### OmniGuidance Implementation Plan

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

• Uniform Guidance will apply to:
  – All New and Renewal awards issued (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)

• 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)
What Rules Apply?

• Previous Federal Research Terms and Conditions are now obsolete and are not yet re-released under the UG

• Agencies are instead applying:
  – The parts of the Code of Federal Regulations (CFR) that codify their implementation of the Uniform Guidance
  – Their own internal Policy Statements or Grants Manuals
    • Some of these aren’t yet released (including the NIH Grants Policy Statement)

• 8 Agencies intend to migrate back to the Federal Research Terms and Conditions when they are ready
Which Agencies intend to Apply the Federal Research Terms and Conditions?

- Department of Agriculture
  - NIFA
- Department of Commerce
  - NIST/NOAA
- Department of Energy
- Department of Transportation
  - FAA
- Environmental Protection Agency
- NASA
- NIH – co-Chair
- NSF – co-Chair

What about the other parts of USDA?

DOD
Be Aware:
Incremental Funding* Treatment Varies

<table>
<thead>
<tr>
<th>Incremental Funding generally subject to the Uniform Guidance</th>
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<tbody>
<tr>
<td>• NIH</td>
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<td>• NSF</td>
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<tr>
<td>• Department of Justice</td>
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<td>• EPA</td>
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<td>• ?</td>
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<th>Incremental Funding generally subject to the old rules</th>
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<td>• Department of Defense Agencies</td>
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*funding issued after 12/26/14 (regardless of budget period start date)
SPA NOGAs & the UG

- New set of 13 federal templates that include UG terms and conditions about to be completed
- Some new or updated UG terms common to all agencies
- Some agency-specific
- Awards may receive multiple NOGAs this year (as agencies publish their terms or migrate to the Research Terms and Conditions)
New or Revised Common UG Terms

• Allocable computer devices deemed essential and with unit cost less than $5,000 may be direct charged
• Fixed price subawards need prior agency approval
• Fixed price (sub)awards must be certified complete at project end or the (sub)award amount must be adjusted
• Prior agency approval needed for direct charging of administrative or clerical salaries not identified in the approved budget
• Prior agency approval needed for adding or rebudgeting into participant support costs
• Publication costs or costs to share results may be charged up to 60 days after the award end date
• Subward invoices that are proper need to be paid within 30 days
• Awards must be closed out within 90 days (same rule as before but more emphasis on enforcement now)
Possible UG issues
(especially before Research Terms and Conditions)

• Prior approval may be needed for:
  – Subawards (especially if not in the proposal)
  – Changes in level of effort of more than 25% for key personnel named in the proposal (but not in the award)
PI Quick Guide on Subawards

• DRAFT of PI Quick Guide
  – Help Text and additional links coming soon
  – When finalized, will be sent electronically to all PIs who hold subawards and to all grants administrators
Questions???

• Additional information available at: