



Huron's OMB Uniform Guidance "Go-Live" Checklist

Preparing Your Institution for Compliance with the New Regulations

1. Communication:

- Alert the research community, including Principal Investigators, local support staff and central research administrators of the upcoming December 26th effective date, what it means and how their work will be impacted
- Provide resources – web links, contacts and other materials – to aid individuals in need of assistance

2. Policy and Procedure Updates:

- Review and update institutional policies and procedures impacted by the changes within the Uniform Guidance, including those heavily impacted:
 - Direct Charging
 - Effort Reporting
 - Procurement
 - Sponsored Project Compensation
- Embed appropriate internal controls within procedures to maintain compliance with policy and federal regulations
- Determine if your institution will operate in compliance with the new or old procurement standards for the first full fiscal year that begins after December 26th and document this determination (perhaps as a footnote to your policies or internal memo)

3. Disclosure Statement (DS-2) Updates:

- Determine if updates to the DS-2 are required for consistency with policies and compliance with the Uniform Guidance
- Determine your institution's necessary timeline for submitting DS-2 updates:
 - As soon as possible after 12/26/2014;
 - Prior to the award of a CAS-covered contract;
 - 6 months before the effective date or start of fiscal year; or
 - With the next indirect cost rate proposal submission
- Assemble a work team charged with preparing and submitting updates to the DS-2

4. Outgoing Proposals:

- Notify Principal Investigators and their local support staff that applications submitted after December 26th should be developed in accordance with the Uniform Guidance and any updated institutional policies
- Prepare Pre-Award Staff to review outgoing proposals submitted after December 26th in line with the Uniform Guidance and updated institutional policies

5. Incoming Awards:

- Notify Principal Investigators and their local support staff that awards made after December 26th, including some incremental funding, must be managed in accordance with the Uniform Guidance and any updated institutional policies
- Prepare Post-Award Staff to manage awards made after December 26th in line with the Uniform Guidance and updated institutional policies
- Update subaward templates to provide subrecipients will all required information
- Identify cases where prior approval is required for administrative and clerical salaries charged directly to sponsored awards

6. Groundwork for Indirect Cost and Fringe Benefit Rate Updates:

- Identify key changes to the institutional indirect cost rate calculation process and make any necessary system (e.g., GL tracking and coding) updates
- Determine if the fringe benefit rate should be updated to incorporate a terminal leave rate and initiate the calculation and negotiation process