

# The Office of Management and Budget (OMB) Uniform Guidance

## Uniform Guidance Key Changes

This Quick Guide highlights some of the more significant changes that may impact your new grant applications. The Office of Management and Budget (OMB) has combined many of OMB federal circulars, including A21 and A110, into a single guidance document that can be used by all agencies. This combined document is now known as, "Uniform Guidance." As stated per the OMB webpage, this guidance "will supersede requirements from OMB Circulars A-21, A-87, A-110, and A-122 (which have been placed in 2 C.F.R. parts 220, 225, 215, and 230); Circulars A-89, A-102, and A-133; and the guidance in Circular A-50 on Single Audit Act follow-up." The new Uniform Guidance rules are effective for new awards made on or after December 26, 2014.

## Procurement

The Uniform Guidance provides detailed and prescriptive methods by which research institutions should procure goods and services costing more than \$3,000 under a federal award. The Guidance emphasizes the documentation requirements and internal written procedures for procurement (UG 200.317-326). The OMB is providing a grace period until FY17 to comply with these standards.

## Close-Out

The Uniform Guidance reminds institutions that financial close-out reports are to be submitted no later than 90 calendar days after the end date of the performance period, and such financial and performance reports, including any due under a subaward, must be received prior to close-out. All final billings must be included in the financial close-out report unless an extension is authorized by the federal sponsor (UG 200.343).

## Subawards

With prior sponsor approval, fixed price subawards of up to \$150,000 are permissible under the Uniform Guidance, provided there is no mandatory cost sharing or matching (UG 200.332). Additionally, the Guidance clarifies that if a subrecipient does not already possess a negotiated Indirect Cost Rate, it may apply a //de minimis// 10% rate (UG 200.331).

## Subrecipient Monitoring

The Uniform Guidance requires institutions to perform a risk assessment of subrecipients prior to issuing the subaward in order to determine the appropriate level of monitoring (UG 200.331). Factors to be considered may include:

- Prior experience with same or similar subawards;
  - A-133/Uniform Audits;
  - Personnel or system changes; and
  - Monitoring by federal agencies.
- Recent federal audits and enforcement actions continue to reinforce the need for ongoing monitoring of subrecipients regardless of the risk level assigned at the pre-award stage.

## Administrative & Clerical Salaries

The Uniform Guidance clarifies that salaries of administrative and clerical staff should be treated as indirect (F&A) costs. The New Guidance outlines specific conditions under which it may be appropriate charge these as direct costs.

- The services are integral to a project or activity;
- Individuals involved can be specifically identified with the project or activity;
- Explicitly included in the budget or have prior written approval from the federal agency;
- The costs are not also recovered as indirect costs (F&A) (UG 200.413).

## Cost Sharing

The Uniform Guidance reinforces that voluntary, committed cost sharing cannot be used as a factor during the merit review of proposals unless it is explicitly specified in a notice of funding opportunity.

## Computing Devices

The Uniform Guidance clarifies that Computing devices are generally considered "Supplies" and can therefore be directly charged to federally sponsored projects as long as they are "essential and allocable" to the performance of a federal award (UG 200.33).

## Visa Costs

The Uniform Guidance clarifies that costs associated with short-term visas for personnel whose critical skills are required for a specific award, may be proposed and charged as a direct cost as long as:

- The skills are critical and necessary for the project;
  - The costs are considered direct and allowable under Cost principle; and
  - The costs are consistent with University cost accounting policy and procedure.
- Expedited processing fees generally remain unallowable under the new guidance. Please visit the following website for further information for other key changes: [ecfr](#)
- Note: The number in parenthesis is the page number where you can find changes in the above website.

## Changes Effective 12/26/14

- Effective/Applicability Dates (110)
- Conflict of Interest (112)

**Fixed amount awards & Subawards (201&332)**  
**Cost Sharing or Matching (306)**

- Subrecipient and contractor monitoring (330)
- Requirements for pass-through entities (331)
- Close-out (343)

**Direct Costs (Admin and Clerical - 413)**

- Indirect Costs (414)
- CAS and Disclosure Statements (419)

**Materials and Supplies (Computing Devices) (453)**  
**Participant Support Costs (68 & 456)**  
**Publication and Printing Costs (461)**

- Exceptions to Guidance (102)
- Notice of Funding Opportunities (203)
- Agency Review (205)
- Performance Measurement (301)
- Internal Controls (303)
- Program Income (307)
- Revisions of Budget and Program Plans (308)
- Period of Performance (309)
- Equipment (313)
- Monitoring and Reporting Program Performance (328)
- Policy Guide (400)
- Prior written approval (407)
- Compensation (430)
- Exchange Rates (440)
- Losses on other awards and contracts (451)
- Pre-award Costs (458)
- Limitation of reimbursement of administrative costs (III.C.8)

## Changes Effective After 12/26/14

- Method for collection and storage (335)
- Required certifications (415)
- Interest (449)
- Information contained in the Federal award (210)
- Recruitment Costs (463)
- Travel Costs – Temporary Dependent Care (474)
- Procurement (317 – 326)
- Compensation – FB (terminal leave) (430)
- Depreciation (436)

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