health Services (PHS), and NIH awards must complete COI training prior to engaging in funded research. Potential Conflict of Interest (PCOI) disclosure forms need to be completed by all personnel, including students, on federally funded research projects. In the case of federally-funded research, covered individuals must verify potential conflicts of interest at least annually.

The Policy and Process for Grants Handbook Infractions is also in effect and included in Appendix I. Additionally, all procedures on disclosures and management of conflict of interest are included in Appendix IX.

The reader is referred to the APU Employee Handbook for COI policy details.

MANAGING AND PREPARING CHANGE REQUESTS

During the grant period, changes may occur unexpectedly and may prompt the need for a no cost extension, budget revision, carry forward request, change of key personnel including investigators, and change in scope of work. As soon as those changes are identified within the school internal grant team, the director of Grants Management should be notified so as to work with the grant team on preparing the change request and submitting it to the funding agency, if necessary. The Office of General Counsel may be involved in the process. The change request package should be reviewed, approved, and signed by the authorized organization representative (AOR). If there is a desire for renewal or extension, the director of Grants Management and the Grant Accounting manager will work with the PD/PI on the renewal request.

CLOSE-OUT

PD/PIs should allow time to prepare final reports before the grants close-out date. PD/PIs will review research outcomes and compare them to the project plan and goals in preparing a final report and submitting it to the director of Grants Management prior to the reporting deadline. The quality of the report is important as it may impact chances for future funding for the PD/PIs and for APU.

The Grant Accounting manager works with the PD/PI and department assistant (designee) to ensure all allowable expenditures/purchases and costs shared are timely and accurate. At this time, final indirect costs recovery income entry should be performed, all expenses should be reviewed and any unallowable expenses should be identified and corrected. After the final review, no more purchases or expenses should be added into this account anymore.

Depending on the sponsor's requirements for invoicing and financial reports, payroll and non-payroll expense details may need to be submitted along with the final invoice or drawdown. For accounts with direct cost encumbrances, encumbrances should be clear and be reported on the final invoice as a work-paper adjustment. If the project has cost-sharing, final cost-share reconciliations should be performed.

For any non-cost-reimbursable agreements, (e.g., fixed cost contracts where the contractor pays a set amount regardless of the ultimate cost to complete the project), any expenses not covered by the grant must be covered

by a non-restricted account. If the agreement states any remaining balance after all indirect costs have been transferred should be returned to the sponsor, the residual amount (grant receipt exceeds expenses) will be sent back to the sponsor. If the contract states that there is no need to return excess funding, the remaining funds will be moved to the school or department restricted research account, according to the school's policy and the dean's decision.

After all required reports and adjustments are resubmitted, the account will be closed out. All grant files should be copied into the Cayuse SP portal. The PD/PI and his/her department, should also maintain the project files. The official grant file may be in electronic or paper format, or a combination of both. The file should include all significant records pertaining to the grant. These records should include, but not be limited to, the complete application, summary of review actions, award notices, progress reports, financial records, audit records, official correspondence, all compliance certificates and forms, closeout documents, and other supporting and related papers.

With sponsored project records, APU follows Federal rules and policies regarding record retention. Per the Office of Management and Budget (OMB) 2 CFR 200.333-337, sponsored project related files must be kept for at least three (3) years from the date of the final financial report being submitted. However, some sponsors may require records to be retained for more than three years. With multi-year grants, the three-year period starts when the final report is submitted at the end of the grant. For more information, see APU's Record Retention and Destruction Policy.

APPENDICES

APPENDIX I
POLICY AND PROCESS FOR GRANTS HANDBOOK INFRACTIONS

The policies and procedures described in the Grants Handbook are to promote smooth and efficient grant application and implementation and to protect researchers and the University. It is, therefore, vital that faculty and staff adhere to the policies and procedures in this handbook. Violations will be managed through the process detailed below. Issues pertaining to academic misconduct, academic integrity, conflicts of interest, and whistleblowing are managed through those specific institutional policies.

In the event of an alleged violation of this handbook's policies, the executive director of the Office of Research and Grants (ORG) will contact the faculty or staff member as soon as possible in an effort to resolve the matter informally and to clarify any misunderstandings that may have led to the violation. It is anticipated that most violations will be resolved through informal dialogue without the need for a formal inquiry, official warning, or subsequent sanctions.

If resolution is not reached through an informal process, the ORG executive director will initiate an inquiry by notifying the faculty or staff member in writing of the alleged violation within five (5) business days. The inquiry will provide an opportunity for the faculty or staff member to respond in writing and to meet with the executive director to discuss the allegations and explain why no violation occurred. The executive director may also meet with others who have information relevant to the inquiry. The executive director will draft a report documenting findings, which will be provided to the faculty or staff member, her/his program chair and dean, and Office of the Provost within 15 business days of the meeting with the member. If a violation of handbook policies is found, the report will include an official warning/reprimand to the faculty or staff member and/or recommendation to the dean as to sanctions that are appropriate to the severity of the violation. Sanctions for intentional, serious, or repeated violations could include the return of awarded monies, suspension of research, and forfeiture of application privilege for subsequent grants. In the most severe cases, following procedures outlined in the Faculty Handbook, non-renewal of the faculty's employment contract or termination of employment may be pursued.

The dean will have ten (10) business days to decide on any recommended sanctions. If the dean follows the recommendation or imposes other sanctions, the faculty or staff member may appeal within ten (10) business days to the Office of the Provost for provost or designee consideration. Nothing herein shall be construed to limit any rights of faculty under the Faculty Handbook (e.g., in the case of termination of employment or non-renewal of contract, the only appeal mechanism will be through PARB as detailed in the APU Faculty Handbook).

APPENDIX II
ROLES AND RESPONSIBILITIES

From identifying a grant (or contract) opportunity to writing, submitting, and managing the grant, the process is coordinated among various APU administrative departments and academic schools, colleges, and departments.

BUSINESS OFFICE

The Business Office is responsible for maintaining official fiscal records, including expenditure documents for all grant projects, and typically maintains records for three (3) years following the end of a grant period. The Grant Accounting manager in the Business Office maintains copies of all grant agreements and creates a cost center to track all fiscal activity for each grant. The Business Office must approve grant budgets prior to submission to the funding agency.

The Business Office, in conjunction with the relevant department deemed appropriate, administers all funds awarded in response to authorized institutional applications. All University grant projects must comply with pertinent federal Office of Management and Budget (OMB) guidelines, (OMB Circulars A-21, A-110, OMB Uniform Guidance 2 CFR 200), on file in the ORG and the Business Office, and posted on the ORG website: https://www.apu.edu/researchandgrants/training/policies/.

OFFICES OF THE PROVOST AND PRESIDENT

APU's authorizing organization representative (AOR) is designated by the provost. The AOR acts on behalf of the provost to enact all required grant related approvals, including grant submittals and, in consultation with the Office of the General Counsel, grant awards, contracts, and subawards.

The president appoints the university's research integrity officer (RIO) and institutional official (IO). The RIO is to ensure APU's compliance with the governing regulations and has the authority to (i) establish and implement APU's policies and procedures on research misconduct, and (ii) sign APU's institutional assurance with the federal Public Health Service (PHS). The RIO responsibilities also include providing oversight to the Committee on the Conflict of Interest. The IO is charged with appointing members of the IRB and IACUC and whose responsibilities include working with these bodies to ensure institutional compliance with regulations and best practices pertinent to research involving human and animal subjects.

OFFICE OF RESEARCH AND GRANTS

The Office of Research and Grants (ORG) will provide guidance and support as follows:

> **PRE-AWARD.** The director of Sponsored Research assists in the preparation, routing, and submitting of grant applications through APU's approval system and to federal and private funding source systems. The director of Sponsored Research also coordinates grant searches and grant submittals with schools/colleges, departments, faculty, and when appropriate, the Office of University Advancement.

> **POST-AWARD.** The director of Grants Management and team assists APU faculty members and researchers in implementing their sponsored grants and contracts and in complying with APU and sponsors' regulations and policies.

> **INSTITUTIONAL REVIEW BOARD (IRB).** IRB is responsible for reviewing and providing a resolution for all studies and research activities involving human subjects. PD/PIs submit applications to the IRB coordinator. The IRB meets monthly. For multiple-year research grant projects, annual IRB renewal should be filed, as needed.

INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE (IACUC). IACUC is responsible for reviewing and approving all studies and research activities involving animal subjects. PD/PIs should submit applications to the IACUC coordinator.

OFFICE OF UNIVERSITY ADVANCEMENT

The Office of University Advancement, in addition to its work with donors and alumni, has the task of seeking funding to support building projects, endowed chairs, scholarships, and special projects. All grant requests to private foundations and organizations must first be approved by Advancement. ORG and Advancement work closely together on identifying potential private sources for grants.

OFFICE OF HUMAN RESOURCES

The Office of Human Resources (HR) serves the APU Community in a variety of capacities from recruiting highly qualified employees to coordinating benefits and providing workplace learning. All grant related hiring of employees and independent contractors must go through the HR process (see Appendix VIII) to ensure all applicable labor laws are fulfilled.

PROJECT DIRECTOR/PRINCIPAL INVESTIGATOR (PD/PI)

PD/PIs are responsible for the grant writing and preparation, and they are to work closely with the ORG director of Sponsored Research to coordinate the application routing and submission. In the post-award phase, PD/PIs are responsible for the overall management of the grant, and they must partner with the Business Office and the ORG director of Grants Management to assure compliance with applicable federal, state, and local regulations, completion of all required reports, and submission of all in-house documentation (i.e., requests to transfer funds, personnel requisitions, and budget modifications). PD/PIs are accountable for ensuring that the project is conducted as described in the proposal and that project goals are met. PD/PIs also maintain required records dealing with grant execution and achievement. Records should be organized such that individuals unfamiliar with the project can easily review them.

OFFICE OF THE GENERAL COUNSEL

The Office of the General Counsel provides quality legal services in support of APU's mission by representing and advising the university on a broad range of legal matters. On grant and contract related activities, the General Counsel reviews and approves all memoranda of understanding (MOUs), grant awards, subawards, and contracts. The Office of the General Counsel also performs risk management assessment and assists with ensuring appropriate insurance coverage is obtained, where needed, and with any investigations or audits of grant activities and expenditures.

INFORMATION AND MEDIA TECHNOLOGY (IMT)

The chief information officer (CIO) reviews grant applications regarding equipment, computer hardware, and software purchases. The CIO also considers space arrangements to ensure proper support and service. All university computer hardware (including external funded grants) should be purchased through IMT.

DEPARTMENTS

PD/PIs and their deans must authorize the routing of a proposal in Cayuse SP before the proposal can proceed through the APU approval system. Department chairs and grant administrators, if any, often work with the PD/PIs to develop budget line items; determine the use of time, space, and equipment to conduct grant activities; and in some cases, to provide fiscal and program oversight to the project. Department grant administrators or other staff should support the program PD/PIs with any administrative responsibilities such as purchasing, hiring, and travel reimbursements and grant activities in general.

APPENDIX III
FORMS AND POLICIES

APU is responsible to be a good steward of grant funding thus, in the grant lifecycle, all processes, commitments and expenses should be clearly justified showing benefits to the projects. All relevant forms, policies and procedures are listed below.

FORMS

Pre-Award

Proposals including research activities
- Potential Conflict of Interest Form

Proposals including budget for faculty and staff effort
- Current and Pending Support (CPS) Form: Faculty
- Staff Grant Commitment

Proposals including subrecipient(s)
- Subrecipient Information Form

NIH Proposals
- NIH PI Assurance Certification Form

Proposal requesting indirect costs waiver/reduction
- IDC Waiver/Reduction Form
    Access all forms listed above at grants.apu.edu/proposal-routing/routing-forms.

Post-Award

Agreement
- Amendment
    - Supplemental Information Form

Access the form at grants.apu.edu/award-project-management/milestone-management

Project Management
- Subrecipient
    - Sub-recipient Information Form
    - Sub-Recipient Monitoring Form

Access the 2 forms at grants.apu.edu/award-project-management/sub-recipients-management

Financial Management
- Expense Monitoring
    - Grant Financial Multiple Year Report (Need access approval)
- Payment Management
    - Paying Individuals (APU employees and Non-APU employees)
    - Payment Services
    - Reimbursement Forms and others
- Income Processing and Management
    - Deposit Forms

Access all financial forms listed above at home.apu.edu.

POLICIES

Research Policies

- Policy on Integrity in Research
- Policy for Conflicts of Interest in Research
- Whistleblower Policy
- Whistleblower Protections in Federal Grants and Contracts

Access all policies listed above on the ORG google site at grants.apu.edu/grants-policies-and-procedures)

Grants Policies

- Policy on Faculty Compensation from Grants
- Policy and Process for Grants Handbook Infractions

Access all policies listed above on the ORG google site at grants.apu.edu/grants-policies-and-procedures)

- Policy for Fringe Benefits from Grants
- Grant Property and Inventory Management Policy
- Grant Property and Inventory Management Procedure and Workflow
- Grants Internal Controls Policy

Access all policies listed above on APU HR Total Access.

General Policies and Procedures Relevant for Research Administration

- Policy and Procedure for Expense Reimbursement
- Travel and Business Expense Guidelines and Procedures
- Purchasing Policy and Procedures
- Payroll Policy and Procedures
- General Accounting Policy: Overview
- General Accounting Policy: Accounting for Financial Transactions
- General Accounting Policy: Accounting System Maintenance

Access all policies listed above on APU HR Total Access.

APPENDIX IV
PROPOSAL ROUTING PROCESS

The APU Office of Research and Grants (ORG) assists faculty and staff with grant inquiries, grant submittal, grant resubmittals, ORG-initiated grant efforts, grant resources at APU, and grants management and administration. For more information about grants and resources available through ORG at APU, please see grants.apu.edu.

The Grant Routing Process – Some Variance Could Occur on Case-by-Case Basis

Pre-Routing	**Step 1**: The APU internal proposal routing begins 10 business days before submission deadline. Prior to routing, Project Director/Principal Investigators (PD/PIs) would have discussed the grant with their department chair and dean/VP-level supervisor and worked with ORG to maximize the prospect of an excellent proposal being submitted. During this pre-routing (and sometimes during routing), areas of support from ORG are in: - Providing a *Fast Facts Sheet* that identifies key application requirements, including number of pages, key budget guidelines, and cost-sharing requirements; - Providing resources in developing the budget and budget justification; - Identifying compliance or legal issues; - Checking internal consistency of narrative; - Checking consistency of narrative against requirements from funding agency; - Obtaining and reviewing the sub-recipient information form (if applicable); - Identifying any cost-sharing commitments which may require PI to communicate with the dean or responsible administrative persons for approval; and - Providing guidance for use of online routing system Cayuse SP (apu.cayuse424.com). PD/PI is responsible to create and fill out the online routing application except for the Authorizing Units section, which will be filled out by ORG.
10 Business Days	**Step 2**: The routing process begins 10 business days before submission deadline. Routing starts with the dean/VP level supervisor approval in the Cayuse online portal. The proposal should be in a *reasonably complete* form as follows: - Narrative is close to final. Revisions would not include significant changes to the proposed program unless there is prior notification to ORG. - Budget and budget justification are complete. Subsequent adjustments made pending ORG review to ensure consistency with RFP requirements and APU policies. - All attachments, including any MOU's, are present. - ORG will contact the PI immediately if any documents are missing.
10-5 Business Days	**Step 3**: ORG will guide the routing process by seeking approvals from APU departments (Business Office, IMT, General Counsel, Advancement, Financial Aid, etc.) depending on the nature of the proposal. ORG commits to an initial review and response in writing within 48 hours. If applicable, a subrecipient risk analysis will be performed by ORG. ORG will also contact the PI with feedback generated by different APU departments as routing proceeds.
5 Business Days	**Step 4**: Five business days before submission deadline, PI provides a final and complete application. ORG audits for APU and RFP consistency and compliance. Application should be uploaded into appropriate online format (Cayuse, or other). **On a case-by-case basis, further submission details can be discussed at this time.** Further revisions only made as result of ORG routing review.
2 Business Days	**Step 5**: Two business days before submission deadline, no additional changes without ORG Executive Director approval. The two days prior to submission provides APU senior administration the opportunity for final review of the proposal. Submission will be done as soon as the application is approved.

APPENDIX V
DIRECT AND INDIRECT COSTS

DIRECT COSTS

All APU expense categories are described on the Grants website. Please review any unallowable cost categories. If any uncertainty whether the funds can be spent in specific areas or not, PD/PIs should check with the Grant Accounting manager or the director of Grants Management.

Personnel

Time commitments and teaching reassignments for faculty members involved in external grant activity must be consistent with pertinent university policies. PD/PI should communicate with department chair or supervisor on time commitments.

Faculty/Staff Salaries

All salary requests must be made in accordance with the sponsor's Request for Proposal (RFP) budget guidelines. Salaries for faculty must also be consistent with the Faculty Handbook including overload limits. Faculty stipends for an academic semester can be counted as overload or underwriting current salary, and may be calculated based on the current adjunct/overload teaching rate. Department chairs and deans must approve all faculty compensation from grants.

1. <u>Salary Cap</u>. To incentivize grant applications, faculty members may request up to 37.5% of potential additional income based on a regular 12-month salary when applying for grants that include salary. For more details see Appendix III for link on the Policy for Faculty Compensation from Grants. NIH and NSF have their rules pertaining to salary cap and limitation on number of months of salary allowed.
2. <u>Approval for Course Buy-out or Overload Pay.</u> Faculty buyout and/or overload from grants must be approved by the department chair and dean before a grant application is submitted. Grant applications must clearly state whether salary income from grants would create a course buy-out situation, or would entitle the faculty member to be paid in addition to their regular salary. For more details on the calculation of the buyout rate, see Appendix III for link on the Policy for Faculty Compensation from Grants.
3. <u>Supplemental Pay from Grants for non-PIs</u>. Pay for supplemental hourly services for faculty on grants should follow the established rates for adjuncts. For more details, see Appendix III for link on the Policy for Faculty Compensation from Grants.
4. <u>Administrative and Clerical Salaries on Federal Awards</u>
    a. APU must comply with the federal regulations in the Cost Accounting Standards (CAS) and the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR 200, (Uniform Guidance). The Part 200.413(c) states that "the salaries of administrative and clerical staff should normally be treated as indirect (F&A) costs."
    b. However, the Uniform Guidance does provide for criteria that, if met, can justify inclusion of administrative and clerical salaries as direct charges on federal awards. Therefore, administrative and clerical salaries should be included as direct charges on federal awards ONLY when they meet the Uniform Guidance criteria and definition of "unlike purpose or circumstance."
    c. The Uniform Guidance allows for direct-charging of administrative and clerical salaries if and only if all of the following four conditions are met:
        i. Administrative or clerical services are integral to a project or activity;
        ii. Individuals involved can be specifically identified with the project or activity;
        iii. Such costs are explicitly included in the budget and/or have the prior written approval of the Federal awarding agency, and

iv. The costs are not also recovered as indirect costs.

Fringe Benefits

Fringe benefits are calculated for all salary lines, except when disallowed by grant guidelines. APU uses an estimated benefit rate of 26% for full time university employees, and 10% for part time employees and student workers. The rates are in accordance with the APU Business Office Fringe Benefits Rates Policy for Sponsored Programs (www.apu.edu/businessoffice/departments/grants/) – also see Appendix III for link. The university-wide rate for the fringe benefits to be used for full time employee is estimated at 31%. The 5% difference relates to faculty/staff tuition discount. The Indirect Costs Agreement negotiated by APU with US DHHS restricts the fringe benefits to retirement, payroll taxes, worker's compensation, health insurance. This indicates that the tuition remission is not an allowable direct cost.

Under Federal awards, fringe benefits are allowances and services provided by the university to its employees as compensation in addition to regular salaries and wages. Fringe benefits include, but are not limited to, the costs of leave (vacation, family-related, sick or military), employee insurance, pensions, and unemployment benefit plans. The costs of fringe benefits are allowable provided that the benefits are reasonable and are required by law, university-employee agreement, or an established policy of the university.

Reference: OMB Uniform Guidance 200.431 Compensation-fringe benefits

Student Employment

Regular hourly student employees may be included in grants, as appropriate. Please refer to the Student Employment Handbook for pay scale and related policies and procedures: http://www.apu.edu/studentemployment/working/

Since payment rates and financial assistance programs for undergraduate student workers and work-study program participants are established on a case-by-case and availability basis, they must be coordinated with the student employment office.

Please refer to the Student Employment Handbook for pay scale and related policies and procedures: http://www.apu.edu/studentemployment/working/

Expenditures

Expenditures for a sponsored project must be in line with the approved budget appearing in the proposal or letter of award. Any changes to the budget and any transfer across line items must be made in accordance with funding source guidelines and discussed with the director of Grants Management and the Grant Accounting manager. Some expenditures will require budget-modification requests. PD/PIs must seek input from the director of Grants Management regarding how to spend or deal with any funds carried over from one funded year to another.

The Grants Accountant must process all grant-related invoices. No invoice generated and submitted to an outside entity by the PD/PIs is considered binding and/or official.

Consultants

When dealing with consultants and subcontractors, please work with the director of Sponsored Research prior to grant submission and the director of Grant Management following the award. Depending on the funding source, there may be a ceiling limit per hour pay for consultant and contractor. No work should be started prior to necessary institutional approvals.

For non-APU consultants, the pay rate determination should be fair and reasonable. If the consultant is an individual, submit the Independent Contractor Determination Worksheet (http://www.apu.edu/humanresources/forms/) to the Office of Human Resources (HR). HR will set up a contract with each contractor.

Faculty consultant and contractor work are based on the percentage of the established annual contract pay rate, and staff members follow their established hourly rates. Additional fringe benefits and payroll taxes will be assessed. An Extra Services Payment Request available through APU's Total Access portal should be submitted with proper approval. All consultant and subcontractor hiring paperwork needs to include the purpose of the hiring and how the service is beneficial to the projects.

All grant-related consultants and contractors should submit invoices for services provided and the project support administrative designee needs to get all the required approval signatures before forwarding to the Business Office.

Under Federal awards, costs of professional and consultant services by persons associated with a particular profession or possess a special skill, and who are not officers or employees of the university are allowable given parameters are met for determining the allowability of costs and that retainer fees are supported by evidence of bona fide services available or rendered (genuine or real services).

Relevant factors for determining the allowability of costs include:
1. The nature and scope of the service rendered in relation to the service required.
2. The necessity of contracting for the service, considering the university's capability in the particular area.
3. The past pattern of such costs, particularly in the years prior to Federal awards.
4. The impact of Federal awards on the university's business (i.e., what new problems have arisen).
5. Whether the proportion of Federal work to the university's total business is such as to influence the non-Federal entity in favor of incurring the cost, particularly where the services rendered are not of a continuing nature and have a weak relationship to work under Federal awards.
6. Whether the service can be performed more economically by direct employment rather than contracting.
7. The qualifications of the individual or concern rendering the service and the customary fees charged, especially on non-federally funded activities.
8. Adequacy of the contractual agreement for the service (e.g., description of the service, estimate of time required, rate of compensation, and termination provisions).

Reference: OMB Uniform Guidance 200.459 Professional service costs

Travel

Travel costs charged to grants and contracts should be reasonable and comply with policies established by APU, federal regulations and sponsoring agency terms. Travel policies vary depending on funding source. The specific terms and conditions of an award should be consulted before making travel arrangements. If there is a conflict between a sponsor's rule and APU's rule, the more restrictive rule applies. International travel is governed by university policy requiring a pre-approval process and post-travel report. Further information can be found at: http://www.apu.edu/generalcounsel/policies/.

Grant-related travel should be approved by the dean/chair to ensure arrangements do not affect day-to-day business. Travel should be completed before the grant termination-period. Only in exceptional circumstances, additional requiring approval from the director of Grants Management may be needed to travel after the end of the grant projects. In these cases, funds must be encumbered prior to the formal conclusion of the grant, including pre-approval from sponsors. Preapproval from sponsors is required for all federal and state funded foreign travel.

Lodging and subsistence

All travel expenses should be considered reasonable and allowable. Federal and state grants follow the per-diem rate system developed by the State Department, which has set an upper limit of related expenses per city and season, https://www.gsa.gov/travel/plan-book/per-diem-rates.

Under Federal awards, costs must be considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the university in its regular operations as the result of the university's written travel policy.

Costs charged directly to the federal award must have documentation justifying that

1. Participation of the individual is necessary to the federal award; and
2. The costs are reasonable and consistent with the university's established travel policy.

Travel costs for dependents are unallowable, except for travel of duration of six months or more with prior approval of the federal awarding agency.

Reference: OMB Uniform Guidance 200.474 Travel costs

Air travel

All grant travel should follow the APU travel policy. Also, federal grant recipients should observe the Fly America Act and Open Skies Agreement with European Union too.

The Fly America Act requires travelers whose air travel is being financed by the federal government to use a United States flag air carrier service for all international air travel when available. The airfare should be the lowest available commercial discount ticket. Also, the European Union (EU) and the United States (US) Open Skies Agreement is in effect too. The EU–US Open Skies Agreement is an open skies air transport agreement between the European Union and the United States.

When the airfare costs exceed the basic least expensive unrestricted accommodations class offered by commercial airlines, these costs are considered unallowable except when such accommodations would:

i. Require circuitous routing (route that is longer than most direct way);
ii. Require travel during unreasonable hours;
iii. Excessively prolonged travel;
iv. Result in additional costs that would offset the transportation savings; or
v. Offer accommodations not reasonably adequate for the traveler's medical needs. The university must provide proper justification for these conditions on a case by case basis in order for the use of first-class or business-class airfare.

Reference: OMB Uniform Guidance 200.474 Travel costs

Auto vehicle travel

As of January 1, 2020, mileage should be calculated at a rate of $0.575/mile.

Food

All catering and food service requests for on-campus APU functions go through banquet services. For rates and more information, go to: https://www.apu.edu/eventservices/.

For planning food costs while traveling, use federal or state guidelines if the funder requires it.

Federal and state awards do not allow food expenses unless the expense has been budgeted in the proposal and is necessary for the project. If business meals are provided, it is essential to document attendance, activities, and purpose.

Computer Hardware & Software

When purchasing computer hardware or software, it is important that both IMT and the Business Office are aware of the order. IMT becomes aware of the purchase when it approves the initial requisition, then once the merchandise is delivered. IMT installs and services it throughout its use. For more detail, review the purchasing policy at: http://www.apu.edu/businessoffice/departments/purchasing/.

Materials and Supplies Costs

Under federal awards, costs incurred for materials, supplies, and fabricated parts necessary to carry out a project are allowable. Materials and supplies purchased must be charged at their actual prices (direct costs), net any applicable credits. Fees associated with transportation of materials and supplies are allowable.

Reference: OMB Uniform Guidance 200.453 Materials and supplies costs, including costs of computing devices

Conferences

Under federal awards, a conference is considered a meeting, retreat, seminar, symposium, workshop or event whose primary purpose is to provide technical information beyond the university and is necessary and reasonable for successful performance under the federal award. Conferences costs, paid by the university as a sponsor or host of the conference, deemed allowable include rental of facilities, speakers' fees, costs of meals and refreshments, local transportation, and other conference related costs. Conference hosts/sponsors must use proper judgment to ensure conference costs are appropriate, necessary and managed in a way that minimizes costs to the federal award.

Reference: OMB Uniform Guidance 200.432 Conferences

All Other Direct Costs

Refer to APU policy and OMB Uniform Guidance 200.102-200.415.

Carry-overs

Funds that are not expended at the end of a year or a grant cycle are not automatically carried over to the next year. Some sponsors request additional support documents submitted prior to carryover approval. Work with the director of Grants Management to ensure carry-over request and submission, as needed. In all cases, project grant guidelines will be followed. Some grants require the return of unspent funds prior to the ending date. PD/PIs may not make requests for a no-cost extension without prior consultation with the director of Grants Management.

INDIRECT COSTS (FACILITY AND ADMINISTRATIVE COSTS)

Based on APU institutional indirect cost policy, indirect cost recovery funding is designed to support and increase external grant activity, thus enhancing curricular development, research and scholarship, as well as outreach by faculty, administrators, departments, centers, and other entities. The policy is aligned with best practices in the field of grants and contracts management at colleges and universities.

This policy will accomplish the following objectives:

- Provide individuals and departments with tangible incentives and rewards for seeking external funding in support of departmental, college and institutional stated missions;

- Enhance APU's competitiveness in seeking additional external funds through matching funds and internally supported pre-award planning activities;

- Cover institutional costs, induced by the granted project, from security and liability to utility costs;

- All indirect costs generated from external sources in support of a given grant award will be allocated as follows:

  - 50% will be directed to the University General Fund, to be used for covering overhead expenses and other hidden costs (space, utilities, technology, etc.).

  - 20% will be granted to the responsible dean and/or department. Use of these funds is subject to the dean's discretion and may include assistance with various school or department administrative costs. A few examples include personnel to complete preliminary research, writing, or editing, expenses for allowable supplies and research equipment not included in the grant application, and overtime clerical help.

- 15% will be placed in a restricted account for the PD/PI. Subject to the dean's approval, these funds can be expended to assist with pilot studies, conference presentations of research (if not included in the initial grant), individual membership dues and other future research and grant development.

- 15% will be placed in a restricted account to be used by ORG to promote grants and research activity at APU.

APU has a 30% federally negotiated indirect cost rate using the total direct cost rate. ORG has a copy of the *Federal Agency Acceptance of Negotiated Indirect Cost Rates* letter. A federal awarding agency may use a rate different from the negotiated rate for a class of federal awards or a single federal award. [Ref: OMB Uniform Guidance 200.414 Indirect (F&A) costs]. All projects should request 30% indirect costs, if allowed, or the maximum amount specified by the funding agency. One should not assume that there are no indirect costs allowed unless it is clearly specified in the funding announcement. If a PD/PI believes there is a need to charge less than the full allowable indirect rate, an Indirect Cost Waiver/Reduction form (see Appendix III) should be submitted. The waiver/reduction request will be reviewed and approved by the ORG executive director.

Where the project in question has incurred tangible, direct expenses not covered by the grant, such expenses are covered by any available indirect costs with the remaining balance distributed as described above.

APPENDIX VI
SUBRECIPIENT INFORMATION

According to the OMB Uniform Guidance (2 CFR Part 200), APU is responsible for assessing the risk and monitoring the subrecipient's programmatic and financial activities. The following is a brief outline of subrecipient related activities:

PRE-AWARD STAGE

- PD/PIs should ask for the Subrecipient Information form (available at http://www.apu.edu/researchandgrants/grants/) and grant application documentation to be submitted by the potential subrecipient. ORG can provide support in that process.
- The director of Sponsored Research will perform a Subrecipient Risk Analysis to determine the level of risk and whether a subaward contract can be issued or not. For more details, the Subrecipient Risk Analysis Tool is available on the ORG site at https://grants.apu.edu.
- If the assessment indicates a subaward is not possible or at high risk, the director of Sponsored Research will communicate with all parties.
- For application submission purposes, ORG will generate the subaward section in Cayuse 424/Proposals.

AWARD STAGE

- Subaward recipient candidates should submit all needed documents to the director of Grants Management the scope of work, the budget, and Subaward Request Form for their project.
- Based on the Subrecipient Risk Analysis done in the pre-award, the director of Grants Management will set up a subrecipient monitoring plan for each subawardee.
- The project PD/PI and the director of Grants Management will review the scope of work and the budget, and prepare an APU contract for subaward for review and approval by the Office of General Counsel and the authorized organizational representative (AOR).
- Depending on the sponsors, a clearance from the sponsor may be required. Sub-recipients need to follow the policies and guidelines of the primary sponsor, as well as of APU guidelines and their own guidelines such as financial reporting and conflict of interest. Review the prime sponsor's agreement and budget to set up the budget limit for the Subrecipient.
- Negotiate and set up Subaward agreement(s) with prime sponsor agreement and monitoring plan. In this stage, the following aspects should be considered:
  - o Subaward end date should be at least 90 days before the prime agreement end date to ensure to include all subawardee's expenses and needed reports in the final report to the prime sponsor
  - o Related portion of the Prime sponsor agreement should be included
  - o List report schedule, invoice schedule and other report requirements
  - o Approved SOW and budget should be included as attachment
  - o Include a term to state that any missing Subrecipient(s) information or late invoice and reports may delay the setup the accounts or payments
  - o Specific audit language and monitoring plan details should also be included
- In compliance with the Federal Funding Accountability and Transparency Act (FFATA), the director of Grants Management will enter the subaward recipient's information into www.USASpending.gov within 60 days of the effective award date when federal funding exceeds $25,000.

POST-AWARD STAGE

- A New Subrecipient Package will be sent and this will include a Welcome Letter, Invoice template/sample, Report template/sample

- Follow Subrecipient Monitoring plan
    - Review spending and programmatic work completion timeline against budget and SOW
    - Review technical Reports, Progress reports and other deliverables such as effort reporting, RCR training, and cost-share report, as needed
    - Follow the guidelines for a Subrecipients submitted invoice review
- Keep Subrecipient Monitoring Action Record
- Take action, if there are problematic Subrecipient issues
- Any issues should be reported to the director of Grants Management
- Send Problematic Subrecipient Letter
- Request an audit, if needed
- Get consultation with the Office of General Counsel

AWARD CLOSING STAGE

- Determine if the subaward agreement can be renewed/revised
- Check the SOW and the final report
- Initiate and remind the sub-recipient the award closing procedure and due date
- Contact subrecipient making sure the final invoice and appropriate final reports submitted to APU within 60 days following the subcontract end date
- Forward the approved invoice to the Business Office for payment within 15 days of the receipt of the invoice
- All necessary records should be maintained

Appendix VII
Compliance

Federal and State Regulations

The University complies with all state and federal regulations, including:

- Title VI of the Civil Rights Act of 1964
- Title IX of the Education Amendments of 1972
- Section 504 of the Rehabilitation Act of 1973
- The Older Americans Act of 1975
- The American with Disabilities Act of 1990
- OMB Circulars A-21, A-110, A-122, A-133
- OMB 2 CFR Chapter I, Chapter II, Part 200, et al. (Uniform Guidance)

Contractual Policy: All contractual agreements between APU and external funders are to be reviewed and approved in accordance with APU contracting policies, including legal and financial reviews of contracts and signatures by authorized institutional persons.

Non-discrimination Policy: Azusa Pacific University does not discriminate on the basis of race, color, national origin, gender, age, disability, or status as a veteran in any of its policies, practices, or procedures.

APU is a private university and is exempt from Federal Income Tax under section 501(c) (3) of the Internal Revenue code. Questions related to tax deductible donations may be directed to the Office of University Advancement.

Ethical Compliance
Responsible Conduct of Research Training

Azusa Pacific University encourages the highest standards in the conduct of research. In order to foster ethical research and to comply with federal guidelines, the university has developed a Responsible Conduct of Research (RCR) program. This program aims to inform and remind faculty, staff, and student researchers of best practices and to prevent conflicts and ethical breaches in ten core RCR areas:

Human Subjects Research	Animal Subjects Research
Authorship	Mentoring
Collaborative Research	Peer Review
Conflicts of Interest	Plagiarism
Data Management	Research Misconduct

All faculty, staff, and student researchers are strongly encouraged to complete the RCR series. One way to do this is by a combination of completing the CITI online RCR modules hosted by the Collaborative Institutional Training Initiative (CITI) and attending two key workshops in person, i.e., the sessions on Research Misconduct and Conflicts of Interest in Research. The APU Office of Research and Grants should be contacted for updates as to when upcoming RCR workshops are scheduled and to request RCR training for a local team of researchers.

While strongly encouraged for all researchers, the RCR program is required for research teams that receive certain extramural funding. Students paid by National Science Foundation grants are required to complete five

(5) hours of face-to-face training in addition to the online RCR modules through CITI[1], and all researchers on National Institutes of Health training grants[2] are required to complete an additional eight (8) hours of face-to-face training. Verification of this training must be submitted to the director of Grants Management. Training for these particular situations must be renewed every three years.

At the discretion of the dean, RCR training may also be required of department chairs, faculty who teach research classes, and faculty with release time for research.

Conflicts of Interest

Project and prospective PD/PIs must take reasonable steps to ensure that applying for a given grant will not constitute an impropriety or conflict of interest for them or for APU. Such situations include, but are not limited to areas of personal or financial gain for the applicant, advantages that could be had by a grant applicant because of personal relationships, and circumstances that might compromise the University's reputation or give the University an unfair competitive advantage. The PD/PUs and other collaborators (including faculty, staff, students, consultants and co-investigators) must submit signed Potential Conflict of Interest (PCOI) forms at the time of grant application routing. The PCOI forms must be renewed annually. New collaborators should complete and sign a PCOI form when they join the project. Additional details are in the APU Conflicts of Interest in Research Policy: https://www.apu.edu/researchandgrants/training/policies/.

Research Integrity

PD/PIs are expected to uphold the highest integrity in data collection, analysis, and dissemination and to avoid every act or appearance of plagiarism. The Integrity in Research Policy, available on the Office of General Counsel website (https://www.apu.edu/generalcounsel/policies/list/), is compatible with expectations of the U.S. Department of Human and Health Services' Office of Research Integrity.

All questions and concerns about research integrity should be directed to the Research Integrity Officer (RIO). In the event of an alleged violation of the Integrity in Research Policy, the RIO is responsible to evaluate the allegation and administer an investigation and hearing process if warranted. Recommendations from the investigations will then be made by the RIO to the provost.

Research with Human and Animal Subjects

PD/PIs intending work on any project that aims to produce generalizable research while using human subjects, including use of humans in surveys, must first obtain approval from the Institutional Review Board (IRB). IRB applications are done through the IRBManager online portal found on the IRB webpage: https://www.apu.edu/researchandgrants/ethics/irb/. The IRB handbook is also linked to on this webpage. Similarly, projects involving the use of animals in research need prior approval of protocols submitted to the Institutional Animal Care and Use Committee (IACUC). Researchers are referred to the IACUC webpage for more information: https://www.apu.edu/researchandgrants/ethics/iacuc/. APU compliance support procedures are in keeping with federal guidelines.

Data and Data Ownership

Retention of Federally Sponsored Research Data: PD/PIs must retain all federally sponsored research data records three (3) years from the submission of the final expenditure report or three (3) years from the completion of the research as defined in the signed contract or grant award.

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[1] It is highly recommended that faculty with NSF funding also attend the training required of their students.

[2] This applies to the following NIH programs: D43, D71, F05, F30, F31, F32, F33, F34, F37, F38, K01, K02, K05, K07, K08, K12, K18, K22, K23, K24, K25, K26, K30, K99/R00, KL1, KL2, R25, R36, T15, T32, T34, T35, T36, T37, T90/R90, TL1, TU2, and U2R. This policy also applies to any other NIH-funded programs supporting research training, career development, or research education that require instruction in responsible conduct of research as stated in the relevant funding opportunity announcement.

The Invention and Patent Policy and Copyright Policy for Works Created at or in Affiliation with Azusa Pacific University, available on the Office of General Counsel website https://www.apu.edu/generalcounsel/policies/list/, discuss ownership of works created by those affiliated with APU. The second of these policies includes a Sponsored Works section that outlines policies around ownership of products that are derived from externally funded sources.

Research data records (also referred to as scientific records) include research or laboratory notebooks, preliminary research reports or summaries, protocols, records relating to the source of research materials and tools, adverse event reports, research reports, publications, and any other records that are necessary for the reconstruction and evaluation of the reported results of research and the events and processes leading to those results.

APPENDIX VIII
PROCEDURE ON GRANT-FUNDED PERSONNEL HIRING AND ARRANGEMENT

Background

This procedure is established as a guide for hiring and arrangement of grant-funded personnel. Grant-funded positions are typically limited in term, i.e., they are limited to the time the grant is able to fund them, but in most other respects work similar to other campus positions.

Grant-funded personnel hiring and arrangement are subject to 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Also, grant-funded projects are subject to APU policies and funders' grant policies. In the event of any inconsistency, or conflict, applicable law supersedes university policies and university policies supersede college, department or lower unit bylaws, policies, or guidelines.

Legal reviews are required before grant agreement acceptances can be made. If the Office of the General Counsel requests Human Resource (HR) department review on agreement terms and conditions, the agreement will be sent to HR to ensure compliance prior to acceptance.

The start date and end date of grant-funded projects are usually different from the APU academic or fiscal year (July 1 to June 30). A grant year can start any date of a year. The grant start dates are typically stated on the Notice of Award received from the funder.

Annual Adjustment Increase Percentage

Incremental annual salary adjustments of 2% are usually built into multi-year grant budgets. The increase is an estimate that gives the PD/PI the ability to adjust salaries of awarded projects in keeping with possible institutional salary increases. Grant-funded positions, however, must follow APU's annual salary adjustment percentage irrespective of whether the APU percentage is higher or lower than the increment built into the grant budget. With advice from the Business Office, the Office of Research and Grants can change the annual adjustment to higher or lower percentages than 2% when developing the grant proposal budget in the pre-award stage.

Grant/Contract Limited Life Span

Timely hiring for grant-funded positions are crucial to keeping project timelines. The intended length of the project and the availability of budgeted funds both help determine the duration of an externally-funded position. When externally-funded programs terminate, the employee positions also end. All hires on grant-funded projects include clarification in the offer letter that the position is temporary and continued employment is contingent upon the availability of external grant funds.

PROCEDURE FOR HIRING AND REARRANGING GRANT-FUNDED POSITIONS

New Grant-Funded Positions

Grant-funded positions are determined during the proposal submission stage. After an award is made and contractual agreements between the funder and APU are complete, PD/PIs must follow HR procedures and processes to recruit new personnel guided by the salary rate determined in the awarded grant budget.

PD/PIs are responsible for writing job description. The job description template is available through the Human Resources website: http://www.apu.edu/humanresources/forms/. The job description should match the awarded proposal's budget narrative and scope of work. The salary figure and the hourly rate are estimated in the grant

proposal at the time the proposal is submitted. After a grant is awarded, changes in salary rates cannot exceed the budgeted rates unless other budget categories are reduced proportionately. Cutting into operating expenses may not be possible for a tightly budgeted grant. Depending on the terms of agreement, APU may need to request approval to revise any salary figures or percentage of effort.

Since the budget for grant-funded positions are approved by the funders, the Business Office/the financial committee has an expedited process to approve the position and the hiring.

Questions regarding international job applicants are referred to the APU Employee Handbook for information on verification of right to work.

Questions regarding student employment, international students, advertising procedure, and pay scale are referred to the Office of Student Employment. The Student Employment Application and Student Employment Handbook can be downloaded from: http://www.apu.edu/studentemployment/working/.

Incorporating Current Faculty and Staff into Grant-Funded Positions

100% FTE Positions on Grant Funded Projects

Dean approval is necessary when a faculty or staff transitions to a position that is to be 100% covered by grant funding. At the time of transition, departments must inform the university employee of the date the position is expected to end, subject to contract or grant renewal.

Less than 100% FTE on Grant Funded Projects

Faculty - Time Buyout

Faculty teaching buyout must be approved by the department chair and dean before the grant application is submitted. Grant applications must clearly state whether salary income from grants would create a course buy-out situation, or would entitle the faculty member to be paid in addition to their regular salary.

Calculating Buy-out Rates for Full-Time Faculty Working on Externally-Funded Projects: For each 3-unit course buy-out, grant funds to underwrite that expense should be calculated at 10% of the faculty member's annual salary plus the allowable fringe benefit rate. In cases where the grant does not allow this level of expense, the adjunct rate plus 8% fringe may be used with the dean's approval. The difference will be considered as cost-share support from APU.

Faculty - Supplemental Pay

Instead of time buyout, another option is for the faculty to receive supplemental pay from a grant provided approval is given by the department chair and dean. This pay would be for services in addition to what the faculty is normally contracted by the University to do.

Salary Cap: To incentivize grant applications, faculty members may request supplemental income of up to 37.5% of their annual salary when applying for grants that include salary. Such requests are, however, also subject to terms and conditions provided by the sponsors. To calculate the maximum income for faculty on not on 12-month contracts, salary would be adjusted to the equivalent of 12-months pay using the monthly rate and 37.5% added. In this way, faculty members could earn a maximum of 137.5% of that 12-month amount from all sources, including all types of overload and research. Approval to do so must come from the dean.

The director of Grants Management and the Grant Accounting manager monitor the effort (percentage of time on each grant) of any grant-funded personnel who are supported by multiple grants.

Exempted Staff

With approval from the VP or dean of the staff's reporting area, exempt staff may do work on grants that are not part of their regular work duties. Either time buyout by percentage or supplemental pay are options for

remuneration. In either case, HR needs to set up a second job code, one that is different from the regular staff job code.

<u>Non-exempted Staff</u>

With approval from the VP or dean of the staff's reporting area, non-exempted staff can work on grant-funded project provided their total time does not exceed 100% time. Accordingly, their time will be divided and paid for based on the percentages of effort for their regular duties and the grant work. Because the regular position and grant work may require different levels of skill and expertise, the hourly pay rate between the two could differ.

Personnel Changes

PD/PIs should notify the director of Grants Management as soon as possible when there are major rearrangements in personnel with grant-funded projects, PD/PIs, along with the director of Grants Management, will then revisit the scope of work, grant agreement terms and policy, and budget to ensure changes are necessary and affordable.

PD/PIs are to follow HR procedures and be in consultation with HR when proceeding with personnel changes, including changes is positions titles and pay rates. Usually, grant-funded programs and projects have tight timelines to perform tasks and deliver end products, so processing personnel changes with HR need to be done expeditiously. The director of Grants Management will assist the process between PD/PIs and HR with personnel changes as needed.

HR policy: APU employees, including those in grant-funded positions, who receive salary increase adjustments after August 1 are not eligible for additional institutional annual increases (usually in November) of that year.

Cost-share Documentation

When APU cost-share support is included in the awarded proposal and budget narrative, APU monitors the cost-share portion, including personnel effort funded by APU.

APPENDIX IX
PROCEDURES FOR DISCLOSURE AND MANAGEMENT OF CONFLICTS OF INTEREST IN RESEARCH

This document accompanies the Azusa Pacific University's Conflicts of Interest in Research Policy (PO2012032).

Azusa Pacific University ("APU", "University", "Institution") promotes objectivity in research by establishing procedures on disclosing and managing potential conflicts of interest related to the design, conduct, and reporting of research. APU investigators and their respective teams are expected to submit a potential conflict of interest ("PCOI") disclosure form prior to starting their research projects.

I. **Overview of Conflicts of Interest in Research**

Individuals involved in research for which the University is responsible, have an obligation to disclose potential conflicts to the Committee on Conflict of Interest ("CCOI") as described in the Conflicts of Interest in Research Policy. The Research Integrity Officer ("RIO") will appoint CCOI members and provide staff support for the CCOI. Covered individuals are required by the policy to notify the CCOI of any potential conflicts of interest through the PCOI form.

Procedures Summary: The RIO and CCOI will determine what level of inquiry, if any, is necessary due to investigators' responses on the PCOI form. University investigators will provide the CCOI with information and expertise necessary to support the review. The covered individual must provide the CCOI with a clear explanation of all conflicts of interest, including significant financial interests, so that an appropriate management plan may be adopted. Within thirty (30) days of obtaining all necessary information, the committee will recommend the appropriate management conditions, if necessary. Recommendations will be forwarded to the RIO for a final determination. Approved management conditions will be communicated to the covered individual and his or her direct supervisor or other designee(s) in accordance with the determination made by the RIO and CCOI.

The direct supervisor or other designee(s), in accordance with the determination made by the RIO and CCOI, is responsible for ensuring the conflict is managed as communicated by the RIO and will report at least annually to the RIO for review by the CCOI on the operation of each management process as long as the pertinent project continues to be carried out.

Records will be maintained by the Research Integrity Officer (RIO) at least three (3) years. A PCOI disclosure, COI determination, and management process chart is seen in attachment.

Appeals Process: Any covered individual shall have the right to appeal to the provost a final decision involving that individual under this policy and procedure. In the event the provost has a conflict of interest related to the appeal, the final decision on the appeal will be ceded to the president or designee.

II. **Details of Disclosure, COI Determination, and Management**

1. Disclosing and determining potential conflicts of interest

Process of disclosure submission. Disclosures will be done through submission of Potential Conflict of Interest (PCOI) Form (attached to this procedure). Depending on the circumstance, disclosures can be made through the following mechanisms:

a. Disclosure prior to submitting a grant application

i. University investigator(s) and their identified research team will submit PCOI forms along with the application documents for internal proposal routing through the Office of Research and Grants ("ORG") in Cayuse SP. Deans or VP level administrators are expected to approve the proposal thus acknowledging the potential conflict of interest disclosures.

ii. Subrecipients are expected to submit a Subrecipient Information Form that will be reviewed in the process of internal proposal routing. Section C (C3, C4) in the Subrecipient Information Form addresses aspects related to conflicts of interest and those will be evaluated as part of the pre-award subrecipient risk analysis.

b. Disclosure at the time of Institutional Review Board (IRB) protocol submission and continuing review for human subjects research

University investigator(s), their identified research team (including investigators from other institutions) will submit the PCOI form(s) through IRBManager as part of the IRB protocol submission.

c. Disclosure at the time of Institutional Animal Care and Use Committee (IACUC) protocol submission and continuing review for animal subjects research

University investigator(s), their identified research team (including investigators from other institutions) will submit the PCOI form(s) as part of the IACUC protocol submission.

d. Disclosures in post-award or other circumstances

i. In the case of federally funded research, covered individuals must verify potential conflicts of interest at least annually. This will be handled by the relevant administrative office (post-award, department administrators). Training on Responsible Conduct in Research (RCR) Conflict of Interest will also be offered by the ORG.

ii. Subrecipient disclosures. Terms related to potential conflict of interest disclosures will be incorporated in the written agreement/contract with subrecipients. If subrecipients cannot provide certifications, the agreement/contract shall: (a) state that subrecipient investigator(s) are subject to the University policy and will be responsible for disclosing potential conflict of interest related to the subrecipient's work for the University; (b) the time period(s) for the subrecipient to submit all investigator disclosures of significant potential conflict of interest to the University will be specified in the agreement/contract.

The ORG staff (IRB/IACUC coordinator, director of Sponsored Research, or director of Grants Management) receiving the PCOI form will review and flag disclosures that indicate potential conflict of interest. At that time, the disclosure will be passed on to the RIO and the investigator may be asked to provide additional information.

Process of determination. When disclosures of a potential conflict of interest are made on the PCOI form, the form, along with additional information, will be reviewed by the RIO and CCOI with the expectation of making a determination within ten business days. The following steps will be followed to determine a conflict of interest:

● Review all investigator disclosures of significant financial interests (form and additional information provided)

● Consider whether any significant financial interests relate to the federally funded research (e.g., funded by PHS or NSF)

● Consider whether any significant financial interests exists

When a conflict of interest is determined, communication with the investigator and relevant offices will be managed through the RIO office.

2.   Management of conflicts of interest

When a conflict of interest is determined, the RIO and CCOI will provide a management plan, including conditions and/or restrictions necessary to mitigate the conflict. The University shall monitor the investigator's compliance with the management plan on an ongoing basis until the funded research project is completed. Monitoring will be assigned by the RIO to the investigator's direct supervisor or other designee(s) in accordance with the determination made by the RIO and CCOI to the investigator's department supervisor (chair or equivalent). The scenarios in which COIs occur and the ensuing management plans can differ widely as exemplified below.

Scenario 1. Prior to engaging in research or in spending research federal funding

A conflict of interest management plan will be tailored by the RIO in collaboration with the CCOI to promote the highest level of objectivity in research. Per federal guidelines, a financial conflict of interest ("FCOI") is of particular concern. The plan and compliance monitoring will be promptly communicated to the investigators who will be required to officially acknowledge the communication and take action. Ambiguities will be resolved by the RIO in collaboration with other relevant offices. Implementation is expected to begin forthright and monitoring will be done by the investigator's direct supervisor or other designee(s) in accordance with the determination made by the RIO and CCOI.

The following are examples of conditions or restrictions that could be considered for the management plan at this stage:

- Public disclosure of FCOI, when presenting or publishing research
- Disclosure of potential conflicts of interest directly to participants when engaging in research with human subjects
- Appointment of an independent monitor capable of taking measures to protect the design, conduct and reporting of the research against bias resulting from potential conflict of interest
- Modification of the research plan
- Change of personnel or personnel responsibilities or disqualification of personnel from participation in all or a portion of the research
- Reduction or elimination of the financial interest
- Severance of relationships that create financial conflicts

Scenario 2. In the course of on-going federally funded research, a new investigator joining the University, or an existing investigator joining a new project or disclosing a new conflict of interest

Within 60 days of disclosure of financial conflict of interest, the RIO and CCOI will review and implement, on at least interim basis, a management plan that specifies the actions that have been and will be taken to mitigate the conflict of interest.

Scenario 3. When the University identifies a potential conflict of interest that was not disclosed timely or was not reviewed by the University

Within 60 days of disclosure of potential conflict of interest, the RIO and CCOI will review and determine whether it is federally funded and whether financial conflict of interest exists. If so, a management plan will be implemented, at least on an interim basis, immediately after the determination. Whenever a financial conflict of interest is not identified or managed in a timely manner (including failure by the investigator to

disclose, failure by the institution to review or manage, failure by the investigator to comply with the management plan), the University shall, within 120 days of institution's determination of non-compliance, complete a retrospective review to determine whether the federally-funded research was biased in the design, conduct, or reporting of such research.

The University is required to document the retrospective review and this shall include: 1) project number; 2) project title; 3. principal investigator(s); 4) name of investigator with financial conflict of interest; 5) name of the entity with which the investigator has a financial conflict of interest; 6) reason(s) for the retrospective review; 7) detailed methodology used for the retrospective review (review process, composition of review panel, documents reviewed); 8) review findings; and 9) conclusions. Based on the results, the University should update the FCOI report specifying actions to be taken to mitigate the conflict of interest. If bias is found, the University is required to notify the federal agency funding the research promptly and submit a mitigation report.

3.   Records maintenance

The RIO and Administrative Offices will maintain records of all investigators' disclosures of financial interest and the Institution's review and response to such disclosures and all actions under the Institution's policy or retrospective review, if applicable, for at least 3 years. This record-keeping is to be done whether or not a disclosure results in the Institution making a determination of a conflict of interest, financial or otherwise.

Attachments

Potential Conflict of Interest Disclosure Form is available on the ORG google site at grants.apu.edu/proposal-routing/routing-forms.

Conflict of Interest Process Chart
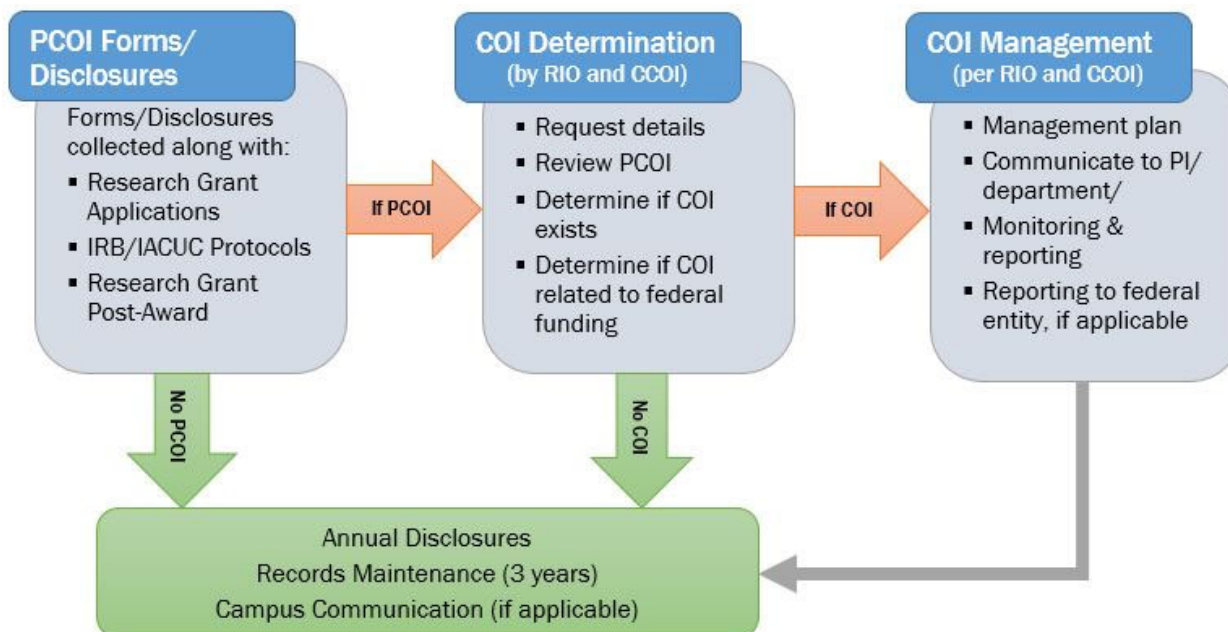
GRANTS LEXICON

Allowable costs: Costs reimbursed under a grant or contract, which may be determined by the federal Office of Management and Budget (OMB), the funding source, or APU policy.

Audit: Review of financial transactions, documentation, accounting procedures and systems, internal or external auditors.

Award: Funds provided by an external funding source for support of a project. This term applies to both the original award and supplements

Award letter: Written notification from the funding agency that a proposal has been funded; the start and end dates, and the amount funded.

Blanket purchase orders: Purchase orders that show a maximum amount that can be spent

Budget: The spending plan in a proposal submitted to and/or approved by the funding source. After the award is approved, the budget becomes a spending guide for the grant project.

Budget amendment/modification: Administrative changes made to the project budget. These generally require funding source approval.

Budget category: A portion of a budget designated for a particular type of expenditure such as personnel, fringe benefits, travel, equipment, materials and supplies, sub-grants or subcontracts, supplies, indirect costs, etc.

Contract: The instrument by which entities/recipient institutions are considered a contractor/vendor when they provide goods and services within normal business operations and operate in a competitive environment. Contracts are defined as funding based on specific deliverables and milestones being met and guide how the contracting parties will interact with each other. Contracts are usually designed to benefit the sponsor.

Cost reimbursement contract: Contract under which allowable and reasonable costs incurred by a contractor in the performance of a contract are reimbursed in accordance with the terms of the contract.

Cost-share: The portion of costs not borne by the funding source.
Mandatory cost-sharing: When cost-sharing is mandatory, the requirement for cost-sharing will be described in the application guidelines. Mandatory cost-sharing must be tracked and reported.
Voluntary cost-sharing: The cost is specifically pledged on a voluntary basis.
Voluntary committed cost-sharing: This is voluntary cost-sharing that includes in the award budget that the cost-sharing will be tracked.

Direct costs: An expense that relates to the grant project, (e.g., salaries, supplies, services, travel, equipment).
Disallowed costs: Questioned expenditures, which are not reimbursed by the funding source. Repayment to the funding source may be required if payment has already occurred.

Equipment: Property that is not permanently attached to buildings or grounds has an acquisition cost of $5,000 or more, and a life expectancy of one year or more.
Capital equipment is classified differently, depending on ownership or title to the equipment. Title to or ownership of equipment is determined by the provisions of the sponsoring award, contract, or agency policy. There are four classifications of capital equipment:
1. Sponsor Purchased/University-Titled

2. Government-Titled Equipment
3. Government-Furnished Property
4. University-Funded Equipment

Fixed-price contract: A contract where the contractor pays a fixed amount for the agreed-upon work regardless of the ultimate cost to complete the project. In these types of contracts, there is a risk that the institution must complete the work even if there are costs overruns. However, the institution may retain any unexpended balance that remains after the contracted work is complete.

Fringe benefits: Benefits such as life and health insurance, retirement, unemployment compensation and workers compensation that are paid in addition to salary. Benefit packages are subject to change. Also referred to as Employee Related Expenses (ERE).

Grant: Funding provided in exchange for the recipient performing a specified activity (scope of work) within a certain amount of time, such as conducting a program, research project, or training project. A sponsored grant (often just referred to as grant) is typically formalized in a written agreement that is legally binding with regard to budgetary restrictions, agreements for cost-sharing, reporting, and other stipulations. Extramural sponsors include federal, state and local agencies, foundations, other nonprofits, and corporations.

Grant contract: The legal document representing an award, which includes the following: 1) a grant agreement with appropriate exhibits; and 2) a copy of the proposal, which describes the project and incorporates information about the budget and evaluation activities; 3) any subsequent amendments and/or budget modifications.

Grantee: The recipient of a grant.

Grant proposal: A written plan for a project or program to secure funding for specific objectives. Typically, grant proposals are written in response to and in accordance with a grant application or set of instructions and must be submitted by a specific deadline. Most grants are competitive.

Grantor: Funding source that provides funds for the purpose of carrying out projects.

Indirect costs: Overhead and administrative costs that cannot be identified specifically with a particular program, project, or activity. These costs are incurred for the necessary operation of the university, and include library resources, building maintenance, and general administration.

Matching funds: Are cash or "in-kind" support contributed by the university to fulfill the objectives of the project. Required matching funds are usually stated in the grant contract. A term often used interchangeably with matching funds, is "Cost-share".

NIH Public Access Policy: Effective from April 7, 2008, Principal Investigators must ensure that electronic versions of any peer-reviewed manuscripts arising from NIH funding and accepted for publication after that date are deposited in PubMed Central (PMC), NIH's digital archive of biomedical and life sciences journal literature, and that the articles may be made publicly available by PMC no later than 12 months after publication.
Effective from May 25, 2008, anyone submitting an application, proposal, or progress report to NIH must include the PubMed Central reference number (PMCID) when citing articles that arise from their NIH funded research.

Project director/principal investigator (PD/PI): The individual responsible for carrying out the requirements of the grant project or program.

Program officer: The funding source representative who has the task of monitoring the project, providing technical assistance, approving major changes, and ensuring that project or program objectives are carried out.

Proposal: An application submitted to an external funding source that may lead to a funding award. All proposals require institutional approval by officials with the authority to commit the University's resources.

Reporting: Performance and fiscal requirements set by the funding source. The PD/PI is responsible for the performance report and Grants Accounting is responsible for producing and submitting financial reports.

Stewardship: The obligation to be a responsible caretaker of public and private funding resources awarded to the university.

Sub-Award agreement (sub-contract or sub-recipient agreement): Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract (Uniform Guidance §200.92)

Supplanting: Illegal use of grant funds to pay for ongoing activities already budgeted for, or for the usual activities assigned to a position.

Unobligated balance carryover: An unobligated balance from a prior award period that the funding source approves to be added to the subsequent award budget.

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