



# Revisions to 2 CFR 200

Applicable to Federal Awards Made On or After  
October 1, 2024

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Contracts & Grants Accounting

RAC Forum  
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# Agenda

- UG Revisions Not Implemented by UC at This Time and Requiring Additional Approvals
- Research Terms & Conditions (RTCs)
- Equipment – 2 CFR § 200.313 (a)
- Participant Support – 2 CFR § 200.1
- Timing of Payments – 2 CFR § 200.305(b)
- Closeout, Project Reporting Due Dates and SAM.gov – 2 CFR § 200.344
- Other Changes

# Revisions to 2 CFR 200 Requiring UCOP Confirmation and DHHS Approval

- Equipment, Supplies \$10,000  
UCB – NO CHANGE UNTIL FURTHER NOTICE
- MTDC on Subawards up to \$50,000  
UCB – NO CHANGE UNTIL FURTHER NOTICE

# NSF and the Research Terms and Conditions (RTCs)

- **RTCs will no longer be referenced in NSF awards made on or after October 1, 2024.**
- NSF Award Conditions  
[https://www.nsf.gov/awards/managing/award\\_conditions.jsp?org=NSF](https://www.nsf.gov/awards/managing/award_conditions.jsp?org=NSF)
- In the case of any inconsistency between the coverage contained in the NSF Proposal and Award Policies and Procedures Guide and 2 CFR 200, the coverage specified in 2 CFR 200 applies.

# Equipment - 2 CFR § 200.313(a)

## Equipment

Unless specifically identified in the award as exempt property, **title to equipment** purchased or fabricated under the award **conditionally vests** upon acquisition in the recipient.

A conditional title means a clear title is withheld by the Federal agency until conditions and requirements specified in the terms and conditions of a Federal award have been fulfilled. Federal agencies reserve the right to transfer the title to equipment to the Federal Government or a third party at any time during the award period.

## Important Reminders

- Maintain property records
- Conduct physical inventory at least once every two years
- Ensure safeguards for preventing property losses



# Participant Support - 2 CFR § 200.1

## **Participant**

Individual participating in or attending program activities under a Federal award, such as trainings or conferences, but who is not responsible for implementation of the Federal award.

## **Participant Support Costs**

Stipends, subsistence allowances, travel allowances, registration fees, **temporary dependent care, and per diem paid directly to or on behalf of participants.**

## **NSF Participant Support Costs Self-Assessment Checklist**

[https://www.nsf.gov/bfa/dias/resources/Participant\\_Support\\_Costs\\_Self-Assessment\\_Tool.pdf](https://www.nsf.gov/bfa/dias/resources/Participant_Support_Costs_Self-Assessment_Tool.pdf)

# Timing of Payments - 2 CFR § 200.305(b)

“Payment methods must minimize the time elapsing between the transfer of funds from the Federal agency or the pass-through entity and the disbursement of funds by the recipient or subrecipient regardless of whether the payment is made by electronic funds transfer or by other means.”

- Accruals on C&G funds must be marked for a reversal.
- CGA and FAC will be performing more detailed reviews or accruals.
- Accruals not reversed by department timely will be reversed by accounting to ensure timely returns of federal funds.

## Closeout - 2 CFR § 200.344(c)

- The recipient must liquidate all financial obligations incurred under the Federal award no later than 120 calendar days after the conclusion of the period of performance. A subrecipient must liquidate all financial obligations incurred under a subaward no later than 90 calendar days after the conclusion of the period of performance of the subaward.
- If the recipient does not comply with the requirements of this section, including submitting all final reports, the Federal agency **MUST** report the recipient's material failure to comply with the terms and conditions of the Federal award in *SAM.gov*.



# Other Changes



- Special Purpose Equipment includes “associated software”
- Replaced “Non–Federal Entity” with “Recipient and Subrecipient”
- “Indirect Cost”, not “F&A”

# Resources

## Uniform Guidance

<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1>

## NSF Policy Office Outreach

<https://nsfpolicyoutreach.com/#regional>

## NIH Grants Policy Updates

<https://www.youtube.com/watch?v=hkLTGm0VebA>

## NIH Extramural Nexus

<https://nexus.od.nih.gov/all/category/new-resources/>



# Questions?