



# Uniform Guidance Implementation

## Proposal Development Reference Guide

The Uniform Guidance issued by the White House Office of Management and Budget includes revised cost principles for federal awards made on or after December 26, 2014. This Proposal Development Desk Reference Guide highlights select items that should be considered in the proposal development and budget preparation process, in accordance with the Uniform Guidance. **Grant applications that will be awarded after 12/26/14 should be developed in accordance with the Uniform Guidance.**

Topic/ UG Sections	New Guidance	UMCP Implementation	Action
<b>Restrictions on Voluntary Cost Share</b>  (200.29 / 200.99 / 200.306)	<p>Cost sharing should only be solicited for research proposals <u>when required by regulation and transparent in the notice of funding opportunity</u>. Voluntary committed cost sharing is not expected under Federal research proposals and is not to be used as a factor in the review of applications or proposals unless it is specifically stated as such in the announcement. Only mandatory cost sharing or cost sharing committed in the budget must be included in the research base for computing F&amp;A cost rate.</p> <p>Shared costs, matching funds, and contributions must meet certain criteria to be accepted as cost sharing. In particular, salary costs above a Federal awarding agency's cap <u>are not</u> mandatory cost-share or match.</p>	<p>Any funded award with cost sharing is required to maintain a separate KFS account for costs to be counted as cost sharing.</p>	<p>Research proposals for federal grants must <u>only include cost sharing when it is required</u> by the solicitation.</p>
<b>Budget Preparation</b>	<p>Many cost items require pre-approval which are consistent with the A122. For the full list, go to <a href="#">Code of Federal Regulations - Title 2 Section 200.407</a>. For more information on UMCP Implementation of UG Cost Principles, go to <a href="#">UMCP's Uniform Guidance Cost Principles Guide</a>.</p> <p><b>Modified Total Direct Cost (MTDC)</b> should only include salaries and wages, fringe benefits, materials and supplies, services, travel, and subgrants up to the first \$25,000 of each subaward (regardless of the period covered). Specifically excluded from the MTDC are equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000. (Section 200.68) <u>The Uniform Guidance further excludes participant support costs and rental costs.</u></p>	<p>The MTDC is the basis by which Facilities and Administrative (F&amp;A) costs are charged to federal awards. F&amp;A rates are negotiated campus-wide. Read more on <a href="#">F&amp;A Costs</a>.</p>	<p>Any costs that you anticipate incurring during the performance of your research project should be included in your proposal budget and budget justification.</p>



# Uniform Guidance Implementation

## *Proposal Development Reference Guide*

Topic/ UG Sections	New Guidance	UMCP Implementation	Action
<b>Subrecipients – Subawards</b> (200.330 / 200.92)	<p>A subaward is for the purpose of carrying out a portion of the Federal award and creates a Federal assistance relationship with the subrecipient. For subawards with entities that do not have a negotiated indirect cost rate (F&amp;A), the de minimus indirect cost rate of 10% of MTDC should be applied to the subaward.</p> <p>UMCP F&amp;A is recovered on up to the first \$25,000 of the award for the entire period of performance.</p>	<p>Your CA can help you make the determination of whether a subrecipient is a subaward or a contractor.</p>	<p>Risk assessments for all subrecipients of federal awards will be conducted by ORA’s subaward unit. Read more on <a href="#">Subawards</a>.</p>
<b>Subrecipients – Contractors</b> (200.330 / 200.22)	<p>A contract is for the purpose of obtaining goods and services and creates a procurement relationship with the contractor. A contractor relationship is created in instances where the entity is providing something that they regularly provide to others in the public market.</p> <p>The entire contract amount is subject to F&amp;A.</p>	<p>Your CA can help you make the determination of whether a subrecipient is a subaward or a contractor.</p>	<p>Read more on <a href="#">Procurement in the Uniform Guidance</a>.</p>
<b>Conflict of Interest</b> (200.112)	<p>Federal agencies are required to have policies on conflict of interest in Federal awards and requires non-Federal entities to disclose in writing any potential conflicts of interest (in accordance with applicable policies) to the Federal awarding agency or pass-through entity. Conflicts of interest in this part are specifically related to how decisions are made for selecting subrecipients or procurement contracts.</p>	<p>UMCP currently has a conflict of interest policy that governs conflict involving potential financial gain or personal benefit. <a href="#">Read the policy.</a></p>	<p>Any potential conflict of interest that can be identified during the proposal development phase should be disclosed to the <a href="#">UMCP Research Compliance Office</a>.</p>
<b>Reporting Requirements</b> (200.201 / 200.339)	<p>The UG requires that all technical and financial reports be provided to the federal awarding agency and all obligations incurred, including subrecipient invoices and cash payments, be liquidated <u>within 90 days after the end date</u> of the award. The institution must also certify that the project was completed and/or level of effort was expended. If not carried out fully, the award will be adjusted.</p>		<p>When planning your project, include time for preparing technical and financial reports that will be required by the federal awarding agency.</p>