Uniform Guidance
2 CFR 200

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Driven to Discover™
Structure

• Associate Vice President for Research Administration and Assistant Controller assigned to implementation.
  – Designed Implementation Plan for the University.
  – Appointed Steering Committee and Working Groups.
  – Appointed UG Implementation Coordinator.
OmniGuidance Implementation Plan

- **Understand (OMB)**
- **Influence (OMB)**
- **Plan (OMB)**
- **Understand (Agency)**
- **Plan (Agency)**
- **Implement**
- **Evaluate**
- **Refine**

**Timeline:**
- **2013**
  - 12/26/13 Release

- **2014**
  - 6/26/14 Agency plans due to OMB
  - 12/26/14 Implementation (all but audit)

- **2015**
  - 7/1/15 Audit provisions go into effect for UMN
Uniform Guidance Org Chart

- Uniform Guidance Steering Committee
  - COSTING Work Group
  - PRE-AWARD/SUBAWARD Work Group
  - COI Work Group
  - PURCHASING Work Group
  - PROPERTY Work Group
  - HR/EFFORT Work Group
  - POST-AWARD Work Group
  - Individual Specialists
Implementation Coordinator

- Prepare and/or present educational offerings about the new regulations and the University’s implementation.
- Support activities of the Steering Committee and Working Groups.
- Oversee and organize the content for the University’s Uniform Guidance web site (http://www.ospa.umn.edu/documents/UG.html).
- Serve as a primary or companion UG point of contact for other University central offices.
- Shepherd updated policies and procedures through University consultative and policy/procedure approval process.
- Understand the system and training implications and work with business analysts and system owners to document system and training changes that are needed.
- Monitor developments on implementation rollouts and regulatory interpretations promulgated by OMB and the various implementing agencies, and provide updated information to the University community.
- Monitor implementation approaches and developments at other research universities, and suggest improvements to the University’s approach.
Campus Readiness

- PI Quick Guides
- Web site
- Road Shows
- Symposium Presentations
- Regular visits to CRAD & SRC
PI Quick Guides

- Proposals (September 2014)
- Subawards (March 2015)
- Awards (Summer/Fall 2015)
- Procurement (July 2016)
UG Terms with Greatest Impact to the University

- Direct Charges
- Subawards
- Award Closeout
- Procurement
- Dependent Care
Significance of Change

• Status of Federal Rollout
  – Two sets of regulations
  – Research Terms and Conditions (prior approvals)
  – Inconsistent agency requirements
  – Inconsistent implementation for ongoing awards

• University policies and business processes

• University’s F&A rate

• University’s FY16 audit
Next Steps

• Continue to partner with COGR and FDP
• Continue to refine policies and business processes

• Additional information available at: