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**UNIVERSITY OF MIAMI POLICY AND PROCEDURE MANUAL**

TITLE:	Internal Controls Policy	REFERENCE:	New
CATEGORY:	Office of Research Administration	PAGE:	1 of 2
		SUPERSEDES:	New
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	Associate Vice President	EFFECTIVE:	03/31/2015
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**PURPOSE:**

The purpose of this policy is to supplement UM's B002, Internal Control Policy to more specifically establish and communicate a sound system of internal control for UM's sponsored activities in accordance with 2 CFR 200, Federal and State regulations, as well as terms and conditions. Failure to comply with UM's policies and procedures may result in audit findings, suspension of sponsored activities, closer monitoring by the sponsor, delays in final payments, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded clinical trials.

**SCOPE:**

All UM personnel must be aware of the complex and detailed rules provided under Federal and non-Federal regulations as well as the terms and conditions of the individual sponsored activity. While compliance with all applicable requirements is essential, it is equally important to maintain an open research environment that welcomes the participation of researchers from around the world as part of UM's mission. To maintain this balance, UM personnel must be familiar with this policy in addition to the Federal and non-Federal regulations on restricted sponsored activities.

This policy applies to all UM personnel, namely:

- Faculty, including voluntary faculty.
- Faculty emeriti engaged as active researchers on UM research activities.
- Researchers, including research staff, postdoctoral fellows, and research associates.
- Graduate students, undergraduate students, and interns involved in research programs.
- Staff in departments, centers, institutes, and administrative offices charged with responsibilities under this policy.
- Consultants, agents, and volunteers associated with research and scholarly activities, as well as in departments and offices charged with responsibilities under this policy.

**POLICY:**

The University of Miami will maintain a system of internal controls in accordance with 2 CFR 200 and other agency specific requirements. All sponsored funds awarded to UM are subject to UM's policies and procedures and internal control system.

UM's internal control environment includes processes and policies that are designed to provide reasonable assurance regarding the achievement of the following objectives of Federal and other sponsored activities:

1. Transactions are properly recorded and accounted for, in order to:
  - a. Allow for the preparation of reliable financial statements and reports.
  - b. Maintain accountability over assets.
  - c. Demonstrate compliance with Federal statutes, regulations, and terms and conditions of all sponsored activities.

2. Transactions are executed in compliance with:
  - a. Statutes, regulations, and terms and conditions of our sponsors that could have a direct and material effect on sponsored activities.
  - b. Any other statutes and regulations that are identified in the Compliance Supplement.

([https://www.whitehouse.gov/omb/circulars\\_default](https://www.whitehouse.gov/omb/circulars_default))

3. Funds, property, and other assets are safeguarded against loss from unauthorized use or disposition.

#### **DEFINITIONS:**

Please refer to UM's ORA website for a list of acronyms and terms commonly used in sponsored/ research administration grants, contracts, and cooperative agreements: <http://ora.miami.edu/assets/pdf/ora-policies/glossary.pdf>

#### **PROCEDURE:**

UM personnel are to use [UM's ORA website](#) for guidance on matters pertaining to sponsored activities.

UM personnel are to follow the Standard Operating Procedures (SOP) outlined, as well as utilize the various required forms and templates that have been implemented for the activities related to this policy.

UM personnel should contact the Pre or Post Award staff for consultation if additional information is needed. Contact information can be found on [UM's ORA Contacts Webpage](#).