



## OFFICE OF SPONSORED PROGRAMS

Charles R. Drew University of Medicine and Science

### What Principal Investigators (PI) and Administrators Need to Know Based on the Uniform Grants Guidance after December 26, 2014

The Uniform Guidance governs the management of federally funded sponsored projects across the entire project lifecycle. The guidance became effective on December 26, 2014. The guidance supersedes and streamlines requirements from the eight (8) Office of Management and Budget (OMB) Circulars including A-21, A-110 and A-133 that were applicable to institutional of higher education (IHEs). This Reference Guide highlights areas impacted by the Uniform Guidance across the sponsored project lifecycle. More detailed information is available on CDU OSP website <http://www.cdrewu.edu/res/RA/osp/Uniform>.

#### Proposal Preparation

Review the Proposal Preparation Guide, which includes details relevant to proposals submitted on or after December 26, 2014. Below are the key highlights:

- Newly allowable direct charges may include, among others:
  - Administrative and clerical salaries (if integral to project). Prior agency approval required.
  - Computing devices costing less than \$5,000.
- Subaward proposals must use a subrecipient's federally negotiated Facilities & Administrative (F&A) rate.
  - If none exists, then you must use 10% de minimis rate, unless no F&A required.
- Subaward proposals must include a new Subrecipient vs. Contractor classification checklist [..\Subaward - Uniform Guidance\FDP Form - Checklist to Determine Subrecipient or Contractor Involvement.pdf](#)
- No need to include voluntary committed cost sharing; agencies may not consider it in merit review.

#### Managing Awards and New Funding Increments

- Review carefully new Terms & Conditions of Notice of Grant Award.
- Review the Cost Principles Reference Guide for allowable and unallowable costs, and prior approval requirements, including before rebudgeting.
- Monitor progress and expenditures. It is a longstanding requirement that the PI is responsible for all aspects of the project, including ensuring that all expenditures are reasonable, allocable and allowable to the project. More information about the PI's fiscal responsibility, including quarterly reviews of expenditures, available soon.

- New emphasis on sharing excess equipment and supplies.

### Subrecipient Monitoring

- As in the past, the PI is responsible for monitoring all subrecipients. This requires:
  - Review of subrecipients' progress reports.
  - Review of subrecipients' expenditures to ensure they are reasonable, allowable and allocable.
  - Corrective action and notification to OSP and Finance if subrecipient is not performing.
- Shorter timeframe for subawardee to submit final invoices to comply with University closeout procedures.

### Final Award Closeout

- As of May 2015, finalize expenses within 60 days of the project termination, and within 40 days for subawards to CDU, as compared with CDU current 120-day schedule. PIs and administrators will receive notifications in advance.
  - Contact OSP to request a no-cost extension from the funder if necessary and appropriate.

### Summary: Support and Resources

- Contact OSP for help with proposal budgets and any funding agency interactions.
- OSP will provide close-out reminders for new deadlines.
- Education and Trainings are available at: <http://www.cdrewu.edu/res/RA/osp/Education>
- Check the Uniform Guidance Website periodically for updates:  
<http://www.cdrewu.edu/res/RA/osp/Uniform>.