Uniform Guidance Update
(a.k.a. OMB A-81 or Omni-Circular or “UG”)

ORA Quarterly Update
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Background

• Combines core/fundamental guidance derived from multiple circulars governing management of federally funded sponsored projects
• Clarifies certain costing and process elements with the intent to streamline research management
• “Single most important change in research management governance in the history of US federal research support” Michelle Bull, NIH
• OMB: “This document is changing the culture of grant management.”

Objective is to reduce administrative burden and the risk of waste, fraud and abuse.
Background

Research Financial Compliance: Federal Update

- Grants Reform/A-81/Omni-Circular Update:
  - Rollout of A-81 occurred in a OMB-sponsored webinar on 12/26/13
  - Implementation of admin and costing principles expected one year after publication date (12/26/2014) and use as audit guidance the first full fiscal year after publication
  - OMB states that “all Federal agencies will consistently and in unison implement and apply the new guidance”
  - COFAR “expects to develop a robust training program for the grant recipient community”
The Uniform Guidance - Implementation Plan

<table>
<thead>
<tr>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
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<tbody>
<tr>
<td>12/26/13 Release</td>
<td>6/26/14 Agency plans due to OMB</td>
<td>12/26/14 Implementation (all but audit)</td>
<td>7/1/15 Audit provisions go into effect for Duke</td>
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<td>Understand</td>
<td>Implement</td>
<td>Influence (with Peers, COGR, FDP, etc.)</td>
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<td>Agency Plan</td>
<td>Understand / Operationalize</td>
<td>Implement</td>
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<td>Development</td>
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<tr>
<td>OMB/COGR</td>
<td>OMB to “Harmonize”</td>
<td>Evaluate with Metrics</td>
<td>Refine</td>
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Key Elements: Good

- **Computers** will likely be an allowable cost if included in the original budget and justified; may not need to be solely dedicated to the sponsored project, but some method of verifying use on project will be expected.

- **Publication costs** are an allowable costs after the end date of the project period (but will need to be forecast and included in FFR).

- Certain “**project management**” **personnel costs** may be allowable, but must be specifically budgeted in the proposal.

- **10% F&A rate** set for subs with no negotiated rate.
Key Elements: Possibly Problematic

• Subaward/Subrecipient management requirements are more rigorous
• Procurement standards may be tighter
• New requirements to track moveable equipment
• Stronger language reminds signatory officials of penalties for false certification – impact on timing on proposal submission
• Fixed-price Subawards capped at $150k

What Can You Expect

• Change
  – Many policies, procedures and training classes will be impacted
  – More consistency across agencies
  – Less burden
• Communication in the Very Near Future
  – Some changes need to be included in proposals now
  – Some items could have a longer lead time
• However...
  – Some items may be refined via the “harmonization” process and by agencies
  – “Interpretation” and clarification will occur via federal agencies, OIGs, and professional organizations
• Some confusion is likely...from feds...2 sets of rules...
• Website
  – Communication and updates
  – FAQ’s