

## Harty, William P.

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**From:** COGR <cogr@usc.edu>  
**Sent:** Sunday, July 27, 2014 6:09 PM  
**To:** cogr-l@usc.edu  
**Subject:** [cogr-l] COGR: Uniform Guidance and FAQ Update

COGR met with the COFAR and other stakeholders on Thursday, July 24. The COFAR called for the meeting so that they could update the grantee community on a number of issues related to the Uniform Guidance (UG).

A key part of the meeting was an update on soon-to-be-released FAQs by the COFAR. As stated in the meeting, the FAQs should be released within the next one to two weeks. Below is a recap of the meeting. Per our summary of the FAQs (beginning with item 4 below), this relates our understanding as they were described to us. We expect the published version to match up with the summary below; however, we suggest holding off on any institutional decisions until the official release of the FAQs.

### Recap of 7/24 COFAR Meeting:

- 1) COFAR priorities for FY15 will be implementation of the UG and initial analysis of the DATA Act.
- 2) Metrics. COFAR will utilize internal metrics to gauge the “success of the UG” and will count on the grantee community for other metrics.
- 3) Webcast(s). We expect a COFAR webcast in September to address some of the most significant issues that have been raised by the grantee community.
- 4) Incremental funding. Each agency will determine how they will apply the UG to new increments of funding; this will be done in a manner to be consistent with the terms and conditions of the award.
- 5) F&A rates. Rate proposals beginning with FY14 base years will be premised on the UG.
- 6) DS-2. Revisions should be submitted after 12/26/14. However, the UG can be followed prior to submission and approval of the DS-2. For example, you can propose admin salaries, computing devices, etc. starting immediately.
- 7) Terminal leave, workers comp, and unemployment comp. Rather than an FAQ, our understanding is that the COFAR will follow the COGR recommendation (see COGR letter on cogr.edu, July 1 link) and make a technical correction to the UG. Consequently, the “indirect cost” language in the UG will disappear.
- 8) Procurement. This may be the “hottest topic” across the entire grantee community. Our understanding is the COFAR will publish an FAQ that grants a one year grace period. While COGR advocated for a research exemption (see COGR letter on cogr.edu, July 1 link), we proposed the grace period as an alternative to give the community time to review additional options for implementing this section of the UG.
- 9) Conflict of Interest. There will be an FAQ that states this section of the UG is applicable to procurement transactions only.
- 10) FAQs, including the treatment of Program Income, Depreciation, and other FAQs suggested by COGR (see cogr.edu, July 1 link) will be addressed in the FAQs. However, these were not covered in the meeting.

We will continue to keep the membership updated on all developments.

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