



WCMC Implementation of

# The Uniform Guidance (2 CFR, Part 200)

Tuesday, September 22, 2015 &  
Wednesday, September 23, 2015  
UG Workshop

**Michelle A. Lewis, M.S.**

Director of Research Administration  
Interim Director, Research Integrity

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# Disclaimer

The information contained in this presentation is considered to be accurate as of September 22, 2015. The UG is an evolving document subject to updates, corrections, etc.

The WCMC research and research administration community are encouraged to refer to the following sources for the most up-to-date information:

- [2 C.F.R., Part 200](#) (The Uniform Guidance)
- [COFAR](#) website
- Agency-specific guidance (i.e., NIHGPS 2015 or PAPPG)
- The WCMC UG Guidebook (*for internal distribution*)
- Institutional policies



# THE UNIFORM GUIDANCE

## Quick Housekeeping

- Please sign the attendance sheet.
- Please return the electronic response cards before you leave.
- Please take a packet of the WCMC guidebook and companion documents before you go. Electronic versions of everything presented will be disseminated.
- There is a lot of material to cover so please silence your phones and provide your undivided attention.



Last housekeeping tip...

Please ask questions



Step to the microphones to ask your question(s)



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# Polling Time!!!

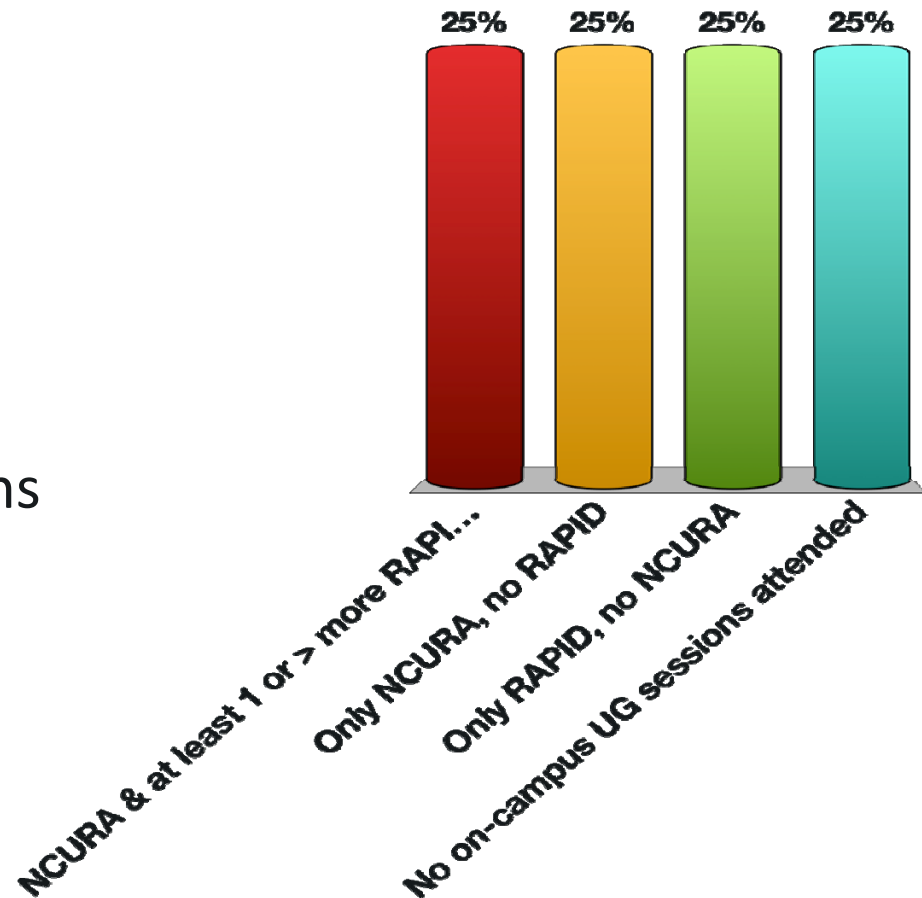


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# Did you attend any of the following WCMC UG sessions **on-campus**?

- A. NCURA & at least 1 or > more RAPID sessions
- B. Only NCURA, no RAPID
- C. Only RAPID, no NCURA
- D. No on-campus UG sessions attended



# THE UNIFORM GUIDANCE

## Today's Agenda

- I. Lightning Round: Uniform Guidance Overview
- II. Deeper dive: Detailed review of specific UG sections and their applicability to WCMC grants management
- III. Review of WCMC UG reference tools, companion documents & policies
- IV. Next Steps



# I. UG Overview

LIGHTNING ROUND

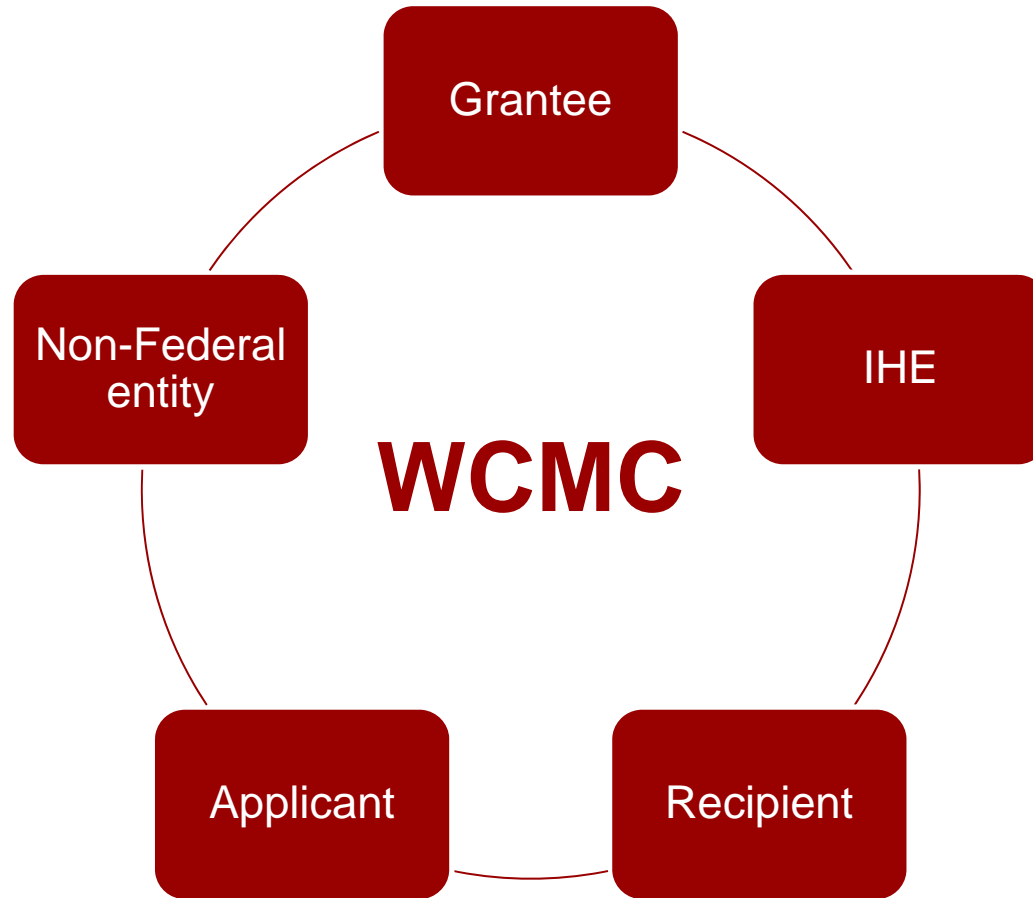


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\*IHE: Institutions of Higher Education

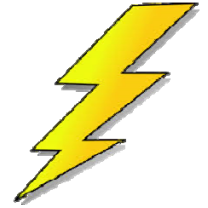


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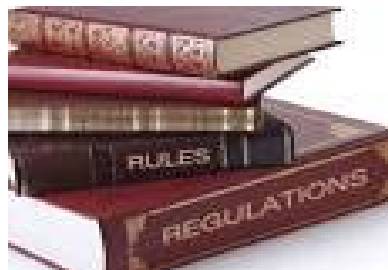
# THE UNIFORM GUIDANCE

## 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



# THE UNIFORM GUIDANCE

## History & Timeline

- December 26, 2013: The OMB, COFAR, and eight (8) Federal-awarding agencies published the joint interim final rule of *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards*

*more commonly known as*

“Super Circular”

“Omni Circular”

“Title 2 CFR, Subtitle A, Chapter II, Part 200”

“2 C.F.R. Part 200”

**\*\*The Uniform Guidance\*\***

- June 26, 2014: As mandated by OMB, Federal granting agencies required to release their UG implementation plans to OMB with final versions published on or before 12/26/2014.



# THE UNIFORM GUIDANCE

## History & Timeline

- December 19, 2014: HHS published in the Federal Register, the interim final rule adopting OMB's final guidance in 2 CFR, Part 200.
- December 26, 2014: **Final** Uniform Guidance went into effect.



# THE UNIFORM GUIDANCE

## Highlights Part I

In the past...

...there were three Office of Management and Budget (OMB) circulars that provided guidance to IHE's 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.



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# 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, 2017



# THE UNIFORM GUIDANCE

## Highlights Part III

- Many of the UG Subparts will appear familiar since the guidance originated from familiar OMB circulars (i.e., A-21 and A-110).
- Certain Subparts are **new** or include significantly different terms from original OMB circular guidance:
  - Changes to allowable costs (allowance of certain computing devices as well as administrative/clerical salaries)
  - Encouragement of family friendly policies (dependent care costs)
  - Increase of the Single Audit threshold to \$750,000
- Some Subparts of the UG *may* appear new since the guidance originated from unfamiliar OMB circulars ( § 200.317- § 200.326 *Procurement*).





# THE UNIFORM GUIDANCE

## Federal Agencies Implementation Response

- ✓ To-date 27 federal granting agencies have adopted the Uniform Guidance (2 CFR part 200)

- ✓ 21 federal granting agencies have partnered to develop a **federal-wide** Research Terms and Conditions (RTCs) companion document to provide additional clarity for select provisions consistent with the UG

- ✓ Until the federal-wide RTC is published each Federal agency has been encouraged to develop their own Interim Terms and Conditions

CFR Part	FEDERAL AGENCY
<u>300-399</u>	DEPARTMENT OF HEALTH AND HUMAN SERVICES (NIH INTERIM)
<u>400-499</u>	DEPARTMENT OF AGRICULTURE
<u>600-699</u>	DEPARTMENT OF STATE
<u>700-799</u>	AGENCY FOR INTERNATIONAL DEVELOPMENT
<u>800-899</u>	DEPARTMENT OF VETERANS AFFAIRS
<u>900-999</u>	DEPARTMENT OF ENERGY
<u>1000-1099</u>	DEPARTMENT OF TREASURY
<u>1100-1199</u>	DEPARTMENT OF DEFENSE (INTERIM)
<u>1200-1299</u>	DEPARTMENT OF TRANSPORTATION
<u>1300-1399</u>	DEPARTMENT OF COMMERCE
<u>1400-1499</u>	DEPARTMENT OF THE INTERIOR
<u>1500-1599</u>	ENVIRONMENTAL PROTECTION AGENCY
<u>1800-1899</u>	NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
<u>2300-2399</u>	SOCIAL SECURITY ADMINISTRATION
<u>2400-2499</u>	DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
<u>2500-2599</u>	NATIONAL SCIENCE FOUNDATION
<u>2600-2699</u>	NATIONAL ARCHIVES AND RECORDS ADMINISTRATION
<u>2700-2799</u>	SMALL BUSINESS ADMINISTRATION
<u>2800-2899</u>	DEPARTMENT OF JUSTICE
<u>2900-2999</u>	DEPARTMENT OF LABOR
<u>3000-3099</u>	DEPARTMENT OF HOMELAND SECURITY
<u>3100-3199</u>	INSTITUTE OF MUSEUM AND LIBRARY SERVICES
<u>3200-3299</u>	NATIONAL ENDOWMENT FOR THE ARTS
<u>3300-3399</u>	NATIONAL ENDOWMENT FOR THE HUMANITIES
<u>3400-3499</u>	DEPARTMENT OF EDUCATION
<u>3600-3699</u>	OFFICE OF NATIONAL DRUG CONTROL POLICY, EXECUTIVE OFFICE OF THE PRESIDENT
<u>5900-5999</u>	GULF COAST ECOSYSTEM RESTORATION COUNCIL

As of 3/12/15



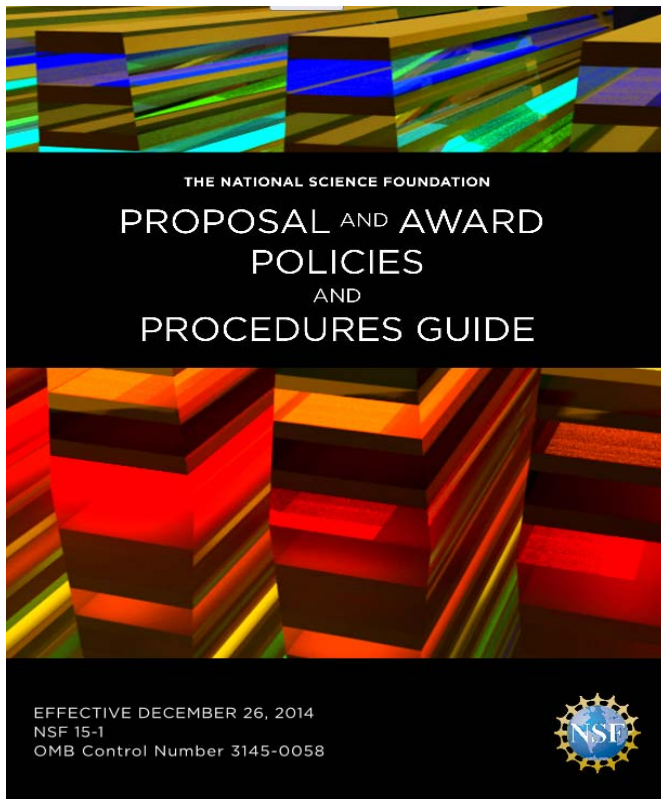
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# THE UNIFORM GUIDANCE

## 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

[REDACTED]

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

is under the direction of

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/fedAwardId/1522699>).

The cognizant NSF program official for this grant is Betty H. Tuller, (703) 292-7239.

The cognizant NSF grants official contact is Elizabeth Leo, (703) 292-4597.

Sincerely,

[https://exch.mail.umd.edu/...CF2wdAAxbMcQ11JQQKa7yzCnVaZAABZaTIFAaAJ8a=Print&spid=\\_1420658921849\\_127043473\[1/7/2015 2:29:13 PM\]](https://exch.mail.umd.edu/...CF2wdAAxbMcQ11JQQKa7yzCnVaZAABZaTIFAaAJ8a=Print&spid=_1420658921849_127043473[1/7/2015 2:29:13 PM])



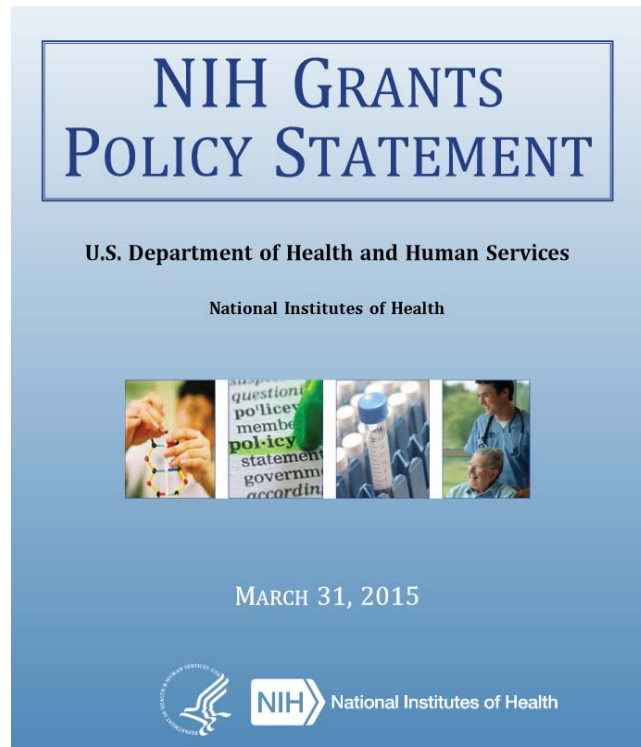
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# THE UNIFORM GUIDANCE

## 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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# THE UNIFORM GUIDANCE

## 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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NIH NGA R | Version: 1 - 05/08/2014 13:52:00 | Generated on: 12/12/2014 12:11:26 AM

(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

Page-3

NIH NGA R | Version: 1 - 01/15/2015 12:03:00 | Generated on: 3/26/2015 7:45:09 AM

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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# Polling Time!!!

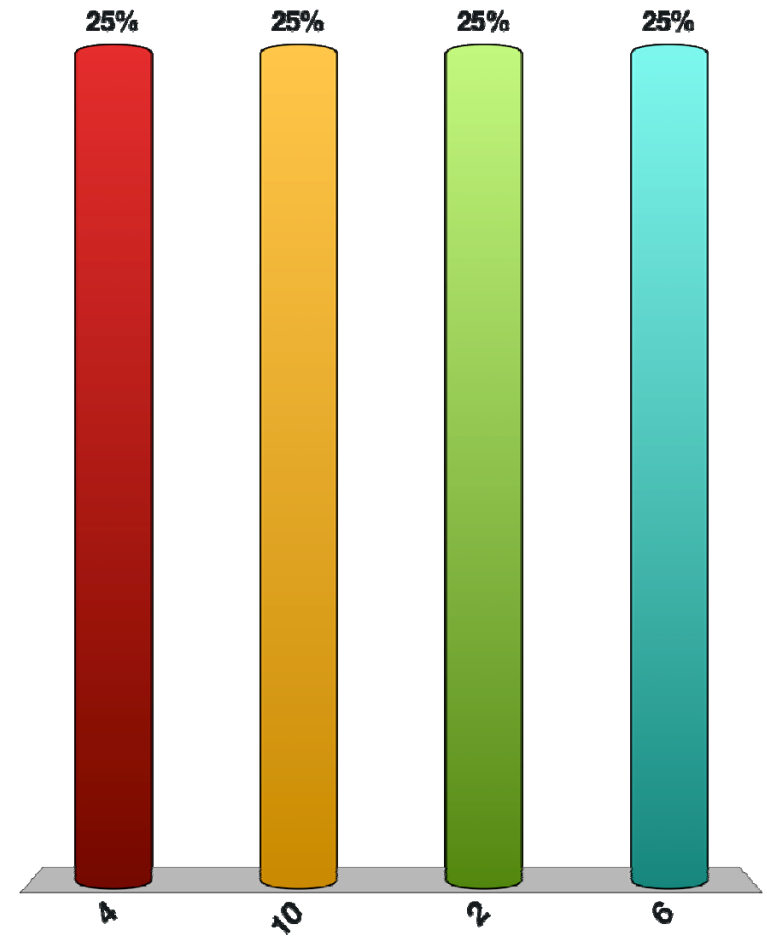


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The UG is comprised of how many subparts?

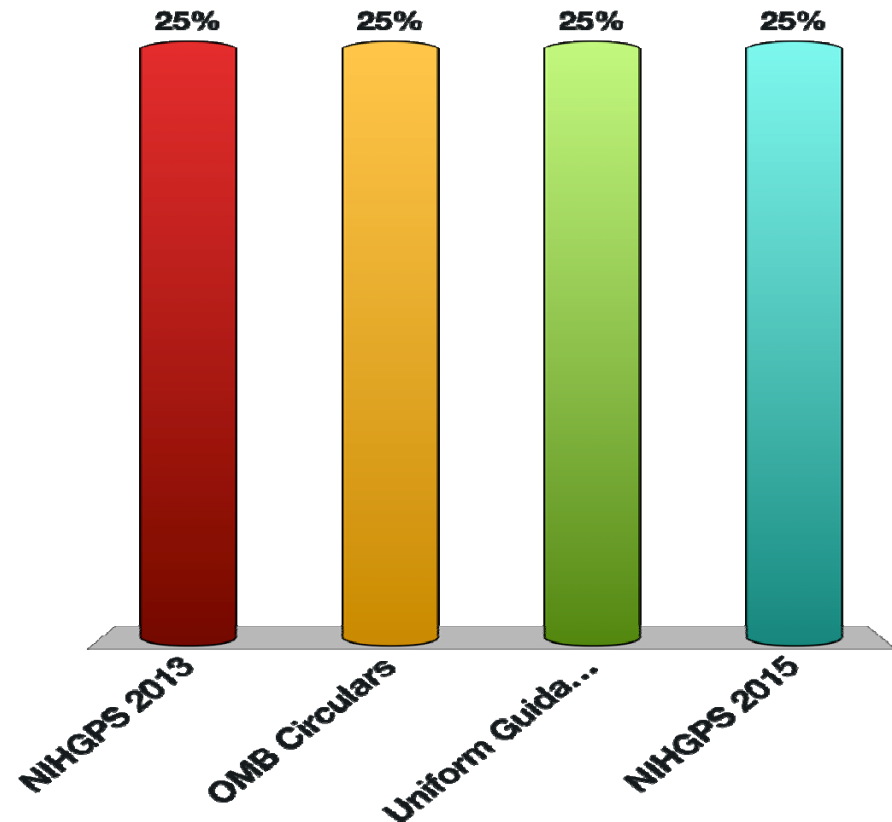
- A. 4
- B. 10
- C. 2
- D. 6





Scenario: NIH grant with an NoA issued on 9/30/14 is subject to which of the following T&C's?

- A. ☒ NIHGPS 2013
- B. ☒ OMB Circulars
- C. ☐ Uniform Guidance
- D. ☐ NIHGPS 2015



# II. UG Deeper Dive

HIGHLIGHTS



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# THE UNIFORM GUIDANCE

CFR Title 2, Part 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

**Preamble** - [Major Policy Reforms](#)

**Subpart A** ( § 200.0 - § 200.99) - [Acronyms and Definitions](#)

**Subpart B** ( § 200.100 - § 200.113) - [General Provisions](#)

**Subpart C** ( § 200.200 - § 200.212) - [Pre Award Requirements](#)

**Subpart D** ( § 200.300 - § 200.345) - [Post Award Requirements](#)

**Subpart E** ( § 200.400 - § 200.475) - [Cost Principles](#)

**Subpart F** ( § 200.500 - § 200.521) - [Audit Requirements](#) (includes Appendices I-XI)



# “Should” versus “Must”

- Throughout the UG both “should” and “must” are used
- **MUST** = required
- **SHOULD** = recommended; indicates best practices or recommended approach for the Grantee to be aware of but not necessarily what is required to comply



# THE UNIFORM GUIDANCE

## Subpart A ( § 200.0 - § 200.99) - Acronyms and Definitions

- 200.0 – Acronyms listed in the beginning
- 200.1- 200.99 Definitions
  - ❑ 99 Definitions
- Key Definitions:
  - ❑ **200.33 Equipment**: means useful life of more than one year, an per unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal Entity, or \$5,000.
  - ❑ **200.93 Subrecipient**: means a non-Federal entity that receives a Subaward from a pass-through entity to carry out part of a Federal program.
  - ❑ **200.23 Contractor** (replaces the term “Vendor” in the OMB circular): means an entity that receives a contract defined in 200.22 (\*the document used does not matter as much as how WCMC defines and documents its relationship with the entity).



# THE UNIFORM GUIDANCE

## Subpart A ( § 200.0 - § 200.99) - [Acronyms and Definitions](#)

### ➤ Key Definitions (continued):

- ❑ **200.99 Voluntary Committed Cost Sharing** (VCCS): means cost sharing specifically pledged on a voluntary basis in the proposal's budget or in the Federal award on the part of the non-Federal entity and that becomes a binding requirement of the Federal award.



# THE UNIFORM GUIDANCE

## Subpart B ( § 200.100 - § 200.113) - [General Provisions](#)

- **200.100, Purpose: 2 CFR, Part 200** establishes uniform administrative requirements, cost principles and audit requirements for all types of non-Federal entities.
  
- **Federal awarding agencies must not impose additional or inconsistent requirements unless:**
  - ☐ Required by Federal statutes, regulations, or Executive Order
  - ☐ OMB permits an exception
  - ☐ OMB approves information in the Federal award in accordance with 200.210



# THE UNIFORM GUIDANCE

## Subpart C ( § 200.200 - § 200.212) - [Pre Award Requirements](#)

### ➤ **200.204 Federal Agency Review of Merit**

- ☐ The scoring criteria used by Federal agencies to review the merit of a proposal.
- ☐ Not necessarily new requirement, but the UG clarifies that Federal awarding agencies must design and execute a merit review process for competitive grant applications and cooperative agreements.
- ☐ The merit review process must be described in the funding opportunity announcement (FOA)





# THE UNIFORM GUIDANCE

## Subpart C ( § 200.200 - § 200.212) - [Pre Award Requirements](#)

### ➤ 200.205 Federal Agency Review of Risk

- ☐ Federal awarding agencies will be required to have a framework for evaluating the risk posed by applicants prior to receipt of a federal award
- ☐ Items considered:
  1. Financial stability
  2. Quality of management systems
  3. History of performance
  4. Reports and findings from audits performed under Subpart F (Audit Requirements)
  5. Applicants ability to effectively implement statutory, regulatory or other requirements
- ☐ Special conditions that correspond to the degree of risk may be applied by the Federal awarding agency to the grantee, if appropriate



# WCMC get ready for FAPIIS!!!

- FAPIIS: The Federal Awardee Performance and Integrity Information System for Federal awards
- January 1, 2016 (???) goes into effect... we should get ready.
- Web-accessible database established to track contractor misconduct and performance and will be reviewed by Federal awarding agencies prior to issuing notices of award.

Read more here: <http://blogs.managementconcepts.com/wrap-it-up-grant-closeouts/#.VgFGCk1dGUk>



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# WCMC get ready for FAPIIS!!!

- FAPIIS database contains:
  - Federal contractor criminal, civil, and administrative proceedings in connection with federal awards;
  - suspensions and debarments;
  - administrative agreements issued in lieu of suspension or debarment;
  - Non-responsibility determinations; .
  - contracts terminated for fault;
  - defective pricing determinations; and
  - past performance evaluations.

Read more here: <http://blogs.managementconcepts.com/wrap-it-up-grant-closeouts/#.VgFGck1dGUk>



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# WCMC get ready for FAPIIS!!!

- The FAPIIS database will notify the contractor when the government posts new information regarding the contractor's record of responsibility.
- The contractor will then have an opportunity to post a response concerning the information posted by the government.

Read more here: <http://blogs.managementconcepts.com/wrap-it-up-grant-closeouts/#.VgFGCk1dGUk>



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# WCMC get ready for FAPIIS!!!

URL: <https://www.fapiis.gov/fapiis/index.action>

**FAPIIS** Federal Awardee Performance and Integrity Information System

Home Data Reports Search Help Policy

**Highlights**

**User Resources**

- [Definitions](#)
- [Navigation](#)

Use [Adobe Acrobat Reader](#) to view files in pdf format.

**Downloads**

To view or download the full government-entered or vendor-entered lists, click [here](#) or click the Data Reports tab.

**Government Awardees**

Access to FAPIIS is part of your current PPIRS access.

**Liability on DUNS Number**

- [Limitation of Liability](#)

**Search FAPIIS Records**

Search Instructions: Search by DUNS, CAGE, or by selecting a filter from the dropdown box. NOTE: If you enter multiple search criteria, the DUNS code will take precedence.

CAGE or DUNS/DUNSPLUS4 searches must be exact. CAGE must be 5 characters; DUNS must be either 9 or 13 characters.

Special Search Note: It is possible in the FAPIIS application that a contractor may not have a CAGE CODE. If you search by CAGE and do not get the contractor you are looking for, try again using the 'Name' search option. Note some of the Extended Systems do not require DUNS. If your search of the FAPIIS system does not produce a Performance Information section of SAM record, you can go directly to the System for Award Management (SAM) <https://www.sam.gov/> and use the 'Advanced Search' option to locate the entity of interest.

To search for an individual by name, search using the 'Contains' option and specify *only* the person's last name.

DUNS/Plus4:

CAGE:

Name  Begins with

[CPARS](#) [PPIRS](#) [System for Award Management \(SAM\)](#) [Help Desk](#) [Accessibility/Section 508](#)



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# WCMC get ready for FAPIIS!!!

- Save the Date!
- **October 15, 2015** Management Concepts is offering an instructor-led 1.5 hr online course targeted to recipients, pass through entities and Federal grants personnel to understand the implications of FAPIIS on grants administration in conformance with the UG.
- Location for attending the course for free on campus will be disseminated soon.
- More information on the course is here:  
<http://www.managementconcepts.com/Course/id/2801>



# THE UNIFORM GUIDANCE

## Subpart D ( § 200.300 - § 200.345) - [Post Award Requirements](#)

### ➤ 200.301 Performance Measurement

- ☐ Federal awarding agencies must require recipients to use OMB-approved standard government-wide information collections to provide financial and performance information.
- ☐ Recipients must be required to relate financial data to performance accomplishments, and must also provide cost information to demonstrate cost effectiveness

### ➤ 200.301 Internal Controls

- ☐ Non-federal entities are required to provide reasonable assurance to the federal awarding agencies and taxpayers that funds are used as intended and in accordance with applicable laws and regulations.



# THE UNIFORM GUIDANCE

## Subpart D ( § 200.300 - § 200.345) - [Post Award Requirements](#)

### ➤ 200.301 Internal Controls

- ☐ Control environment: the foundation of internal controls and should set a positive and supportive attitude toward internal controls and conscientious management
- ☐ Risk assessment: the identification and analysis of risks and how to manage them
- ☐ Control activities: policies, procedures, techniques and mechanisms that enforce management's directives.
- ☐ Information & communication: how issues are communicated to management for subsequent action





# THE UNIFORM GUIDANCE

## Subpart E ( § 200.400 - § 200.475) - Cost Principles

- 200.430 Compensation – Personal Services
  - ☐ Clarifies what types of salaries are allowable on a grant
- 200.431 Compensation – Fringe Benefits
  - ☐ Family-related leave is allowable
  - ☐ Severance
- 200.431(b)(i) Change in Leave Treatment
  - ☐ Payment for unused leave when an employee retires or terminates is allowable
- 200.432 Conferences
  - ☐ Temporary dependent care costs (what is considered an allowable expense for the conference host versus the PI).



# THE UNIFORM GUIDANCE

**Subpart F** ( § 200.500 - § 200.521) - [Audit Requirements](#) (includes Appendices I-XI)

This section of the UG sets forth standards for obtaining consistency and uniformity among Federal agencies for the audit of non-Federal entities expending Federal awards.

More information will be forthcoming regarding the best method to engage the research community



**Break time!!!**  
**10 minutes**



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# III. WCMC Reference Tools



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# THE UNIFORM GUIDANCE

- WCMC Guidebook – let's review!
  - Detailed guide of WCMC's implementation of the UG
- WCMC Companion Documents – let's review!
  - Administrative & Clerical Salaries
  - Computing Devices
- Policies
  - Currently under review by Dean Koretzky



# THE UNIFORM GUIDANCE

WCMC Guidebook & Companion documents – let's review!

Detailed guide of WCMC's implementation of the UG



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Office of Research Administration

**UNIFORM GUIDANCE  
2 C.F.R., Part 200  
HIGHLIGHTS**

**Companion and Reference guidebook for WCMC PI's and Department/Research Administrator's**

*The Uniform Guidance (2 C.F.R. § 200) streamlines and consolidates government requirements for receiving and using federal awards so as to reduce administrative burden and improve outcomes. It was published in the Federal Register (79 Fed. Reg. 75871) on December 19, 2014, and became effective for new and continuation awards issued on or after December 26, 2014. Please note the new regulations do not affect grant funds awarded prior to December 26, 2014, unless funds made available under those grants are carried forward into a new Federal fiscal year or a continuation grant.*

Updated: September 21, 2015

Created by: Michelle A. Lewis, WCMC UG Chair & Director of Research Administration

Reviewed and/or Edited by: WCMC UG Steering Committee, UG Workgroups & UG Department Contributors



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# THE UNIFORM GUIDANCE

Policies updated (currently under review by Dean Koretzky):

- COI Policies\*
  - Cost Sharing Policy
  - Cost Transfer Policy
  - Data Retention Policy
  - Data Retention Procedures
  - Direct Costs Policy
  - Effort Compliance Policy & Plan
  - Recharge Centers / Cores Policy\*\*
- Detailed review of key policy changes at October 12, 2015 RAPID meeting

\*Under review by Conflicts Advisory Panel leadership & University Counsel

\*\*Under review by Assistant Dean, Dr. George Grills



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# Polling Time!!!

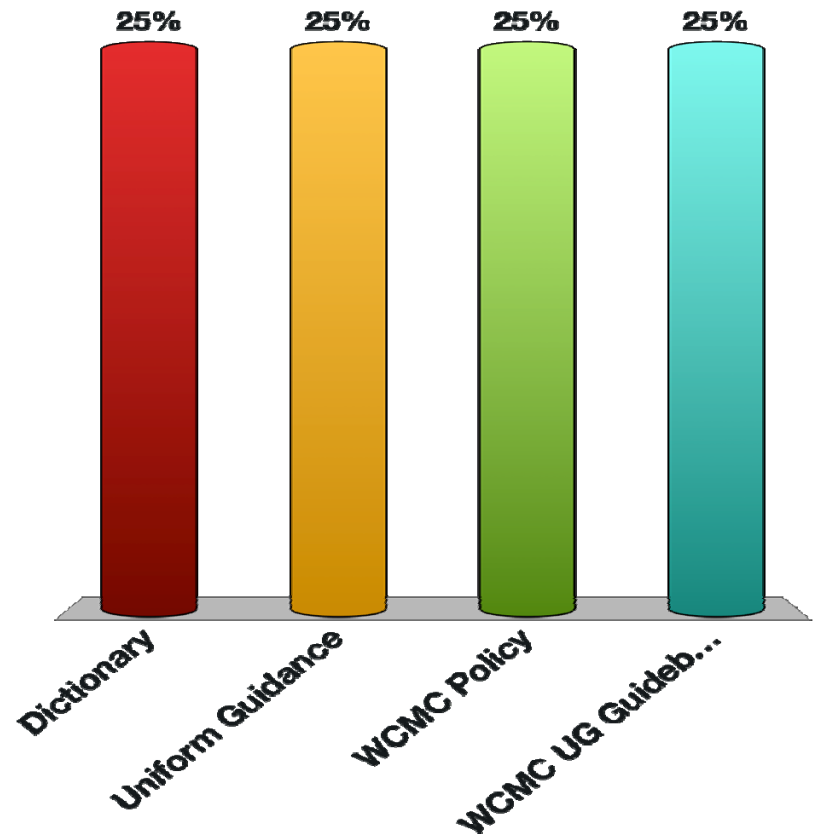


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You can find more information on the allowability of charging admin/clerical salaries here (select all that apply)...

- A. Dictionary
- B. Uniform Guidance
- C. WCMC Policy
- D. WCMC UG Guidebook



# IV. Next Steps



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## Next Steps

- Electronic versions of all information presented today will be disseminated.
- Dedicated website for UG in the works.
- Policies will be released upon notification of approval from the Dean.
- Dedicated session will be scheduled to review subrecipient monitoring changes.



# 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=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)



# THE UNIFORM GUIDANCE

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



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