Federal Compliance

When UNC is awarded a grant from a sponsor, either directly or through any pass through mechanisms, there are specific compliance requirements that must be met.

Federal Regulations – In accepting an award from a sponsoring agency, UNC and the PI/PD assume the responsibility for the financial, technical, and administrative aspects of the award.

There are five principal sets of federal regulations that provide guidance in the financial and programmatic management of awards to universities:

<u>2 CFR Part 200</u>, <u>Uniform Administrative Requirements</u>, <u>Cost Principles</u>, and <u>Audit Requirements for Federal Awards</u> - Effective 12/26/2014

<u>2 CFR Part, 220 (OMB Circular A-21)</u>, <u>Cost Principles for Educational Institutions</u> - Principles for Determining Costs Applicable to Grants, Contracts, and Other Agreements with Educational Institutions - (Note that A-21 applies to contracts and to subrecipients performing work under federal awards.)

<u>2 CFR Part, 215 (OMB Circular A-110)</u>, <u>Uniform Administrative Requirements for Grants and Other Agreements</u> with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations - (Note that federal contracts are subject to Federal Acquisition Regulations rather than A-110).

OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations

<u>EDGAR</u> - Administrative regulations for the U.S. Department of Education grants.

<u>FAR</u> - Federal Acquisition Regulations are the primary regulations used by federal sponsors to govern contracts for supplies and services, including research services. FAR incorporates OMB Circular A-21 for the purpose of defining allowable costs. FAR is not applied to grants and cooperative agreements that are governed by OMB Circular A-110, agency grant regulations, or Federal Demonstration Project (FDP) terms and conditions. Federal contracts typically incorporate all of the FAR clauses applicable to a given project.