The final guidance was issued on December 26, 2013 and supersedes and streamlines requirements from OMB Circulars A-21, A-110, A-133, and 5 other circulars.

The guidance for the Administrative Requirements and the Cost Principles become effective for nonfederal entities on December 26, 2014.

- With the exception of the procurement provisions which become effective as of July 1, 2016
  - There will be a transition period (potentially up to five years) where both the current regulations and the new OMB Uniform Guidance will be applicable.

The guidance for the Audit Requirements becomes effective for the RF with the fiscal year that begins July 1, 2015.

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<th>2 CFR Part 200 – OMB Uniform Guidance</th>
<th>Implications</th>
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  - Pre-Award
    - Subrecipient vs. contractor determination must be made and documented
    - Perform a risk assessment of the subrecipient
  - Post-Award - More prescriptive requirements
    - Add a lengthy list of elements to the subaward terms
    - Establish a monitoring plan for the subrecipient and enforcement action against noncompliant subrecipients
    - Financial review
    - Programmatic review
  - Must use subrecipient’s negotiated F&A rate or provide a 10% MTDC “de minimis” rate (or another negotiated rate with the subrecipient)
  - Fixed amount subawards require written prior approval from the federal agency |
| Prior Approvals | New emphasis on agency prior approvals. Previously prior approval was not needed for some items. |
| Direct Charging of Administrative and Clerical Salaries 2 CFR Part 200.413(c)(1-4) | Reference to Major Project criteria eliminated.
Following 4 criteria must be met:
1. Integral to the project or activity
2. Can be specifically identified with the project or activity
3. Costs are explicitly included in the budget or have prior written approval by the federal agency |
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| Direct Charging of Other Cost – for example Computing Devices | - Cost less than $5,000 and are essential and allocable to the project, should be listed under “Materials and Supplies”.  
- They do not have to be solely dedicated to the performance of a federal award.                                                                                                                                                                                                                               |
| Closeout                                               | - More emphasis on submission of reports no later than 90 days and enforcement will be obtained by the inability to draw cash down after 90 days.  
- New emphasis on progress report submission                                                                                                                                                                                                                                                                                     |
| Cost Share                                              | - Federal funding agencies are prohibited from considering voluntary committed cost sharing (VCCS) in the merit review process.  
- It is strongly discouraged to include VCCS in proposals, except when it is required by the federal funding agency.                                                                                                                                                                           |
| Procurement                                             | The implementation date for procurement changes has been extended to July 1, 2016  
- New procurement standards involve many changes for the RF. The biggest and most onerous change is the requirement for competition for items over $3,000. The current RF policy requires competition at $50,000.  
- A subgroup is currently analyzing the requirements and will be recommending specific procedures and guidelines.                                                                                                                                                                             |
| Compensation Person Services (Effort Reporting)         | - The current effort reporting process, including ECRT, will be compliant with the Uniform Guidance.  
- Requires a consistent written definition of institutional base salary (IBS).  
- Charges for salaries and wages must be based on records that are supported by a system of internal controls.  
- A subgroup will be evaluating the effort reporting process after more information is released by federal agencies, the audit community, organizations such as COGR, and other institutions.                                                                 |