

# CFR Part 200 Uniform Guidance Revisions

- Office of Management and Budget (OMB) completed its 5-year review of Uniform Guidance (applicable to Federal awards)
- Final revisions emphasize stewardship and results-oriented accountability
- Key changes:
  - updated definitions,
  - modifications to existing requirements,
  - revisions incorporate current goals and initiatives of the Administration,
  - statutory requirements, and
  - clarifications of existing requirements to reduce the burden to recipients
- Federal agencies Terms & Conditions being updated to include UG amendments
- Applicable to new awards or funding amendments to existing awards on or after November 12, 2020
- OSP & SPA currently evaluating impact to NYU systems and processes

➤ *Effective August 13, 2020*

- Prohibition on using Federal funds to purchase/use covered telecommunications and video surveillance equipment, services with certain foreign (Chinese) entities, their subsidiaries and affiliates
- Termination Clause - Broader federal agency authority for termination of grant awards

➤ *Effective November 12, 2020 (abbreviated list)*

- Clarification of key concepts like “performance period” and “budget period” and their impact on charging costs
- Actions federal agencies must take to enhance program performance and results
- “Buy American” policies for acquisitions of supplies, equipment and services “to the greatest extent practicable”
- “Never Contract with the Enemy” applicable to international awards >\$50K where Armed Forces are actively engaged in hostilities
- Increase in micro-purchase and simplified acquisition dollar thresholds to align with statutory requirements
- Expanded use of the de minimis method for the recovery of indirect costs
- Pass-through entities are responsible for addressing only a subrecipient's audit findings specifically related to its award.
- Public posting of portions of federally negotiated indirect cost rate agreements (NICRAs)
- Changes to award closeout procedures intended to improve timeliness