



The American University of Kurdistan Grants Management Policy and Procedures

Policy Number: AS035
Effective Date: May 28, 2023

CONTENT

- I. Introduction
- II. Roles and Responsibilities
- III. Definition
- IV. Policy Statement
- V. Policy Principles
- VI. Policy Procedures
- VII. Policy History

I. INTRODUCTION

- a. **Authority:** The Board of Trustees (herein referred to as “Board”) at The American University of Kurdistan (herein referred to as “AUK” or “University”) is authorized to establish rules and regulations to govern and operate the University and its programs.
- b. **Purpose:** The purpose of the Office of Grants Management’s (herein referred to as “OGM”) Policies and Procedures is to provide guidance to faculty and staff at the AUK about the management and administration of externally funded programs.
- c. **Scope:** This policy applies to all AUK employees and governs university educational programming, research and scholarly endeavors sponsored in whole or in part by outside entities including government and industry. It does not apply to philanthropic gifts or contributions.

II. ROLES AND RESPONSIBILITIES

- a. **Responsible Executive:** Provost
- b. **Responsible Administrator:** Director of Grants Management
- c. **Responsible Office:** Office of Grants Management
- d. **Policy Contact:** Director Grants Management

III. DEFINITION

- **Allocable Cost:** A cost is allocable to a particular award or other cost objective if the goods or services involved are chargeable or assignable to that award or cost objective in accordance with relative benefits received.
- **Allowable Cost:** A cost is allowable when it is included in the contracted product or service. Examples of common unallowable costs for federal awards according to the Federal Uniform Guidance are: alcoholic beverages, donations and contributions, entertainment costs, fines and penalties, goods or services for personal use, losses on federal projects, pre-agreement costs, Value Added Taxed (VAT). These types of cost are generally unallowable by nature unless they were specifically approved by the funding agency for the implementation of the program.
- **Contract:** A mechanism for procuring a product or service with specific obligations for both sponsor and recipient. Typically, a research topic and the methods for conducting the research are specified in detail by the sponsor, although some sponsors award contracts in response to unsolicited proposals. A contract is a legally binding document.
- **Cooperative Agreement:** An award similar to a grant, but in which the sponsor's staff may be actively involved in proposal preparation and anticipates having substantial involvement in research activities after the award has been made.
- **Direct Cost:** A cost that is directly used in the implementation of the award and is itemized in the award budget. It includes defined cost categories such as personnel, fringe benefits, supplies, and travel, etc.
- **Facilities and Administrative Costs (Indirect Cost):** Incurred for common or joint objectives and, therefore, cannot be identified readily and specifically with a particular sponsored project, an instructional activity or any other institutional activity. Facilities and administrative costs are synonymous with indirect costs.
- **Grant:** A type of financial assistance awarded to an organization to conduct research or other programs as specified in an approved proposal. A grant, as opposed to a cooperative agreement, is used whenever the awarding office anticipates no substantial programmatic involvement with the recipient during the performance of the activities.
- **Institutional Review Board (IRB):** A committee that has been formally designated to approve, monitor, and review biomedical and behavioral research involving human subjects (see Policy of Institutional Review Board on the Use of Human Subjects in Research).
- **Principal Investigator (PI):** The individual with the responsibility for conducting the research or other activity described in a proposal for an award. The terms "principal investigator" or "project director" may be used interchangeably in accordance with the agency's program language.
- **Proposal:** A formal written description concerning the conduct of research, training or technical assistance with the support of an external sponsor. The proposal represents an offer by the University to perform the activities specified

and contains all information necessary to describe project plans, staff capabilities and funds requested. The University's review and approval process must assure compliance with both sponsor and University expectations and policies.

- **Reasonable Cost:** A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.
- **Sponsored Programs:** Projects or programs that are conducted by faculty member(s) and/or administrative staff member(s) and supported - fully or in part - by external restricted funding awarded to the University. Sponsored programs may be research, instructional or service in nature. In all sponsored programs, the University has obligations to the funding source in accordance with the terms of a proposal or agreement. In the case of a proposal, these obligations are based on the project description developed by the faculty member(s) and/or administrative staff member(s). In the case of a grant, these obligations are based on the project description developed jointly by the sponsor and the faculty member(s) and/or administrative staff member(s).
- **Sponsor/Funding Agency:** Government or private agencies external to the University who provide support for a program or project at the University.

IV. POLICY STATEMENT

The AUK receives grants and contracts from government, nonprofit as well as industry and business sponsors in support of research and the University's mission. Grants and contracts are particularly important in assisting the University to build and maintain capacity.

V. POLICY PRINCIPLES

1. Pre-Award

Sponsored programs are programs that are conducted by faculty member(s) and/or administrative staff member(s) and supported - fully or in part - by external restricted funding awarded to the University. It is established by an agreement, usually called a contract, cooperative agreement, grant, purchase order or other document decided upon between the university and the sponsor. Sponsored programs are undertaken to increase institutional resources to enhance the University's research and educational programming, and to facilitate the ability of faculty members, staff members and students to develop and achieve their goals in educational programming, research and service delivery through successful competition for external funding.

The proposal serves as the primary document upon which the University and a funding source agree to provide in regard to facilities, funds and services necessary to perform the project development, research, service and/or training. Grants and contracts are made to the institution and not the principal investigator; therefore, institutional approval and involvement is required. The proposal specifies the obligation of the principal investigator to perform services, the university to provide facilities and services, and the sponsor to provide support.

University staff and faculty who plan to submit a proposal to an outside sponsor must have the preliminary approval of their (academic) unit head and/or dean before contacting the

Office of Grants Management (OGM), to obtain the necessary forms and start the formal process of a program proposal.

To be assured that the OGM is able to submit the proposal, forms and other required documentation before the submission deadline of the funding opportunity, all the required documentation need to be submitted to the OGM at least ten days prior to the deadline!

All external publicity on grants and contracts is to be verified with the OGM for release through the Office of Communications.

2. Post-Award

Post-award administration begins when an award is received and there are multiple requirements and tasks as part of the post-award administration. The post-award phase includes everything that happens from the time the award has been initiated until the project has been completed and closed out. There are post-award functions required for the administration of sponsored projects whether funded by grants, contracts, or cooperative agreements.

VI. POLICY PROCEDURES

1. Internal Procedures

Contracts, grants, research agreements and sponsored-award documents are legal instruments that bind the parties to the terms stated therein. Therefore, grantor laws and regulations as well as AUK policies and regulations must be followed when preparing, accepting, signing and executing such legal documents. Thus, all proposals - whether new or continuing - must be processed through the OGM for formal University approval and signature before they are submitted to external sponsors. The OGM serves as the administrative voice in the negotiation and acceptance of grants and contracts and subsequent modifications.

A sponsored-program proposal is usually originated by the faculty or staff member who will be in charge of the program under the direction of the appropriate (academic or administrative) unit head or administrator. All proposals soliciting external support - whether from government or private agencies- call for some commitment to institutional resources. Therefore, the Proposal Internal Approval Form must be prepared and submitted by the principal investigator with the approval of a sponsoring academic or administrative unit. Cost sharing should be only engaged in the following circumstances:

- When mandated by the sponsor
- When necessary due to the competitive nature of the award

In the event mandatory cost sharing is required, the principal investigator must complete a Cost Sharing Request Form and obtain appropriate University approval(s).

In addition to the Proposal Internal Approval Form, proposals may include the following sections in the following order:

- title page and abstract, problem statement (purpose for developing the proposal)
- objectives: goals and desired outcomes,
- procedures: program methods and program design - a plan of action,
- evaluation methodology: product and process analysis, and
- budget and budget justification.

2. Pre-Award

Pre-award services are the activities and processes that legally and ethically enable an institution to obtain externally funded research and sponsored programs. The exact nature of those services varies, depending upon the size of the unit, its culture, and mission. Pre-award services generally include:

- Dissemination of funding opportunities and information
- Assisting with the proposal development
- Reviewing and approving proposals to be submitted by the institution
- Managing the proposal submission process
- Negotiating, accepting, and activating an award

a) Dissemination of Funding Opportunities and Information

- The first step toward external funding is the identification of sources of funding opportunities and search for sponsor information. The OGM disseminates this type of information, which is periodically updated to assure that the University community keeps abreast of continuing and new sources of funding, and new developments affecting the grant-seeking process.
- Faculty and staff members who wish to pursue sponsored programs should receive preliminary approval from the appropriate (academic or administrative) unit head and/or dean. Questions concerning faculty and/or staff time commitments, space and facilities, as well as proposed new courses and/or requirements, should be resolved at this time. All early correspondence including letters of intent in initial solicitation efforts are to be routed through the OGM.
- Principal investigators who plan to submit a proposal involving the use of human subjects are required to undergo proposal review by the Institutional Review Board (IRB) for the Use of Human Subjects prior to submitting the proposal to the OGM (see Policy of Institutional Review Board on the Use of Human Subjects in Research). In such cases, the principal investigator or project director will inform the OGM of the need for this review; the OGM and the Office of the Provost will coordinate the review process. Proposals involving the use of human subjects are not to be submitted to the target agency until the Institutional Review Board has conducted its review.⁴
- The principal investigator should contact the OGM for guidance concerning the calculation of project costs to include the appropriate facilities and administrative costs (indirect costs) and appropriate fringe benefit costs. The principal investigator should verify equipment estimates with the AUK Finance Department.

b) Assisting with the Proposal Development

- Once a University faculty or staff member identifies the most appropriate sponsor and grant mechanism, the proposal development and preparation process begins. Proposals are typically documents that must respond to all sponsor requirements. Failure to do so may lead to rejection by the sponsor. The OGM provides guidance in this process.

- After obtaining preliminary approval from the (academic or administrative) unit head and/or dean, the principal investigator can get a Proposal Internal Approval Form from the OGM. The principal investigator will submit the completed form along with the Proposal Internal Approval Form to the (academic or administrative) unit head and/or dean for approval. The Proposal Internal Approval Form and any other signatures necessary to the proposal must be obtained and then submitted to the dean of the principal investigator's college or director of unit for signature. The Proposal Internal Approval Form and the original proposal with one copy is then ready to be submitted to the OGM.

c) Reviewing and Approving Proposals to be Submitted by the Institution

- The OGM will review the completed proposal for compliance issues and for budget consistency, create the permanent file for the proposal, and verify that all necessary agency program submission requirements have been met. The completed proposal will then be signed by an authorized person in the OGM and forwarded to the offices of the appropriate University officials for signatures. The OGM cannot assure that this will be accomplished for proposals submitted in less than the ten-day time frame. If substantive changes are made after signatures have been obtained, a revised proposal will be rerouted noting the changes.
- The signed proposal will then be returned to the OGM, which will return the approved proposal to the principal investigator or project director for final review. The OGM retains the original Proposal Internal Approval Form and the remaining copy of the proposal for the official file

d) Managing the Proposal Submission Process

- The OGM submits the completed, approved project proposal (including narrative, budget, and appendices) by the required deadline.
- The Terms and Conditions of the award need to be assessed. It includes areas such as: period of performance, cost principles, patents and copyright, terminations, financial reporting, payments schedules, as well as other requirements negotiated in an award.
- The development of sub award agreements and contracts require the evaluation of a variety of issues such as: payments and reporting schedules, statement of work, budget and facilities and administrative cost rates (F&A), among others.

e) Activating an Award

- The file is considered funded when the OGM receives the award document from the sponsoring agency. Official agency documents with original signatures must be provided to the OGM and retained in the official file.
- The OGM will inform appropriate university officials, including the Office of Communications, of awards and will be responsible for coordinating with the Finance Department to begin the financial management of the sponsored

program.

3. Post-Award

Post-award administration begins when an award is received and there are multiple requirements and tasks as part of the post-award administration. The post-award phase includes everything that happens from the time the award has been initiated until the project has been completed and closed out. There is a full range of post-award functions required for the administration of sponsored projects whether funded by grants, contracts, or cooperative agreements.

The post-award functions include the following types of activities:

- Financial Management
- Completing the required programmatic and financial reports.
- Time and Effort Reporting
- Record Retention - Files management and Archiving
- Closing out the award

a) Financial Management

The Principal Investigator will work directly with the OGM and the Finance Department for the financial management of the project. Financial Management includes the following:

- Monitoring expenses for allowability, allocability, reasonableness, and compliance with University policies
- Monitoring spending against budget, noting certain trends such as overspending or underspending.
- Reporting and invoicing the sponsor on project expenses.

b) Completing programmatic and financial reports

Technical or narrative reports required by the funding agency are to be prepared by the PI. All reports are to be reviewed by the OGM prior to submission. Once reviewed and approved, the report will then be forwarded to the sponsor/funding agency.

The PI and the OGM must maintain all appropriate documentation for the final submission. The PI will work with the OGM in the submission of all financial reports. The PIs are responsible for obtaining and communicating all due dates for reporting including the final close-out report.

c) Time and Effort Reporting

As a recipient of sponsored funds, AUK must assure sponsors that the assignment of effort and associated salary and fringe benefit costs to the projects they sponsor is reasonable in relationship to the work performed, and that commitments to sponsors have been met.

The corresponding percent of effort commitments for key personnel should:

- Be consistent with the description of the individuals' roles on the project and be reasonable given the nature and complexity of the project, and

POLICY – Grants Management

- Not be inflated beyond what is reasonably required to accomplish the proposed work, and be consistently reflected on the corresponding institutional authorization documentation of a proposal.

The PI of the project will certify that faculty and/or staff are paid in full or in part as per the grant. The OGM provides the PI and relevant personnel with the required documents to be filled out and signed within 30 days after the end of the reporting period. The signed timesheet should be sent back to the OGM.

d) Record Retention - Files Management and Archiving

The PI and the OGM will ensure that all files are prepared for storage and/or archiving at the end of the grant cycle. The OGM will also ensure that appropriate notifications are made as to storage and following of protocol. Records should be able to be readily, reasonably, retrievable upon request by the sponsor for a period of not less than five years.

e) Project Close-Out

At the conclusion of a sponsored project, the terms of the award generally require written reports, including a final technical or progress report and a report of expenditures, which must be submitted to the sponsor within a specified period of time. These reports are generally viewed as the University's fundamental obligation to the sponsor, and are generally required whether the sponsor is a private organization or a public agency.

Appendices

Form 1: Proposal Internal Approval Form

Form 2: Cost Sharing Request Form

VI. POLICY HISTORY

- Approved by:** Board of Trustees
- Adopted:** May 28, 2023

PROPOSAL INTERNAL APPROVAL FORM

A Complete Project Proposal must be attached.

(Submit this form to the Office of Grants Management at least 10 days prior to due date.)

PROJECT INFORMATION	
P.I.:	Date:
Employee ID#:	Phone #:
P.I. College/Unit:	P.I. Department:
Proposal Due Date:	Sponsoring Agency:
Solicitation URL:	
Project Title:	
Purpose/description of your proposal (Insert one sentence):	
Remarks or special instructions:	
Co P.I.:	Department:
Co P.I.:	Department:
Co P.I.:	Department:

Proposal Status:	<input type="checkbox"/> New	<input type="checkbox"/> Revision	<input type="checkbox"/> Supplement	<input type="checkbox"/> Continuation
Project Type:	<input type="checkbox"/> Contract	<input type="checkbox"/> Grant	<input type="checkbox"/> Cooperative Agreement	
Agency Type:	<input type="checkbox"/> Federal	<input type="checkbox"/> Industry	<input type="checkbox"/> NGO	<input type="checkbox"/> Foundation

SPECIAL CONSIDERATIONS & AUTHORIZATIONS (Check Yes or No)				
Human subjects involved? <input type="checkbox"/> Yes <input type="checkbox"/> No				
If Yes, have you submitted a request for IRB approval? (See IRB policy) <input type="checkbox"/> Yes <input type="checkbox"/> No				
Confidential Info enclosed	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Is the budget enclosed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Consultant proposed	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Is the budget narrative enclosed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Subcontractor proposed	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Is the proposal narrative enclosed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Possible patents/copyrights?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Are other required attachments enclosed?	<input type="checkbox"/> Yes <input type="checkbox"/> No

REQUESTED FUNDS		
Performance period	Start date:	End date:
	Requested Funds for Year One	Requested Funds for Total Period (Only complete if different from year one)
Total Direct:	\$	\$
Total Indirect:	\$	\$
Total Requested	\$	\$

INDIRECT COST RATE
What is the Indirect cost rate? (i.e. XXX% of the Modified Total Direct Costs)

COST SHARING DETAIL (if applicable)			
Source	In-Kind Match	In-Cash Match	Total Match
Insert Department name and AUK (Example, CSD, AUK)			
External to AUK			
Total			

Investigator certification: By signing below, I certify that the information on this form is true, complete and correct to the best of my knowledge, and that

a. The proposal is complete in its technical content; adheres to the rules of proper scholarship and to the specifications of the sponsor.

b. Facilities/space and other institutional resources necessary to complete the proposal project are available to the project, or provisions have been arranged with Department/College to make such space or other institutional resources available in the event of an award.

c. Should the proposal be funded and accepted, I will conduct the project according to the sponsor's terms and conditions and the policies of the University. I accept responsibility for meeting the requirements of the award;

d. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. I understand as the Principal Investigator, I have ultimate responsibility for the scientific conduct of the proposed project, the ethical performance of the proposed project, the protection of the rights and welfare of human subjects, and adherence to any stipulations imposed by the applicable IRB. I agree to accept responsibility for compliance with all applicable regulations, laws, and policies of the sponsor and the University, including those governing the use of space, salary verification, cost sharing and financial oversight of the proposed project.

Authorization approvals: By signing, I confirm that the proposed technical content, budget, personnel, faculty time, allocation of institutional space/resources, equipment and cost sharing have been approved. (Does not represent specific approval or personnel titles, classifications, salary rates or other issues governed by University policy).

Principal Investigator Name:	Principal Investigator Signature:	Date
Co-Principal Investigator Name: <i>(If applicable)</i>	Co-Principal Investigator Signature: <i>(If applicable)</i>	Date
College/Unit Head Name:	College/Unit Head Signature:	Date

Approvals	Signature	Date
Director Office of Grants Management		
Provost Office of the Provost		

YOUR OGM CONTACT:
RETURN FORM TO GM@AUK.EDU.KRD
 Signed materials are due to the OGM 10 business days before submission deadline (Grants Management Policy and Procedures). Proposals that fail to meet this deadline will be submitted with conditional approval only. In these cases, the PI is responsible for making appropriate changes to the proposal or withdrawing the proposal, at a later date, if subsequent review reveals that the proposal is incomplete, contains errors, inaccuracies, misrepresentations, or does not conform to University or sponsor requirements.

Cost Sharing Request Form

For AUK purposes, cost-sharing is a contribution, either mandatory (required by statute, regulation or written policy) or voluntary, of cash or services provided by the grantee institution or a third party to the overall costs of a sponsored project. AUK discourages voluntary cost-share contributions but will consider mandatory or voluntary cost sharing when the project goals are consistent with the university unit, college and university missions. Contributions may be made from any non-Federal source, including non-Federal grants or contracts, and may be cash or in-kind. Cash and in-kind contributions are acceptable when they are not paid by sponsoring agency under another agreement; allowable institutional costs; and reasonable and necessary to the project objective(s). ***It is the Principal Investigator's responsibility to assure that all cost sharing commitments have been met and provide appropriate documentation for audit verification when necessary.**

	Personnel	Fringe Benefits	Travel	Supplies	Equipment	Other Direct Costs	Indirect Costs	Total
Sponsor Request	0	0	0	0	0	0	0	0
In-Kind Cost Sharing: <i>In-Kind Cost Sharing contributions represent the fair market value of non-cash contributions allocated to the sponsored project. Examples of In-Kind Cost Sharing include providing volunteer time or the use of existing equipment or real property during sponsored project performance.</i>								
Insert Department name and AUK (Example, CSD, AUK)	0	0	0	0	0	0	0	0
Insert Department name and AUK (Example, CSD, AUK)	0	0	0	0	0	0	0	0
External	0	0	0	0	0	0	0	0
Total In-Kind Cost Sharing	0	0	0	0	0	0	0	0
In-Cash Cost Sharing: <i>Cash Cost Sharing usually involves an outlay of hard dollars or funds specifically allocated to a sponsored project. Examples of Cash Cost Sharing are salaries and fringe benefits paid to employees who are working on the sponsored project, but which are not invoiced to the sponsor.</i>								
Insert Department name and AUK (Example, CSD, AUK)	0	0	0	0	0	0	0	0
Insert Department name and AUK (Example, CSD, AUK)	0	0	0	0	0	0	0	0
External	0	0	0	0	0	0	0	0
Total In-Cash Cost Sharing	0	0	0	0	0	0	0	0
Total Project Costs	0	0	0	0	0	0	0	0

Principal Investigator, Department: _____ Date: _____

Project Title: _____ Project Period: _____

Sponsor: _____ Deadline: _____

Justification for Cost-Sharing: **Mandatory by the Sponsor**
 Other, please specify: _____

	Name	Signature	Date
Dean:	_____	_____	_____
Director, Office of Grants Management:	_____	_____	_____
Provost, Office of the Provost:	_____	_____	_____

Forward this signed form to the Office of Grants Management by email: gm@auk.edu.krd