Uniform Guidance
2 CFR 200

Council of Research Associate Deans
September 17, 2014

Nicole Pilman, Uniform Guidance Implementation Coordinator
Sue Paulson, Assistant Controller
Pamela A. Webb, Associate VP for Research
Goals of Updated Regulations

Reduce fraud, waste, and abuse

vs.

Streamline
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

Understand (OmniGuidance)

Influence

Plan (OmniGuidance)

Understand (Agency)

Plan (Agency)

Implement

Evaluate

Refine
Recent Developments

- NSF releases draft implementation plan for comment (5/9/14)
- COGR (including UMN) proposes FAQs to OMB (6/24/14)
- UMN responds to NSF’s draft (7/2/14)
- OMB raises potential new definition of MTDC (8/27/14)
- OMB puts out 30 pages of FAQs (8/29/14)
- UMN releases *PI Quick Guide* (9/4/14)
- COGR (including UMN) puts out updated implementation tracking guidance (9/17/14)
OMB FAQs Resolved Certain Issues

- **Procurement** rules to be delayed 1 year
  - Largest impact for UMN is a new requirement to get 3 price quotes on purchases between $3K and $10K
- **F&A rate proposals** with FY14 base years (like UMN) should use new rules to calculate the rate
- **COI** rules determined to be conflicts in procurement only
- **Program income** rule in UG about including royalties in the definition of what has to be tracked is invalid under federal law
- **Profit** definition clarified to exclude legitimate unexpended balances under fixed price awards/subawards
- **DS-2 statements** submitted after 12/26/14 to true-up charging practices to new rules provide a safe harbor to universities during review by feds (UMN won’t be dinged for inconsistent costing treatment by the feds)
Known **Effective Dates** (as of 9/18/14)

- **Uniform Guidance** will apply to:
  - All New and Renewal awards issued on or after 12/26/14 (even if costed/budgeted and submitted under the old rules)
  - 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)

- **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)
PI Quick Guide on Proposal Budgeting

**Sent on 9/4/14 to:**
- All federal PIs and co-PIs
- AEL list
- All Certified Approvers
- All Grants Management User Network Users
- All SPA and SFR staff
- Posted on SPA website
- Referenced in UM Brief
Expected Next Developments

• Work with COGR/OMB to solve MTDC definition issue
• UMN UG Steering and Work Groups continue to meet to discuss emerging developments and local impact of new regs
  – Known policy/procedure changes will begin going through the review process soon
• Federal agency implementation plans not likely to be released until Nov or December 2014 (for 12/26/14 implementation)
• Federal “Research Terms and Conditions” replacement may or may not be ready for 12/26/14
  – Would include an updated Prior Approvals matrix
• UMN to create a PI Quick Guide on Award Management for release in late fall
Questions???

• Additional information available at: