Uniform Guidance
2 CFR 200

Council of Research Associate Deans
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OmniGuidance Implementation Plan

- 2013:
  - 12/26/13 Release

- 2014:
  - 6/26/14 Agency plans due to OMB

- 2015:
  - 12/26/14 Implementation (all but audit)

- 2016:
  - 7/1/15 Audit provisions go into effect for UMN

Stages:
- Understand (OmniGuidance)
- Influence
- Plan (OmniGuidance)
- Understand (Agency)
- Plan (Agency)
- Implement
- Evaluate
- Refine
Before 12/26/14

• UG Steering Committee and Working Groups continue work on:
  – U-wide policy/procedure and training changes
  – Update Internal Business Processes
  – Monitor/update remaining pending issues
• SPA to update NOGA Terms and Conditions
• Federal agency implementation plans
• Federal “Research Terms and Conditions” replacement
• Prior Approvals matrix (contingent upon agency implementation plans and Research T&C)
On 12/26/14

• **Uniform Guidance will apply to:**
  – All New and Renewal awards issued (even if costed/budgeted and submitted under the old rules)

• **Old Rules (A-21, A-110, A-133) will apply to:**
  – All active awards that do not get incremental funding or another award action (until they expire)

• **Uniform Guidance may apply to:**
  – All non-competing awards (agencies may decide on a case-by-case basis)
After 12/26/14

- Upcoming issues of PI Quick Guide:
  - Subawards (Winter 2015)
  - Award Management (Spring 2015)
  - Closeouts (Summer 2015)
  - Procurement (Spring 2016)

- DS-2 statement submitted to true-up charging practices to new rules (provides a safe harbor to universities during review by feds)

- UMN’s upcoming F&A rate proposal (to be submitted Spring 2015 against a FY14 base year)

- Single (A-133) Audit for UMN’s FY16 (July 2015 – June 2016)
After 12/26/14 cont.

• Implement new/revised processes for:
  – Subrecipient Progress Reports
  – Subrecipient Invoices
  – Publication Costs
  – 90 Day Enforced Closeouts
  – Dependent Care while Traveling
  – Procurement rules (effective 7/1/16)
Questions???

• Additional information available at: