

This guide identifies key changes in federal regulations from certain Office of Management and Budget (OMB) Circulars to the new OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). Not all changes are noted, only those that are likely to have a significant effect on the LLU research community. These changes are applicable to federal awards awarded on or after December 26, 2014. The complete Uniform Guidance can be found at: <u>http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200\_main\_02.tpl</u>.

| GENERAL  | COST RELATED  |   |
|--|---|---|
| Internal Controls   All organizational levels<br>of the institution must have robust internal con-<br>trols documented and followed to ensure com-<br>pliance with terms, conditions, and regulations<br>of the award. 200.303 & 200.61<br>Prior Approvals   Additional prior written ap-<br>provals have been added to the regulations.<br>200.407 (Cost) & 200.308 (Program)<br>Closeout Period   The closeout period is | <ul> <li>Computers   Computing devices under<br/>\$5,000 are considered supplies and can be directly charged to grants if they are essential<br/>and allocable. Devices costing \$5,000 or more<br/>must be identified in the approved budget or<br/>approved in writing by the sponsor. 200.48,<br/>200.313(a), 200.453(c)</li> <li>Publication &amp; Printing Costs   Publication<br/>and printing costs may be charged to the pro-<br/>ject after the end of the award period, but must<br/>be recorded as an expense before the closeout<br/>of the award. 200.461(3)</li> <li>LLUH Policy Change   Direct Costs on Spon-<br/>sored Projects</li> </ul> |   |
| specific to sponsor regulations. Reference the<br>Notice of Award or award agreement for project<br>specific requirements. 200.343   |   |   |
| LLUH Policy Change   Closeout of Sponsored<br>Projects   |   |   |
| SUBAWARD/SUBRECIPIENT  |   | <ul> <li>Questions &amp; Training</li> <li>Contact your RAFM<br/>Financial Analyst at<br/>ext. 44589</li> <li>Visit our website:</li> </ul> |
| <b>Risk Assessment  </b> A risk assessment of subrecipients as well as the monitoring and management of subrecipients has been clarified and redefined. <u>200.331</u>   |   |   |

**F&A (Indirect Cost) Rates |** Subrecipients are entitled to receive their federally negotiated F&A rate or, if they do not have one, a 10% de minimis rate, unless the Federal award restricts the F&A rate. <u>200.331(4)</u>

LLUH Policy Change | Subawards & Subrecipient Monitoring

- Visit our website: www.llu.edu/research -affairs/uniformguidance.page
- Training Seminar June 4, 2015