

# New York University

## UNIVERSITY POLICIES

<b>Title:</b>	Internal and External Audit Policy for Sponsored Programs
<b>Effective Date:</b>	December 1, 2017
<b>Supersedes:</b>	September 1, 2013
<b>Issuing Authority:</b>	Sponsored Programs Administration
<b>Responsible Officer:</b>	Assistant Vice President for Post-Award Administration

### Policy

It is the policy of New York University (NYU, “the University”) that the University responds to all internal and external audits and financial reviews of sponsored awards in a manner that is in compliance with all applicable Federal requirements, including the Federal Office of Management and Budget’s Uniform Guidance, as well as all other applicable sponsor, state and city requirements.

### Purpose of this Policy

The purpose of this policy is to provide guidelines for the proper management and response to internal and external audits and financial reviews of sponsored programs.

### Scope of this Policy

This policy is applicable to all schools, departments, units and personnel of the University involved in managing sponsored awards including contracts.

### Procedures for Implementation

All audits of sponsored programs are coordinated by Sponsored Programs Administration (SPA). Principal Investigators (PIs) or Department Administrators (DA’s) contacted by a sponsor intending to perform an audit or financial review of a sponsored project should immediately contact SPA.

#### a. Internal Audits

All audits of sponsored programs are coordinated by Sponsored Programs Administration (SPA). Principal Investigators (PIs) or Department Administrators (DA’s) contacted by a sponsor intending to perform an audit or financial review of a sponsored project should immediately contact SPA.

## **b. External Audits**

### **i. Sponsor Audit, Program Audit or Financial Review**

*Programmatic Audits*- The department must notify the Office of Sponsored Programs (OSP).

*Financial Audits or Reviews*- The department must notify SPA, which will be the primary point of contact for completing the audit. SPA will coordinate the audit and collaborate with the department, as necessary, to develop a response and submit correspondence. The department should not send correspondence directly to the sponsor.

### **ii. NYU'S Annual Audit**

*Compliance Audits (OMB Uniform Guidance):*

During annual OMB Uniform Guidance audits, SPA will be present at all meetings including internal control discussions with PIs and DA's. All documentation should be forwarded to SPA for review and submission to auditors and sponsors.

The OMB Uniform Guidance required report is submitted to the Federal Audit Clearinghouse. This report is a public document, which summarizes how the University has complied with sponsor requirements and internal policies and procedures in administering sponsored awards.

Terms and conditions of the Sponsor and Federal requirements dictate what expenses and activities are allowable. When administering awards, PIs and DA's should not assume that something is allowable because it was included in the approved budget. Any activity or expense that may not comply with the award terms and conditions should be discussed with SPA and OSP.

Intentional disregard of Federal requirements and University policies and procedures may lead to sponsor imposed administrative sanctions, damage to reputation, loss of current or future funding and/or in severe cases, imprisonment.

## **Policy Definitions**

N/A

## **Related Policies**

N/A

## **Federal Regulations**

- OMB Uniform Guidance

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