

UG Designation

Overview and Key Concepts

As part of the University's internal controls to ensure that the correct guidelines are being followed, Washington University will be flagging awards as either being subject to the Uniform Guidance 2CFR Part 200 (UG) or the applicable OMB Circulars. In general, awards issued with new money on or after December 26, 2014 are subject to the UG, see Appendix A for links to agency implementation guidelines. In order to document which awards will follow the UG, the University will be using a designation of "U" within the AIS Profile system in the <42> Pub Health Sr field. When this determination has been made based on agency implementation guidelines and the Notice of Award (NoA), the new UG terms will apply to the fund in its entirety, see Appendix B for examples. .

Procedures

Prime Awards -The Office of Sponsored Research Services –Grants/Contracts Team will make the determination based on the notice of award or contract for when the UG terms are applicable. When this determination has been made, the aforementioned "U" will be entered on each allocation with the same root five digit fund number. All UG terms, with the exception of the Procurement Guidelines, will be in effect henceforth for this award. The University will flow down the UG terms to subrecipients, as applicable.

Pass-through Awards (In-coming Subawards) - The Office of Sponsored Research Services -Contracts Team will indicate whether or not the agreement is subject to UG on the internal Summary of Terms & Conditions (STC) form. Subsequently, the OSRS- Grants Team will enter the "U" designation into the profile at the time of entry.

Exception Reporting

Sponsored Projects Accounting will periodically monitor awards/contracts via RAPs queries to ensure that all allocations have been flagged correctly for the applicable federal guidelines

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Agency Links on UG implementation

Department of Justice

- [Title 28 CFR 70](#)
[\[PDF-216 Kb\]](#)

Environmental Protection Agency

- 2 CFR Parts 200 and 1500
- [EPA Letter to Recipients Implementing Uniform Guidance](#)

National Aeronautics and Space Administration (NASA)

- 2 CFR 1800
- https://prod.nais.nasa.gov/pub/pub_library/srba/index.html (link is external)

Department of Health and Human Services

(CDC, HRSA, AHRQ, SMHSA, FDA, NIH, etc.)

- 45 CFR Part 75

National Institutes of Health (NIH)

- [Interim General Grant Conditions \(link is external\)](#) serve as the applicable terms and conditions
- See also NIH's 45 CFR Part 75 [related FAQs \(link is external\)](#).
- Revised Grants Policy Statement <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-087.html>

The National Science Foundation (NSF)

- PAPPG Effective 12/26/14
- [Proposal & Award Policies & Procedures Guide \(PAPPG\) \(link is external\)](#),

Examples and Scenarios for Agency Implementation

When will the Uniform Guidance apply to my award?

The UG will apply to the scenarios below when the issuance of the agency modification or award is on or after December 26, 2014. The Department of Defense is the only agency which has opted to apply the UG terms to new awards exclusively (see below).

New Awards and Competitive Renewals

- *The new UG terms will apply to all new awards issued on or after December 26, 2014 including any carry forward funds from prior competitive segments that are approved for use in the current period.*

Non-Competing Continuations

- *The UG terms will apply to non-competing continuations with incremental funding and will apply to the award in its entirety including any carryforward from previous budget periods.*

Supplemental Funding

- *The UG terms applies to the supplemental increments received for an award and following the receipt of the award the UG terms will apply to the awards in its entirety including any unspent funds remaining at the time the supplement is received.*

Award Revisions with Additional Funding

- *The UG terms will apply to award revisions that provide additional funding as part of the revision. The UG will apply to the award in its entirety including any unspent funds at the time the revision or additional funding is received.*

When will the Uniform Guidance NOT apply to my award?

The Department of Defense is the only agency which has opted to apply the UG terms to new awards issued after 12/26/14 exclusively. The UG terms will not apply on any other actions or modifications.

Non-Monetary Modifications/Revisions to the Award

- *The UG terms will not apply to changes in the award where there is no additional dollar increase to the award. For example a modification to remove a restriction of the terms would not result in the UG terms applying.*

Less Unobligated Balance

- *The UG terms will not apply to approvals for restricted carryforward where no additional funding is supplied for the consecutive year.*

Reductions in Funding

- *The UG terms will not apply to modifications that reduce the obligated award amount.*