BC 10.145 - Sponsored Programs Equipment

I. POLICY:

As the steward of sponsored funding, Baystate Health (BH) is responsible for ensuring that the management of funds, including any equipment purchased with sponsored funding, is managed in a manner that is in compliance with BH, Sponsor, Federal, and Award requirements.

The Office of Management and Budget (OMB) 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, requires that institutions receiving federal funding must comply with certain regulatory requirements. As such, BH must comply with the terms and conditions of the award contract and what is in Section 200.313 Equipment of the Uniform Guidance, including any restrictions or requirements on equipment management.

II. PURPOSE:

The purpose of this policy is to establish internal controls for managing equipment acquired using sponsored funding at BH, from purchasing through disposition.

Per Uniform Guidance, equipment that is purchased with sponsored award funding vests conditionally with BH unless otherwise specified in writing by the sponsor. This policy seeks to outline the additional requirements that must be adhered to for sponsored equipment, above and beyond BH' standard controls around purchasing, procurement and equipment management.

III. SCOPE:

This policy applies to all individuals responsible for the management of sponsored funding at BH, namely the Principal Investigator (PI), Sponsored Programs Administration (SPA), and other individuals responsible for compliant and timely sponsored award management. This policy applies to all sponsored funding, including both federally and non-federally sponsored projects.

IV. DEFINITIONS:

Disposal: The action of removing ownership of an item from BH's system of record.

Equipment: Any item with a useful life that is greater than one year, and an acquisition cost of $5,000 or above.

Inventory: The action of creating and maintaining a complete list of equipment.

V. PROCEDURE:

Members of the BH community are responsible for supporting an environment that safeguards BH resources. As such, BH equipment must be managed in a manner that prevents inappropriate use and maximizes the use of these resources. All items that are purchased with sponsored funding, have an acquisition cost of $5,000 or greater, and a useful life of more than one year are considered sponsored equipment and are subject to this policy and the associated federal requirements as outlined in Uniform Guidance, sponsor guidelines, and the applicable Notice of Award.

If software and/or equipment requires connection to the BH network, it will be subjected to ISO review.

As noted above, sponsored equipment activities must align with standard BH policies related to purchasing (3.2000 Purchasing Guidelines), procurement (BC 1.500 - Uniform Guidance Procurement Policy), and equipment management (BC 5.160 - Capital Policy). At all times during the useful life of the equipment, the PI will additionally work with SPA to meet any federal, sponsor or award requirements above and beyond baseline BH requirements.

Purchasing: Prior to initiating the purchase of sponsored equipment, the PI will work with SPA and BH finance to ensure all requirements are met.

Asset Management: During the useful life of the award, the PI will work with Finance to support inventory and management of equipment, per BH standard requirements.

Disposition: Prior to moving or initiating the disposition of sponsored equipment, the PI will notify SPA and BH finance to ensure appropriate requirements are met.

VI. CROSS REFERENCES:

3.2000 - Purchasing Guidelines
BC 1.500 - Uniform Guidance Procurement Policy
BC 5.160 - Capital Policy

VII. REGULATORY REFERENCES:

2 CFR Part 200 - Uniform Administrative Requirement, Cost Principles and Audit Requirements for Federal Awards - Subpart D – Post Federal Award Requirements – Equipment

NSF Award Administration Guide – Chapter IV: Grantee Standards - E. Property Management Standards

NIH Grants Policy Statement

APPROVALS:

		Date:
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