



Document Downloaded: Tuesday October 28, 2014

October 2014 COGR Meeting Presentation Thursday Morning - David Kennedy

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Published Date: 10/23/2014

Institutional Implementation of the Uniform Guidance: Are We Ready?

COGR Meeting
Washington Marriott Hotel
Washington, DC
October 23-24, 2014

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COGR

UG Update & COGR activity



- ▶ UG goes live on December 26, 2014
- ▶ OMB and the Council on Financial Assistance Reform (COFAR) at the helm
- ▶ Important FAQs released on August 29th. And a Webcast with star power; see <https://cfo.gov/cofar/>
- ▶ Ongoing COGR engagement with COFAR and other Stakeholders (States, Nonprofits, Audit, etc.)
- ▶ www.cogr.edu ... **COGR Guide V2; Sept. 17 link**

UG Update & COGR activity



- ▶ **COGR Request Letters:** 1) September 26 – clarify definition of MTDC and use of the term subcontract, 2) October 9 – incorporate Technical Corrections (based on FAQs) into the final version of UG, and 3) October 10 – change the trigger for DS-2 submission to \$50 million in CAS-covered contracts
- ▶ **November Mtg w/COFAR: Technical Corrections**
- ▶ 2015: OMB Memorandum M-14-17 and “Metrics”
- ▶ This session ... Are We Ready?

This Session

Representatives from the COGR Board and Committees will continue the discussions from the past two COGR meetings and provide up-to-date insights and perspectives on the OMB Uniform Guidance.

Special attention will be paid to those sections of the Uniform Guidance that carry the most uncertainty and that will require thoughtful institutional planning, preparation and appropriate training.

COGR will accumulate the “results” of this session and share summaries and recaps with the Membership that can be used to help your institution be better prepared for the December 26 roll-out of the OMB Uniform Guidance.

The Top 15

- ▶ 200.110 Effective/Applicability Date
FAQs are helpful, but 2 sets of rules?
- ▶ 200.112 Conflict of Interest
FAQ: Procurement, not objectivity in research – UGTC ?
- ▶ 200.303 Internal Controls
FAQ: Must versus Should, but more needed? – UGTC ?
- ▶ 200.306 Cost Sharing
Formally incorporate 2001 OMB VUCS Memo – UGTC ?
- ▶ 200.307 Program Income
FAQ: Bayh-Dole, statutory supersedes UG – UGTC ?

The Top 15

- ▶ 200.317-326 Procurement Standards
FAQ: Effective July 1, 2016 (or FY17), but work ahead
- ▶ 200.331 Requirements for Pass-through Entities
New requirements, new burden
- ▶ 200.332 Fixed Amount Subawards
FAQ helps a bit, but still challenges – UGTC ?
- ▶ 200.343 Closeouts
New opportunity (120 days), but Research Ts & Cs ?
- ▶ 200.413 Direct Costs + + +
What Faculty Need to Know! (also .453, .463, etc. etc .)

The Top 15

- ▶ 200.414 Indirect Costs
4-year extension, 1.3% UCA, and partner with Cogs
- ▶ 200.419 Cost Accounting Standards and DS-2
11th hour push and cautious optimism – UGTC ?
- ▶ 200.430 Compensation – personal services
Opportunities and challenges
- ▶ 200.431 Compensation - fringe benefits (terminal leave)
FAQ not helpful, but more clarification coming – UGTC ?
- ▶ 200.436 Depreciation
FAQ: Institutional share clarified as allowable – UGTC ?

What's Next?

- ▶ Check in with: <https://cfo.gov/cofar>
- ▶ Pay close attention to material, advice, etc. from your professional associations and other trusted sources
- ▶ Leverage many in your Institution Plan for training and roll-out: Pls, all levels of Admin, IT, experts from Purchasing, Payroll, etc.
- ▶ ***Technical Corrections to the UG and Agency Plans in the Federal Register*** sometime before December 26th (Dec. 1, 12, 24 ???)
- ▶ Find comfort with uncertainty ... lots to be found!