

The following includes significant information for any faculty or staff member applying for, or considering applying for, federal government grants. The intention is to consolidate regulations and procedures into one source and, to an extent, simplify these. Only time will tell if the changes will have the desired result.

With an effective date of 12/26/2014 the federal government combined existing OMB circulars in respect of federal grant administration into one “uniform” set of administration requirements and cost principles for all non-federal entities, such as UTPB, to follow. Generally referred to as “**Uniform Guidance**” (UG), it is intended to standardize the rules that applicants for, and recipients of, federal grants must adhere to for all new federal grants from the next institutional financial year (09/01/2015). Having said that, unsurprisingly, agency rules and conditions that vary from UG, will take precedence over the UG rules. General agency exceptions were supposed to have been circulated by now – but haven’t been. Exceptions on individual RFPs and FOAs will be detailed in the respective announcements.

This reform was carried out by the Council on Financial Assistance Reform (COFAR) and the Office of management and Budgets (OMB) to simplify procedures for (primarily) administering grants and to emphasize that more importance is being attached to “Internal Controls”.

The relevant document can be accessed at <http://www.gpo.gov/fdsys/pkg/FR-2013-12-26/pdf/2013-30465.pdf>. It is a 108 page document so we would advise against printing it for reference and suggest storing an electronic version that can utilize an effective search facility. This link will also be placed on the Research and Grants UTPB webpage.

There are a number of issues that have either been introduced or that will be more closely monitored. These are – in no particular order of priority:

- Internal Controls & Audit
- Conflict of Interest & Mandatory Disclosures
- Federal Agency Review of Merit
- Federal Agency Review of Risk (includes retirement of experienced personnel)
- Data Protection
- Procurement methods and associated issues
- Administrative and clerical staff regulations
- Termination and Closeout

Essential Links for more information:

- Government Printing Office (GPO) Federal Digital System – This Website is a gateway to virtually any federal document, including those governing federal grants, cooperative agreements, and other assistance awards. Links to the Code of Federal Regulations, where the UG is codified, to the Federal Register, and to other federal documents are provided in the Browse menu on the left side of the page: <http://www.gpo.gov/fdsys/>
- Council on Financial Assistance Reform (COFAR) – The COFAR is the body of individuals and organizations responsible for providing recommendations to the OMB in drafting the Uniform Guidance. Their Website is housed within the Chief Financial Officers Council’s site, and it includes links to the

Uniform Guidance, several recorded Webcasts, Q&A documents, and other resources. The site is not super easy to navigate, but it does contain a wealth of information: <https://cfo.gov/COFAR/>

- Office of Management and Budget (OMB) – The White House’s Office of Management and Budget is responsible for the final language and implementation of the UG. **Their Policy Statements page includes a summary of the Circulars replaced by the UG as well as crosswalks and text comparisons between the old Circulars and the new requirements:**

http://www.whitehouse.gov/omb/grants_docs

- Council on Governmental Relations (COGR) – The Council on Governmental Relations is “an association of research institutions and is the national authority on the financial and regulatory infrastructure...associated with managing federal research grants and contracts.” Their resources on the Uniform Guidance are useful and readable. In particular, their Implementation and Readiness Guide for the OMB Uniform Guidance is excellent. It’s the first bulleted item on this Web page:

http://www.cogr.edu/Pubs_Financial.cfm

- Education Department General Administrative Regulations (EDGAR) – provides guidance on how the UG is being implemented in their agency. They have some great links and informational documents for educational institutions: <http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>

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