Update on Uniform Guidance
2 CFR 200

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Goals of Updated Regulations

Reduce fraud, waste, and abuse vs. Streamline
OmniGuidance is a combined, “simplified” version of 8 previous circulars

**2 CFR 200**
- Subpart A – Acronyms and Definitions
- Subpart B – General Provisions
- Subpart C - Pre-award Requirements & Contents of Federal Awards
- Subpart D – Post Federal Award Requirements
- Subpart E – Cost Principles
- Subpart F – Audit Requirements
- Appendix
## OmniGuidance Implementation Plan

<table>
<thead>
<tr>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
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<tbody>
<tr>
<td><strong>12/26/13</strong> Release</td>
<td><strong>6/26/14</strong> Agency plans due to OMB</td>
<td><strong>12/26/14</strong> Implementation (all but audit)</td>
<td><strong>7/1/15</strong> Audit provisions go into effect for UMN</td>
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- **Understand (OmniGuidance)**: 12/26/13 Release
- **Influence**: 6/26/14 Agency plans due to OMB
- **Plan (OmniGuidance)**: 12/26/14 Implementation (all but audit)
- **Understand (Agency)**: 7/1/15 Audit provisions go into effect for UMN
- **Plan (Agency)**: Evaluate
- **Implement**: Refine
Roles and Responsibilities

U-wide Steering Committee

- Steer institutional decision-making
- Generally understand UG structure; review Sections B&E
- Create overall communications strategy
- Critically review work group materials
- Review and accept/revise/deny work group recommendations
- Prioritize recommendation implementation, if needed
- Identify recommendations that require higher level institutional review
- Also serve as working group leads, members, liaisons, or subject matter experts

Specialists

- Costing
- Pre-Award/Subaward
- Post-Award
- Purchasing
- Property
- COI
- HR/Effort

Topic-Focused Work Groups

- Analyze in detail the portion of the Uniform Guidance and agency implementations specific to its topical area
- Understand national developments and implementation strategies promulgated at other Universities
- Identify places where university policy, procedures, practices, systems or business processes are out of alignment with new guidance
- Make recommendations to Uniform Guidance Steering Committee about changes that need to be made
- Engage in the University consultative process
- Identify impacts of recommendations
  - Policy & Procedures
  - Training & Job Aids
  - Business Process Flows
  - System Changes
  - Propose communication strategy (stakeholders directly impacted by change)
  - Training (if applicable) recommendations

Contributors

- Costing
- Pre-Award/Subaward
- Post-Award
- Purchasing
- Property
- COI
- HR/Effort
Changes in Direct Costing Rules

• **Admin and Clerical Salaries**
  – Can be direct charged under certain circumstances (services provided are integral to the award, specifically identified with the activity, explicitly included in the budget or have prior written approval of the Federal agency).

• **Protocol-Related and Data-Related Costs**
  – Can be direct charged for developing and maintaining protocols (human, animals, etc.) managing substances, managing and securing project specific data, and coordinating research subjects

• **Dependent Care During Conferences Beyond the Non-Federal Entity**
  – Can be direct charged if the entity has a consistent policy paying these costs (across all fund sources).

• **Entertainment Costs**
  – Still unallowable unless it has a specific programmatic purpose and is approved in the budget or by federal agency written approval
Changes in Direct Costing Rules

• Publication Costs (Page Charges)
  – Page charges are still allowable costs after award end date but before closeout (in essence, adoption of the NSF model)

• Computing Devices
  – Devices under $5,000 may be direct charged (allocable portion only) if essential to the performance of the Federal award.

• Program Income
  – New “default” treatment is addition (use program income for the purposes of the award and under the same terms and conditions) unless the agency specifies otherwise in its award.
  – Agency may treat the prime recipient differently than subrecipients if it wishes to do so
Changes in Direct Costing Rules

• Participant Support Costs
  – Require prior agency approval

• Conference Expenses
  – Now includes the concept of dissemination of technical information beyond the Recipient - so presumably within-the-U meetings don’t qualify

• Visa Costs
  – Short-term, travel visas (as opposed to longer-term, immigration visas) are allowable costs.
Changes in Indirect /F&A Costing Rules

• Federal agencies are expected to honor negotiated F&A rates
  – Class or single award exceptions only when required by Federal statute or regulation, or approved by an agency head or delegate
  – Exceptions must be reported to OMB
  – Policies, procedures, and general decision-making criteria for making exceptions must be published
  – UMN negotiated rate should be honored on subawards
  – UMN must grant 10% de minimus F&A rate granted to subrecipients without a negotiated rate (or negotiate a rate with them)

• Participant Support Costs
  – Must be excluded from F&A (similar to NSF model)
Purchasing

• Use of statutorily imposed state or local geographical preferences prohibited in procurements
• Requirement to use one of only 5 procurement methods
• **Language that implies that purchases over $3K require competitive quotes (potential major impact on P-cards)**
• Confusion not resolved about F&A on vendor purchases over $25K

Equipment

• New data elements to track in our property system
• Records must contain “use” of the equipment
  – COGR attempt underway to mitigate the impact of this requirement
Cost-Sharing

• Voluntary committed cost-sharing is not expected in research proposals
• Cost-sharing obligations must be included in FOAs

Performance Measurement (Financial and Performance Reporting)

• Stronger certification language reminds signers of statutory penalties for false certifications
• Increased focus on obligation to relate progress/performance to per-unit cost where possible
  – Seeking OMB FAQ to confirm that the Research Performance Progress Report (RPPR) will meet this requirement
Uniform Guidance Web Site

http://www.ospa.umn.edu/documents/UG.html