UNIFORM GUIDANCE

WU structure announced to:

• Executive Committee for Research

• RNews and Website (8/21/14)
  ▪ https://research.wustl.edu/resources/uniformguidance/pages/default.aspx
UNIFORM GUIDANCE, CONT.

- COFAR FAQ’s – still waiting, should be issue by end of August
- Do not expect third set of FAQ’s
- COFAR communicating at NCURA and FDP meetings (plus discussion with COGR)
- Procurement is still primary concern
PROCUREMENT

• Still the primary concern
• What risk are Feds concerned about?
• How does this reduce admin burden?
• “Bear Claw” concept
  • Standard Requirements
  • New Requirements
'Claw' of Procurement Requirements in Uniform Guidance
(2 CFR §200.320)

1. Micro Purchases
   - Up to $3K
   - No quotations
   - Equitable distributions

2. Small Purchases
   - Up to $150K
   - Rate quotations
   - No cost or price analysis

3. Sealed Bids
   - $150K
   - Construction projects
   - Price is a major factor

4. Competitive Proposals
   - >$150K
   - Fixed price or cost reimbursement
   - RFP with evaluation methods

5. Sole Source
   - Unique
   - Public emergency
   - Authorized by agency (or pass-through entity)
   - No competition

General Standards:
A. Documented Policies
B. Necessary
C. Full & Open Competition
D. Conflict of Interest
E. Documentation
   i. Cost & Price Analysis
   ii. Vendor Selection

SOURCE: Gil Tran, Office of Management and Budget, National Council of University Research Administrators annual meeting, Aug. 13, 2014
OTHER ISSUES

- F&A Rebudgeting for 52.5%
- A-133 audit fieldwork initiated
- Spending rates monitored by feds
QUESTIONS?

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