

SPO Update

- Uniform Guidance - proposed changes
- State of CA

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Uniform Guidance (2 CFR 200) proposed changes

OMB issued a proposed ruling in early Oct 2023

Some highlights:

- Removing 10 prior written approval requirements for certain items
- Removing the simplified acquisition threshold cap for fixed amount subawards
- Increasing the per-unit threshold value of equipment from \$5,000 to \$10,000
- Increase to the cap for IDC recovery on the first \$25K of each subaward to first \$50K

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Exhibit A – Statement of Work

- We are seeing terms and conditions being added to the scope of work by State agencies or PIs being directed to add them
- Examples:
 - approval requirements of reports or deliverables
 - requirements to get bids for subrecipients
- If you notice this, contact your SPO CGO, or include a note in the Phoebe proposal record

SPO State of CA proposal guidance [link](#)
California Model Agreement [link](#)

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Exhibit A-2 Key Personnel

- We are seeing requests to list all paid personnel as key personnel.
 - reality: the definition of key personnel is interpreted differently
 - UTC-220 definition of Key Personnel: The PI and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they receive salaries or compensation under the agreement.

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Exhibit A-2 Key Personnel (cont.)

- University is accustomed to defining Key Personnel as someone who is responsible and accountable for the design, conduct, and reporting of the project. For most projects that would be the PI and Co-PI. Being paid on the project for a substantive amount of effort is interpreted by some state agencies as meeting the definition of Key Personnel
- SPO continues to advise listing PI and Co-PI as key and add others only when responsible and accountable for the design, conduct, and reporting of the project
- Remember: for an award subject to UTC-220, UCB must obtain prior approval to make key personnel changes. Document approvals of changes by email. Note, depending on the agency an amendment may be required.

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Exhibit B – Budget

- We are seeing request to provide budgets by task in addition to the budget by project period
 - advise against detailed budget by task
 - could include a summary by task if necessary
- We are seeing subrecipient budget justification indicating that UCB sought bids prior to selection of a subrecipient
 - bids are not applicable to subrecipients
 - bids may be required for service/consultants/independent contractors per UC policy