

POLICY

Regulatory Guidance

Topic: Sponsored Awards Admin & Mgmt	Department: Grants	Policy No: 5.10.02	Effective Date: 12/26/14	Page No: 1 of 2
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Purpose: To summarize the regulatory guidelines for sponsored awards.

Policy:

1. It is the policy of the Boyce Thompson Institute for Plant Research (BTI) that persons associated with a sponsored project are responsible for knowing the applicable regulations, principles, standards and policies.
2. These include applicable Federal, state and internal policies.
3. The federal guidelines noted in this policy serve as a basic reference point – sponsored awards may include other regulatory guidance, as applicable.

Federal Regulatory Guidance:

All federal awards, subawards, and/or amendments issued to BTI with a start date prior to December 26, 2014, are required to adhere to:

4. OMB Circular A-122, Cost Principles for Non-Profit Organizations.
 - This Circular establishes principles for determining costs applicable to grants, contracts, and other agreements with non-profit organizations.
 - The principles deal with the subject of cost determination, and make no attempt to identify the circumstances or dictate the extent of agency and organizational participation in the financing of a particular project.
 - The principles are designed to provide that the Federal government bear its fair share of total costs, determined in accordance with generally accepted accounting principles, except where restricted or prohibited by law.
 - Agencies are not expected to place additional restrictions on individual items of cost.
5. OMB Circular A-133 Audit of Institutions of Higher Education and Other Non-Profit Organizations.
 - This Circular sets forth standards for obtaining consistency and uniformity among Federal agencies for the audit of states, local governments, and non-profit organizations expending Federal awards.

All new Federal awards, subawards, and amendments with a start date on or after December 26, 2014, including incremental funding, are subject to:

6. OMB 2 CFR Part 200
 - These regulations set forth the uniform administrative requirements for grant and cooperative agreements, including the requirements for awarding agency management of Federal grant programs before the federal award has been made, and the requirements federal awarding agencies may impose on non-federal entities in the federal award.
 - Cost principles for determining allowable costs incurred by non-federal entities under Federal awards.



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- Audit requirements issued pursuant to the Single Audit Act Amendments of 1996, (31 U.S.C. 7501-7507) sets forth standards for obtaining consistency and uniformity among federal agencies for the audit of non-federal entities expending federal awards. These provisions also provide the policies and procedures for Federal awarding agencies and pass-through entities when using the results of these audits.