Uniform Guidance
2 CFR 200

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Driven to Discover℠
Remaining Issues

- Procurement
- Compensation
- Research Terms and Conditions
- Program Income
- Dependent Care Conference Costs
Procurement

Procurement "Claw" (Section 200.320)

1. Micro Purchases
   - Up to $150K
   - Rate quotations
   - No cost or price analysis
   - $3K
   - No quotations
   - Equitable distributions

2. Small Purchases
   - > $150K
   - Construction projects
   - Price is a major factor
   - Up to $150K
   - Rate quotations
   - No cost or price analysis

3. Sealed Bids
   - > $150K
   - Fixed price or cost reimbursement
   - RFP with evaluation methods

4. Competitive Proposals
   - > $150K
   - Fixed price or cost reimbursement
   - RFP with evaluation methods

5. Sole Source
   - Unique
   - Public emergency
   - Authorized by agency (or PTE)
   - No competition
Procurement

• Procurement rules will take effect July 1, 2017 (extension granted)

• Purchases between $3K and $150K require price or rate quotations must be obtained from an “adequate” number of qualified sources
  
  • UMarket & University-wide Contracts are already competitively bid and meet requirements
University Plan

• A pop-up alert is already in EFS that reminds the preparer that three price quotes are needed for items costing at least $10K
  – Purchasing Services continues to monitor compliance levels

• In early November Purchasing Services will begin to develop a strategy related to necessary threshold, signature & approval changes to be in effect as of 7/1/17
Compensation

• UG offers greater flexibility in accounting for salaries and wages charged to Federal awards
• UG emphasizes strong Internal Controls with or without an effort reporting system
• UG stresses written institutional policies and procedures
Institutional Base Salary (IBS)

• Only for IHEs and specifically defined in the UG (200.430(h)(2))
  – Components of faculty salaries should be clearly established in appointment letters
  – Define the treatment of clinical practice plan compensation in relation to IBS
  – Generally, IBS will exclude salary paid by a separate organization – VA appointments, consulting, incidental activities, incentive pay
University Plan

• To be in line with the Uniform Guidance, the University needs to define what workload, extra service/overload, incentives, etc. are included and excluded in the Institutional Base Salary (IBS)

• A working group with representatives from SPA, SFR, HR, the Controller’s Office, and academic units are currently meeting to determine what makes up IBS at the University
Research Terms and Conditions

• 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 that codify their implementation of the Uniform Guidance
  – Their own internal Policy Statements or Grants Manuals

• At least 9 Agencies intend to migrate back to the “new” Federal Research Terms and Conditions
9 Agencies…

- Commerce/NOAA and NIST
- DOE
- EPA
- NASA
- NSF
- DHHS/NIH
- USDA/NIFA
- DOT/FAA
- Homeland Security
- DOD
RTCs Implementation

• DRAFT made available by the Federal Working Group on October 14
• FDP Working Group now reviewing them and compiling comments
  – All comments due December 14.
• To be implemented October 2016(??)
• In the meantime follow:
  • Uniform Guidance
  • Agency UG implementation plans and/or policy statements or grants manuals
Program Income

• With the NIH and NSF implementation of the UG, there is an opportunity to potentially change how the sale of capital assets purchased with sponsored funds are handled
University Policy Updates

• Typically policy is built around the majority and special circumstances are handled via special procedures or oversight.

• Data shows that the very large majority of sponsored capital assets are purchased on NSF and NIH awards.

• This presents a business case and highlights a potential opportunity to revise two policies/procedures:
  – Capital Equipment Disposals: Purchased with Sponsored Funds
  – Managing Program Income Earned on Sponsored Projects
What may change?

• Sales of capital assets purchased with sponsored funds would have two procedures:
  – Capital assets purchased on non federal sponsored funds or NSF & NIH grants & cooperative agreements would follow the non sponsored sale of capital assets procedures
    • This change means units selling the capital asset retain the revenue with no further obligation to the sponsor
  – Capital assets purchased on contracts and grants or cooperative agreements from all other federal agencies would follow a revised procedure for sale of capital assets purchased on sponsored funds
    • A grid will be created to help units understand which procedure to follow
    • A requirement will be added to contact GA for confirmation
    • Language will be removed that indicates sale treated like program income
Dependent Care Conf. Costs

- 200.474(c)(1) Temporary dependent care costs (as dependent is defined in 26 U.S.C. 152) above and beyond regular dependent care that directly results from travel to conferences is allowable provided that:

  (i) The costs are a direct result of the individual's travel for the Federal award;
  (ii) The costs are consistent with the non-Federal entity's documented travel policy for all entity travel; and
  (iii) Are only temporary during the travel period.
University Plan

• The UG Steering Committee compiled data and information from other institutions that has been shared with senior leadership for their consideration

• The Senate Research Committee will soon be considering this as part of a larger parental leave issue
Questions???

- Additional information available at: