



**The Association of Universities
for Research in Astronomy**

**Award Management Policies
Manual**

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The Association of Universities for Research in Astronomy Award Management Policies Manual

I. Introduction and Objectives

The development and management of awards is important because it provides the revenue needed to support the mission of the Association of Universities for Research in Astronomy, Inc. (AURA). Federal and state regulations, award terms, and AURA policies and procedures require sound programmatic and fiscal management of awards.

The purpose of this manual is to define the responsibilities of the Principal Investigator (PI), Central Administrative Services (CAS) staff and other personnel with regard to the programmatic and fiscal management necessary to administer awards. This manual only applies to AURA's NSF-funded Centers.

This manual defines uniform policies and processes for coordinating, managing, and monitoring the *administrative activities* of AURA Centers to ensure that all actions required by an award are successfully performed. Updates will be made to this manual as necessary to comply with new award management practices and requirements.

This manual applies to the full life cycle of AURA awards and other agreements where AURA receives funding or payments. The life cycle of an award or other agreements involving payments to AURA ranges from the preparation of proposals, the receipt of the award or agreement, the management of the award or agreement, and the closeout of the award or agreement.

II. Compliance Environment

AURA personnel must ensure that AURA complies with all terms and conditions of awards and other agreements. It is important that the terms and conditions of each individual award are reviewed and understood. Additionally, each funding agency may have its own general terms and conditions for awards and policies and procedures in separate guides that must be followed.

All recipients of federally funded awards must comply with the "[Uniform Guidance](#)" which is formally known as the "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" and can be found at 2 CFR 200 et seq. The Uniform Guidance replaces OMB Circular A-110, OMB Circular A-122, and OMB Circular A-133.

As an example of the compliance environment for one type of award, NSF cooperative agreements require compliance with the following:

- NSF Financial and Administrative Terms and Conditions for Cooperative Agreements (FATC)

- Supplemental Financial and Administrative Terms and Conditions for Cooperative Agreements (S-FATC) (different versions for FFRDCs and Large Facilities)
- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR 200 et seq.
- NSF Proposal and Award Policies and Procedures Guide (PAPPG)

In addition to NSF terms and conditions, AURA personnel must also comply with AURA policies, which include the following:

- [AURA Policies and Procedures](#) (found on [aura-astronomy.org](#) website)
- [CAS Procurement Procedures](#) (found on [auracas.aura-astronomy.org](#) website)
- [CAS Property Procedures](#) (found on [auracas.aura-astronomy.org](#) website)
- Individual AURA Center procedures

Relevant policies and procedures will be accessible from the CAS and AURA HR websites. It is the responsibility of each AURA staff person to be knowledgeable about all AURA policies.

III. Definitions

AURA	Association of Universities for Research in Astronomy, Inc.: an Arizona non-profit corporation that serves as the managing entity of all AURA cooperative agreements, contracts, and other awards.
AURA Corporate Office	The AURA employees based in Maryland and Washington D.C. as well as those based in Tucson, Arizona: AURA Central Administrative Services, Risk Assessment Manager, and AURA Human Resources.
Award	A grant, cooperative agreement, contract, sub-award, or similar agreement to provide funding to support AURA’s research or development activities. For purposes of this manual, if a contract or subaward is being discussed, it will be referenced as such.
Award management	The management of the entire life cycle of awards, subawards and vendor contracts, from proposal preparation to final close-out of the award/subaward/contract.
Award Management Records	Include copies of Federal awards, contracts, subawards and their respective amendments; and copies of proposals and reports filed with the NSF and other Federal agencies. Award Management records are maintained in Carina.
BSR Guide	Business Systems Review (BSR) Guide: a guide from the NSF Office of Budget, Finance, and Award Management that “defines the overall framework, structure, and details used by NSF in the

review process” that is an important part of NSF’s monitoring program of large facility projects.

CAS	Central Administrative Services: a division of the AURA Corporate Office. CAS is responsible for the business services for the AURA Centers funded by the NSF. The Compliance Officer, the Grants Officer and the Contracts Officer referred to in this manual are part of the CAS staff.
Carina	AURA’s online application for tracking awards and contracts .
Center	Any scientific facility operated by AURA on behalf of the NSF. The Center Director is responsible for ensuring that Center staff successfully discharge their responsibilities as defined in this manual.
Compliance Officer	The position responsible for developing, implementing and monitoring a program to ensure compliance with award terms and conditions and to prevent illegal, unethical and improper conduct.
Compliance Requirement	The requirements, directives, and standards established by a Federal agency with which an awardee is required to comply.
Compliance Verification Procedures (CVPs)	The procedures to be followed to ensure compliance with Federal award terms, conditions and obligations. Compliance Verification Procedures are housed in Vela.
Compliance Verification Records	Records that confirm compliance with a Compliance Verification Procedure or with a Federal award term or condition; a record that indicates a Federal requirement was completed; or a record that explains where actual documentation confirming compliance with Federal award requirements can be found or located. Compliance Verification Records are located in Vela.
Contracts Officer	The position granted authority to negotiate, enter into, administer, renew or terminate contracts of all types, including but not limited to, contracts, subawards, memorandums of understanding, cooperative agreements and cooperative support agreements.
Councils	AURA establishes and maintains various councils that provide independent management oversight, advocacy and stewardship of NSF Centers.
External Board of Directors	A Center may have an external board of directors (BoD) that is an integral part of the Center’s governance. Gemini and LSST external BoD interactions will be processed through the NSF Program Officer, the AURA President, the AURA Executive Vice President or the AURA CFO.
Grants Officer	The position responsible for AURA award management functions.
HR	Human Resources: a division of the AURA Corporate Office.

PI	Principal Investigator: the person responsible for the performance of an award. For the purposes of this manual, the term PI can also refer to the person assigned to and responsible for the performance of a contract where AURA provides goods or services.
Proposal	Any submission to or from an agency or organization that may result in an award for AURA to provide property (real or personal) or services, or to lease property, or an amendment to an award or agreement, or a funding action under an existing award
Reqless	The AURA electronic requisition entry system.
Risk Assessment Manager	The AURA employee who provides an independent internal audit function conducting regular, ongoing examination of AURA's internal controls. The Risk Assessment Manager dually reports to the AURA CFO and the AURA Board of Directors' Audit Committee.
System for Award Management	U.S. Government system used to register contractors.
Vela	A web based award management compliance system and repository for Compliance Verification Procedures and Records. Vela includes: (i) the terms of all active Cooperative Agreements and Cooperative Support Agreements and the names of individuals assigned responsibility for compliance with those provisions; (ii) the compliance procedures to be followed to ensure compliance with award terms; and (iii) Compliance Verification Records.

IV. Management Structure and Division of Responsibilities

A. Overview

The Association of Universities for Research in Astronomy, Inc. is the legal entity that enters into all contracts and awards for the Centers. The AURA Corporate Office has the legal and fiduciary responsibility for administering all AURA awards. The Compliance Officer and the AURA CFO or designee reviews AURA's award compliance.

Central Administrative Services (CAS) is the division of AURA that provides the necessary oversight of award compliance. It accomplishes this through a knowledgeable, well-trained business staff familiar with award requirements and through the CAS Compliance Officer who has responsibility for the implementation, maintenance and monitoring of a Compliance Program to ensure that all actions required during an award life cycle are in compliance with the award terms and conditions.

CAS is the primary contact with funding agencies on all legally binding agreements, such as contracts, memoranda of understanding, grants, and cooperative agreements. For centralized award management to be successful, Centers must ensure that CAS is involved in all stages of the award life cycle, from proposal preparation to the close out of an Award. AURA Centers are responsible for the substantive work of awards. The Principal Investigator and Co-Principal

Investigator are responsible for proposal preparation, complying with the terms and conditions of an award, and carrying out their roles and responsibilities set forth in this manual.

B. AURA Corporate Office responsibilities

The AURA Corporate Office is ultimately responsible for ensuring that its divisions and Centers perform their responsibilities under this manual and in compliance with AURA policies, terms and conditions of all AURA awards, as well as with all pertinent regulatory requirements. The AURA CFO has the authority and responsibility to ensure that CAS, HR, and the Centers perform their responsibilities as defined in this manual.

C. CAS responsibilities

The CAS Division Chief is responsible for ensuring that CAS personnel perform their duties as described in this manual. The CAS Staff shall provide business and administrative services that meet award management requirements. The CAS Compliance Officer shall serve as a compliance resource to NSF Centers and corporate staff on award management matters. The CAS staff shall provide support and training as requested by Center staff to assist in the successful adherence to the intent of this manual.

D. Center responsibilities

Each Center's Director is responsible for ensuring that Center personnel perform their duties as described in this manual. Center staff shall provide all information related to awards and agreements as requested by the AURA Corporate Office and its divisions, CAS and HR.

E. HR responsibilities

The Human Resources Senior Manager is responsible for ensuring that HR personnel perform their duties as described in this manual. HR staff shall provide human resources services that meet award management requirements. HR is responsible for ensuring that all job descriptions clearly define the responsibilities of each staff person regarding their role in the award management process. HR staff shall provide support and training as requested by Center staff to assist in the successful adherence to the intent of this manual.

F. Staff responsibilities

AURA staff are responsible for complying with this manual. AURA staff have a duty to report violations of award or agreement terms and conditions to the AURA CFO or to the Compliance Officer. AURA staff are responsible for being knowledgeable about policies, award terms and conditions, and other relevant federal regulatory requirements.

G. Award Management Functional Organization Chart

The chart that follows is a visual representation of the functional responsibilities during the lifetime of an award.

AWARD MANAGEMENT FUNCTIONAL ORGANIZATION CHART

PRE-AWARD

<p><u>Proposal & Budget Preparation</u> →</p> <ul style="list-style-type: none"> -Research Proposals: Co-Principal Investigator -NSF Reconnect of major facility: Center Management & Corporate -Supplemental funding: Center Management 	<p><u>Center Approval</u> →</p> <ul style="list-style-type: none"> Center Director 	<p><u>Observatory Council Approval</u> →</p> <ul style="list-style-type: none"> \$3M+ 	<p><u>AURA Corporate Approval</u> →</p> <ul style="list-style-type: none"> -Grants Officer -\$1M-\$3M: AURA President -\$3M+: AURA Board 	<p><u>Proposal Submission</u></p> <ul style="list-style-type: none"> Grants Officer
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AWARD

<p><u>Pre-award Notice & Negotiation</u> →</p> <ul style="list-style-type: none"> -Grants Officer -Corporate -CAS -Center Management 	<p><u>Acceptance of Award</u> →</p> <ul style="list-style-type: none"> -Co-Principal Investigator -Grants Officer -Accounting 	<p><u>Management of Award & Compliance with Award T's & C's</u> →</p> <ul style="list-style-type: none"> -Corporate -Center Management -CAS & HR -Grants Officer -Compliance Officer -Observatory Council 	<p><u>Subawards & Contracts</u> →</p> <ul style="list-style-type: none"> -Contracts Officers -Co-Principal Investigator or -Technical Representative 	<p><u>Performance Metrics</u></p> <ul style="list-style-type: none"> -Corporate -Center Management -CAS
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OTHER POST AWARD REQUIREMENTS

<p><u>Award Management Oversight</u></p> <ul style="list-style-type: none"> -Compliance Officer -CFO -Grants Officer 	<p><u>Records</u></p> <ul style="list-style-type: none"> -Award Management Records-Carina -Compliance Verification Records-Vela 	<p><u>Training</u></p> <ul style="list-style-type: none"> -Compliance Officer -CAS -HR 	<p><u>Amendments</u></p> <ul style="list-style-type: none"> -Center Management -Grants Officer -Contracts Officers 	<p><u>Transfers of Awards</u></p> <ul style="list-style-type: none"> -HR -Co-Principal Investigator -Center Director -Funding Agency
<p><u>Monitor</u></p> <ul style="list-style-type: none"> -CFO -Compliance Officer -Grants Officer -Contracts Officer 	<p><u>Financial Management</u></p> <ul style="list-style-type: none"> Accounting 	<p><u>Monitoring Expenditures</u></p> <ul style="list-style-type: none"> -Co-Principal Investigator -Contracts Officers -Business Managers -Accounting 	<p><u>Closeout</u></p> <ul style="list-style-type: none"> -Grants Officer -Co-Principal Investigator -Accounting -Contracts Officers 	

V. Staff Training and Continuing Education

Staff training and continuing education are essential to ensure that AURA staff remain current with any changes in regulation, contract terms and conditions, as well as best practices in their areas of expertise. It is the responsibility of all department managers to ensure that new staff members are adequately trained to perform their responsibilities and that continuing education opportunities exist for current employees.

A. Compliance Officer and HR training responsibilities

The Compliance Officer and HR are responsible for developing and coordinating training programs for new and existing AURA and Center staff, with subject matter experts responsible for preparing training materials.

B. Other CAS departments

The managers of each CAS department shall maintain continuing education programs for their staff regarding their responsibilities in the award management process as well as in their areas of expertise. Additionally, the managers of each CAS department shall ensure that all new staff are adequately trained to perform their responsibilities.

C. Centers

Each Center shall ensure that all staff involved with the award management process are adequately trained to perform that function and that continuing education programs are available. CAS, the Compliance Officer and HR will serve as resources to the Centers on training matters.

VI. Award Management and Compliance Records

A. Carina: a repository for Award Management Records

Official award management records shall be stored in the Carina online database. Award management records may be stored in other locations only if that record is readily accessible by AURA management and the location of the record is documented in Carina. The types of Award Management Records maintained in Carina are listed in Appendix A.

B. Vela: a repository for NSF CA and CSA Compliance Documentation

Compliance Requirements, Compliance Verification Procedures and Compliance Verification Records for NSF awards are maintained in Vela. The Compliance Requirements contain Compliance Verification Procedures for carrying out award provisions. The procedures specify when compliance with an award provision must be documented in Vela or where actual documentation confirming compliance with Federal award requirements can be located.

C. Records retention policy

All records associated with an existing award shall be retained. Records associated with prior awards must be retained in accordance with [AURA Policies and Procedures](#) Section A.X "Records Retention."

VII. Required Government Registrations and Filings

Federal regulations require that award recipients periodically file or update various registrations and certifications. The following list is independent of disclosures and certifications *required as part of a proposal*. The table below specifies which person or department is responsible for each required registration or certification.

Required Registration, Disclosure, or Certification	Responsible Party
System for Award Management registration	Contracts Officer
Filing of Standard Form LLL, "Disclosure of Lobbying Activities"	AURA CFO
Submission of annual audit report to NSF	CAS Controller
General Services Administration Pricing Request	Contracts Officer

VIII. Proposal Process

A. Announcements of opportunity

The Center is responsible for finding announcements of opportunity.

B. Proposal preparation

- 1. Proposal PI:** All proposals for the management or construction of large facilities or associated projects must name the President of AURA as the PI. AURA recognizes that proposals for Cooperative Agreements require coordination between the Center and the corporate officer who will be responsible for the preparation of proposals for all management and operations and construction projects.

These proposals are created as collaborative efforts recognizing that the Center provides the programmatic expertise and the corporate office provides the administrative and governance expertise for those required elements of the proposal. The Grants Officer is responsible for the coordination of these efforts.

The review and approval of major proposals may require the coordination of the exterior board of directors for Gemini or LSST in addition to the review and approval by the operating councils and the final approval from the AURA board of directors. The Grants Officer will be responsible for the coordination of proposal preparation, review and the required approvals.

For all other types of awards, the person to be held responsible for performance should be named as the PI.

2. **Responsibility for preparation:** For all other proposals, all elements of the proposal are the responsibility of the proposing PI. Each Center must establish an internal procedure for proposal review.
3. **Available staff resources:** CAS and HR are responsible for providing resources to Center staff during the proposal preparation process. CAS shall serve as a resource to the Centers in matters related to proposal preparation such as the following:
 - Funding opportunities and agency proposal management portals
 - Eligibility to submit a proposal
 - AURA business and certification information
 - Budget and narrative templates, salary, indirect cost and fringe benefits rates
 - Forms
4. **Carina entry:** Center staff must create a Carina entry for each new proposal. Center Directors or designee must ensure that all proposals are adequately documented in Carina.

C. Pre-award expenditures

Pre-award expenditures may only be incurred if they are allowed under the funding agency's rules. Before pre-award expenditures are incurred, their allowability, and any required internal approvals, must be documented in advance in Carina.

D. Content approval

The AURA Board of Directors is responsible for reviewing and approving proposals for management and operations and large construction projects. The Center staff is responsible for review and approval of scientific, technical, resource, financial, and management content of proposals prior to the review and approval by CAS, and any required external reviews and approvals such as AURA Councils, Boards of Directors of Gemini and LSST and if appropriate, NSF. Each Center shall have documented internal procedures for the review and approval of the scientific, technical, resource, financial, and management content of all proposals before they are submitted. This shall include review of budgets for reasonableness and allowability. Each Center is responsible for ensuring that its policies regarding internal reviews and approvals are followed.

E. Grants Officer review

The Center is responsible for ensuring that all proposals have been reviewed by the Grants Officer for required proposal elements and corporate legal information before they are submitted.

1. **General:** Prior to submitting proposals that include budgetary information or require certifications to funding agencies, Center personnel must send the proposal to the Grants Officer for review. The Grants Officer will coordinate the review of each proposal for budgetary, administrative, and compliance content using the appropriate CAS subject matter experts. The Grants Officer will require changes to the proposal as

needed to ensure compliance with all applicable laws, regulations, and policies, including funding agency policies and AURA policies, and including [AURA Policies and Procedures](#) Section C.II.B.2. This review may take a significant amount of time. Proposals should be submitted to the Grants Officer for review a minimum of two weeks in advance of proposal submission.

- 2. Routing proposals to Grants Officer:** The PI may post a proposal in the funding agency's website portal to be reviewed, approved and submitted by the Grants Officer. If the funding agency does not have such a system, the PI will send the proposal to the Grants Officer, who will then submit it to the funding agency.
- 3. Coordinating required approvals:** The Grants Officer shall coordinate required approvals. As part of the review of each proposal, the Grants Officer shall determine what additional approvals, if any, are required for the proposal under NSF or AURA policies and shall verify that all required approvals have been received before the proposal is submitted to the funding agency.
- 4. Verifying certification accuracy:** The funding agency requires institutions to make various certifications regarding their policies and activities as a part of each proposal submission. The Grants Officer shall verify the accuracy of all certifications. As part of the review of each proposal, the Grants Officer shall verify that AURA has documentation on file supporting the accuracy of each required certification. For more details, see the NSF Proposal & Award Policies & Procedures Guide or other appropriate guidance.

F. Award negotiations

The AURA Corporate Office is responsible for leading cooperative agreement negotiations with input from CAS and Center staff. The Grants Officer is responsible for coordinating negotiations with funding agencies and finalizing all other awards and agreements for incoming funding, with input from Center staff.

IX. New Awards

A. Review and acceptance of new awards

All awards and contracts must be reviewed by the AURA Corporate Office, the Grants Officer or a Contracts Officer prior to signing. Only authorized staff in the AURA Corporate Office and CAS may sign documents accepting terms and conditions of new awards, contracts, or amendments.

B. Drawing award funds

The award terms must have been reviewed and accepted before award funds may be drawn. Many agencies specify that the act of drawing funds on an award constitutes a legally binding acceptance of the award's terms and conditions (in lieu of signing the award). For this reason, the CAS Accounting department shall not draw funds on an award until the AURA Corporate Office, the Grants Officer, or a Contracts Officer has reviewed the award and determined that all terms and conditions are acceptable to AURA.

C. New award processing and notifications

Once the award has been accepted, all Center responsibilities associated with the award will be formalized in Carina and Vela and the responsible parties will be notified that the contract or award is active.

- 1. Entry into Carina and Vela:** The Grants Officer is responsible for entering award information into Carina. Each new award will be entered into Carina and Vela by the Grants Officer.
- 2. Notification to Accounting department:** The Grants Officer shall notify the Accounting department when a new award is received. The Accounting Department will ensure that proper accounts associated with a new award are set up in the accounting system and documented in Carina.
- 3. Notification to Center staff:** Once the Grants Officer has verified that all of the tasks for setting up the new award have been completed, the Grants Officer will send notice of the new award to the PI and to any other personnel that the Center has specified. When notifying the PI, the Grants Officer shall ensure the following:
 - The PI is aware of all reports and other required actions and deliverables, and
 - The PI has read and understands the terms of the award.
- 4. Notification to staff of special actions required:** The Grants Officer will notify staff of any special actions required of them under the award by documenting them in Carina and in Vela, as appropriate. The PI is responsible for referring to Vela and Carina for actions to be taken. For example, if the award calls for payments based on performance milestones, the PI must ask the Accounting department to issue an invoice for that milestone when it is completed.

D. Entry in Carina of action due dates

The PI is responsible for ensuring that all award-required actions having due dates (e.g., reports, milestones) are entered into the award's Schedule table in Carina so that the Grants Officer can monitor the status of all award deliverables and report on the same to AURA management.

X. Ensuring Compliance with Award Terms and Conditions

A. Vela: NSF Award Management Compliance Tracking

Vela is used to assign and track NSF award management responsibilities. Vela allows a user to:

- assign responsibility for the performance of an NSF award provision to one or more individuals;
- view the NSF award provisions and the Compliance Verification Procedures for compliance with such provisions;
- accept responsibility for compliance with a NSF award term and its procedures;

- document when a Compliance Verification Procedure or task has been completed; and
 - create and view Compliance Verification Records.
1. **Vela award assignments:** When a new or amended NSF award is received, the Grants Officer shall enter each provision in Vela and assign responsibility for compliance with each provision. The Compliance Officer shall establish Compliance Requirements in Vela and shall be responsible for the development of Compliance Verification Procedures for such requirements with the help of Center, CAS and/or Corporate personnel. The procedures specify the positions responsible for carrying out the award terms and are assigned by the Grants Officer or the Compliance Officer.
 2. **Maintenance of Vela:** The Grants Officer has the overall responsibility for maintaining Vela.
 3. **Use of Vela for responsibility notification:** The Grants Officer shall use Vela to notify personnel of their responsibilities. When a new award is processed, the Grants Officer shall direct all the people with responsibilities under that award to the screens in Vela that show the award provisions and Compliance Verification Procedures and tasks for which they are responsible, and request that they read and accept responsibility for such provisions, procedures and tasks in Vela. The Grants Officer will follow up as needed until all provisions have been acknowledged.
 4. **Award change notification:** The Grants Officer shall update Vela and notify responsible parties when award provisions, Compliance Requirements and Compliance Verification Procedures change. The Grants Officer shall be responsible for ensuring that AURA promptly receives and processes all changes to a funding agency's policies, amendments to awards, and other changes to award terms and conditions. When an award provision is modified, the Grants Officer is responsible for updating Vela with appropriate notes to help users understand the change, notifying the AURA staff responsible for compliance with the provision of the change, and requiring them to acknowledge reading the change in Vela.
 5. **Performance of Procedures:** Corporate, CAS and Center staff shall perform the Compliance Verification Procedures and tasks assigned to them and shall document compliance with these requirements as may be specified in Vela.
 6. **Verification of Compliance:** The Compliance Officer shall verify compliance with the Compliance Verification Procedures. If compliance with a procedure is not documented, the Compliance Officer shall follow up with the staff member responsible to ensure compliance with the procedure is completed.

B. Award Compliance Monitoring

The AURA CFO or designee and the Compliance Officer monitor compliance with award provisions. AURA's Risk Assessment Manager shall include a review of award compliance in the annual audit plan, which is approved by the Audit Committee of the AURA Board of Directors.

1. **Annual compliance audits:** At least annually, the Compliance Officer shall audit a selection of award provisions to verify the compliance status reported in Vela. Audit selections are made by the Compliance Officer and/or CAS personnel. A report of the audit results is prepared and provided to the CAS Senior Manager and to the CFO. In the case of nonconformities or errors, the Compliance Officer shall contact the party responsible for the Compliance Requirement and seek rectification.

C. Procurement

Policies and procedures on compliance with award terms regarding procurement activities that include approvals for vendor agreements (contracts, sub-awards, sub-recipients, and memoranda of understanding) are found in the CAS Procurement Procedures and the AURA Procurement Policies documents. These policies and procedures are posted on the AURA CAS website.

AURA recognizes that the review and approval of vendor agreements (contracts, lease agreements, sub-awards, sub-recipients, and memoranda of understanding/agreement) may require the coordination of both external boards of directors for Gemini and LSST in addition to the review and final approval by the AURA board of directors and the NSF. The Procurement Office will be responsible for the coordination of approvals requiring review by the CAS Contracts Officers, Center boards of directors, the AURA President and the NSF.

D. Property management

Policies and procedures on compliance with award terms regarding property and equipment are found in the CAS Property Manual, which is posted on the AURA CAS website.

E. Tracking award deliverables

1. **Documenting dates of deliverables:** The PI shall document completion of reports and other deliverables in Carina. The PI is responsible for entering the actual delivery date of each required report or deliverable for the award in the Schedule Table found in Carina. If an extension is granted by the funding agency, the PI shall promptly update the Carina Schedule Table accordingly.
2. **Past due deliverables:** The Grants Officer shall investigate all past due deliverables. The Grants Officer shall use Carina to identify past due award deliverables and shall follow up with PIs as needed.

F. Training on compliance with award provisions

The Compliance Officer shall coordinate and provide training to CAS and Center staff on award provisions as requested.

XI. Transfer of Awards

A. Transfer of awards to AURA

1. **Award transfers for new hires:** AURA Human Resources shall notify the Grants Officer when a new hire wishes to transfer an existing award to AURA.
2. **Other award transfers:** AURA staff shall contact the Grants Officer when they want to transfer an existing award at another institution to AURA.
3. **Initiation of award transfer:** The Grants Officer shall contact the funding agency to initiate the award transfer process and shall coordinate all actions required to complete the transfer.
4. **Processing award transfers:** Transfers of existing awards to AURA shall be processed following the same procedures as for new awards.

B. Transfer of AURA awards to other institutions

1. **Notifications by PI:** When a PI is departing AURA and wishes to transfer an existing award to his/her new institution, the PI shall notify its Center Director, the funding agency and the Grants Officer. Both the Center Director and the funding agency must approve of the transfer.
2. **Coordination of award transfer:** Upon confirmation that the Center Director and the funding agency have approved the transfer, the Grants Officer shall contact the funding agency and coordinate the transfer. Transfers of awards to other institutions shall follow the procedures for closing awards.

XII. Amendments to Awards

A. Amendments to cooperative agreements

1. **Amendment requests:** The Center in coordination with the Grants Officer is responsible for preparing a request for amendment.
2. **Amendment request submission:** The Center will submit the request for an amendment to the cooperative agreement to the Grants Officer for review and approval and prior to submission directly to the funding agency. This applies to all requests whether they do or do not involve funding.
3. **Review of amendment request:** The Grants Officer will review all requests for award modifications for compliance with funding agency regulations and AURA policies, and then submit the request to the funding agency.
4. **Processing award modifications:** The procedures for processing new awards given in Section IXX shall be used for reviewing and processing amendments and other modifications to existing awards.

XIII. Monitoring Award Performance

AURA has full responsibility for the conduct of the performance requirement of cooperative agreements and other awards. To carry out this responsibility, AURA must monitor the performance of the award to assure adherence to performance goals, time schedules, and other requirements as appropriate to the project or the terms of the award.

A. Performance of cooperative agreements

The Center is responsible for performance of cooperative agreements, with oversight provided by AURA Management Councils. The Director of each Center is responsible for the performance of all cooperative agreements at that Center, subject to monitoring and oversight by the appropriate AURA Corporate Management Council. The responsibilities of the AURA Management Councils are found in [AURA Policies and Procedures](#), Section A.I.D "Role and Responsibilities of the Management Councils."

B. Performance of other awards

The Center's Director shall ensure the PI's performance of awards other than cooperative agreements. Each Center shall have documented procedures for monitoring the performance of each award other than cooperative agreements to assure adherence to performance goals, time schedules, or other requirements appropriate to the project or terms of the award. This monitoring must be done by someone other than the award PI. If a Center does not have a policy, the PI's supervisor shall be responsible for this performance monitoring.

XIV. Allowability of Costs

Expenditures under federal cost-reimbursement awards are governed by the federal cost principles and must conform to federal policies and award special provisions. AURA must ensure that costs charged to the award are necessary, reasonable, allocable, and allowable under the applicable cost principles.

A. Applicable cost principles

The federal cost principles applicable to most AURA operations are found in Subpart E (2 CFR §200.400) of the Uniform Guidance.

B. Requisition approval

Requisition approvers are responsible for determining allowability of direct costs. AURA staff with authority to approve purchase requisitions are responsible for determining whether the expenditures in each purchase requisition are allowable under federal cost principles before approving the requisition. This determination of allowability of costs must be documented in the requisition processing system (Reqless) for each requisition. If a requisition approver is unsure about the allowability of certain expenditures, they may consult with the Procurement Manager before making their determination and approving the requisition. CAS Procurement staff review all procurements after Center approval for allowability, allocability and reasonableness. Federal cost principles are posted on the CAS website and are updated by the Procurement Department as needed.

C. Training on federal cost principles

The Procurement Manager and the Compliance Officer shall provide staff with resources and training on federal cost principles.

D. Audit of requisitions

As part of the annual audit plan, the Risk Assessment Manager shall include a selection of purchase requisitions to determine if federal cost principles are being correctly applied by requisition approvers. The annual audit plan is approved by the Audit Committee of the AURA Board of Directors. If the review reveals noncompliance, the Compliance Officer shall work with the appropriate staff to develop a remediation plan, and then monitor the execution of the plan.

E. Indirect cost rates and other overhead charges

The AURA CFO and the CAS Controller are responsible for developing indirect cost rates and other overhead charges and obtaining the required approvals. The Controller is responsible for compliance with all federal policies and procedures regarding indirect cost rates. The Controller is responsible for posting current rates and their application for proposals and budgeting on the CAS website.

XV. PI Award Management Duties; Notifications and Approvals

A. Award performance

The PI is responsible for successfully performing the award so that all performance goals, schedule milestones, or other requirements are met within the period of performance.

B. Deliverables and report submission

The PI is responsible for preparing and submitting all reports and other deliverables required under the award and documenting the submission in Carina, except as noted in Section E below:

C. Budget and expenditure monitoring

The PI is responsible for monitoring the award budget and expenditures to ensure the following:

- Expenditures are allowable under federal cost principles
- Expenditures are within available funding, including budget line items
- Charges are made using the appropriate object code
- Charges are in accordance with the Center's policies

D. Need for notifications and approvals

The PI is responsible for knowing which actions or events require funding agency notification or approvals, and submitting the appropriate notices and approval requests, except as noted in Section E below. The required approvals and notifications for federal funding agencies follow:

- Short-Term Absence of the PI or Project Director (Up to Three Months)
- Significant Changes/Delays or Events of Unusual Interest
- Significant Changes in Methods/Procedures

- Conflicts of Interests
- Pre-award Costs in Excess of 90 Days
- No-Cost Extension
- Changes in Objective or Scope
- Significant Change in Person-Months Devoted to Project
- PI Transfer

E. Notifications and approval requests handled by others

The following table lists the funding agency notifications and approvals that are handled by AURA staff other than the PI.

Notice/Approval Type	Person Responsible
Anticipated Residual Funds in Excess of \$5,000 or 5%	Grants Officer
Cost Sharing Equal To or Greater Than \$500,000; changes in the amount of approved cost-sharing or matching provided by the Awardee	Grants Officer
Conflicts of Interests	Grants Officer
Withdrawal of PI/Co-PI	Grants Officer
Rearrangement/Alteration of \$25,000 or over	Contracts Officer (as preliminary step of procurement process for work)
Long-Term Absence of the PI/PD (Over Three Months)	Grants Officer
Subject to CA and CSA dollar thresholds for approval, the subawarding, transferring or contracting out of any work under a CA or CSA; Addition of Sub-award	Contracts Officer (as part of the process of placing sub-award)
Change PI and Add/Change Co-PI	Grants Officer
Travel costs for dependents	Grants Officer
Transfer of funds budgeted for participant support costs as defined in 2 CFR 200.75 to other categories of expense	Grants Officer
Additional categories of participant support costs other than those in 2 CFR 200.75	Grants Officer
Changes in Key Personnel	Grants Officer

Notice/Approval Type	Person Responsible
Any costs that require prior agency approval as set forth in the Uniform Guidance Cost Principles	Grants Officer

XVI. Sub-recipient Assessment and Monitoring

AURA's policies and procedures for the assessment and monitoring of award sub-recipients are found in the [AURA Procurement Policies](#). In addition, AURA Contracts Officers use the “CAS Sub-recipient Assessment and Monitoring Tool” in assessing potential sub-recipients and in monitoring their sub-award performance.

XVII. Providing Services to Non-federal Organizations

Federal regulations restrict AURA's ability to provide goods and services using federally funded equipment:

"Notwithstanding the encouragement in §200.307 “Program Income” to earn program income, the non-Federal entity must not use equipment acquired with the Federal award to provide services for a fee that is less than what private companies charge for equivalent services, unless specifically authorized by Federal statute, for as long as the Federal Government retains an interest in the equipment" 2 CFR 200.313 (c) (3). The Contracts Officers shall comply with these restrictions in the Uniform Guidance.

XVIII. Award Termination and Close-out

This provision governs the tasks that are performed at the end of an award's period of performance, including when the period of performance is shortened by early termination or transfer.

A. Final deliverables and reports

Final deliverables and reports are prepared and submitted by the same persons responsible for interim deliverables and reports.

B. Close-out of accounts

The Grants Officer requests Accounting to close all accounts for the award. At the end of the period of performance, the Grants Officer shall take steps to ensure that no more charges are made to the award. This is required because it is not permissible to charge expenses for one award to another award, including but not limited to a Center's cooperative agreement. These steps shall include, but are not limited to the following:

- Accounting closes out all accounts for the award
- Accounting removes the account numbers from the timecard system

APPENDIX A AWARD MANAGEMENT RECORDS MAINTAINED IN CARINA

The types of Award Management Records included in Carina include the following:

Incoming Awards from:

- NSF
- NASA
- DOE
- JPL
- Various colleges and universities
- Other governmental organizations

Outgoing:

- Contracts
- Subawards
- MOUs
- Other various agreements

The following documentation shall be posted in Carina for all contracts and subawards:

- Contract with exhibits
- Subaward with exhibits
- SAM search
- History of subaward or contract per UG 200.318
- Price Analysis or Cost analysis
- AURA and NSF Approval(s) (if applicable)

- Subrecipient/Contractor designation
- Amendments to contracts or subawards
- Authorizations of pre-award costs

Change Log

Date	Description of Change	Version
2/12/16	Added Functional Organization Chart	17.1
11/6/17	Added Compliance Officer information and Appendix A; revised Functional Organization Chart; made revisions to address the addition of Compliance Requirements, Compliance Verification Procedures and Compliance Verification Records to Vela, award management changes and readability.	18.0

