



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

**Award Management Policies
Manual**

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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 (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 Principle Investigator (PI), Central Administrative Services (CAS) staff and other personnel with regard to the programmatic and fiscal management necessary to administer awards. This manual is referenced in [AURA Policies and Procedures](#) Section A - AURA Organization, Structure, and General Policies, subsection XX, which requires AURA personnel at Centers funded by the National Science Foundation to adhere to the provisions of this manual. This manual only applies to those NSF-funded Centers.

This manual defines uniform policies and processes for coordinating, managing, and monitoring the *administrative activities* of AURA Centers so as 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 at least annually.

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. Each agency has its own terms and conditions for awards and also policies and procedures in separate guides that must be followed.

While each agency has its own terms and conditions and policy guides, all recipients of federally funded awards will be required to comply with the "[Uniform Guidance](#)" released at the end of 2013, which is formally known as "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards," 2 CFR 200 et seq. The "Uniform Guidance" replaces OMB Circular A-110, OMB Circular A-122, and OMB Circular A-133. Federal agencies are required to implement the "Uniform Guidance" in lieu of the OMB circulars by no later than 26 December 2014.

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)

- "The Federal Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards," Title 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 policies

Relevant policies and procedures will be accessible on the CAS and AURA HR websites. CAS is responsible for ensuring that posted policies and procedures are amended as needed. 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 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.
Award management	The management of the entire life cycle of awards and vendor contracts, from proposal preparation to final close-out of the award/contract.
Board of Directors	An appointed or elected body or committee that has responsibility for the management and oversight of an organization.
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 Grants Officer and Contracts Officer referred to in this manual are part of the CAS staff.
Carina	AURA's online application for tracking proposals, awards, and agreements.

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.
CFR	Code of Federal Regulations: the codification of the general and permanent rules published in the Federal Register. The CFR is categorized initially by "titles" such that a designation 2 CFR, for example, covers the rules established under Title 2, which is Grants and Agreements.
Compliance Officer	The AURA employee who is primarily responsible for overseeing and managing policies and procedures to assure compliance with applicable local, state and federal laws and regulations. The Compliance Officer reports to the VP of Administration.
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 and/or the AURA Vice President of Administration.
Grants Officer	The CAS employee responsible for award management functions.
HR	Human Resources: a division of the AURA Corporate Office.
PI	Principle 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 an agreement where AURA provides goods or services.
Proposal	Any submission to or from an agency or organization that may result in an award or agreement for AURA to provide goods or services, or lease property, or an amendment to an award or agreement, or a funding action under an existing award. If an organization approaches AURA about leasing a site for a telescope, that would be considered a proposal that must follow the procedures for proposals given in this manual even though no proposal document is prepared by AURA.
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 VP of Administration and the AURA Board of Director's Audit Committee.
System for Award Management	Official U.S. Government system used to register contractors.
Vela	An online database (currently in development with planned launch in FY14) of the terms and conditions of all active awards and the assignment of responsibility for complying with those terms and conditions. The database also includes all federal regulations regarding the performance of federal awards.

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 AURA Vice President of Administration 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 coordination, and monitoring of the administrative activities of AURA Centers, departments, and personnel to ensure that all actions required during the life cycle of an award are in compliance with the award terms and conditions as well as other applicable federal and state regulations.

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 Principle Investigator and or Co-Principle 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 with compliance with AURA policies, terms and conditions of all AURA awards, as well as all pertinent regulatory requirements. The AURA Vice President of Administration has the authority and responsibility to ensure that CAS, HR, and the Centers perform their responsibilities as defined in this manual.

(See BSR Guide, Award Management, Principle 1, Practice 1.2)

C. CAS responsibilities

The CAS Senior Manager is responsible for ensuring that CAS personnel perform their duties as described in this manual. The CAS Senior Manager shall monitor the activities of CAS personnel as necessary to determine that the policies and procedures in this manual are being followed and shall take appropriate action to correct any deviations. CAS staff shall provide support and training as requested by Center staff to assist in the successful adherence to the intent of this manual.

(See BSR Guide, Award Management, Principle 1, Practice 1.2)

D. Center responsibilities

Each Center's Director or designee 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.

(See BSR Guide, Award Management, Principle 1, Practice 1.2)

E. HR responsibilities

The AURA Senior Human Resources Manager is responsible for ensuring that HR personnel perform their duties as described in this manual. The Senior Manager of HR shall monitor the activities of HR

personnel as necessary to determine that the policies and procedures in this manual are being followed and shall take appropriate action to correct any deviations. HR is responsible for ensuring that all job descriptions clearly define the responsibilities of each staff person with regard to 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. (See BSR Guide, Award Management, Principle 1, Practice 1.2)

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 Vice President of Administration. AURA staff are responsible for being knowledgeable about policies, award terms and conditions, and other relevant federal regulatory requirements.

G. Award Management Functional Organization

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			
PROPOSAL AND BUDGET PREPARATION	CENTER APPROVAL	AURA CORP APPROVAL	PROPOSAL SUBMISSION
Co-Principal Investigator	Center Director	Grants Officer \$1M-\$3M: AURA President \$3M+: AURA BoD	Grants Officer
AWARD			
NOTICE OF AWARD	ACCEPTANCE OF AWARD	COMPLIANCE	
Grants Officer	Co-Principal Investigator and Grants Officer	Grants Officer and Compliance Officer	
POST-AWARD			
MONITOR	PAYMENT	MONITORING EXPENDITURES	SUBAWARDS
Compliance Officer	Accounting	Co-Principal Investigator	Contracts Officer
AUDIT	CLOSEOUT		
Accounting	Grants Officer		

H. 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.

(See BSR Guide, Award Management, Principle 1, Practice 1.3)

I. HR

HR is responsible for coordinating training programs for new and existing AURA and Center staff, with subject matter experts responsible for preparing training materials.

J. CAS Grants Officer

The CAS Grants Officer shall attend continuing education classes on federal award management annually.

K. 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.

(See BSR Guide, Award Management, Principle 1, Practice 1.3)

L. 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 and HR will serve as a resource to the Centers on training matters.

(See BSR Guide, Award Management, Principle 1, Practice 1.3)

V. Award Management Records

A. Carina repository for award management records

Official award management records shall be stored primarily 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. An individual's email archive is not an acceptable record keeping system for documenting required award management actions.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

B. Documentation of required actions

When an action required by this manual or by award terms and conditions is performed, the completion of the action shall be documented in Carina and/or Vela by the person who completed the required action so that compliance can be verified. Similarly, if a required action is not performed, an explanation for noncompliance must be documented in the system.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

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.”

VI. Required Government Registrations and Filings

Federal regulations require that award recipients periodically file and/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 Vice President of Administration
Submission of annual audit report to NSF	CAS Controller
General Services Administration Pricing Request	Contracts Officer

VII. 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 both exterior boards of directors for Gemini and 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 policy 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
 - Center policy and procedures
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 the OC, SOC, 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.

(See BSR Guide, Award Management, Principle 1, Practice 1.2)

E. CAS Grants Officer review

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

1. **General:** Prior to submitting proposals that include budgetary information and/or require certifications to funding agencies, Center personnel must send the proposal to the CAS Grants Officer for review. The CAS Grants Officer will coordinate the review of each proposal for budgetary, administrative, and compliance content using the appropriate CAS subject matter experts. The CAS 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, but not limited to, [AURA Policies and Procedures](#) Section

C.II.B.2. This review may take a significant amount of time. Proposals should be submitted to the CAS Grants Officer for review a minimum of two weeks in advance of proposal submission. (See BSR Guide, Award Management, Principle 2, Practice 2.1)

2. **Routing proposals to CAS Grant Officer:** The PI may post a proposal in the funding agency's website portal to be reviewed, approved and submitted by the CAS Grants Officer. If the funding agency does not have such a system, the PI will send the proposal to the CAS Grants Officer, who will then submit it to the funding agency.
3. **Coordinating required approvals:** The CAS Grants Officer shall coordinate required approvals. As part of the review of each proposal, the CAS Grants Officer shall determine what additional approvals, if any, are required for the proposal under NSF and AURA policies and shall verify that all required approvals have been received before the proposal is submitted to the funding agency. Policies that require approvals for proposals include, but are not limited to the following:
 - [AURA Policies and Procedures](#) Section C.II.B.2
 - [AURA Policies and Procedures](#) Section C.IV.
 - NSF cooperative agreement provisions
 - Approval by the AURA President of all proposals for outside funding that will require NSF approvals or other NSF actions.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

4. **Verifying certification accuracy:** The NSF requires institutions to make various certifications regarding their policies and activities as a part of each proposal submission. The CAS Grants Officer shall verify the accuracy of all certifications. As part of the review of each proposal, the CAS Grants Officer shall verify that AURA has documentation on file supporting the accuracy of each required certification.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

- a. **Conflicts of interest:** NSF Award and Administration Guide section IV.A. Conflict of Interest Policies requires that NSF grantee institutions maintain "an appropriate written and enforced policy on conflict of interest and that all conflicts of interest for each award be managed, reduced or eliminated prior to the expenditure of the award funds". The NSF requires certifications regarding compliance with this provision as a part of each proposal. This requirement is addressed by [AURA Policies and Procedures](#) Section A.IX. "AURA Policy Government Conflict of Interest" and is administered by AURA Human Resources.
- b. **Drug free workplace:** The NSF requires certification of compliance with the Drug Free Workplace Act as a part of each proposal. This topic is addressed by [AURA Policies and Procedures](#) Section B.XXVIII "Drug-Free Workplace," which is administered by AURA HR.
- c. **Debarment and suspension:** The NSF requires certification that AURA is not debarred or suspended by any federal agency, together with various certifications regarding criminal and civil convictions of AURA and its principals. [CAS Procurement Procedures](#) Section 2.6 "Compliance with debarment and suspension requirements" addresses the requirement that contracts and sub-awards may not be given to debarred or suspended parties.

- d. Lobbying: When a proposal exceeds \$100,000, the NSF requires AURA to complete a certification regarding lobbying restrictions.
- e. Nondiscrimination: NSF requires a certification regarding compliance with NSF nondiscrimination regulations and policies. This topic is addressed in [AURA Policies and Procedures](#) Section B.XXI "Equal Employment Opportunity and Affirmative Action Plan."
- f. Flood hazard insurance: NSF requires a certification regarding flood insurance for recipients with facilities located in FEMA-designated special flood hazard areas.
- g. Responsible conduct of research: NSF requires a certification that the institution has a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research, as described in the NSF [Award and Administration Guide](#) Chapter IV.B. This topic is addressed in [AURA Policies and Procedures](#) Section A.XIX "AURA Policy Governing Responsible Conduct of Research."
- h. Organizational support under section 526 of America Competes Act: The NSF requires a certification that there is organizational support for the proposal as required by Section 526 of the America COMPETES Reauthorization Act of 2010.
- i. Federal tax obligations: The NSF requires a certification regarding federal tax obligations.
- j. Criminal convictions: NSF requires a certification that the corporation has not been convicted of a felony criminal violation under any federal law within the 24 months preceding the date on which the certification is signed.

F. Award negotiations

The AURA Corporate Office is responsible for leading cooperative agreement negotiations with input from CAS and Center staff. The CAS 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.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

VIII. New Awards

A. Review and acceptance of new awards

All awards and contracts (agreements, memoranda of understanding, and memoranda of agreements) must be reviewed by the AURA Corporate Office and/or the CAS Grants Officer or a CAS 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 accounting department shall not draw funds on an award until the AURA Corporate Office, the CAS Grants Officer, or a CAS Contracts Officer has reviewed the award and determined that all terms and conditions are acceptable to AURA.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

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 the contract or award is active.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

- 1. Entry into Carina and Vela:** The CAS Grants Officer is responsible for entering award information into Carina. Each new award will be entered into Carina and Vela by the CAS Grants Officer. The information entered shall include, but not be limited to the following:
 - The award/contract type (fixed price, cost reimbursement, etc.)
 - Invoicing schedule and type of invoicing (cost reimbursement, milestone payments, etc.).
- 2. Notification to Accounting department:** The CAS 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 Procurement department:** The CAS Grants Officer shall notify the Procurement Manager of new awards and request that the appropriate signature authorities are created in Reqless. The Procurement Manager will grant signature authority in Reqless for the individuals specified by the Center.
- 4. Notification to Center staff:** Once the CAS Grants Officer has verified that all of the tasks for setting up the new award have been completed, the CAS 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 CAS Grants Officer shall ensure the following:
 - The PI is aware of all reports and other required actions and deliverables
 - The PI has read and understands the terms of the award
- 5. Notification to staff of special actions required:** The CAS Grants Officer will notify staff of any special actions required of them under the award by documenting them in Carina and in Vela. 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.

(See BSR Guide, Award Management, Principle 2)

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 CAS Grants Officer can monitor the status of all award deliverables and report on the same to AURA management.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

IX. Ensuring Compliance with Award Terms and Conditions

A. Award provisions tracking system Vela

The CAS Grants Officer shall maintain an online tracking system for award provisions in Vela. The AURA staff member responsible for fulfilling each provision of each award will be identified in Vela. When a new or amended award is received, the CAS Grants Officer shall enter each provision in Vela and assign responsibility for compliance for each provision. Vela will have the following capabilities:

- Allow users to view the award provisions for which they are responsible
- Allow users to document that they have reviewed a provision and accepted responsibility for complying with it
- Allow the CAS Grants Officer to track which award provisions have not yet been acknowledged and follow up as needed
- Allow users to document periodically (e.g., annually) AURA's compliance with a particular provision

(See BSR Guide, Award Management, Principle 2)

1. **Use of Vela for responsibility notification:** The CAS Grants Officer shall use the award provisions tracking system (Vela) to notify personnel of their responsibilities. When a new award is processed, the CAS Grants Officer shall direct all the people with responsibilities under that award to a screen in Vela that shows the award provisions for which they are responsible, and request that they read and accept responsibility for each provision in Vela. The CAS Grants Officer will follow up as needed until all provisions have been acknowledged.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

2. **Award change notification:** The CAS Grants Officer shall update Vela and notify responsible parties when award provisions change. The CAS 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 CAS 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.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

B. Award Compliance Monitoring

The AURA Vice President of Administration or designee monitors 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 statements of compliance:** At least annually, the CAS Grants Officer shall have CAS and Center staff document in Vela compliance status with regard to every administrative provision of every active award. The CAS Grants Officer shall follow up as needed if compliance is not documented for a particular award provision.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

2. **Annual compliance audits:** At least annually, the CAS Grants Officer shall audit a selection of award provisions to verify the compliance status reported in Vela.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

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 corporate 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.

Contracts that require external Board approval will be submitted in Fastlane by the CAS Contracts Officer. Upon acceptance by the NSF Contracts Specialist and Program Officer, the NSF Program Officer will forward the contract to the external Board for review and approval. Upon external Board approval, the NSF Program Officer will officially approve the contract in the NSF electronic portal. If AURA Board approval is required, the CAS Contracts Officer will submit the contract to the AURA Director of Corporate Operations.

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.

(See BSR Guide, Award Management, Principle 2, Practice 2.3)

2. **Past due deliverables:** The CAS Grants Officer shall investigate all past due deliverables. The CAS Grants Officer shall use Carina to identify past due award deliverables and shall follow up with PIs as needed.

(See BSR Guide, Award Management, Principle 2, Practice 2.3)

F. Training on compliance with award provisions

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

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

X. Transfer of Awards

A. Transfer of awards to AURA

1. **Award transfers for new hires:** AURA Human Resources shall notify the CAS Grants Officer when a new hire wishes to transfer an existing award to AURA. Human Resources shall notify

the CAS Grants Officer when they learn that a new hire intends to transfer an existing award to AURA.

2. **Other award transfers:** AURA staff shall contact the CAS Grants Officer when they want to transfer an existing award at another institution to AURA.
3. **Initiation of award transfer:** The CAS 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 both the funding agency and the CAS Grants Officer.
2. **Coordination of award transfer:** Upon being notified that a departing PI wishes to transfer an award to another institution, the CAS Grants Officer shall contact the funding agency and coordinate the transfer. Transfers of awards to other institutions shall follow the procedures for closing awards.

XI. Amendments to Awards

A. Amendments to cooperative agreements

1. **Amendment requests:** The Center in coordination with the CAS 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 CAS Grants Officer required reviews and approval and for 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 CAS 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.

B. Amendments to awards other than cooperative agreements

For awards other than cooperative agreements, the PI shall submit the request directly to the funding agency.

C. Processing award modifications

The procedures for processing new awards given in Section VIII shall be used for reviewing and processing amendments and other modifications to existing awards.

XII. 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, or 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."

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

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.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

XIII. 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 at [2 CFR](#) 230 "Cost Principles for Non-Profit Organizations."

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 CAS 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 Contracts Officers as needed.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

C. Training on federal cost principles

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

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

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 CAS Grants Officer shall work with the appropriate staff to develop a remediation plan, and then monitor the execution of the plan.

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

E. Indirect cost rates and other overhead charges

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

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

XIV. PI Award Management Duties

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. The PI must inform AURA HR and the CAS Grants Officer whenever personnel with responsibilities under the award depart AURA or change positions so that the CAS Grants Officer can update records and verify that responsibilities have been transferred to others.

(See BSR Guide, Award Management, Principle 2, Practice 2.3)

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:

(See BSR Guide, Award Management, Principle 2, Practice 2.3)

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

(See BSR Guide, Award Management, Principle 2, Practice 2.1)

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

(See BSR Guide, Award Management, Principle 2, Practice 2.3)

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%	CAS Grants Officer
Cost Sharing Equal To or Greater Than \$500,000	CAS Grants Officer
Conflicts of Interests	CAS Grants Officer
Withdrawal of PI/Co-PI	CAS Grants Officer
Rearrangement/Alteration of \$25,000 or over	CAS Contracts Officer (as preliminary step of procurement process for work)
Long-Term Absence of the PI/PD (Over Three Months)	CAS Grants Officer
Addition of Sub-award	CAS Contracts Officer (as part of the process of placing sub-award)
Change PI and Add/Change Co-PI	CAS Grants Officer

XV. Sub-recipient Monitoring

AURA's policies and procedures for the monitoring of award sub-recipients are found in [AURA Procurement Policies](#) Section X "Sub-Recipient Monitoring."

XVI. Providing Services to Non-federal Organizations

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

"The recipient shall not use equipment acquired with Federal funds to provide services to non-Federal outside organizations for a fee that is less than 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 215.34(b)

A. Proposal preparation and approval

All proposals to provide services to outside organizations must be prepared or approved by a CAS Grants Officer or Contracts Officer. In order to ensure compliance with [2 CFR](#) 215.34(b), and all other applicable federal requirements, AURA staff may not submit proposals or quotes to perform services for outside organizations without the prior approval of a CAS Grants Officer or Contracts Officer.

B. Verification of compliance

The CAS Grants or Contracts Officer shall document that AURA's proposed price for services exceeds the price charged by private companies for equivalent services. Before approving or submitting a proposal or quote for AURA to provide services to an outside organization, the CAS Grants Officer or Contracts Officer shall document compliance with [2 CFR](#) 215.34(b) by either of the following:

- Documenting that no private company provides equivalent services; or
- Documenting that the price to be charged by AURA is higher than the lowest price offered by a private company for equivalent services

XVII. 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 CAS Grants Officer requests Accounting and Procurement to close all accounts for the award. At the end of the period of performance, the CAS 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:

- CAS Accounting closes out all accounts for the award
- CAS Accounting removes the account numbers from the timecard system
- CAS Procurement removes the account numbers from the Reqless purchase requisition system

C. Unspent award funding

1. **For services to outside organizations:** Funds that are unspent at the end of the period of performance of agreements to perform services for outside organizations must be de-obligated by AURA.

2. **For grants paid in advance:** Funds that are unspent at the end of the period of performance for awards where the funding agency pays the full grant amount in advance must be returned to the awarding agency.

D. Record retention

Centers and CAS staff shall follow the AURA policy regarding record retention, [AURA Policies and Procedures](#) Section A.X “Records Retention.”

