Uniform Guidance Highlights
for
Department Administrative Roundtable (DART)

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March 4, 2015
Uniform Guidance

• Framework
• Agency Updates: NIH
• Case Study
• Questions/References
Framework
Uniform Guidance
Framework

• Uniform Guidance (UG)
  • Reduces administrative burden
  • Reduces waste, fraud, and abuse
  • Merges 8 circulars into 1
  • Is the most significant change in federal grant administration in 50 years
## Terminology

<table>
<thead>
<tr>
<th>Terminology</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prior approval</td>
<td>UNMC must ask sponsor for permission to take an action, cannot take the action until sponsor explicitly approves</td>
</tr>
<tr>
<td>Expanded authority</td>
<td>Sponsor delegates approval authority to UNMC; UNMC can take action with proper justification/documentation</td>
</tr>
</tbody>
</table>
## NIH Developments

<table>
<thead>
<tr>
<th>Date</th>
<th>Document Type</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>December 2014</td>
<td><strong>HHS Interim Final Regulation 45 CFR Part 75</strong></td>
<td>• Went into effect 12/26/2014&lt;br&gt;• Allowed for 60-day public comment period</td>
</tr>
<tr>
<td>February 2015</td>
<td><strong>NIH Interim Grant General Conditions</strong></td>
<td>• Highlights UG-related changes&lt;br&gt;• Summarizes selected policies that remain in effect&lt;br&gt;• Is not a complete listing</td>
</tr>
<tr>
<td>Later in 2015</td>
<td><strong>NIH Grants Policy Statement</strong></td>
<td>• Will be revised, after comment period</td>
</tr>
</tbody>
</table>
UG: NIH Interim Conditions: Allowability of Costs Tests

- Reasonable
- Allocable
- Consistent
- Conforming
UG: NIH Interim Conditions: Expanded Authorities

- Carry-forward of unobligated balances*
- 90-day pre-award spending
- No-cost extension: First, for up to 12 months, and notification before end date
- Provide fixed-price subawards*
- Direct charging of administrative and clerical salaries*
UG: NIH Interim Conditions: Expanded Authorities

*When appropriate

- Carry-forward of unobligated balances
- Provide fixed-price subawards
- Direct charging of administrative and clerical salaries
UG: NIH Interim Conditions: Expanded Authorities

Carry-forward of unobligated balances

- If allowed in the NOA
UG: NIH Interim Conditions: Expanded Authorities

Provide fixed-price subawards
- If the project scope is specific
- If adequate pricing data is available
UG: NIH Interim Conditions: Expanded Authorities

Direct charging of administrative and clerical salaries
• If services are integral to project
• If individuals can be specifically identified with the project
• If such costs are explicitly included in the budget
• If the costs are not also recovered as indirect costs
UG: NIH Interim Conditions: Prior Approval

- Change in scope
- No-cost extension: Second, for longer than 12 months, or notification after end date
- Change in status of PI or key personnel named in the NOA: Withdrawal from the project, three-month absence, 25% effort reduction
- New foreign component
Charging as direct costs (supply) is allowable

- If essential and allocable
- Does not need to be dedicated solely to project
UG: NIH Interim Conditions: F&A Rates – Other than federally-negotiated rates

<table>
<thead>
<tr>
<th>Types of recipients</th>
<th>Percentage</th>
<th>Category</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>10%</td>
<td>MTDC   Does not have negotiated rate</td>
</tr>
<tr>
<td></td>
<td>8%</td>
<td>MTDC   Foreign organizations</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Types of projects</th>
<th>Percentage</th>
<th>Category</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>8%</td>
<td>MTDC   Institutional training</td>
</tr>
<tr>
<td></td>
<td>0%</td>
<td>Individual fellowships</td>
</tr>
<tr>
<td></td>
<td>0%</td>
<td>Conferences</td>
</tr>
<tr>
<td></td>
<td>0%</td>
<td>Construction</td>
</tr>
<tr>
<td></td>
<td>0%</td>
<td>Genomic Arrays</td>
</tr>
</tbody>
</table>
UG: NIH Interim Conditions: Closeout

Due within 120 calendar days of end date

- Final Federal Financial Report
- Final progress report
- Final Invention Statement
Case Study
Uniform Guidance
You are a departmental administrator. Your PI, Dr. Funded, is halfway through the current budget period of an R01 grant. It is underspent by approximately $30,000.

Due to recent scientific developments, Dr. Funded would like Dr. Smart to work on Specific Aim #1. Dr. Smart works at the University of Exotic Foreign Location, which has an F&A rate of 50%.

Dr. Funded would also like you to work on the grant, specifically to coordinate with Dr. Smart. You estimate that would take 2% of your time. Due to the time zone difference, you might need to work from home some evenings.
UG: Case Study

• Can you subcontract with University of Exotic Foreign Location?

• What F&A rate would you use?

• Can you direct-charge your time?

• Can you direct-charge a laptop?
UG: Case Study

Can you subcontract with University of Exotic Foreign Location? What F&A rate would you use?

Considerations

• OMB Circulars A-21 / A-110 or UG?
• Is this a change in scope?
UG: Case Study

Can you subcontract with University of Exotic Foreign Location? What F&A rate would you use?

• Prior approval required to add a foreign subcontract
• 8% MTDC
UG: Case Study

Can you direct-charge your time? Can you direct-charge a laptop?

Considerations

- Is 2% beyond the support you normally provide to a sponsored project?
- Can you do your work without the laptop?
UG: Case Study

Can you direct-charge your time? Can you direct-charge a laptop?

• Need more information
References

Uniform Guidance
NIH UG Documentation

HHS Interim Final Regulation 45 CFR Part 75

NIH Notice NOT-OD-15-065

NIH Interim Grant General Conditions

NIH UG Frequently Asked Questions