

## Uniform Administrative Requirements for Federal Awards

CIRCULAR A110 AND 2 CFR PART 200 (UNIFORM GUIDANCE)  
JANUARY 27, 2016

---

---

---

---

---

---

---

---

2

### The Federal Government changed the rules about a year ago

- ▶ OMB Circular A-110 is still in effect for awards and funding increments issued prior to December 26, 2014
- ▶ 2 CFR Chapter I, Chapter II Parts 200,215,220, 225 and 230 is now the "Uniform Guidance"
  - Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards
    - Issued December 26, 2013 and Amended December 19, 2014

---

---

---

---

---

---

---

---

3

### You will...

- ▶ ...learn about pre-award requirements
- ▶ ...learn about post award requirements
- ▶ ...explore the federal rules governing cost-sharing
- ▶ ...learn UM's government property control procedures

---

---

---

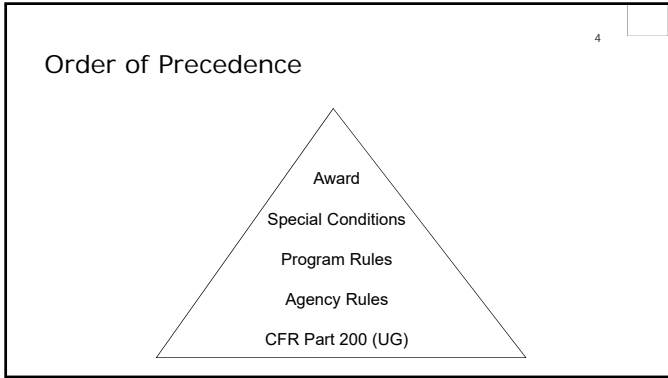
---

---

---

---

---



---

---

---

---

---

---

---

---

- Uniform Administrative Requirements For Federal Awards 5
- ▶ Subpart A Acronyms & Definitions
  - ▶ Subpart B General Provisions
  - ▶ Subpart C Pre-Federal Requirements & Contents of Federal Awards
  - ▶ Subpart D Post Federal Award Requirements

---

---

---

---

---

---

---

---

UG Purpose: 6

“Sets forth the uniform administrative requirements for grant & cooperative agreements, including the federal awarding agency management of federal grant programs.”

---

---

---

---

---

---

---

---

7

### Terms You Should Know

- ▶ Grant Agreement-200.51
- ▶ Cooperative Agreement-200.24
- ▶ Contract-200.22
- ▶ Subaward-200.92

---

---

---

---

---

---

---

---

8

### Terms You Should Know (con't)

- ▶ Budget-200.8
- ▶ Computing Devices-200.20
- ▶ Cost-sharing or matching-200.29
- ▶ Equipment-200.33
- ▶ Micropurchase-200.67
- ▶ Participant Support Costs-200.75

---

---

---

---

---

---

---

---

9

### Assistance vs. Procurement

- ▶ Assistance: Generally, what the proposer wants to do. Awards are either grants or cooperative agreements.
- ▶ Procurement: Generally, what the government buys [can include research]. Awards are contracts.

---

---

---

---

---

---

---

---

11

### Subpart B-General Provisions

- ▶ Effect on Issues
  - No agency can impose rules that are in conflict with Uniformed Guidance
- ▶ Deviation
  - OMB can grant exceptions in rare circumstances
- ▶ Subawards
  - UG applies to any subrecipients performing work under an award

---

---

---

---

---

---

---

---

12

### Subpart C: Pre-Federal Requirements & Content of Federal Awards

- ▶ Agency decides what type of funding instrument
  
- ▶ Federal agencies must notify public of funding opportunities via Federal Register, program announcements

---

---

---

---

---

---

---

---

13

### Components of Subpart C

- ▶ Forms
  - Federal agency specific
  - SF 424, SF 424 R&R
- ▶ Special Award Conditions
  - If previous problems, agency can impose additional requirements
- ▶ Certificates & Representations (UG 200.208)
  - Must be submitted annually

---

---

---

---

---

---

---

---

14

### Aspects of Subpart C

- ▶ Written procedure for determining the reasonableness, allocability and allowability of cost
- ▶ Accounting records that are supported by source documentation

---

---

---

---

---

---

---

---

15

### Subpart D: Post-Federal Award Requirements: Financial and Program Management

- ▶ Standards for financial management systems (UG 200.302)
- ▶ Payment (UG 200.305)
- ▶ Cost sharing or matching (UG 200.306)
- ▶ Program income (UG 200.307)
- ▶ Revision of budget and program plans (UG 200.308)
- ▶ Non-Federal audits
- ▶ Allowable costs
- ▶ Period of availability of funds

---

---

---

---

---

---

---

---

16

### Financial & Program Management

*(A-110 C.21 and UG 200.302)*

- ▶ Accurate, current and complete disclosure of each project
- ▶ Records that identify adequately source & application of funds
- ▶ Effective control over & accountability for all funds, property & other assets

---

---

---

---

---

---

---

---

17

### Payments

*(A-110 C.22 and UG 200.305)*

- ▶ Advances
- ▶ Reimbursements
- ▶ Forms

---

---

---

---

---

---

---

---

18

### Cost Sharing

*(A-110 C.23 and UG 200.306)*

- ▶ Cash: the recipient's cash outlay; contributions under the direct control of the recipient.
- ▶ In-Kind: value of non-cash contributions provided by non-Federal third parties.

---

---

---

---

---

---

---

---

19

### Third Party In-kind: What Qualifies?

- ▶ Webster's Definition: "with goods or produce rather than money"
  - Volunteer Services
    - Based on rates paid for similar work
    - Associated Benefits
  - Donated Equipment & Supplies
    - At current fair market value

---

---

---

---

---

---

---

---

21

### Cash Contributions "What the University Pays"

- ▶ Definition: "the recipient's cash outlay, including money contributed to the recipient by third parties."
  - Salaries & benefits of University employees
  - University purchased equipment
  - Facility & Administrative costs on the above
  - Waived F & A Costs (with permission of the sponsor)

---

---

---

---

---

---

---

---

22

### Sources of "Cash" Contributions

- ▶ University unrestricted funds contributed to project:
  - State funds
  - Gift accounts
  - Endowment funds
  - F&A recovered and returned to departments (i.e. DRIF)
  - Program income

---

---

---

---

---

---

---

---

23

### Requirements for Cost Sharing *(A-110 C.23 and UG 200-306)*

- ▶ Verifiable from the recipient's records
- ▶ Not included as contributions for any other federally-assisted program
- ▶ Necessary & reasonable for accomplishment of the project

---

---

---

---

---

---

---

---

24

### Requirements for Cost Sharing

*(A-110 C.23 and UG 200.306)*

- ▶ Allowable under A-21 (UG Subpart E – Cost Principles)
- ▶ Have not been paid by the federal government under another award
- ▶ Provided for in the approved budget

---

---

---

---

---

---

---

---

25

### More Cost Sharing

- ▶ Conform to other provisions
  - Unrecovered F&A cost may be included only with prior approval
  - Donated supplies and volunteer services values consistent with market rates

---

---

---

---

---

---

---

---

26

### Program Income

*(A-110 C.24 and UG 200.307)*

- ▶ Must be reported to the government
- ▶ Must be used in one of the following ways:
  - Added to funds committed to the project
  - Used to finance the non-federal share of the project
  - Deducted from the total cost to determine net allowable costs

---

---

---

---

---

---

---

---



27

### Revision of Budget or Program Plan

*(A-110 C.25 and UG 200.308)*

- ▶ Required to report deviation from budget & program plans
- ▶ Request prior approval for:
  - Change in scope (UG 200.308 (b))
  - Change in key personnel (UG 200.308 (c)(2))
  - Absence for more than 3 months or 25% reduction in time (UG 200.308 (c)(3))
  - The need for additional funding

---

---

---

---

---

---

---

---

28

### Expanded Authorities

*(A-110 C.25 (e) and UG 200.308)*

- ▶ Agencies can waive cost-related and administrative prior approvals for:
  - Pre-award Costs (90 days prior to award)  
(UG 200.308 (d)(1))
  - One-time 12 month extension(UG 200.308(d)(2))
  - Carry forward of balances(UG 200.308 (d)(3))

---

---

---

---

---

---

---

---

29

### Federal Demonstration Partnership (FDP)

- ▶ Purpose-to reduce administrative burdens to maximize research productivity
- ▶ Mission-to demonstrate that accountability can be maintained while simplifying research administration

---

---

---

---

---

---

---

---

30

### Other Aspects of Subpart C (A-110 and UG 200)

- ▶ Non-Federal audits (A-110 C.26)
  - Recipients are subject to A-133 / UG 200.5XX (requires external non-fed. audit)
- ▶ Allowable cost (A-110 C.27)
  - Recipients are subject to A-21 / UG 200.4XX
- ▶ Period of availability of funds (A-110 C.28 and UG 200.309)
  - A recipient may charge to the grant only costs...incurred during the funding period

---

---

---

---

---

---

---

---

31

### Property Standards (A-110 C.30 -.37 and UG 200.310-315)

- ▶ Insurance coverage (UG 200.310)
- ▶ Real property (UG 200.311)
- ▶ Federally-owned and exempt property (UG 200.312)
- ▶ Equipment (UG 200.313)
- ▶ Supplies and other expendable property (UG 300.314)
- ▶ Intangible property (UG 200.315)

---

---

---

---

---

---

---

---

32

### Federally-Owned Property (A-110 C.33 and UG 200.312)

- ▶ Tangible property acquired with federal funds or on loan from a federal agency
- ▶ Title to federally-owned equipment vests with the government

---

---

---

---

---

---

---

---

33

### Equipment

(A-110 C.34 and UG 200.313)

- ▶ Nonexpendable, tangible personal property having a useful life greater than one year
- ▶ Acquisition cost of \$5,000 or more

---

---

---

---

---

---

---

---

35

### Property Control

- ▶ UM is required to establish and maintain a system for managing and accounting for government property purchased with government funds or on loan from the Federal Government.
- ▶ Contracts - FAR sec 52 & 45
- ▶ Grants - A-110, Subpart C and UG Subpart D 200.3XX

---

---

---

---

---

---

---

---

36

### How Equipment is Audited

- ▶ Review accounting system to determine equipment expense
- ▶ Determine if budgeted (allowable)
- ▶ Review organization's inventory records
- ▶ Review the organization's process for tagging and locating
- ▶ On-sight verification
  - Is it in the room reported in inventory records
  - Is the equipment tagged

---

---

---

---

---

---

---

---

37

### Procurement Standards

*(UG 200.318-321)*

- ▶ All procurement transactions shall be conducted in a manner to provide open and free competition, to the maximum extent practical
- ▶ A minimum of three quotes on orders in excess of \$25,000 (small purchase threshold) or a sole-source justification is provided [A.2.(ee)]
- ▶ Positive efforts are made to utilize small business, minority-owned firms, and women's business enterprises, whenever possible

---

---

---

---

---

---

---

---

38

### Reports and Records

*(A-110 C.51 and UG 200.333)*

- ▶ Performance reports are required annually and are due 90 days after grant year
- ▶ Final reports are due 90 days after expiration
- ▶ Monitor sub-recipients

---

---

---

---

---

---

---

---

39

### Financial Reporting

*(A-110 C.52 and UG 200.327)*

- ▶ Recipients must use form SF-425 to report the status of funds
- ▶ Each agency can determine frequency of financial reports

---

---

---

---

---

---

---

---

40

### Retention and Access Requirement

*(A-110 C.53 and UG 200.333)*

- ▶ Financial record, supporting documents, statistical records and all other records... must be retained for 3 years.
- ▶ FOIA- (Freedom of Information Act)
- ▶ Access to data may be requested by federal agencies.

---

---

---

---

---

---

---

---

42

### Termination

*(A-110 C.61 and UG 200.339)*

- ▶ Awards may be terminated in whole or in part if :
  - The recipient materially fails to comply with terms & conditions
  - If the Federal Government and recipient mutually agree to terminate
  - The recipient notifies the Federal Government of termination

---

---

---

---

---

---

---

---

43

### Enforcement/Remedies for Non-compliance

*(A-110 C.62 and UG 200.338)*

- ▶ If a recipient fails to comply with terms
  - Withhold cash payments
  - Deny use of funds & applicable matching credit for all/part of cost
  - Suspend or terminate the award
  - Withhold future awards
  - Other legally available remedies
    - Debarment & suspension

---

---

---

---

---

---

---

---

### Close-Out Procedures

(A-110 Subpart D.71 and UG 200.343)

- ▶ Financial and performance reports must be submitted within 90 calendar days\*
- ▶ The recipient must refund any advances or payment not authorized
- ▶ The recipient must account for any property acquired with Federal funds or received from the Federal Government

\* NIH Policy Guide has extended to 120 days, UMCP business practice will continue to file financial reports at 90 days

---

---

---

---

---

---

---

---

### Presenters

- |   |   |
|---|---|
| ▶ Monique Anderson<br>Assistant Director, ORA<br><a href="mailto:manders1@umd.edu">manders1@umd.edu</a><br>301-405-6272 | ▶ Helena Moynahan<br>Assistant Director, OCGA<br><a href="mailto:hmoynaha@umd.edu">hmoynaha@umd.edu</a><br>301-405-2615 |
|---|---|

---

---

---

---

---

---

---

---