Goal for Reform

“Reduce Both Administrative Burden and Risk of Waste, Fraud and Abuse”

- Limiting costs for best use of federal resources
- Stronger oversight
- Target audits on risk of waste, fraud and abuse
COFAR

“Strong Controls Yield Better Outcomes”

- Guidance targets risks & minimize burden
- Standardized business processes & data
- Well trained workforce
- Strong program oversight
Uniform Guidance - Feds

- OMB will not revise document
- Accepting comments and questions
- Issue FAQs to address issues
- OMB & COFAR leadership
Agency Implementation

- Must submit DRAFT to OMB by June
- Not able to share plans/strategy
- Work towards consistency over summer
- Issue plans in early fall (target)
- Train agency staff
Agencies, cont.

- Substantial impact to their policy office and operations
- Harried, frustrated, frantic staff
  - Unclear why timing was surprising
- Potential changes to their systems and websites
- Limited coordination among agencies
Grantee Community

- Designate workgroup(s)
- Seeking consensus on interpretations
- Sharing info via COGR and FDP
- Provide feedback to agencies
Working Group

- DAs from Med School and Danforth & OSRS, SPA, OGC, Compliance
- Purchasing, H/R, Dean’s Office and others as needed
- Monthly meetings
- Detailed discussion & feedback
Potential Impacts to Operations
Applicability of UG

- Applies to all new awards and increments issued on/after 12/26/14
- Manage awards under old and new guidelines
- Inconsistent UG trigger (NOA date, budget start date...)

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Subagreements

- Document vendor vs. collaborator determinations
- Risk assessment of new entities – must complete prior to issuing subK
- De minimus F&A rate of 10%
Procurement

- Competitive bids for items >$3,000
  - Substantial change to purchasing workload
  - Longer lead-times for deliveries
  - Storage requirements
  - Documentation of bids
  - Impact to p-card transaction limit
Administrative Salaries

- *Integral* to a project or activity
- Individuals can be specifically identified
- Such costs are explicitly included in the budget or have the prior written approval of the Federal Awarding agency.
Prior Approvals

- Grantee directed to seek prior written approval before undertaking certain tasks.
  - Can Feds handle additional request volume
  - What is expected response time
  - Inconsistent waiver of prior approvals among agencies
Compensation

- Incidental compensation – paid at IBS & prior written approval
- Intra-university consulting – approved in writing by federal agency
- Vacation payout – treated as F&A cost
  - VAP earnings code
  - Charge fed portion to Dept account?
  - Edits in HRMS