



GRANTS HANDBOOK: POLICIES AND PROCEDURES

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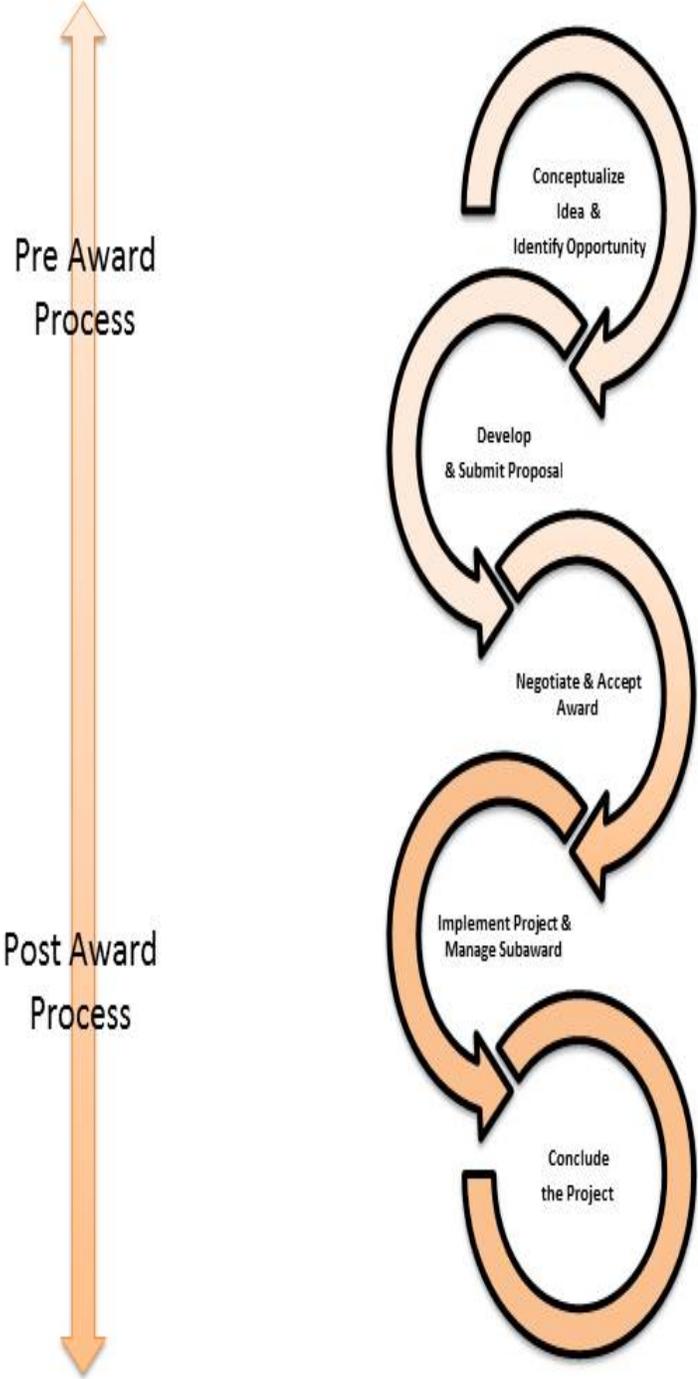
GENERAL INFORMATION

APU encourages faculty to seek external funding to support projects and activities that will support and enrich our institutional mission. The Office of the Vice Provost for Graduate Programs and Research, the Business Office, and the Office of Research and Grants (ORG) have provided this *Grants Handbook* to assist faculty in the preparation of grant applications and proposals for research, service, curricular development, training, and other program operations supported by external funding.

The Grants Handbook outlines policies and procedures relating to APU faculty and staff involved in research and scholarship at APU. In the event of any inconsistency, or conflict, applicable law supersedes university policies and university policies supersede college, department or lower unit bylaws, policies, or guidelines. Externally funded projects are subject to APU policies and, if provided in the grant agreement or other contract and not inconsistent with APU policies, the funders' grant policies.

The APU Grants website, <http://www.apu.edu/researchandgrants/>, is a resource for APU faculty and staff members to learn more about grant submission and management.

THE GRANT CYCLE



PRE-AWARD SERVICES

One of the goals of the Office of Research and Grants is to help secure external funding for research, equipment acquisition, professional and program development, and service projects. The Director of Sponsored Research assists faculty in identifying appropriate governmental and private funding sources and provides support in seeking funding from federal and state departments, foundations and agencies, professional and scholarly organizations, research-oriented foundations, private corporations and foundations, and other groups offering grant and fellowship programs. The Director of Sponsored Research processes the grant applications through the APU system and is responsible for ensuring the submission of proposals to the funding source including federal grants through the APU Cayuse software system.

Once a funding source has been identified, the Director of Sponsored Research obtains and helps interpret the materials needed to submit an application, assists in developing the budget and budget narrative, and edits proposal sections as needed, and submits the final, complete, and approved application.

ORG staff makes presentations to faculty, departments, and schools and hosts workshops regarding proposal writing, and works with individual faculty to identify grant opportunities upon request. Many resources are available through ORG to help faculty at every stage of proposal preparation. Notices of grant opportunities are forwarded to interested faculty via campus e-mail.

PROPOSAL PLANNING & GRANT SUBMITTING PROCEDURES

All grant and contract applications require internal review and approval before submission by the University to the funding agency. All proposed projects or requests for funding must be approved in advance using the Grant Routing Form process as described in this handbook. ORG is responsible for shepherding the grant proposal through APU's approval process. APU faculty cannot solicit grants or any type of external funding without prior authorization. The use of University stationery or letterhead to do so without prior permission is prohibited.

Complete proposals must be submitted to ORG **at least ten business days** before the deadline for submitting the completed grant proposal to the funding agency. ORG will invite investigators to meet before the internal APU/ORG submission deadline to coordinate the grant application elements. If a Memorandum of Understanding (MOU) or subcontract is required to be submitted with the grant proposal, APU's legal counsel may require additional time (up to two weeks) to review and approve the documents. Written requests for an exception to the 10-day deadline may be considered in rare cases. Requests may be emailed to the Director of Sponsored Research.

TYPES OF UNIVERSITY/SPONSOR RELATIONSHIPS

Grants, service contracts, and gifts are the major types of extramural funds that the university can acquire. A sponsored grant or service contract is an award of funds in exchange for the awardee performing a specified activity within a certain amount of time, such as conducting a program or a research project. A sponsored grant is typically memorialized in a written agreement that is legally binding with regard to budgetary restrictions, agreements for cost sharing, reporting and other stipulations. Such grants are generally awarded after a competitive review process to

identify the best-proposed project(s). Corporate and foundation grants must first be approved by the Office of University Advancement to avoid duplication of effort and possible conflict with institutional objectives related to corporations and foundations.

A gift or philanthropic grant is a unilateral transfer of money, property, or other assets from a donor to the recipient, usually has fewer constraints than a sponsored program. If you are unclear as to whether your proposal will result in a sponsored grant, philanthropic grant, contract, or gift, please contact ORG.

Types of Proposals

Grants are earned through well-crafted and planned proposals and a commitment to conduct the project with interest and enthusiasm. Funded projects are usually those that are (a) consistent with the interest of the funding source; (b) supportive of APU’s institutional mission; (c) deemed valuable, relevant, plausible and timely; and (d) presented in convincing and creative proposals.

There are four general ways to classify grant proposals:

1. Programs that provide services or products, including training and education to individuals, families, groups, or communities, as well as projects to improve your own teaching.
2. Research projects to support a variety of creative and scholarly activities. If a project requires extensive coordination or networking in advance, it is a good idea to submit a planning proposal requesting funding for the initial pilot efforts.
3. Technical assistance proposals seek funds to provide assistance to organizations as they develop, implement, or manage their programs.
4. Other proposals emphasize equipment, faculty development (e.g., exchange programs and fellowships), or student support.

PROPOSAL DEVELOPMENT PATH

Help is available from ORG at each step:

<ul style="list-style-type: none"> • Develop idea and discuss with colleagues • Determine possible funding sources • Feedback on narrative and budget • Discuss project with Chair/Dean • Obtain and complete a <i>Grant Routing Form</i> 	<ul style="list-style-type: none"> • Obtain and complete Current and Pending Support Form(s) • Obtain and complete PCOI Form(s) • Submit forms for ORG approval & routing • Submit proposal to funding source
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PLANNING AND DEVELOPING YOUR IDEA

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

Step One: Take a vague idea and identify a specific problem or need associated with it. Funding sources want to help solve problems, not finance the chasing of ideas. Next, define your objectives; that is, what you want to accomplish. It is important to focus on the product of your project or what it will accomplish, rather than on a need such as equipment or time. Decide which activities are necessary for you to reach your goals.

Step Two: Discuss your idea with others to help clarify it. Colleagues or faculty in other disciplines may indicate ways you can strengthen it. Establish possible professional collaborations if necessary. Collaboration often increases the number of sources for support.

Step Three: Flesh out your idea into a tangible, fundable project. To help reach their goals, government agencies and private foundations are soliciting your expertise. You are not asking for money, rather you are presenting a service.

Following are things to consider during the development of your idea in the planning process:

<ul style="list-style-type: none"> • Do you know what you want to do and how much it will cost? • What is the purpose and who will benefit from your research or project? • Do you know of any possible funding sources? • When do you need the funding? 	<ul style="list-style-type: none"> • Did you give yourself six months to a year before you need the funds? • Is this a project you will do yourself, or will you have partners? • Will you need matching funds from the University or other sources?
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SEEKING AND SELECTING A FUNDING SOURCE

ORG staff will help you identify governmental and private funding sources most closely related to your idea or project and will make direct contact with the funding source to ensure the sponsors are appropriate for your program.

If you believe it is valuable for you to contact the source directly, notify ORG beforehand to avoid duplication of efforts. We encourage prospective Principal Investigators / Project Directors to establish a good rapport with the program officers at funding agencies, but ORG should be kept informed.

Funding Sources

To increase the chances of funding, kindly notify ORG before you contact a funding source.

- ***Federal Agencies***

The largest funding source for external funding is the federal government, which sponsors thousands of programs. On average, the entire proposal process can take as long as nine months. Generally there are about three months between the time program guidelines are printed and the time proposals are due at the agency. Check with ORG to see if your funding source has additional due dates. For example, many federal research applications have 2-4 funding cycles over an 18-24 month period.

Federal grant programs are available through a wide number of sources, including national laboratories and institutes, national foundations, and US departments, and have established

funding priorities to address issues of national need, equity and diversity. Most programs require the submission of online applications.

- **California Agencies**

California agencies receive some of their funding from the state legislature who responds to societal needs in areas such as education, public health, and social services. APU is able to accept awards up to \$100,000/fiscal year from California agencies.

- A **private foundation** is a nonprofit, non-governmental entity with its own funds and governing board. Foundations are most frequently funded by a single source of funds from an individual, family, or corporation. There are also community foundations that operate with public money, making grants for social, educational, religious, or other charitable purposes in a specific community or region.

Resources

ORG works with faculty to match research ideas to potential funding sources. APU subscribes to several grants databases including COS Pivot, the Foundation Directory, eCivis, and the Federal Register. ORG will provide tools and/or assist faculty in accessing these databases and will provide guidance on narrowing their search requests and helping to identify viable funding sources. In addition, ORG has access to funding source databases, guides, catalogues, and bulletins. Most agencies and foundations publish their mission and application guidelines online.

Following are some samples of federal government websites:

www.ed.gov – US Department of Education grants www.labor.gov – Department of Labor grants www.justice.gov – Department of Justice grants	www.doe.gov or energy.gov – Department of Energy grants www.dod.gov – Department of Defense grants www.hrsa.gov – Health Resources and Services Administration grants
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Foundations/Endowments - Federal government

Several federal agencies provide funding for scholarships and endowments. The terms “foundations” and “endowments” are generally used to indicate private sources of funding. However, at the federal level, the terms also apply to the National Science Foundation (NSF) and the National Endowment for the Humanities (NEH).

The National Science Foundation (<http://www.nsf.gov/>), with annual budget of over \$5 billion, sponsors competitive grants for research, equipment, pre-college and community outreach, student research, curricular development and related initiatives for science, mathematics, engineering and technology, and programs administered in seven directorates: biological sciences; mathematical and physical; geosciences; social, behavioral and economic sciences; computer science and engineering; and education and human resources.

The National Institutes of Health (NIH) at <http://www.nih.gov>, and the National Endowment for the Humanities (NEH) at <http://www.neh.gov> and the National Endowment for the Arts (NEA)

at <http://www.nea.gov>, also run their own extensive grant programs that cover faculty research fellowships, summer support, and major research studies.

Clearinghouses

ORG subscribes to a series of grant clearinghouses and publications that may be helpful in identifying the desired grant program.

Other sources

California-based grant programs are often available to support small initiatives and community-based programming. The website <http://www.cayuse.com/> may provide further information. Cayuse is APU's grants submission vendor.

Program Guidelines

Many agencies have developed guidelines for submitting proposals, which typically require a cover page, budget pages, assurances, and a narrative. Applicants should pay close attention to the directions for preparing the application, budget restrictions, and the application review process. In preparing a budget, be aware that the government uses uniform procedures in dealing with cost analysis, such as consultant fees, overseas costs, per diem, and travel. Only projects fitting within these parameters will be funded. Foundations have more freedom in what projects they fund, but must meet the standards set by Internal Revenue Service to maintain their tax-exempt status. Government agencies also require APU to adhere to the standards on animal welfare, the use of human subjects, conflicts of interest and misconduct in research.

WRITING THE PROPOSAL

The proposal should be written such that someone completely unfamiliar with the proposed project/program can obtain a complete picture of what it plans to accomplish, how it will be accomplished, how it will be evaluated, how much it will cost, how long it will take to accomplish the goals and objectives, and what benefits it will provide. Remember that proposal reviewers are not often familiar with the specific academic areas; so do not write the proposal as if it will be presented to a colleague, but rather to someone who is totally unaware of the context.

A well-planned and presented budget is essential to enhancing the quality of a proposal. If the proposal is successfully funded, the budget will become the project financial plan. It is imperative to request enough funding to conduct your project properly. However, it is equally important not to pad your budget with over-estimates. In many cases, the grant program announcement lists out the detail budget requirement. The Grant Routing Form and all attachments (proposal, budget, budget narrative and Potential Conflict of Interest Form) is due to ORG at least **ten business days** prior to the application deadline in order to allow enough time for the Business Office and other APU departments to review and approve.

Budgeting – Please refer to the direct costs and indirect costs section in the Appendices. The university has an established indirect cost rate of 35% applicable to base salary and wages. Unless the sponsor has established a maximum indirect cost rate or does not allow any indirect cost charge, all budget proposals should include the indirect cost charge in the budget. Please identify the maximum indirect cost rate allowed by the funding source on the Grant Routing Form.

Sub-award/sub-contract(s) - Subaward recipient candidates should submit the scope of work, the budget, and Subaward Request Form for their projects. The Office of General Counsel will conduct a legal review of the proposed contract terms and the Vice Provost for Graduate Programs and Research, ORG, and Principal Investigators / Project Directors must review and approve the scope of work and the budget. As a review of subcontracts will likely add extra days to the grant routing process, please work with the potential subcontractors to get the paperwork ready for review as soon as possible.

Time Commitment – Along with the proposal and budget resources, the primary faculty member’s time commitment to the project also needs to be considered. A reasonable workload should be maintained to carry out university appointments and all sponsored research projects. Grant proposals should explicitly state whether grant funding is intended to underwrite current salary, or whether it will be considered as overload. If the grant application includes a course buyout or the assignment of units to research, this should be clearly articulated and approved by the faculty member’s department chair and dean using the Current and Pending Support Form (available from ORG). Similarly, the time and effort contributions of additional faculty members (e.g., quantitative consultants, translators, etc.) and staff contributing to the project should be explained in the budget justification portion of the grant application. For federally funded projects, periodic effort reporting is required.

Research design – Submission to Institutional Review Board (IRB) is an important component for research that involves human subjects. Institutional Animal Care and Use Committee (IACUC) review is needed if the project includes research with animals. Compliance reviews take time; please plan on communicating with the IRB coordinator or the IACUC coordinator as soon as you have an idea of the research design. Some proposals will not need review and approval by IRB/IACUC before being submitted, but will need approval, if funded, before the research commences.

Insurance – Some funded studies, such as clinical research, will need to be submitted to the University’s insurance carrier for coverage approval.

SUBMITTING THE PROPOSAL

Once again, complete grant proposals must be submitted to ORG via e-mail with a hard copy at least **ten business days before the due date**.

Online Submissions

Online grant submissions have become a requirement for most federal funding agencies. ORG requests that all faculty members consult with us regarding a grant project well before the deadline. ORG will assist you in uploading all required proposal sections into Cayuse (APU’s contracted grants e-submission provider). Cayuse will not allow a proposal to be submitted if it contains errors.

Please keep the following in mind:

- While Principal Investigators / Project Directors and other grant personnel may upload sections of the proposal on their own, all online grants must be submitted through ORG.

- All grant application materials, including biographical sketches/CVs, the grant narrative, and other attachments must be sent to ORG electronically via email. ORG posts active grant projects on Basecamp and will issue passwords to the principal investigators/project directors.

Matching Funds

Institutional matching funds show the organization is committed to the research project and usually strengthens the competitiveness of a given proposal. Matching funds may be cash or in-kind contributions, but must be explicitly stated in the presented budget sheet and must receive prior clearance from your Dean and the Business Office. In-kind contributions represent time, space and operational expenses incurred by the division or the University in support of the proposed project.

Time

This represents pro-rated salaries of all personnel who will be involved in the project (from Deans to the principal investigator/project directors). For example, 5% of Dean XYZ's annual salary would represent 5% of his/her time committed to the project for a given year. Any Employee Related Expenses (ERE) such as benefits will be prorated with the same percentage of salary. Whenever possible, budget justifications should specify whether intended time on research projects will be part of an employee's regular load or overload.

Space

If a grant project requires the use of University space, your Dean and the Chief Information Officer (CIO) must approve.

Equipment

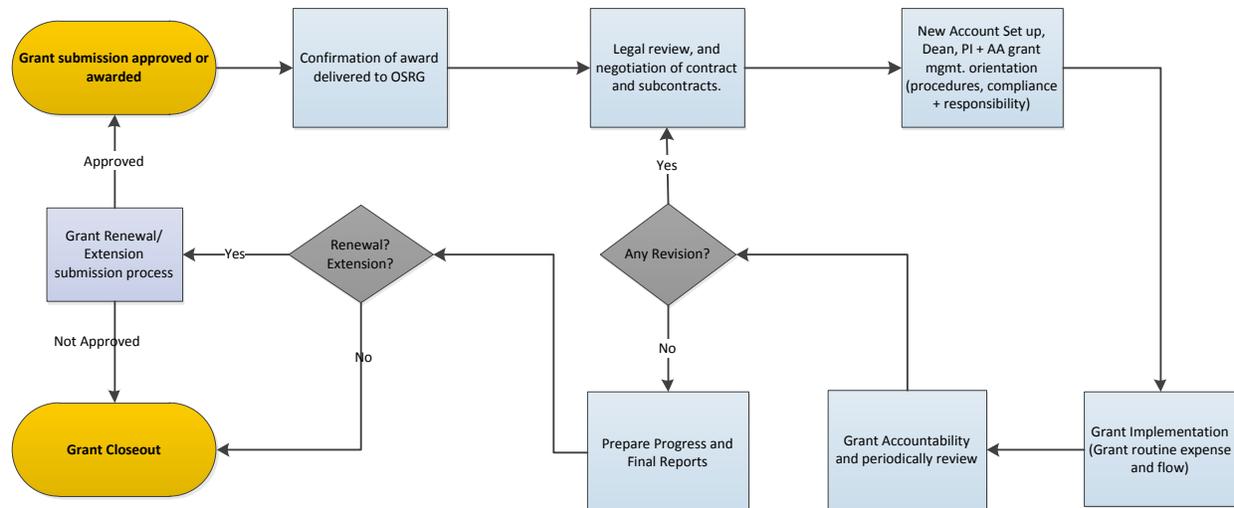
If a grant project includes the purchase of computers or other equipment, your dean and the Chief Information Officer (CIO) must approve.

WHAT TO DO IF A PROPOSAL IS NOT FUNDED

Sometimes proposals are not funded. All funding sources have a limited base of support, and because they receive hundreds or thousands of worthy proposals, they cannot possibly fund all applications. A strong suggestion is to study the reviewers' comments and re-submit the proposal during the next funding cycle.

There are often other possible sources of funding available. ORG will work with you to determine what other sources might also be viable options for your proposal. In most cases, you are encouraged to re-submit your proposal after reviewing the comments and making edits to your proposal.

POST-AWARD SERVICES



NEGOTIATING AND ACCEPTING THE AWARD

Funders send award letters or non-award letters to notify grant applicants of award status. Any correspondence such as award notification letters and checks received from funders should be forwarded to the Director of Grants Management immediately for a timely response (e.g., a thank you letter). Funders may offer less than requested or ask for a revision of the project scope. The Director of Sponsored Research, the Director of Grants Management and the principal investigator/project director will review the award and the project plan to determine if a revised plan/budget needs to be submitted. For awards that include a contract, the principal investigator/project director and the Director of Grants Management will review the terms and conditions and negotiate with the funder as needed.

All grant contracts requiring institutional acceptance must be reviewed and signed by authorized representatives of APU, in accordance with various APU contracting policies, including Legal Review of Contracts, Financial Review of Contracts, and Contract Signing – Authorized Signatures. In most cases, this is the Vice Provost for Graduate Programs and Research, the designated authorized signer for APU grant contracts, who will work with the Office of General Counsel and the Business Office for appropriate review and approval.

IMPLEMENTING THE PROJECT AND MANAGING SUBAWARDS

ESTABLISH A RESTRICTED PROGRAM ACCOUNT (RESTRICTED COST CENTER)

The original copy of the contract will be filed in the office of the Vice Provost for Graduate Programs and Research. Copies will be distributed to the Grant Accountant in the Business office, the Director of Grants Management, the principal investigator/project directors and the

Dean of the school. When the Business Office receives a copy of the contract, a restricted program account will be established. One account may not include funding from more than one funding source. Co-mingling of funds is strictly prohibited and could lead to disallowed costs.

To learn more about reimbursement procedures, please refer to the Business Office website at <http://www.apu.edu/businessoffice/>.

GRANT MANAGEMENT ORIENTATION

After the contract is signed by both the sponsor and APU, the Director of Grants Management will host two grant orientation meetings: one session with the principal investigator/project director only and one session with the principal investigator/project director (s), department chair, support staff /department designee, Business Office and Information and Media Technology (IMT), as needed. The orientation provides the principal investigator/project director(s) and their departments with an overview on the following topics:

- Creation of Project Management Plan and task tracking system
- Project budget cost center
- The principal investigator/project director's responsibilities such as policy and guideline compliance, reporting
- APU expenditure coding and expenditure monitoring
- Guidelines on purchasing equipment, supplies, travel and others
- Guidelines on hiring long-term employees funded by grants
- Guidelines on hiring short-term employees, external consultants and contractors funded by grants

The orientation provides vital information on how principal investigator/project directors manage their grant projects. If not already determined, the distribution of indirect costs can be confirmed at the orientation meeting.

SETTING UP SUBAWARD RECIPIENTS (AS NEEDED)

In situations where APU is the lead agency, if there are subaward recipients included in the project, an APU subaward recipient contract needs to be prepared. Subaward recipient candidates should submit to the Director of Grants Management the scope of work, the budget, and Subaward Request Form for their project. The Director of Grants Management and the principal investigator/project director will review the scope of work and the budget, and prepare an APU contract for subaward for review and approval by the Office of General Counsel and the Vice Provost for Graduate Programs and Research. Depending on the sponsors, a clearance from the sponsor may be required. Sub-recipients need to follow the policies and guidelines of the primary sponsor, as well as of APU guidelines and their own guidelines such as financial reporting and conflict of interest.

In compliance with the Federal Funding Accountability and Transparency Act (FFATA), the Director of Grants Management will enter the subaward recipient's information into

www.USASpending.gov within 60 days of the effective award date when Federal funding exceeds \$25,000.

The Business Office will set up an excel spreadsheet to track the spending on subaward contracts. The principal investigator/project director and the Grant Accountant must approve invoices from subaward recipients before they can be processed for payment. In cases where APU receives a subaward from a prime recipient institution, APU will follow the same process of “Negotiating and Accepting the Award.” In most cases, APU will need to agree to adhere to the policies of both the prime sponsor and the prime recipient institution.

PRINCIPAL INVESTIGATOR/PROJECT DIRECTOR RESPONSIBILITIES

Faculty must fully understand their responsibilities as a principal investigator/project director. The principal investigator/project director oversees fiscal and programmatic performance, is responsible for the overall management of the grant, and must partner with the Grant Accountant and the Director of Grants Management to ensure compliance with applicable federal, state and/or local regulations. This includes completion of all required reports, and submission of all in-house documentation (i.e., requests to transfer funds, personnel requisitions, and budget modifications). All grant project expenses need to be approved by the principal investigator/project director in advance. If the project spending is related to any reimbursement to the principal investigator/project director, the request must have Chair/Dean’s approval. All expenses and cost transfers should be well documented and filed.

The principal investigator/project director is responsible for complying with the sponsor and APU’s policies and guidelines including training (Responsible Conduct of Researchers, Conflicts of Interest, IRB, IACUC compliance), effort reporting, inventory reporting, and periodic program and financial reports. Failure to meet deadlines can have a serious impact on the funding stream and future funding possibilities and in some cases, it can hold up awards of future potential grants to APU.

The principal investigator/project director will monitor the sub recipient’s activities to ensure they are fulfilling the project goals and all related polices and guidelines. If there is any issue or doubt, the principal investigator/project director should contact the Director of Grants Management and the Grants Accountant. They are the resources provided by APU to assist in managing and administering the grant award.

The principal investigators/project directors may occasionally be asked to work with Advancement if foundations or funding source representatives are invited to campus. This could include coordinating a site visit and making presentations to the funding source team.

SETTING UP A PROJECT MANAGEMENT PLAN/TASK TRACKING

Based on the milestone dates and programmatic / performance report deadline(s) stated on the contract, a project management plan will be developed jointly by the principal investigator/project director and the Director of Grants Management to cover required deliverables and reports. The Director of Grants Management will assist in setting up meetings and reviewing the process to track all related key tasks and answer all project related questions. Periodic reviews with the Director of Grants Management about the timeline and progress reports will be scheduled.

If changes in the original proposal are necessary due to a lesser amount of funding than requested, or if there are problems in reaching the project goals, the principal investigator/project director must discuss the problem and its resolution with the Director of Grants Management who will address it with the funding agency, if necessary.

Copies of all correspondence resulting in changes in the proposal or funding must be sent to the Director of Grants Management. The Director of Grants Management must be notified of any potential changes in the budget and contract terms. Correspondence regarding such changes will be reviewed and approved by the Vice Provost for Graduate Programs and Research with review by the Office of General Counsel, if needed.

The principal investigator/project director must submit all interim and final performance and technical reports to the funding agency by the required deadline. These reports will require the principal investigator/project director to work closely with the Grant Accountant to ensure that all fiscal reports are accurate and completed on time. Completed programmatic and fiscal reports must be submitted to the Director of Grants Management for review and mailing *at least* five business days prior to the due date. School or department level grant support personnel must also send reports to the Director of Grants Management for review at least 5 days before submission.

SETTING UP THE PROJECT BUDGET

Using the budget submitted with the proposal and any related revisions, the Grant Accountant will work with the principal investigator/project director to manage fiscal activity, financial reporting and audit aspects of the project. The Grant Accountant is available to answer fiscal questions raised by the principal investigator/project director.

POLICY AND GUIDELINE COMPLIANCE

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

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

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

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

For U.S. Department of Health and Human Services (HHS), the grant management guidance is available for reference at <http://dhhs.gov/asfr/ogapa/grantinformation/appbusguidance.html>.

APU follows federal and state policies, rules and guidelines.

RESPONSIBLE CONDUCT OF RESEARCH (RCR) TRAINING

All APU human subjects researchers are required to participate in the online [Collaborative Institutional Training Initiative \(CITI\)](https://www.citiprogram.org/) training, <https://www.citiprogram.org/>. Details regarding RCR and other training opportunities can be found at the ORG website, <http://www.apu.edu/researchandgrants/training/>. Both NSF and NIH require researchers and students supported by their funding to additionally complete face-to-face Responsible Conduct of Research training. The objectives of RCR training are to:

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

APU provides RCR workshops for faculty, staff and student participation. Dates will be discussed during the grants orientation meeting. For more information, see the Director of Grants Management or ORG website.

CONFLICT OF INTEREST (COI) TRAINING

Investigators and key research personnel on HHS, PHS, and NIH awards must also complete COI training prior to engaging in NIH-funded research. Potential Conflict of Interest (PCOI) agreements need to be signed by all involved personnel (including student researchers, if on Federally funded grants). The agreements must be renewed annually.

PURCHASING AND TRAVEL GUIDELINES

After the principal investigators/project directors develop management plans and budgets, they can start spending the funding awarded within the limit of the categories and amount allowed by the contract. Please refer to the allowable and unallowable cost information posted on <http://www.apu.edu/researchandgrants/>. A designated department support staff should be able to assist the principal investigator/project director in processing purchase, travel and reimbursement requests from the project account. Either the principal investigator/project director or support staff members can work with the Grant Accountant to process payment and reimbursement. All requested expenses need to be reviewed and approved by the principal investigator/project director, department chair and in some cases also the Dean. Please follow the instructions on the forms, which can be downloaded from the grant webpage, <http://www.apu.edu/researchandgrants/>.

It is crucial to document how project expenditures can benefit the project. Without correct justification and approval, requests for payments will not be processed.

Grant funds cannot be used as replacement funds for the department operating budget. In most cases, that is considered to be “supplanting” which is not allowed. Grant funds should be ONLY used for expenditures and purchases related to the specific grant for which they are designated. In addition, please note that “splitting” an equipment order to qualify for less demanding purchasing requirement is not allowed. Check with the Grant Accountant and the Director of Grants Management if there are any questions.

Any computer purchases should be pre-approved by IMT before proposal submission as part of the application process. If the computer purchase is requested after the grant is awarded, the principal investigator/project director should contact the Director of Grants Management to adjust the budget, if possible, and to coordinate with IMT.

Any purchase of equipment and non-common items will need to be approved by both APU and the sponsor. The approval process at APU is included in the application review with the Grant Routing Form.

The grant website includes grant related forms and policies related to purchase, travel and reimbursement. The policies and guidelines include both APU and major federal funding sources. The principal investigator/project director should be very familiar with allowable costs and unallowable costs for their projects. According to 2 CFR 220 (OMB A-21), there are four simple rules to follow. Costs must be (1) reasonable (using the prudent person test), (2) allocable (using the proportional benefit and the interrelationship rules), (3) consistent and treated uniformly in like circumstances, and (4) allowable with any limitation or exclusion in the agreement. These rules can be reviewed during the grant management orientation. Questions may be directed to the Grant Accountant or to the Director of Grants Management.

All travel arrangements under a grant need to be written into the project budget and approved before travel commences. Travel policy and request forms are posted on the grant website. Please make sure to follow the procedure on the form to get all needed approval signatures before travel. Refer to Appendix III for more information.

When an APU credit card has been used for a sponsored project payment, the principal investigator/project director and support staff members should make sure the university credit card transaction is allowable by the sponsor and by all applicable APU policies. All related backup documents should be filed with all project-related expense documents with a copy sent to the Grant Accountant to file. Any unauthorized expenses will be transferred to the department or become the university credit card holder's personal liability. If the principal investigator/project director and the department have any questions about the use of a university credit card for certain sponsored project expenses, please consult with the Grant Accountant in advance.

GUIDELINES ON HIRING FACULTY, STAFF, AND STUDENTS FUNDED BY GRANTS

If there are new grant-funded positions needed for the project and those positions have been budgeted in the proposal or revised budget, the principal investigator/project director must adhere to the following procedures to hire grant-funded employees.

1. Principal investigator/project director writes job description.
2. Principal investigator/project director submits a request for a faculty position through the Office of the Provost. All other requests are submitted to Operations Committee. Position requests should be submitted in Word format. The job description template is available at the Human Resources website.
3. Following review and approval, position openings will be posted as follows: Human Resources posts jobs for staff positions. The Office of the Provost posts jobs for faculty positions. The Office of Student Employment posts student job descriptions.

4. Principal investigator/project director reviews applications, interviews finalists, and identifies top candidates.
5. The finalist interviews with department chair and dean.
6. Principal investigator/project director notifies the relevant department (i.e., Office of the Provost, Human Resources, Office of Student Employment) of the top candidate; background check is conducted for staff members, where required.
7. If applicant is fully approved through the relevant department (i.e., Office of the Provost, Office of Student Employment) and senior academic administrators, a job offer can be made. Human Resources must approve all hires. HR will send the offer email to the hiring manager once all pre-employment processes have been completed.
8. New employees are encouraged to attend orientation (0.5 day if position has no benefits and 1 day if it includes benefits).

Questions regarding international job applicants are referred to the APU Employee Handbook for information on verification of right to work. Please contact Office of Student Employment for questions regarding student employment, international students, advertising procedure, and pay scale. The Student employment Application and Student Employment Handbook can be downloaded from <http://www.apu.edu/studentemployment/working/>.

Note: The length of the project and budget amount determines the length of employment of an externally funded employee. In the event a program is terminated or curtailed, the employee will be terminated. All hires on grant funds include clarification in the offer letter that the position is temporary and that continued employment is contingent upon external grant funding.

Relatives of the principal investigator and key grant personnel may not be hired as employees on their grants.

GUIDELINES ON HIRING CONTRACTORS FUNDED BY GRANTS

Please confer with ORG or the Director of Grants Management before hiring a consultant or contractor, as employment consideration can vary from grant to grant. All contractor-related forms for grants are listed on the Human Resources webpage:

<http://www.apu.edu/humanresources/forms/>.

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

Relatives of the principal investigator and key grant personnel may not be hired as contractors on their grants. Refer to APU Employee Handbook, <http://www.apu.edu/humanresources/handbook/>

MONITORING COST SHARE FUNDING, EXPENDITURES, AND PURSUIT OF COLLECTIONS

Account expenditures should be reviewed monthly to identify under-spending, over-spending, or errors. A regular meeting with the Grant Accountant will be set up to go through the expenses, cost sharing, payroll redistribution, subaward management and project income/revenue reconciliation. The Grant Accountant works on indirect cost recovery reconciliation and prepares invoices for income/revenue collection and fund drawdowns.

PROJECT SITE VISIT AND EVALUATION TEAM VISITS

Depending on the sponsors' policies and requirements, there may be a sponsor site visit during which the sponsor learns more about the project's progress, success, continued potential and conducts an audit. When the principal investigator/project director receives notification about an impending visit, the Director of Grants Management should be notified immediately. Working as a team, the principal investigator/project director, the Director of Grants Management and the Grant Accountant will develop a visit agenda and identify the individuals and locations to be visited.

A project evaluation is very similar to a site visit, but it is more complex and directed by the sponsor. Sponsors will instruct the principal investigator/project director about what they want to see, the topics to discuss, and whom they want to meet. The focus will be on deliverables, outcomes, objectives and impact of the project. Sponsors may want to know about other APU grants to see if there are opportunities to partner for other research projects.

AUDIT PREPARATION AND MEDIA COMMUNICATION

Preparation for internal and external audits is a key responsibility of the principal investigator/project director. The principal investigator/project director should keep a copy of project-related paperwork for audit purposes. APU will perform periodic audits of externally funded projects to ensure compliance with policies. Grant recipients must cooperate fully in all such internal audits.

Copies of the contract should be available from the Vice Provost for Graduate Programs and Research, the Director of Grants Management, the principal investigator/project director and the Business Office. Expenditure reports should be available from the principal investigator/project director and the Grant Accountant. Human Resources records should be accessed directly from the Human Resources department and the Payroll department. University Relations should first address any media requests about the grant.

MANAGING AND PREPARING CHANGE REQUESTS

During the grant period, changes may occur unexpectedly and may prompt the need for a no cost extension, re-budgeting, carry forward request, change of key personnel, change on scope of work, and investigator change. As soon as those changes are identified, notify the Director of Grants Management to get the change request prepared and submitted to the funding agency, if necessary. The Office of General Counsel may be involved in the process as needed. The change request package should be reviewed, approved, and signed by the Vice Provost for Graduate Programs and Research. If there is a desire for renewal or extension, the Director of Grants Management and the Grant Accountant will start working with the principal investigator/project director on the renewal request as soon as possible.

CONCLUDING THE PROJECT

Allow enough time to prepare final close out reports before the final close out date. The principal investigator/project director will review the research outcomes and compare them to the project plan and goals to make sure all the final project progress report should be prepared and submitted to the Director of Grants Management the deadline. The quality of the report is very important and may have a direct impact on the chances for future funding for the principal investigator/project directors and for APU.

The Grant Accountant works with the principal investigator/project director and department assistant (designee) to ensure all allowable expenditures/purchases and costs shared are timely and accurate. The Director of Grants Management facilitates a detailed final close out report with the Grant Accountant and the principal investigator/project director. All necessary adjustments including final indirect cost transfers and transfer of final expenses to the correct account are recorded including stopping any unallowable university credit card purchases ahead of time.

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

For fixed cost contracts (where contractor pays a firm amount regardless of the ultimate cost to complete the project), any expenses not covered by the grant must be covered by a non-restricted account. If there is a residual (revenue exceeds expenses) after all indirect costs have been transferred, any remaining balance should be returned to the sponsor. If the contract states that there is no need to return excess funding, the remaining funds will be moved to the school or department restricted research account, according to the school's policy and the Dean's decision.

After all required reports and adjustments are resubmitted, the account will be closed out. The principal investigator/project director and his/her department, the Director of Grants Management, and the Business Office should maintain the project files. The official grant file may be in electronic or paper format, or a combination of both. The file should include all significant records pertaining only to the particular grant. These records should include, but are not limited to, the complete application(s), summary of review actions, award notices, progress reports, financial records, audit records, official correspondence, all compliance certificates and forms, closeout documents and all other supporting and related papers.

For sponsored research project records, APU follows Federal rules and policies regarding record retention. Per the Office of Management and Budget (OMB) Circular A-110, any sponsored project related files must be kept for at least three years from the date of the final financial report submitted. However, there may be additional requirements from HR (payroll records). OMB Circular A-110 states that "Financial records, supporting documents, statistical records, and all other records pertinent to an award shall be retained for a period of three years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, as authorized by the Federal awarding agency." Since the grant period may range from one or more years, the 3-year rule needs to be considered with the length of the grant. For example, the records of a grant starting in 2006 and ending in 2009 should be kept until 2012 or 2013 depending on the date of the final financial report submission. For more information, see APU's Record Retention and Destruction Policy at <https://docs.google.com/a/apu.edu/document/d/1sFudsIhBcSUjI8Hq7NbfVbFlqSyMASV-r9PERU-OiIY/edit>.

APPENDICES

APPENDIX I ROLES AND RESPONSIBILITIES

From identifying a grant/contract opportunity to writing grants, submitting them and managing them, the entire grant process is coordinated among various APU administrative departments and academic schools and departments.

BUSINESS OFFICE

The Business Office is responsible for maintaining official fiscal records, including expenditure documents for all grant projects, and typically maintains records for 5 years following the end of a grant period. The Grant Accountant in the Business Office is the official authorizing officer who maintains copies of all grant agreements and creates a cost center to track all fiscal activity for each grant. The Business Office must approve grant budgets and external reports prior to submission to the funding agency.

The Business Office, in conjunction with the relevant department deemed appropriate, administers all funds awarded in response to authorized institutional applications. All University grant projects must comply with pertinent federal Office of Management and Budget (OMB) guidelines, (e.g., OMB Circulars A-21, A-110), on file in the ORG and Business offices, and posted on the ORG Website.

OFFICE OF THE PROVOST

The Vice Provost for Graduate Programs and Research is APU's Authorizing Official for all required grant related approvals. Responsibilities include approving grant submittals and, in consultation with Legal Counsel, grant awards, contracts, and subawards. The Vice Provost for Graduate Programs and Research serves as the university's Research Integrity Officer and provides oversight to the Committee on the Conflict of Interest, and serves as an ex-officio member of the IRB and IACUC.

OFFICE OF RESEARCH AND GRANTS

The Office of Research and Grants (ORG) is responsible for preparing and submitting grant applications through APU's approval system and through federal and private funding source systems. ORG coordinates grant searches and grant submittals with advancement, schools, departments, and faculty. The Director of Grants Management assists APU faculty members and researchers in implementing their sponsored grants and contracts and complying with APU and sponsors' regulations and policies.

OFFICE OF UNIVERSITY ADVANCEMENT

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

OFFICE OF HUMAN RESOURCES

The Office of Human Resources (HR) serves the APU Community in a variety of capacities from recruiting highly qualified employees to coordinating benefits and providing workplace learning.

PROJECT DIRECTOR (PRINCIPAL INVESTIGATOR)

The principal investigator/project director is responsible for the overall management of the grant, and must partner with the Business Office and the Director of Grants Management to assure compliance with applicable federal, state and/or local regulations, completion of all required reports, and submission of all in-house documentation (i.e., requests to transfer funds, personnel requisitions, and budget modifications). Principal investigators/project directors are accountable for ensuring that the project is conducted as described in the proposal and that the project goals are met. The principal investigator/project director also maintains required records dealing with grant execution and achievement. Records should be organized such that individuals unfamiliar with the project can easily review them.

COMPLIANCE PARTNER: INSTITUTIONAL REVIEW BOARD (IRB)

The Institutional Review Board (IRB) is responsible for reviewing and approving all studies and research activities involving human subjects. Principal investigators/project directors submit applications to the IRB Coordinator. The IRB meets monthly.

COMPLIANCE PARTNER: INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE (IACUC)

The Institutional Animal Care and Use Committee (IACUC) is responsible for reviewing and approving all studies and research activities involving animal subjects. Principal investigators/project directors submit applications to the IACUC Coordinator.

OFFICE OF GENERAL COUNSEL

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

INFORMATION AND MEDIA TECHNOLOGY (IMT)

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

DEPARTMENTS

Principal investigators/project directors and their Deans must sign the External Grant Routing Form before a grant application can proceed through the APU approval system. Department chairs often work with the principal investigator/project directors to develop budget line items; determine the use of time, space, and equipment to conduct grant activities; and in some cases, to

provide fiscal and program oversight to the project. Departments also support the principal investigator/project director with any administrative responsibilities such as purchasing and travel reimbursements.

APPENDIX II FORMS

Since APU must be a good steward of grant funded awards, all expenses should be clearly justified showing benefits to the projects. Please refer to the grants website <http://www.apu.edu/researchandgrants/> for both pre-award and post-award forms. Please note requirements of grant projects to fulfill APU internal and external funding policies.

Forms and instruction may be updated frequently, as needed.

APPENDIX III DIRECT AND INDIRECT COSTS

DIRECT COSTS

All APU expense categories are described on the Grants website. Please review any unallowable cost categories. If you are uncertain if funds can be spent in certain areas, check with the Grant Accountant or the Director of Grants Management.

Personnel

Time commitments and teaching reassignments for faculty members involved in external grant activity must be consistent with pertinent university policies. Please make sure to communicate with your department chair on time commitments.

Faculty/Staff Salaries

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

1. Salary Cap. To incentivize grant applications, faculty members may request up to 37.5% of potential additional income based on a regular 12-month salary when applying for grants that include salary. To calculate the maximum income for faculty on non-12-month contracts, salary would be adjusted to the equivalent of 12-months pay using the monthly rate and 37.5% added. In this way, faculty members could earn a maximum of 137.5% of that 12-month amount from all sources, including all types of overload and research. Approval to do so must come from the dean.
2. Approval for Course Buy-out or Overload Pay. Faculty buy-outs and/or overload from grants must be approved by the department chair and dean before a grant application is submitted. Grant applications must clearly state whether salary income from grants would create a course buy-out situation, or would entitle the faculty member to be paid in addition to their regular salary.
3. Calculating Buy-out Rate. For each 3-unit course bought out, grant funds to underwrite that expense should be calculated at 10% of the faculty member's salary plus 30% of that amount for fringe benefits. In cases where the grant does not allow this level of expense, the adjunct rate plus 10% fringe may be used with the dean's approval.

4. Supplemental Pay from Grants for non-PIs. Pay for supplemental hourly services for faculty on grants should follow the established rates for adjuncts (one unit of adjunct/overload pay equals 40-45 hours of service, roughly \$24.50 per hour plus 10% fringe). Deviations should be clearly justified.

Fringe Benefits

Fringe benefits are calculated for all salary lines, except when disallowed by grant guidelines. APU uses an estimated benefit rate of 30% for full time university employees, and 10% for part time employees and student workers.

Graduate Assistants

Graduate Assistants, whether Research Assistants (RAs), Teaching Assistants (TAs) or regular hourly student employees, may be included in grants, as appropriate. Please refer to the Student Employment Handbook for pay scale and related policies and procedures:

<http://www.apu.edu/studentemployment/working/>

Student Workers

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

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

Expenditures

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

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

Consultants

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

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

If the consultants are APU faculty and staff members, the supplemental hourly services on grants should follow the established rates for adjuncts. This rate is \$24.50 per hour. The pay rate should be commensurate with the job, but typical remuneration follows this adjunct rate. Deviations should be clearly justified. An Extra Services Payment Request Form should be submitted with proper approval. All consultant and sub-contractor hiring paperwork needs to include the purpose of the hiring and how the service is beneficial to the projects.

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

Travel

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

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

Lodging and subsistence –

All travel expenses should be considered reasonable and allowable. Federal and state grants follow the per-diem rate system developed by the State Department, which has set an upper limit of related expenses per city and season.

Air travel –

The Fly America Act requires travelers whose air travel is being financed by the federal government to use a United States flag air carrier service for all international air travel when available. The airfare should be the lowest available commercial discount ticket.

Auto vehicle travel –

As of January 1, 2014, mileage should be calculated at a rate of \$0.56/mile.

Domestic vs. foreign travel

Agencies	Domestic Travel includes the following areas:	Foreign travel includes the following areas:
National Institutes of Health (NIH)	48 continental States, Alaska, Hawaii, Canada, US Territories	All locations except those areas stated as domestic travel

National Science Foundation (NSF)	travel in the US, its possessions, Puerto Rico and travel to Canada and Mexico	All locations except those areas stated as domestic travel
Department of Defense (DoD)	the 50 States, District of Columbia, the Commonwealths of Puerto Rico and the Northern Mariana Islands, Guam and the U.S. territories and possessions	All locations except those areas stated as domestic travel
Federal Travel Regulations, Department of Energy (DOE)	48 contiguous States, the District of Columbia, the States of Hawaii and Alaska, Commonwealths of Puerto Rico, Guam and the Northern Mariana Islands and the territories and possessions of the United States (excludes the Trust territories of the Pacific Islands)	All locations except those areas stated as domestic travel
Department of State	The United States is defined as the fifty states, Commonwealth of Puerto Rico, possessions of the United States, and the District of Columbia.	international travel is outside of the United States

Any travel outside of the 48 contiguous states should be carefully reviewed before making arrangements.

Food

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

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

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

Computer Hardware & Software

When purchasing computer hardware or software, it is important that both IMT and the business office are aware of the order. IMT becomes aware of the purchase when it approves the initial requisition, then once the merchandise is delivered. IMT installs and services it throughout its use.

Carry-overs

Funds that are not expended at the end of a year or a grant cycle are not automatically carried over to the next year. Permission to do so must be obtained from the Director of Grants Management. In all cases, project grant guidelines will be followed. Some grants require the return of unspent funds prior to ending date. The principal investigator/project director may not make requests for a no-cost extension without prior consultation with the Director of Grants Management.

INDIRECT COSTS (FACILITY AND ADMINISTRATIVE COSTS)

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

This policy will accomplish the following objectives:

- Provide individuals and departments with tangible incentives and rewards for seeking external funding in support of departmental, college and institutional stated missions;
- Enhance APU's competitiveness in seeking additional external funds through matching funds and internally supported pre-award planning activities;
- Cover institutional costs, induced by the granted project, from security and liability to utility costs;
- All indirect costs generated from external sources in support of a given grant award will be allocated as follows:
 - 50% will be directed to the University Fund, to be used for covering overhead expenses and other hidden costs (space, utilities, technology, etc.).
 - 20% will be granted to the responsible Dean and/or department. Use of these funds is subject to the Dean's discretion and may include assistance with various school or department administrative costs. A few examples include personnel to complete preliminary research, writing, or editing, expenses for allowable supplies and research equipment not included in the grant application, and overtime clerical help.
 - 15% will be placed in a restricted account for the principal investigator/project director. Subject to the Dean's approval, these funds can be expended to assist with pilot studies, conference presentations of research (if not included in the initial grant), and individual membership dues.
 - 15% will be deposited in the Sponsored Program's restricted account managed by ORG, used at the discretion of ORG to enhance the grants and research activity at APU.

APU has a 35.0% federally negotiated indirect cost rate using the simplified method (Salary and Wage base). ORG has a copy of the award letter. All projects should request 35% indirect costs, if allowed, or the maximum amount specified by the funding agency. One should not assume that there are no indirect costs allowed unless it is clearly specified in the funding announcement.

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

APPENDIX IV COMPLIANCE

FEDERAL AND STATE REGULATIONS

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

- Title VI of the Civil Rights Act of 1964
- Title IX of the Education Amendments of 1972
- Section 504 of the Rehabilitation Act of 1973
- The Older Americans Act of 1975
- The American with Disabilities Act of 1990
- OMB Circulars A-21, A-110, A-122, A-133

Contractual Policy: All APU agreements are to be reviewed and approved in accordance with APU contracting policies, including Legal Review of Contracts, Financial Review of Contracts, and Contract Signing – Authorized Signatures.

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

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

ETHICAL COMPLIANCE

Responsible Conduct of Research Training

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

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

Certification for research with human subjects is governed by the Institutional Review Board. Certification for research with animal subjects is governed by the Institutional Animal Care and Use Committee. All other RCR areas are administered either through online core modules of the RCR program hosted by the Collaborative Institutional Training Initiative (CITI) at the University of Miami, or through workshops sponsored by the Office of Research and Grants.

All faculty, staff, and student researchers are strongly encouraged to complete the RCR series through a combination of completing the CITI online modules for RCR and attending at least

two workshops, one on Research Misconduct, and the other on Conflicts of Interest in Research. Additional workshops will be offered periodically and are also strongly encouraged. A schedule of upcoming workshops and information on access to the CITI program is available through the Office of Research and Grants.

While strongly encouraged for all researchers, the RCR program is required for faculty who receive extramural funding for research. At the discretion of the dean, completion of the RCR program may also be required of department chairs, faculty who teach research classes, and faculty with release time for research. Completion of the RCR program may also be required by the Office of the Provost.

Students paid by National Science Foundation grants are required to complete five (5) hours of face-to-face training in addition to the online RCR modules through CITI¹, and all researchers on National Institutes of Health training grants are required to complete an additional eight (8) hours of face-to-face training.² Verification of this training must be submitted to the Director of Grants Management. Training must be renewed every three years.

Conflicts of Interest

Project and prospective principal investigators/project directors must take reasonable steps to ensure that applying for a given grant will not constitute an impropriety or conflict of interest for them or for APU. Such situations include, but are not limited to areas of personal, financial gain for the applicant; circumstances that might appear to compromise the University's reputation or to give the University unfair, competitive advantage. The principal investigator and other collaborators (including faculty, staff, students, consultants and co-investigators) must submit signed Potential Conflict of Interest (PCOI) forms with the external grant routing form. The PCOI forms must be renewed annually. New collaborators should complete and sign a PCOI form when they join the project. Additional detail can be found in the APU Conflict of Interest in Research: www.apu.edu/live_data/files/217/conflicts_policy.pdf

Research Integrity

All principal investigators/project directors are expected to uphold the highest integrity in data collection, analysis and dissemination to avoid every act, or remote appearance, of plagiarism. The policy on research integrity is compatible with the model policy suggested by the U.S. Department of Human and Health Services' Office of Research Integrity. See the policy for Conflicts of Interest in Research, at <http://www.apu.edu/researchandgrants/policies/>.

All questions and concerns about research integrity must be directed to the Research Integrity Officer (Vice Provost for Graduate Programs and Research), who will administer the investigation and hearing process, if needed, at the end of which all recommendations will be made to the Provost.

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

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

Research with Human and Animal Subjects

All projects that involve generalizable research with human subjects, including survey methods, must submit proposals to the Institutional Review Board (IRB). The IRB handbook is available at <http://www.apu.edu/researchandgrants/ethics/>. Projects involving animal research must submit proposals to the Institutional Animal Care and Use Committee (IACUC). Please check into IACUC webpage for more information:

<http://www.apu.edu/researchandgrants/ethics/#institutionalanimalcareandusecommitteeiacuc>.
APU compliance support procedures are consistent with federal guidelines.

Biosafety

Guidance and assistance is provided to protect faculty, staff and students from exposure to bio-hazardous materials and to guide against the release of bio-hazardous materials that may harm humans, animals, plants or the environment. APU has established and maintains an Occupational Health and Safety Program (OHSP) that begins with the identification of hazards and the assessment of risk associated with those hazards. Facilities, equipment, and procedures should also be designed, selected, and developed to reduce the potential of physical injury or health risk to personnel. The OHSP is consistent with federal, state, and local regulations and focuses on maintaining a safe and healthy workplace.

Data Ownership

The Integrity in Research Policy,

https://docs.google.com/a/apu.edu/document/d/1eEaL26a0rTkXK1y5Y75ApbYwfP0s06kbqnuj_nE7D34/edit, discusses the ownership of data provided by any APU sponsored projects. APU's Copyright Policy for Works Created at or in Affiliation with Azusa Pacific University also addresses the ownership of works created with external funds.

Federally Sponsored Research Data: The principal investigator/project director needs to retain all scientific records three years from the submission of the final expenditure report, or three years from the completion of the research as defined in the original contract or grant award.

Scientific records include research or laboratory notebooks; preliminary research reports or summaries; protocols; records relating to the source of research materials and tools; adverse event reports; research reports; publications; and any other records that are necessary for the reconstruction and evaluation of the reported results of research and the events and processes leading to those results.

GRANTS LEXICON

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

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

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

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

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

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

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

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

Contract: An agreement to acquire services that benefit the project.

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

Cost share: The portion of costs not borne by the funding source.

Direct costs: An expense that relates to the grant project, (e.g., salaries, supplies, services, travel, equipment).

Disallowed costs: Questioned expenditures, which are not reimbursed by the funding source. Repayment to the funding source may be required if payment has already occurred.

Equipment: Property that is not permanently attached to buildings or grounds has an acquisition cost of \$2,500 or more, and a life expectancy of one year or more.

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

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

Grant: The funding of an approved award made on the basis of a submitted proposal.

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

Grantee: The recipient of a grant.

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

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

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

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

Principal Investigator/Project Director: The individual responsible for carrying out the requirements of the grant project or program.

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

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

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

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

Sub-Award Agreement (Sub-contract or Sub-recipient agreement): A contract issued under a prime contract, agreement, purchase order, or grant for the procurement of purchased program-related tasks.

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

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

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