

2020 Uniform Guidance Updates

Uniform Guidance has been updated effective November 12, 2020.

Several sections have been updated with new rules, revised amounts, new terminology and some clarification.

The most significant changes include the following:

- ✓ Certain new sections (§200.211 & §200.301) indicate that, where applicable, federal awards should include performance goals and targets. Awarding agencies should measure performance to show achievement of goals and objectives. We will need to see whether and how this affects individual grants.
- ✓ Procurement Thresholds-the micro-purchase threshold has been increased to \$10,000 and the simplified acquisition threshold has been increased to \$250,000. In addition, grantees with “clean audits” can elect to increase the micro-purchase threshold to \$50,000. This election is annual (§200.320). That section also clarifies that micro-purchases do not require any competitive process.
- ✓ The optional 10% de minimis indirect cost rate was previously available only to organizations that had not previously negotiated an indirect cost rate. Now the de minimis rate is available to any organization that does not currently have an approved indirect cost rate.
- ✓ Organizations that pass funds through to sub-recipients must recognize the sub-recipients’ approved indirect cost rate, but if none exist the pass-through entity must work with the sub-recipient to determine an appropriate indirect cost rate.
- ✓ There are requirements for domestic sourcing preferences “to the greatest extent practicable” (§200.322).
- ✓ There is also a new section (200.215) called *Never Contract with the Enemy*. However, this only applies to grants in excess of \$50,000 that are performed outside United States and its territories.
- ✓ There is also a ban against purchasing any equipment, services, or systems that use telecommunications equipment or services manufactured by Huawei, or any of its affiliates.
- ✓ §200.344 extends the time to close out an award from 90 calendar days to 120 calendar days after the period of performance. Financial and performance reports

must be provided within that timeframe. That section also confirms that there are no federal requirements governing the disposition of income earned after the period of performance for the federal award unless the federal awarding agency requires a specific use.

- ✓ The terms “budget period” and period of performance” have new definitions and a stricter requirement for incurring costs during the budget.
- ✓ You may see a new term “Assistance Listings”. That is the new name for the CFDA (catalog of Federal domestic assistance). The prior CFDA numbers are now Assistance Listing Numbers.
- ✓ Finally, OMB will be developing a website confirming each recipients indirect cost rate, base, and rate type (§200.414(h)) - Stay tuned!