



The Future is NOW

The New Uniform Guidance

2 CFR 200

Uniform Guidance – the “Long and Winding Road”

December 2013:
Uniform Guidance Published

June 2014:
Agencies Submit Draft Rules to OMB, Continued Outreach on Implementation

December 2014:
Final Guidance Effective, Baseline Metrics Collected, Case Studies of Best Practices Published

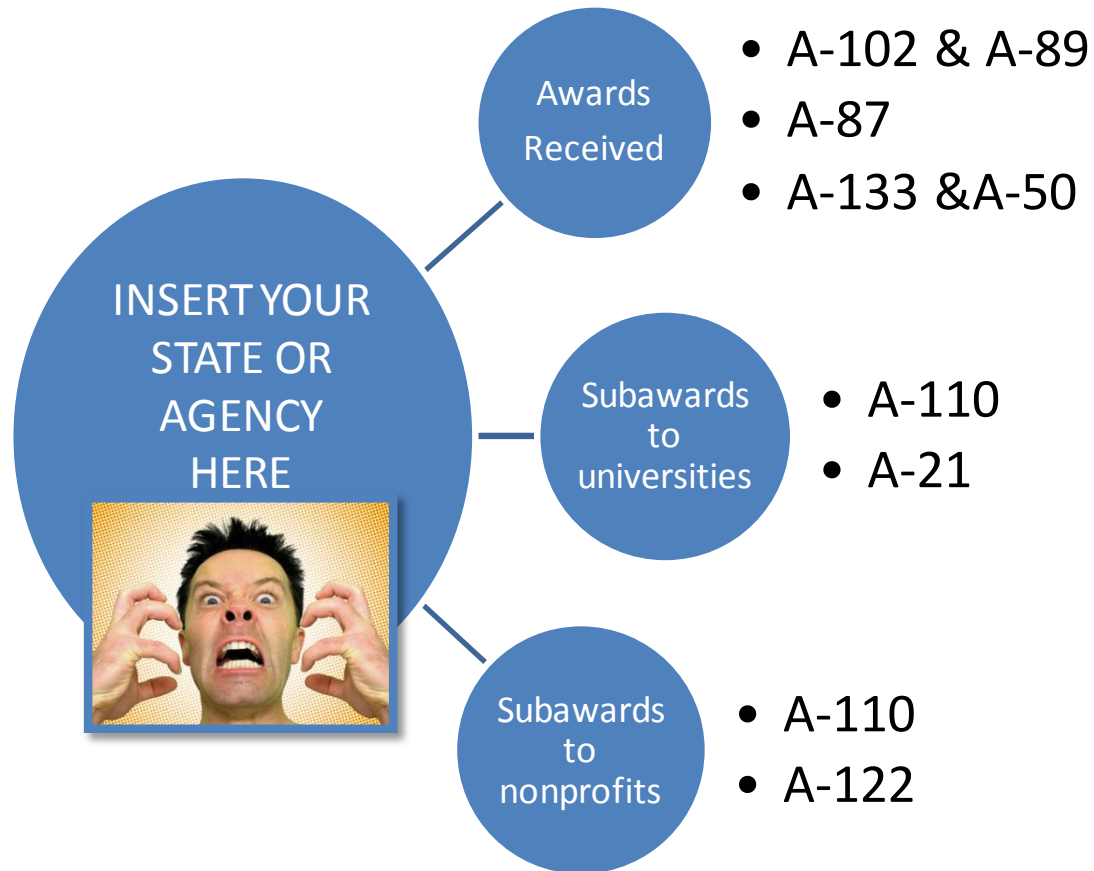
January-April 2014: Training Webcasts, Publish 2014 Single Audit Compliance Supplement

Fall 2014: Metrics, Additional FAQs and Webcast



Eliminating Duplicative and Conflicting Guidance

Then:



Now: All OMB guidance streamlined in 2 CFR 200.



2 CFR 200 -Basic Layout

- 6 Subparts A through F
 - Subpart A, 200.XX – Acronyms & Definitions
 - Subpart B, 200.1XX – General
 - Subpart C, 200.2XX – Pre Award - *Federal*
 - Subpart D, 200.3XX – Post Award – *Recipients*
 - Subpart E, 200.4XX – Cost Principles
 - Subpart F, 200.5XX – Audit
- 11 Appendices - I through XI
- “Should” and “Must”



“Should” and “Must”

Shall it Out – Yes, Shout it Out

But **Should** is In

May will be back

So are April and June

Orange is the new Black

Must is the new **Shall**



Top Impact for Research Universities

- Standard data
 - Definitions, NOFO, Application, Award Notice
- Computing devices as supplies – 200.94
- Conflict of Interest – 200.112
- Fixed award amount – 200.201 (b)
- Cost sharing policy – 200.306
- Procurement standards – 200.320
- Subrecipient Monitoring – 200.331



Top Impact for Research Universities

- Direct charges of administrative SW – 200.413
- IDC Rate acceptance – 200.414
- Documentation for personal services -200.430
 - Internal controls – 200.430 (i)
 - Outcome based – 200.430 (i) (6)
 - Blended funding – 200.430 (i) (7)
- Family - Friendly Policies – 200.432 , 474
- Audit report transparency- 200.512
- Utility Cost Factor for all universities – Appendix III




Resources

- The COFAR website is available at:
<https://cfo.gov/cofar/>
- Includes:
 - FAQs
 - Webcasts
 - Crosswalk to agency exceptions and additions
 - Metrics (OMB Memo – 14-17, September 30, 2014)

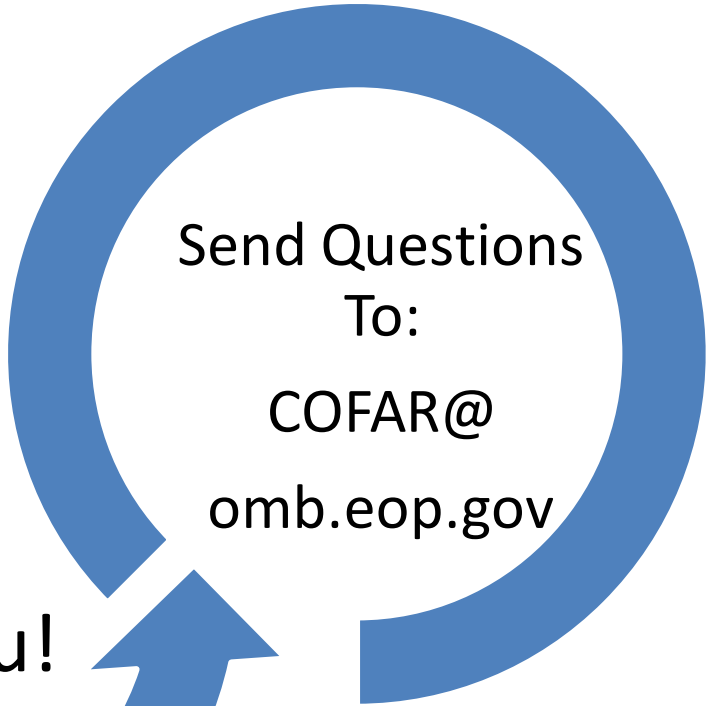




Engage With COFAR



For More
Information Visit:
[CFO.gov/COFAR](https://www.cbo.gov/COFAR)



Send Questions
To:
[COFAR@
omb.eop.gov](mailto:COFAR@omb.eop.gov)



Thank you!

