



# WCMC Implementation of The Uniform Guidance (2 CFR Part 200)

**Michelle A. Lewis,**  
**Director of Research Administration**  
**Monday, May 11, 2015**  
**RAPID Meeting**



Weill Cornell Medical College

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# THE UNIFORM GUIDANCE

## Today's Agenda

- I. Uniform Guidance (UG) refresher: What is its purpose, objectives, and goals?
- II. Current status of WCMC's UG implementation plan
- III. Federal agency(ies) UG implementation updates
- IV. Next steps



# THE UNIFORM GUIDANCE

## Purpose & Objectives of Final Uniform Guidance

### PURPOSE

Provides a government-wide **framework for grants management** which will be complemented by additional efforts to strengthen program outcomes through innovative and effective use of grant-making models, performance metrics, and evaluation.



### OBJECTIVE

To streamline the rules and regulations for federal awards, to reduce both administrative burden and to mitigate the risk of waste, fraud, and abuse of federal funding for non-federal entities receiving Federal awards.



# THE UNIFORM GUIDANCE

## Goals and Intended Impact

1. Eliminate Duplicative and Conflicting Guidance
2. Performance over Compliance for Accountability
3. Efficient Use of IT and Shared Services
4. Consistent and Transparent Treatment of Costs
5. Limiting Costs for Best Use of Federal Services
6. Standard Business Processes & Data Definitions
7. Family Friendly Policies
8. Stronger Oversight
9. Target Audits on Risk of Waste, Fraud and Abuse



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## Highlights Part I

In the past...

...there were three Office of Management and Budget (OMB) circulars that provided guidance on the management of awards subject to federal government administrative requirements, cost principles, and audit requirements: A-21 (cost principles), A-110 (administrative requirements), and A-133 (audit requirements).

Today...

...the UG replaces eight (8) previous OMB circulars (which include A-21, A-87, A-89, A-102, A-110, A-122, A-133 and Circular A-50/Single Audit Act) into one uniform circular.



# THE UNIFORM GUIDANCE

## Highlights Part II

- UG is comprised of one (1) Preamble and six (6) Subparts:

Preamble - [Major Policy Reforms](#)

1. Subpart A (§200.0 - §200.99) - [Acronyms and Definitions](#)
2. Subpart B (§200.100 - §200.113) - [General Provisions](#)
3. Subpart C (§200.200 - §200.212) - [Pre Award Requirements](#)
4. Subpart D (§200.300 - §200.345) - [Post Award Requirements](#)
5. Subpart E (§200.400 - §200.475) - [Cost Principles](#)
6. Subpart F (§200.500 - §200.521) - [Audit Requirements](#) (includes Appendices I-XI)

- All terms and conditions outlined in the Subparts of the UG applies to new awards and additional/incremental funding awarded on or after 12/26/2014.
  - Subpart F (audit requirements) will be effective July 1, 2015
  - Procurement requirements are deferred to July 1, 2016



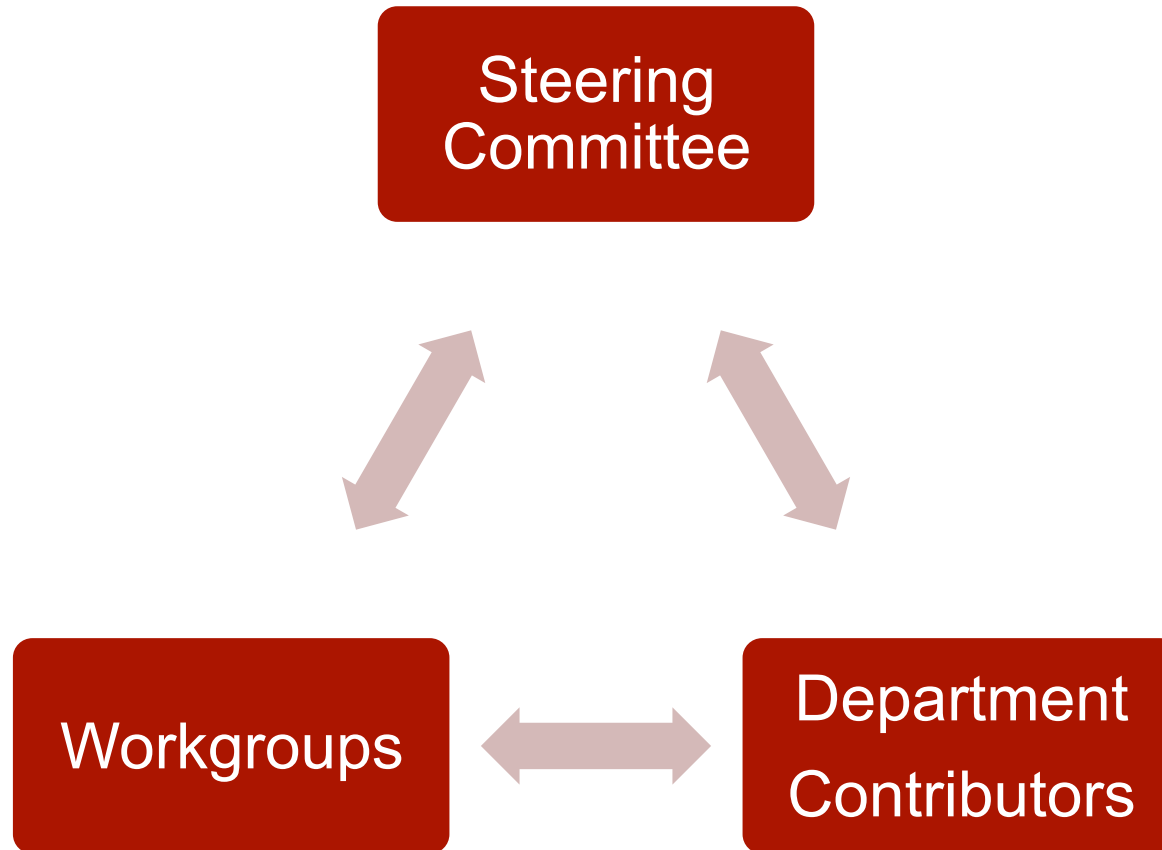
# THE UNIFORM GUIDANCE

## WCMC Implementation Updates



# THE UNIFORM GUIDANCE

## WCMC UG Implementation Teams





# THE UNIFORM GUIDANCE

## WCMC UG Implementation Team: Steering Committee (SC)

### SC Charge:

1. Chairs provide leadership, oversight, and direction to assigned workgroup(s).
2. Develop and assess overall progress of the WCMC UG implementation and perform necessary tests of compliance.
3. Assess scope of new regulations vis-à-vis WCMC policy and procedures.

<u>Team</u>	<u>Title</u>	<u>UG Team Role</u>	<u>UG Subpart(s)</u>
Lewis, Michelle	Director, Research Administration	Chair - UG Implementation	A-F, Appendices
Schwartz, Joseph	Financial Controller	Co-Chair - Finance	D, E, F   Appendix: 8, 10, 11
Paray, Melissa	Supervisor, Research Accounting	Wrkgrp Co-Chair - Finance	D, E, F   Appendix: 8, 10, 11
Walsh, Edward	Sr. Director, Financial Analysis	Co-Chair - Fin. Analysis	D, E   Appendix: 3, 4,
Wong, Julie	Asst. Director, Financial Analysis	Wrkgrp Co-Chair - Fin. Analysis	D, E   Appendix: 3, 4,
Garriga, Adam	Managing Director, Business Operations	Co-Chair - OSRA	C, D, E   Appendix: 1,2,8
Frain, John	Director, Procurement	Co-Chair - Procurement	D



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## WCMC UG Implementation Team: Workgroups (WG)

### WG Charge:

1. WCMC-UG workgroups are comprised of central and departmental campus experts in the fields of pre-and post-award administration, costing policy, audit, purchasing and equipment management.
2. Recommend actions needed at the system-wide and local levels for WCMC policy/procedures to adapt to the UG terms and conditions.

<u>Team</u>	<u>Title</u>	<u>UG Team Role</u>	<u>WCMC Dept.</u>	<u>Steering Committee</u>	<u>Workgroup</u>	<u>UG Subpart(s)</u>
Lewis, Michelle	Director, Research Administration	<b>Chair - UG Implementation</b>	Dean's Office	X	-	A-F, Appendices
Schwartz, Joseph	Financial Controller	<b>Co-Chair - Finance</b>	Finance	X	X	D, E, F   Appendix: 8, 10, 11
Squicciarini, Cara	Asst. Controller	Wrkgrp Member - Finance	Finance	X	X	D, E, F   Appendix: 8, 10, 11
Paray, Melissa	Manager, Grants & Contracts Accounting	Wrkgrp Co-Chair - Finance	Finance	-	X	D, E, F   Appendix: 8, 10, 11
Walsh, Edward	Sr. Director, Financial Analysis	<b>Co-Chair - Fin. Analysis</b>	Financial Analysis	X	?	D, E   Appendix: 3, 4,
Wong, Julie	Asst. Director, Financial Analysis	Wrkgrp Co-Chair - Fin. Analysis	Financial Analysis	X	X	D, E   Appendix: 3, 4,
Garriga, Adam	Managing Director, Business Operations	<b>Co-Chair - OSRA</b>	OSRA	X	?	C, D, E   Appendix: 1,2,8
Cardona, Angelica	Asst. Director, OSRA Post-Award	Wrkgrp Member - OSRA Post	OSRA	-	X	D, E   Appendix: n/a
Lane, Amy	Asst. Director, OSRA Pre-Award	Wrkgrp Member - OSRA Pre	OSRA	-	X	C, D, E   Appendix: 1,2,8
Hunt, Stephen	Asst. Director, Policy, Compliance & Audit	Wrkgrp Member - OSRA Sub's	OSRA	-	X	C, D, E   Appendix: 1,2,8
Frain, John	Director, Procurement	<b>Co-Chair - Procurement</b>	Procurement	X	X	D



# THE UNIFORM GUIDANCE

## WCMC UG Implementation Team:

### Department Contributors (DC)

#### DC Charge:

- WCMC-UG department contributors are comprised of WCMC department representatives who provide feedback on WCMC UG implementation tools.
- Review and provide input on training materials and tools to assist research community with implementation.

<u>Team</u>	<u>Title</u>	<u>UG Team Role</u>	<u>WCMC Dept.</u>	<u>UG Subpart(s)</u>
Betancourt, Eduardo	Department Administrator III	Department Contributor	Genetic Medicine	A, D & E
Brazier-Mitouart, Helene	Research Administration Education Manager	Department Contributor	Dean's Office	A, D & E
Hostiuk, Veronika	Finance & Grants Administrator	Department Contributor	Pediatrics	A, D & E
Lewis, Michelle	Director, Research Administration	Chair - UG Implementation	Dean's Office	A-F, Appendices
Mesi, Anita	Divisional Administrator II	Department Contributor	Medicine - Nephrology	A, D & E
Mohamed, Nahla	Administrative Manager	Department Contributor	Genetic Medicine	A, D & E
Prabudoss, Monica	Associate Director, Research Administration	Department Contributor	Medicine	A, D & E
Reilly, Kevin, M.	Senior Auditor	Department Contributor	Internal Audit	A, D & E
Rodrigues, Zeffrey, G.	Department Administrator I	Department Contributor	Pharmacology	A, D & E
Stevens, Cathy	Assistant Administrator	Department Contributor	Pediatrics	A, D & E
Victor, Kerry	Grants Administrator	Department Contributor	Pharmacology	A, D & E
Villegas-Estrada, Ady	Research Financial Manager	Department Contributor	CTSC	A, D & E



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## UG Implementation: Key Changes

### I. Administrative & Clerical Salaries [Subpart E, §200.413(c)]

#### UG:

- ☐ Allows for direct charging of admin/clerical salaries that are:
  1. Integral to the project;
  2. Individuals must be identified with the project or activity;
  3. Salary costs must be included in the budget **OR** have prior written approval;
  4. Costs must not also be recovered as a indirect cost.
- ☐ Prior approval requirements vary by federal agency

#### WCMC:

- ☐ All admin/clerical salaries must be budgeted w/justification in outgoing proposals.
- ☐ After-the-fact (post-NOA) admin/clerical salary charges will require internal approvals prior to charging grant with proper justification(s) on file.
- ☐ Policy and SOP is under review/development.

\*\*The allowability of admin/clerical costs as a direct charge to grants should not be a work-around or placeholder to subsidize and/or park salaries that would otherwise be appropriately charged to departmental funds. Compensation should be commensurate with effort and project involvement.\*\*



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## UG Implementation: Key Changes

### II. Allowable and Unallowable Programmatic Costs & Activities [Subpart E, §§200.302; 200.401(b); 200.402 - 200.411; 200.420-200.475]

#### UG:

- ☐ Four tests must be met to determine the allowability of costs to a Federal award:
  1. **Reasonableness**: Cost is generally recognized as ordinary and necessary for the operation of WCMC; amount does not exceed what would be incurred by a prudent person (§200.404)
  2. **Allocable**: Good or services purchased are chargeable or assignable to the Federal award in accordance with benefits received (§200.405)
  3. **Consistency**: Harmony and uniformity of practices as it pertains to grant management on the part of the Federal awarding agency and WCMC
  4. **Conformance**: Day-to-day management of grant is in accordance with the terms and conditions of the Federal award as it pertains to compliance and reporting requirements (§200.205)

#### WCMC:

- ☐ Will comply with UG and prior approval matrix will be disseminated.
- ☐ Rule of thumb: Ask first, get approval in writing, then charge grant accordingly.
- ☐ Policy and/or SOP is under review/development.



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## UG Implementation: Key Changes

### III. Computing Devices [Subpart E, §200.430 and §200.431]

#### UG:

- ☐ Classifies computing devices (<\$5,000) as *materials and supplies*.
- ☐ Allows for direct charging of these costs if they are properly justified as being:
  1. Essential and allocable to the project
  2. The research team should not have reasonable access to other devices or equipment that can achieve the same purpose
- ☐ Allows for direct charging of ITS costs (must be justified and itemized in detail).

#### WCMC:

- ☐ Will comply with UG.
- ☐ PI should include in the budget and budget justification why the computing device is necessary and essential to the project.
- ☐ Computers should not be charged to “Other expenses” G/L in SAP.
- ☐ Budget justification guidance will be made available on OSRA “Forms” website.
- ☐ Policy and/or SOP is under review/development.



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## UG Implementation: Key Changes

### IV. Cost Sharing [Subpart D, §§ 200.306 and §200.308(7)]

#### UG:

- ☐ Funding agencies prohibited from using Voluntary committed cost sharing (VCCS) in the merit review or applications or proposals.
- ☐ VCCS may be considered in a proposal only if the Federal awarding agency publishes requirement in FOA/funding solicitation

#### WCMC:

- ☐ Will comply with UG.
- ☐ PI should carefully review the FOA to determine if VCCS is allowable or unallowable.
- ☐ Policy and/or SOP is under review/development.



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## UG Implementation: Key Changes

### **V. F&A Rates for Subrecipients [Subpart D, §200.331(a)(4) and Subpart E§200.414(f)(g)]**

#### **UG:**

- ☐ Requires honoring of the federally-negotiated F&A rate of subrecipients on WCMC proposals.
- ☐ Subrecipients without a federally-negotiated F&A rate required to use a 10% de minimus rate on WCMC proposals.

#### **WCMC:**

- ☐ Will comply with UG
- ☐ If the sponsor caps the rate (i.e., NIH caps the F&A rate to 8% for NRSA training grants or K awards).
- ☐ Policy and/or SOP will reflect this guidance in greater detail.





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## UG Implementation: Key Changes

### VI. Prior Approval [Subpart E, §200.407]

#### UG:

- ☐ Outlines approximately 24 cost categories that *may* require prior approval before direct charging a Federal award.

#### WCMC:

- ☐ Will comply with UG.
- ☐ Best to ask first (i.e., consult with OSRA post-award) and get written approval prior to charging grant.
- ☐ Detailed reference guide including a prior approval matrix will be disseminated to WCMC research community.



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## UG Implementation: Other sections for implementation

- VII.** Publication & Printing Costs
- VIII.** Procurement Standards
- IX.** Program Income
- X.** Records Retention
- XI.** Subrecipient Monitoring\*\*
- XII.** Travel costs (dependent care)
- XIII.** Visa (“J” and “HB1”) costs

If in doubt of how the UG applies to the management of your grant portfolio please ask.



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## Federal Agency Implementation Updates



# THE UNIFORM GUIDANCE

## NIH UG Implementation

- 02/05/2015: Policy notice NOT-OD-15-065 released announcing NIH interim guidance for UG implementation

### NIH Interim General Grant Conditions Implementing New HHS Grants Regulations (Uniform Guidance)

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**Notice Number:** NOT-OD-15-065

#### Key Dates

**Release Date:** February 5, 2015

#### Related Announcements

[NOT-OD-15-046](#)

#### Issued by

National Institutes of Health ([NIH](#))

#### Purpose

The purpose of this Guide Notice is to inform grantees of the interim general conditions of NIH grant awards aligned with the U.S. Department of Health and Human Services (HHS) regulations implementing OMB's Uniform Guidance at 45 CFR Part 75. Although 45 CFR Part 75 related updates are the focus of the NIH Interim General Grant Conditions document, current policy is reiterated to provide recipients with further context (e.g., cost considerations, NIH standard terms of award, special award conditions, and grants appeal procedures). The Interim General Grant Conditions document is being issued in order to serve as the applicable terms and conditions for recipients of NIH awards, until such time as revised Research Terms and Conditions become effective. The NIH Interim General Grant Conditions document is available at: <http://grants.nih.gov/grants/policy/policy.htm>.

These conditions are effective for Notices of Award (NoA) issued on or after December 26, 2014, that obligate new or supplemental funds. NoAs issued on or after December 26, 2014 that do **not** involve obligation of new or supplemental funds remain subject to 45 CFR Part 74 or Part 92, as applicable, until such time that new funds are obligated.

Please also see NIH's 45 CFR Part 75 related FAQs available at: [http://grants.nih.gov/grants/policy/faq\\_grants\\_uniformguidance.htm](http://grants.nih.gov/grants/policy/faq_grants_uniformguidance.htm).

#### Inquiries

Please direct all inquiries to:

Division of Grants Policy  
Office of Policy for Extramural Research Administration (OPERA)  
Telephone: 301-435-0949  
Email: [GrantsPolicy@od.nih.gov](mailto:GrantsPolicy@od.nih.gov)



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## NIH Implementation: NIHGPS

- 03/31/2015: Policy notice [NOT-OD-15-087](#) released announcing the publication of the Revised NIH Grants Policy Statement (NIHGPS).

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### Publication of the Revised NIH Grants Policy Statement (Rev. 3/31/2015)

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**Notice Number:** NOT-OD-15-087

**Key Dates**

**Release Date:** March 31, 2015

**Related Announcements**

None

**Issued by**

National Institutes of Health ([NIH](#))

**Purpose**

The National Institutes of Health (NIH) announces the publication of the revised NIH Grants Policy Statement (NIHGPS, rev. 3/31/2015). This revision is applicable to all NIH grants and cooperative agreements with budget periods beginning on or after December 26, 2014 and awards that received supplemental funding on or after December 26, 2014. This revision supersedes, in its entirety, the NIH Grants Policy Statement (10/2013) as a standard term and condition of award. It also supersedes the NIH Interim Grant General Conditions (published 2/5/2015). However, the October 2013 NIHGPS continues to be the standard term and condition for all NIH grants and cooperative agreements with budget periods that began between October 1, 2013 and December 25, 2014.

The NIHGPS provides both up-to-date policy guidance that serves as NIH standard terms and conditions of awards for grants and cooperative agreements, and extensive guidance to those who are interested in pursuing NIH grants.

This revision incorporates new and modified requirements, clarifies certain policies, and implements changes in statutes, regulations, and policies that have been implemented through appropriate legal and/or policy processes since the previous version of the NIHGPS dated 10/1/2013, including NIH implementation of *45 CFR Part 75, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards*. The document is currently available in PDF format at <http://grants.nih.gov/grants/policy/nihgps/nihgps.pdf>. It will also be available in HTML format at <http://grants.nih.gov/grants/policy/nihgps/index.htm> at a later date. The links to the 10/1/12 and 10/1/13 NIHGPS and all previous versions will remain the same.

NIH will continue to publish interim grants policy changes through the issuance of NIH Guide Notices found at <http://grants.nih.gov/grants/guide/index.html>. Each change will be described, including its applicability and effective date, and the necessary language to implement it as a term or condition of award provided.

A document summarizing the significant changes that are implemented with the March 31, 2015 NIHGPS is available at: [http://grants.nih.gov/grants/policy/nihgps/Significant\\_Changes\\_NIHGPS.pdf](http://grants.nih.gov/grants/policy/nihgps/Significant_Changes_NIHGPS.pdf).

**Inquiries**

Please direct all inquiries to:

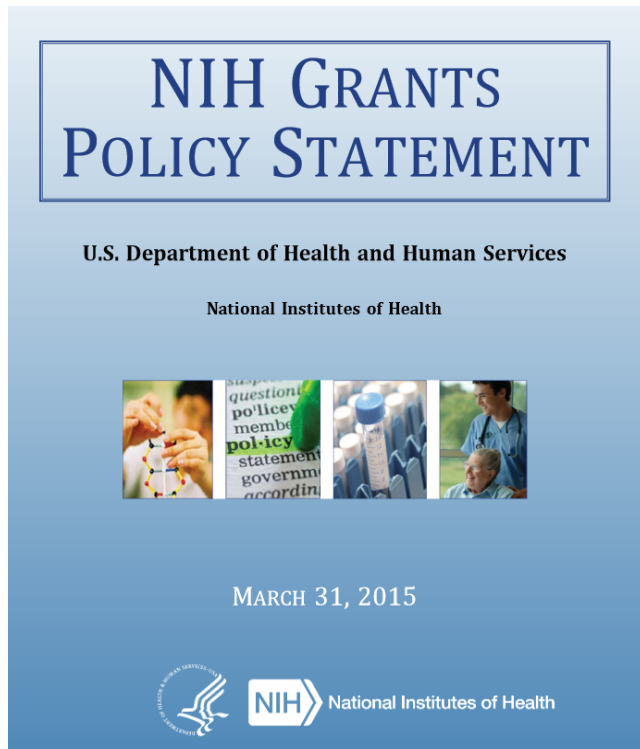
Division of Grants Policy  
Office of Policy for Extramural Research Administration (OPERA)  
National Institutes of Health  
Email: [GrantsPolicy@mail.nih.gov](mailto:GrantsPolicy@mail.nih.gov)



# THE UNIFORM GUIDANCE

## NIH Implementation: NIHGPS

### What is the NIHGPS???



- The NIHGPS provides up-to-date policy guidance that serves as NIH standard terms and conditions of awards for grants and cooperative agreements.
- The March 2015 NIHGPS revision incorporates:
  - ✓ new and modified requirements;
  - ✓ clarifies certain policies, and implements changes in statutes, regulations, and policies implemented since the previous version of the NIHGPS dated 10/1/2013;
  - ✓ includes NIH implementation of *45 CFR Part 75, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards*.

<http://grants.nih.gov/grants/policy/nihgps/HTML5/introduction.htm> or  
<http://grants.nih.gov/grants/policy/nihgps/nihgps.pdf>



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## NIH UG Implementation: NIHGPS

NIHGPS (03/31/2015):

1. Applicable to all NIH grants and cooperative agreements (including supplemental awards) with budget periods beginning on or after 12/26/2014.
2. Supersedes NIHGPS (10/2013) in its entirety\*
3. Supersedes the NIH Interim Grant General guidelines published on 2/5/2015 ([NOT-OD-15-065](#)).

\*October 2013 NIHGPS continues to be the standard term and condition for all NIH grants and cooperative agreements with budget periods that began between October 1, 2013 and December 25, 2014.



# THE UNIFORM GUIDANCE

## NIH UG Implementation

### Old NIH NoA

(issued on or **BEFORE** 12/26/2014)

#### SECTION III – TERMS AND CONDITIONS – 2R01A

This award is based on the application submitted to, and as approved by, NIH on the above-titled project and is subject to the terms and conditions incorporated either directly or by reference in the following:

- a. The grant program legislation and program regulation cited in this Notice of Award.
- b. Conditions on activities and expenditure of funds in other statutory requirements, such as those included in appropriations acts.
- c. 45 CFR Part 74 or 45 CFR Part 92 as applicable.
- d. The NIH Grants Policy Statement, including addenda in effect as of the beginning date of the budget period.
- e. This award notice, INCLUDING THE TERMS AND CONDITIONS CITED BELOW.

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(See NIH Home Page at <http://grants.nih.gov/grants/policy/awardconditions.htm> for certain references cited above.)

This institution is a signatory to the Federal Demonstration Partnership (FDP) Phase VI Agreement which requires active institutional participation in new or ongoing FDP demonstrations and pilots.

### New NIH NoA

(issued on or **AFTER** 12/26/2014)

#### SECTION III – TERMS AND CONDITIONS – 1R01GM

This award is based on the application submitted to, and as approved by, NIH on the above-titled project and is subject to the terms and conditions incorporated either directly or by reference in the following:

- a. The grant program legislation and program regulation cited in this Notice of Award.
- b. Conditions on activities and expenditure of funds in other statutory requirements, such as those included in appropriations acts.
- c. 45 CFR Part 75.
- d. National Policy Requirements and all other requirements described in the NIH Grants Policy Statement, including addenda in effect as of the beginning date of the budget period.
- e. Federal Award Performance Goals: As required by the periodic report in the RPPR or in the final progress report when applicable.
- f. This award notice, INCLUDING THE TERMS AND CONDITIONS CITED BELOW.

(See NIH Home Page at <http://grants.nih.gov/grants/policy/awardconditions.htm> for certain

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references cited above.)

**Research and Development (R&D):** All awards issued by the National Institutes of Health (NIH) meet the definition of "Research and Development" at 45 CFR Part § 75.2. As such, auditees should identify NIH awards as part of the R&D cluster on the Schedule of Expenditures of Federal Awards (SEFA). The auditor should test NIH awards for compliance as instructed in Part V, Clusters of Programs. NIH recognizes that some awards may have another classification for purposes of indirect costs. The auditor is not required to report the disconnect (i.e., the award is classified as R&D for Federal Audit Requirement purposes but non-research for indirect cost rate purposes), unless the auditee is charging indirect costs at a rate other than the rate(s) specified in the award document(s).



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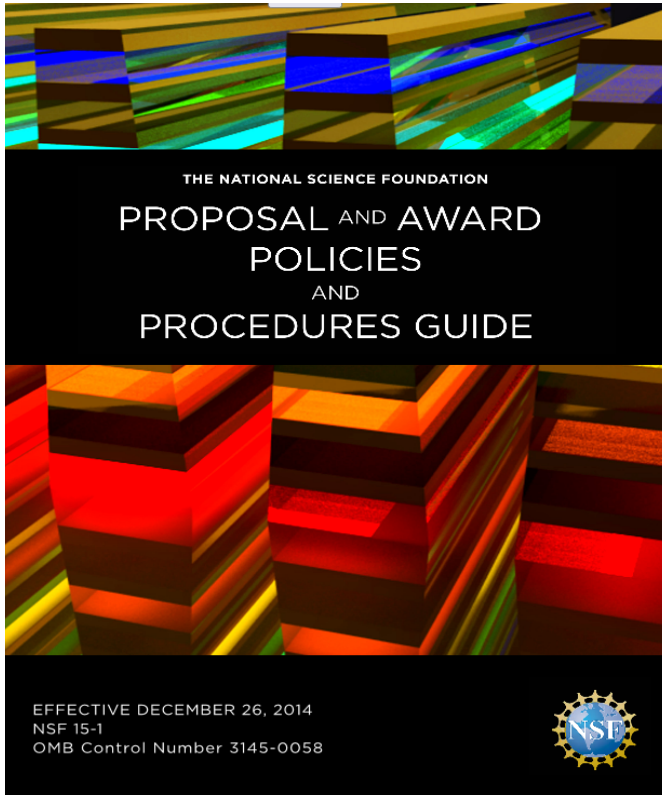
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## NSF Implementation: PAPPG

### What is the PAPPG???



- The NSF PAPPG provides up-to-date policy guidance that is comprised of documents relating to the Foundation's proposal and award process.
- The December 26, 2014 PAPPG revision:
  - ✓ Incorporates new and modified requirements;
  - ✓ In conjunction with NSF's Grant General Conditions, serves as the Foundation's implementation of 2 CFR § 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*;
  - ✓ If the PAPPG is silent on a specific area covered by 2 CFR § 200, the requirements specified in 2 CFR § 200 must be followed.

<http://www.nsf.gov/pubs/policydocs/pappguide/nsf15001/index.jsp?org=EF>



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# THE UNIFORM GUIDANCE

## NSF Implementation: PAPPG

### NSF new NoA

#### AWARD NOTICE

Award Date:  
Award No. (FAIN):  
Proposal No.:

January 7, 2015

Dear Ms. [REDACTED]

The National Science Foundation hereby awards a grant of \$20,761 to University of Maryland for support of the project described in the proposal referenced above. This award is expected to total \$20,761.

This project, entitled [REDACTED] is under the direction of [REDACTED]

This award starts January 15, 2015 and ends December 31, 2015.

This grant is awarded pursuant to the authority of the National Science Foundation Act of 1950, as amended (42 U.S.C. 1861-75) and is subject to NSF Grant General Conditions (GC-1), dated December 26, 2014, available at [http://www.nsf.gov/awards/managing/general\\_conditions.jsp](http://www.nsf.gov/awards/managing/general_conditions.jsp).

This award is subject to the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (Uniform Guidance). NSF's Implementation of the Uniform Guidance is contained in the Grant Conditions referenced in this award.

This institution is a signatory to the Federal Demonstration Partnership (FDP) Phase VI Agreement which requires active institutional participation in new or ongoing FDP demonstrations and pilots, and the following terms and conditions:

This award is subject to the Federal Funding Accountability and Transparency Act (FFATA) award term entitled, Reporting Subawards and Executive Compensation, which has been incorporated into the NSF Terms and Conditions referenced above.

If the awardee has any questions related to the pre-populated data associated with this award in the FFATA Subaward Reporting System, such questions should be submitted to: [FFATAREporting@nsf.gov](mailto:FFATAREporting@nsf.gov) or by phone to: (800) 673-6188.

Funds provided for participant support may not be diverted by the awardee to other categories of expense without the prior written approval of the cognizant NSF Program Officer. Since participant support cost is not a normal account classification, the awardee organization must be able to separately identify participant support costs. It is highly recommended that separate accounts, sub-accounts, sub-task, or sub-ledgers be established to accumulate these costs. The awardee should have written policies and procedures to segregate participant support costs.

F.L. 26, "Administration of NSF Conference or Group Travel Award Grant Special Conditions," dated March 7, 2014, are applicable. See [http://www.nsf.gov/pubs/policydocs/fl26/fl26\\_113.pdf](http://www.nsf.gov/pubs/policydocs/fl26/fl26_113.pdf).

The attached budget indicates the amounts, by categories, on which NSF has based its support.

Please view the project reporting requirements for this award at the following web address [<https://reporting.research.gov/fgdAwardId/1522689>].

The cognizant NSF program official for this grant is Betty H. Tuller, (703) 292-7238  
The cognizant NSF grants official contact is Elizabeth Leo, (703) 292-4597.

Sincerely,

[https://exch.mail.umd.edu/...CF2wdAAAxbMcQ11JQQKa7yzCnfvAzaABZaTIFAAJ&a=Print&spid=\\_1420658921849\\_127043473\[1/7/2015 2:29:13 PM\]](https://exch.mail.umd.edu/...CF2wdAAAxbMcQ11JQQKa7yzCnfvAzaABZaTIFAAJ&a=Print&spid=_1420658921849_127043473[1/7/2015 2:29:13 PM])



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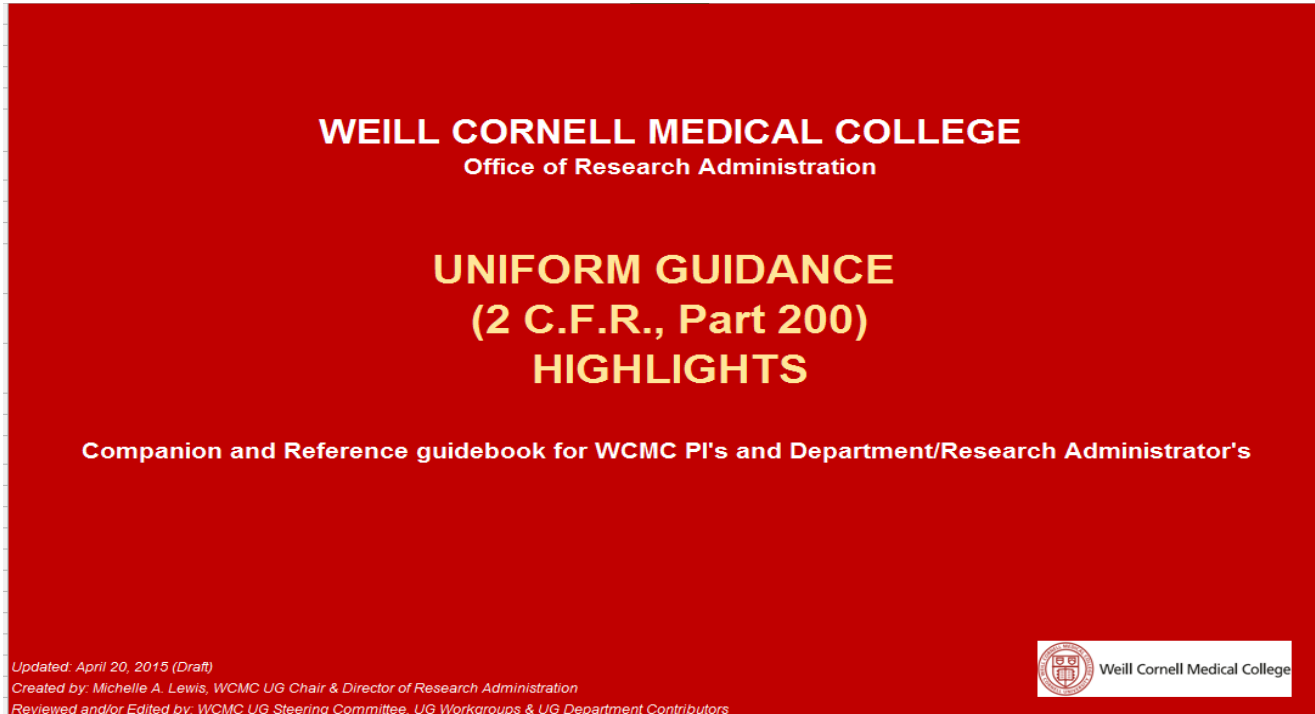
## WCMC UG Implementation Plan & Status

1. Identify WCMC personnel to chair steering committee and workgroups. **Done!**
2. Analyze changes in UG and assess changes needed to existing policies and procedures. **Ongoing!**
3. Continually review agency-specific implementation plans. **Ongoing!**
4. Create WCMC UG website to disseminate information and to keep research community apprised of updates real-time. **May 2015!**
5. Create checklists/tools highlighting important changes impacting pre-award and post-award as a result of UG. **May 2015!**
6. Training/workshops will occur on an ongoing basis...stay tuned!



# THE UNIFORM GUIDANCE

## WCMC UG Implementation: Companion Guide



### Companion Guide Categories

TOPIC	<u>OMB CIRCULAR(S)</u> Past Guidance*	<u>UNIFORM GUIDANCE</u> Present Guidance	<u>NSF UG Implementation</u>	<u>NIH UG Implementation</u>	WHAT DO YOU NEED TO KNOW TO COMPLY AND CONFORM WITH UG?
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# THE UNIFORM GUIDANCE

## Key sites to bookmark

### Uniform Guidance:

[http://www.ecfr.gov/cgi-bin/text-idx?  
SID=ee873e1aa906cf3b0d7474d25be3b5a9&node=2:1.1.2.2.1&rgn=div  
5](http://www.ecfr.gov/cgi-bin/text-idx?SID=ee873e1aa906cf3b0d7474d25be3b5a9&node=2:1.1.2.2.1&rgn=div5)

### NIHGPS & FAQ:

- <http://grants.nih.gov/grants/policy/nihgps/nihgps.pdf>
- [http://grants.nih.gov/grants/policy/faq\\_grants\\_uniformguidance.htm](http://grants.nih.gov/grants/policy/faq_grants_uniformguidance.htm)

### NSF PAPPG & FAQ

- <http://www.nsf.gov/pubs/policydocs/pappguide/nsf15001/index.jsp>
- [http://www.nsf.gov/bfa/dias/policy/faqs/faqs\\_2cfr200.pdf](http://www.nsf.gov/bfa/dias/policy/faqs/faqs_2cfr200.pdf)



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Questions???

For any inquiries or guidance on the applicability of the UG to your award(s), please send your inquiries to the WCMC UG designated mailbox:

[UniformGuidance@med.cornell.edu](mailto:UniformGuidance@med.cornell.edu)

Or call

646-962-4035

