Subject: Sponsor Site Visits/Reviews and Audits (Internal and External)

Effective Date: March 01, 2016

Issued By: The Office of Research Administration (ORA)

Responsible parties:

- Principal Investigators
- Researchers
- Department Administrators
- Deans / Department Chairs
- Sponsored Programs Finance and Administration (Office of Research Administration)
- RFCO – Research Foundation Central Office

Background:

RFSUNY as the fiscal managing agent of all Downstate awards and is therefore subject to various types of audits and reviews related to its sponsored projects activities. Various federal, state and private agencies and organizations which provide support for university activities may request an audit, site visit or review of a campus unit or one of its programs or projects as stipulated in the relevant award agreement.

These reviews are in addition to the federal government’s requirement for an annual compliance audit of federally sponsored projects, as per its Office of Management and Budget (OMB) 2 CFR 200, Uniform Guidance (UG) and represents a significant compliance risk for the University. Consistent with many of its compliance functions, Downstate has developed guidelines for notification of any site visits, reviews and audits of individual awards or programs that PIs and Administrators have been notified of.

Reason for the Policy:

To provide guidance to Principal Investigators and others responsible for the administration of sponsored projects on the requirements for notifying the Office of Research Administration of a site visit, review or audit request from a sponsor.
Policy:

PIs and Administrators must notify Sponsored Programs Finance and Sponsored Projects Administration within five (5) business days of receiving the notification from the sponsor to ensure the appropriate level of support can be provided relative to the notification.

Consistent with many of our compliance functions, Downstate has a centralized process for managing sponsored project reviews. All reviews are managed by Sponsored Programs Finance in close coordination with the project owning department, Sponsored Projects Administration, RFCO and as necessary the Office of General Counsel and the Office of Compliance and Audit Services. Receipt of timely notification of audit and review notices is critical to ensuring sponsor requests can be effectively managed and, to the extent possible, compliance risk reduced.

PIs and their administrators, as the primary contacts for individual awards, are often the first to be notified of review by a sponsor and have the responsibility to notify the Office of Research Administration of the review. The following administrators must be made aware of the review:

Office of Research Administration:

- Director, Sponsored Programs Finance
- Director, Sponsored Programs Administration

Administration must be notified within five (5) business days of receiving the notice of a review from the sponsor. Upon receipt of the notification, the Office of Research Administration will coordinate with the school and PI and others, as applicable, to determine the appropriate level of support needed to ensure the sponsor’s request is addressed in a timely manner.

The PI and the respective school are ultimately responsible for the financial management of an award and will be held accountable for any audit findings as well as for the reimbursement of any disallowances of expenditures identified by the funding agency.