Revisions to 2 CFR 200

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

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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
- 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.

<u>Important Reminders</u>

- 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



Timing of Payments - 2 CFR § 200.305(b)

"Payment methods <u>must minimize the time elapsing between the transfer of funds</u> from the Federal agency or the pass-through entity <u>and the disbursement of funds by the recipient or subrecipient</u> 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 <u>MUST</u> 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

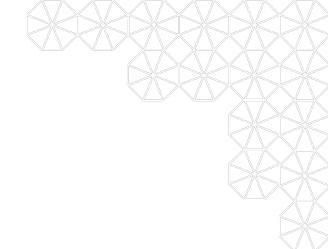
https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1

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?

