

# Florida Agricultural and Mechanical University Division of Research Office of Sponsored Programs

#### INTERNAL OPERATING MEMORANDUM

# Memorandum No. 16A.008

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nd Business (OMB) and FAMU Poli	cies and Procedures
this procedure is to provide guidance	e to university staff
submitting Indirect Grantor letters.	<i>y</i>
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#### 1.0 GENERAL INFORMATION

2 CFR Part 200 Uniform Guidance, Single Audit Act and Subpart F, which were previously found in Circulars A-133 requires non-federal entities that expend \$750,000 or more in federal awards in a year to have a single or program-specific audit conducted for that year. If an entity falls below the \$750,000 threshold, it may still be subject to federal audits and must make records available for review or audit by appropriate officials of the federal agency, pass-through entity, and the Government Accountability Office. Subrecipients shall provide written notification to the pass-through entity that: an audit of the subrecipient was conducted in accordance with the Single Audit Act (including the period covered by the audit and the name, amount, and CFDA number of the federal award(s) provided by the pass-through entity).

#### 2.0 DEFINITION

A **pass-through entity** is a non-federal entity that provides an award of federal funds to a subrecipient to carry out the programmatic activities of a sponsored project.

#### 3.0 RESPONSIBILITIES

- **3.1** Contracts and Grants (C&G) is responsible for preparing the Schedule of Expenditures of Federal Awards (SEFA) reports.
- **3.2 Office of Sponsored Programs (OSP)** is responsible for submitting letters to nonprofit and out-of-state grantors to provide notification of the completion of its Single Audit Act requirement.

#### 4.0 GENERAL PROCEDURES

## 4.1. CONTRACTS AND GRANTS

- C&G prepares the SEFA report.
- The final SEFA reports are submitted to the Office of Sponsored Programs to be used to prepare the required letters.

# 4.2 OFFICE OF SPONSORED PROGRAMS

- Obtain the SEFA report from the Office of Contracts and Grants.
- Use the SEFA report to send letters to the nonprofit and out-of-state grantors notifying these agencies of completion of the University's Research and Development Audit, formerly A-133 Audit. The attached document is an example of the letter requirements.

## 5.0 RECORDS

The appropriate record retention guidelines should be followed for the retention of the Indirect Grantor letters and disposition of the supporting documentation. Federal regulations including 2 CFR Part 215; Internal Revenue Service requirements; Federal Acquisition Regulations (FAR) require grantees and contractors to prepare, maintain, and keep adequate records of sponsored project activities. For government grants and contracts, academic units must maintain original copies of budget documentation expenditure statements signed by the Principal Investigator, and all source documents and invoices which are used to charge direct costs on a grant or contract for a period of three years following the date of submission of the final expenditure report for the grant or contract, except when there is an audit or litigation in process.

Name Director, Office of Sponsored Programs