

Overview of Revisions to 2 CFR Uniform Guidance

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RAC Forum

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Pop quiz!

**Title 2 of the Code of Federal Regulations (2 CFR):
Grants and Agreements**

**Effective Oct 1, what is the revised title
for 2 CFR?**

2 CFR: Federal Financial Assistance

Final rule and guidance issued by OMB on April 22, 2024

Effective date of revised 2 CFR: October 1, 2024

OMB objectives for 2024 Revisions to 2 CFR:

1. Incorporating statutory requirements and administration priorities;
2. Reducing agency and recipient burden;
3. Clarifying sections that recipients or agencies have interpreted in different ways; and
4. Rewriting applicable sections in plain language, improving flow, and addressing inconsistent use of terms.

2 CFR, Subtitle A

Guidance for Federal Financial Assistance

Chapter 1

Part 25: UEI and SAM.gov
Part 170: Reporting Subawards
Part 175: Trafficking in Persons
Part 176: ARRA of 2009
Part 180: Suspension and Debarment
Part 182: Drug-Free Workplace
Part 183: Never Contract with the
Enemy
Part 184: Buy America Preference
Subpart

Chapter 2

Part 200: Uniform Administrative
Requirements, Cost Principles,
and Audit Requirements 

Subpart A: Acronyms and Definitions
Subpart B: General Provisions
Subpart C: Pre-Award Requirements
Subpart D: Post-Award Requirements
Subpart E: Cost Principles
F: Audit Requirements
Appendices I - XII

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Thresholds and Indirect Cost

UCB Implementation Date: TBD

- [§200.1](#) Equipment - threshold increase from \$5K to \$10K
- [§200.1](#) MTDC - Subaward threshold increase from \$25K to \$50K
 - Subaward costs up to \$50K included in MTDC
- [§200.314](#) Supplies
 - Threshold increased from \$5K to \$10K for **unused** supplies

Effective October 1, 2024

- [§200.1](#) Indirect cost is no longer referenced as F&A
- [§200.414](#) Indirect Cost - Subrecipient
 - De minimis rate is increased from 10% to 15%
- [§200.333](#) Fixed Amount Subawards
 - Threshold increased from \$250K to \$500K

Administrative Requirements

Effective October 1, 2024

- [§200.407](#) Prior Approval Requirements - The followings are eliminated:
 - §200.201 Use of Grant Agreements
 - §200.311 Real Property
 - **§200.313 Equipment**
 - **§200.413 Direct Costs**
 - §200.438 Entertainment Costs
 - §200.454 Memberships, Subscriptions and Professional Activity Costs
 - **§200.456 Participant Support Costs**
 - §200.467 Selling and Marketing Costs
 - §200.470 Taxes
- [200.413](#) - Administrative & Clerical Staff Salaries
 - Costs in the budget or prior written approval no longer required
 - All other requirements to charge admin salaries as a direct cost remain unchanged

Allowable Costs

- [§ 200.1](#) and [§200.456](#) Participant Support Costs
 - Temporary dependent care cost is added to the definition
 - Guidance is TBD
- [§200.455\(c\)](#) Data and Evaluation Costs
 - *Data costs*: Expenditures needed to gather, store, track, manage, analyze, disaggregate, secure, share, publish, or otherwise use data to administer or improve the program, such as data systems, personnel, data dashboards, cybersecurity, and related items...
 - *Evaluation costs*: Evidence reviews, evaluation planning and feasibility assessment, conducting evaluations, sharing evaluation results, and other personnel or materials costs related to the effective building and use of evidence and evaluation for program design, administration, or improvement.

Other Changes

- [Appendix I to 2 CFR Part 200](#) Notice of Funding Opportunity (NOFO)
 - Requires consistency and use of plain language
- [§200.1](#) Definition added for Prior Approval
 - Must be written approval and obtained in advance
 - From an **authorized official** of a Federal agency or pass-through entity
- [§200.340](#) Termination - Govt flexibility to terminate is reduced
 - Agencies (and pass-through entities) can no longer terminate based on not meeting program goals or agency priorities unless stated in T&Cs of the award

Implementation of 2 CFR by Federal Agencies

Implementation by federal agencies occurs via:

- Agency regulations in Subtitle B of 2 CFR
- Guidance and policy documents issued by the agency
- Internal procedural issuances
- We will see the implementation in funding opportunities, award terms and conditions, and funded amendments

Some Agency Specific Implementations

- **NSF** - implementing changes in NSF's [GC-1 dated 10/1/2024](#) and will archive its use of the Research Terms and Conditions (RTC) beginning 10/1/2024. NSF has issued the [NSF Prior Approval Matrix](#). Next PAPPG will sync with 2 CFR revisions and GC-1. [Link](#) to NSF's implementation webinar (new & funded amendments)
- **NASA** - implementing changes in NASA Grant and Cooperative Agreement Manual (GCAM) and 2 CFR 1800, effective 10/1/2024. See NASA [GN 24-01](#). Updates and any training will be posted on the NASA grants policy and compliance [page](#). (new & funded amendments)
- **NIH** - implementing changes in FY25 release of the NIH Grants Policy Statement (NIHGPS). [Link](#) to NIH's implementation webinar - 10/17

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Berkeley Implementation

- Continued monitoring for agency implementation plans
- As needed, UCB policy and procedure updates to align with the UG revisions and UC-wide implementation
- Websites updates
- Future presentations (SPO, CGA, Costing & Policy Analysis)
- Changes to the Phoebe Award Summary (PAS) and Subrecipient Commitment Form
- In due time, revised IDC rate agreement

Questions?

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