

The Office of Management and Budget (OMB) has combined 8 federal circulars into a single guidance document known as Uniform Guidance (or 2 CFR 200) that can be used by all agencies. The Uniform Guidance is intended to streamline the management of federal assistance grants and reduce fraud, waste and abuse. These changes have resulted in greater administrative flexibility for the grantee and also greater responsibility in maintaining internal controls. The Uniform Guidance applies to all new awards issued December 26, 2014 and later. Individual agencies will apply the Uniform Guidance to continuation, renewal, and supplement awards issued on or after December 26, 2014 at their discretion.

<p><b>AS PARTNERS IN STEWARDSHIP, UCSF WILL PERFORM COMPETITIVELY UNDER THE NEW PROPOSAL REVIEW PROCESS</b></p>	<p>The Uniform Guidance indicates that all proposals will undergo a risk assessment, in addition to the standard review of the proposed science. The risk assessment will evaluate the applicant institution's history of performance in managing federal awards, compliance records, financial stability, and internal control environment. One element of managing federal awards receiving new emphasis is the responsibility for performance progress reports.</p> <p style="text-align: right;"><i>Applicable CFR Section: 200.205</i></p>
<p><b>ADMINISTRATIVE AND CLERICAL SALARIES SALARY COSTS CAN BE INCLUDED ON COMPETITIVE AND NON-COMPETITIVE PROPOSAL BUDGETS</b></p>	<p>Generally, administrative and clerical salaries should still not be direct charged, but the rules governing "major project or activity" exceptions have been dropped and replaced by the following criteria, all of which must be met:</p> <ol style="list-style-type: none"> <li>1. Administrative or clerical services are integral* to a project or activity;</li> <li>2. Individuals involved can be specifically identified with the project or activity;</li> <li>3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency<sup>1</sup>; and</li> <li>4. The costs are not also recovered as indirect costs.</li> </ol> <p>If all of these requirements are met, PIs/departments should add a new justification statement to proposals to facilitate the required agency approval.</p> <p>*UCSF has determined that integral means:</p> <ul style="list-style-type: none"> <li>▪ Personnel costs must be essential, vital, or fundamental to the performance of the award or activity as documented in the award proposal or scope amendment.</li> <li>▪ Generally administrative and clerical support as individual annual effort must not be less than 10% per year as documented in their effort report.</li> <li>▪ Instances where an individual is on 3 or more awards and has substantial cumulative annual effort charged to federal sources, budgets must be evaluated for appropriateness with university and federal guidelines.</li> </ul> <p style="text-align: right;"><i>Applicable CFR Sections: 200.413, 200.430</i></p>
<p><b>COMPUTING DEVICES CAN BE INCLUDED ON COMPETITIVE AND NON-COMPETITIVE PROPOSAL BUDGETS</b></p>	<p>Computing devices under \$5,000/unit may be direct charged to the project or activity under the following circumstances:</p> <ul style="list-style-type: none"> <li>▪ The machines are essential* (not exclusive) and allocable to the project in that they are necessary to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or "peripherals") for printing, transmitting and receiving, or storing electronic information.</li> <li>▪ The project does not have reasonable access to other devices or equipment that can achieve the same purpose; devices may not be purchased for reasons of convenience or preference.</li> </ul> <p style="text-align: right;"><i>Applicable CFR Sections: 200.33, 200.48, 200.89, 200.439, 200.453C</i></p>
<p><b>PARTICIPANT SUPPORT COSTS CAN BE INCLUDED FOR AGENCY APPROVAL ON COMPETITIVE AND NON-COMPETITIVE PROPOSAL BUDGETS</b></p>	<p>Participant support costs are allowable with agency prior approval. This includes stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects (except NIH Kirschstein-NRSA programs). Participant support costs are not routinely allowed on research projects but can be charged if the project includes an education or outreach component and the agency approves such costs.</p> <p>These costs should be explicitly listed in the proposal budget or approved by the funding agency after the award has been made. These costs will be tracked uniquely in GL Account 57824 (versus Research subject payments in GL Account 57823). Participant Support costs also will not realize indirect cost recovery under the Uniform Guidance.</p> <p style="text-align: right;"><i>Applicable CFR Sections: 200.75, 200.456</i></p>
<p><b>PUBLICATION AND PRINTING COSTS MAY BE CHARGED AFTER THE PERFORMANCE PERIOD HAS ENDED</b></p>	<p>Publication expenses related to the project may be incurred after the end of the performance period without prior approval of a no-cost extension. These costs must be incurred during the 90-day close-out period. Contracts &amp; Grants Accounting (CGA) will provide details in the near future on processing procedures.</p> <p style="text-align: right;"><i>Applicable CFR Section: 200.461</i></p>

<sup>1</sup> NIH has waived their right to pre-approve these items.

<p><b>SHORT-TERM, NON-IMMIGRATION VISA COSTS CAN BE INCLUDED ON COMPETITIVE AND NON-COMPETITIVE PROPOSAL BUDGETS</b></p>	<p>The Uniform Guidance allows short-term, non-immigration visa costs for a specific period and purpose as direct costs to federal awards. The person connected with these visa costs must be critical, necessary and clearly identified as directly connected to the work performed on the federal award. Because this is being classified as a recruiting cost, only the initial visa cost is allowable. J-1 and H-1B visas are for a specific period and purpose; therefore, these visa types are generally allowable if the specific conditions are met.</p> <p style="text-align: right;"><i>Applicable CFR Section: 200.463D</i></p>
<p><b>PI SABBATICALS NO LONGER REQUIRE PRIOR APPROVAL; ONLY PI DISENGAGEMENT LONGER THAN 3 MONTHS</b></p>	<p>Sponsor prior approval is no longer required when PIs are away from campus for 3 months or longer, as long as their work on the project continues at no less than 75% of the level of effort committed. Therefore, we no longer need to seek prior approval for sabbaticals. However, we do still need to seek prior approval if a PI will be "disengaged" for 3 months or more.</p> <p style="text-align: right;"><i>Applicable CFR Section: 200.308</i></p>
<p><b>UCSF MUST DETERMINE, DOCUMENT AND MONITOR SUBRECIPIENT RELATIONSHIPS</b></p>	<p>The Uniform Guidance reiterates the definition of Subrecipients and Contractors, and gives federal agencies the option to require us to document how we make this determination. To this end, Research Management Services (RMS) will standardize its business process to ensure consistency across UCSF.</p> <ul style="list-style-type: none"> <li>▪ Subrecipients are collaborators who contribute to the design, implementation and reporting of research. Example: Study sites that recruit and enroll patients.</li> <li>▪ Contractors perform "work for hire" as part of their regular business model. The service provided is routine and not unique to the project. Example: Whole-genome testing conducted by Affymetrix.</li> </ul> <p>Importantly, Subrecipients have publishing rights to their portion of the project, while Contractors do not.</p> <p>UCSF is obligated to monitor Subrecipients for compliance with all applicable federal guidelines. The PI's signature on Subrecipient invoices indicates that the work performed fulfills the Subrecipient's commitment to the project.</p> <p style="text-align: right;"><i>Applicable CFR Section: 200.330</i></p>
<p><b>THE SUBRECIPIENTS' NEGOTIATED F&amp;A RATE OR AN ALTERNATIVE RATE AS DESCRIBED BELOW MUST BE USED FOR ALL SUBAWARDS INCLUDED IN COMPETITIVE PROPOSALS</b></p>	<p>If a federal program has a published statutory F&amp;A cap, that rate must be used both by UCSF and all of its subrecipients. For instance, NIH has published statutory caps of 8% for:</p> <ul style="list-style-type: none"> <li>▪ Awards to domestic organizations with a foreign or international subrecipient</li> <li>▪ Awards supporting institutional training grants and K awards</li> </ul> <p>For all other federal programs, if a subrecipient has a federally negotiated F&amp;A rate, it must be used. If the entity does not have a negotiated F&amp;A rate, a 10% de minimis F&amp;A rate must be used instead.</p> <p>PIs may not negotiate or agree to lower rates with their subrecipients. There is no change to UCSF recovery of its own F&amp;A – this remains limited to receiving our F&amp;A on the first \$25K of each subaward.</p> <p style="text-align: right;"><i>Applicable CFR Section: 200.331</i></p>
<p><b>AGENCY PRIOR APPROVAL IS REQUIRED TO ENTER INTO FIXED PRICE/RATE SUBAWARDS, WHICH MAY NOT EXCEED \$150K <sup>1</sup></b></p>	<p>Agency prior approval is required to enter into a fixed price/rate subaward rather than a cost-reimbursement subaward, and the total value of each fixed price/rate subaward may not exceed \$150K.<sup>1</sup> Fixed price subawards are most commonly used for clinical trial site agreements, foreign subrecipients, and small businesses. To expedite agency approval, PIs/departments should add a new justification statement to proposals contemplating a fixed price/rate subaward. A statement is not needed for other subawards.</p> <p style="text-align: right;"><i>Applicable CFR Section: 200.332</i></p>
<p><b>NEW PROCUREMENT RULES ARE DELAYED</b></p>	<p>The new procurement standards will be effective July 1, 2016. Changes in processes include:</p> <ul style="list-style-type: none"> <li>▪ Quotes or informal bidding for transactions between \$3K and \$150K</li> <li>▪ Federal Contracting Officer to approve sole source contracts over \$150K</li> </ul> <p>UCSF will issue detailed guidance later in the year.</p> <p style="text-align: right;"><i>Applicable CFR Sections: 200.317-326</i></p>
<p><b>FAMILY FRIENDLY POLICIES ARE NOT YET EFFECTIVE</b></p>	<p>The Uniform Guidance includes family friendly policies to cover the cost of identifying (but not providing) locally available child-care for conference attendees, and temporary dependent care costs required to enable personnel to travel in support of a project's aims. However, in order to charge these expenses to federal grants, institutions must have a standard policy of paying such expenses on all fund sources. Until such time as the UC System identifies the resources to implement such a policy, these expenses will not be charged to federal grants.</p> <p style="text-align: right;"><i>Applicable CFR Sections: 200.432, 200.474</i></p>

<sup>1</sup> May not exceed the Simplified Acquisition Threshold, which is currently \$150K