

Topic: <b>Sponsored Awards Admin &amp; Mgmt</b>	Department: <b>Grants</b>	Policy No: <b>5.10.01</b>	Effective Date: <b>12/26/14</b>	Page No: <b>1 of 1</b>
--	------------------------------	------------------------------	------------------------------------	---------------------------

**Purpose:** When the Boyce Thompson Institute for Plant Research (BTI) accepts a sponsored award, it becomes obligated to comply with various federal laws, executive orders, procurement regulations, and cost principles, as well as the specific provisions of the award. It is the policy of BTI that persons in BTI departments who work with sponsored awards – principal investigators, business operations coordinators, business operations supervisors, and others - should understand the basic responsibilities required for ensuring the compliance of all sponsored awards.

- Policy:**
1. All Federal awards / subawards issued to BTI with a start date prior to December 26, 2014, are subject to OMB Circulars A-122 and A-133 regulations. All new Federal funds (new awards and new monies, such as continuation awards, supplements, etc.) with a start date on or after December 26, 2014, are subject to OMB 2 CFR Part 200 (commonly referred to as Uniform Guidance but hereinafter referred to as “2 CFR Part 200”).
  2. Per 2 CFR Part 200.303, BTI must adhere to the following when administering federal awards:
    - Establish and maintain effective internal control over the Federal award that provides reasonable assurance that BTI is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.
    - Comply with Federal statutes, regulations and the terms and conditions of the Federal award.
    - Evaluate and monitor BTI’s compliance with statute, regulations and the terms and conditions of Federal awards.
    - Take prompt action when instances of noncompliance are identified, including noncompliance identified in audit findings.
    - Take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency, pass-through entity of BTI designates as sensitive, consistent with applicable Federal, state and local laws regarding privacy and obligations of confidentiality.
  3. Barring any sponsor or grant restrictions, administration of non-federal awards should adhere to general BTI policies and comply with the specific terms and conditions of the award.
  4. Policies 5.10.01 through 50.170.01 should be referenced for additional details in administering sponsored research awards.