

What Principal Investigators Need to Know

AWARD REQUIREMENTS CHANGED OR EMPHASIZED IN UNIFORM GUIDANCE

Uniform Guidance (UG) went into effect on December 26, 2014 and represents a change from previous Federal regulations applicable to Federal awards contained in OMB Circulars A-122, A-110 and A-133. The following information highlights the noteworthy changes for a select group of items that may impact research at Fred Hutch. For questions please contact the Office of Sponsored Research: P | 667-4868 E | gmail@fredhutch.org

General

Applicability and Agency Implementation 200.101

- All new and renewal awards received on or after December 26, 2014 are subject to UG. UG implementation for other award actions and circumstances may vary among funding agencies. Awards may be subject to UG in their entirety, or subject to both old and new rules within the same award. Award terms and conditions will specify applicability.

Electronic Record Retention 200.335

- Use of electronic records is acknowledged as today's acceptable standard business practice and is encouraged to replace use of paper records. Periodic quality control reviews are required.

Performance Measurement 200.301, 200.327-328

- Awards may contain more detailed requirements regarding the frequency, content and certification of technical/scientific progress reports and related financial reports.

Pre-Award

Admin and Clerical Staff 200.413 (c)

- Administrative and Clerical salaries may be allowable as direct costs if four requirements are met. If not included and justified in the proposal budget, such salaries cannot be charged to the sponsored program until sponsor prior approval is received.

Computing Devices <\$5,000 200.453(c)

- Computing devices under \$5,000/unit may be direct charged to the project or activity if they are essential and allocable to the project, even if they are not solely dedicated to the performance of a Federal Award.

Pre-Award Costs 200.458

- Pre-award costs may require agency prior approval. Pre-award costs are those costs incurred prior to the effective date of the award that are necessary for efficient and timely performance of the award, and allowable in accordance with award terms and conditions.

Prior Approvals 200.407, 200.308

- Prior written approval from the agency may be required or advisable for certain special/unusual costs. Requirements vary among awarding agencies.

Short Term Visa Costs 200.463 (d)

- Short term visa costs are allowable if they are critical and necessary to the project and not prohibited by the agency. Long term (immigration) visa costs are unallowable.

Post Award

PI Absence from Project 200.308	<ul style="list-style-type: none"> PI can be absent from campus while still remaining engaged in the project. Prior approval from federal sponsor is required if there is (a) a change in scope/objective; (b) a change in key person specified in NOA; or (c) disengagement for more than 3 months or a 25% reduction in time by approved Project Director/PI.
Procurement 200.110(a)	<ul style="list-style-type: none"> Fred Hutch will exercise the option to defer the changes to the procurement standards until December 26, 2015. Until then, Fred Hutch will continue to comply with the procurement standards contained in OMB Circular No. A-122.
Printing/Publication Costs 200.461(3)	<ul style="list-style-type: none"> If costs for publication or sharing of research results are not incurred during the award period, such costs may now be charged anytime within the 90 day closeout period of the award end date.
Subrecipient Determinations 200.330	<ul style="list-style-type: none"> Fred Hutch must document its determination that an entity's role meets the criteria for a subrecipient vs. a personal services/vendor relationship.
Subrecipient F&A 200.331(4)	<ul style="list-style-type: none"> A Subrecipient's federally negotiated F&A rate must be used unless the Federal award restricts the F&A rate. A 10% F&A rate must be used when the subrecipient does not have a federally negotiated rate. *NIH will continue to utilize the statutory 8% rate that is currently reflected in the Grants Policy Statement (GPS) for foreign subawards.
Subrecipient Invoicing 200.305(b)(3)	<ul style="list-style-type: none"> Subrecipient invoices must be reviewed, approved and paid within 30 days of Fred Hutch's receipt of a proper invoice.
Subrecipient Monitoring and Management 200.331	<ul style="list-style-type: none"> UG requires more stringent due diligence and monitoring of subrecipients, including documentation of Fred Hutch's review of subrecipient's technical performance and financial management throughout the award.
Travel 200.474	<ul style="list-style-type: none"> Documentation is required to demonstrate that an individual's travel is necessary to the Federal award.
Value Added Tax (VAT) 200.470 (c)	<ul style="list-style-type: none"> Foreign taxes charged for the purchase of goods or services that is legally required to be paid in the foreign country is allowable, provided the goods or services are an allowable expense, and subject to certain UG criteria.

Close-out

Close-out: 90 Day Deadline 200.343	<ul style="list-style-type: none"> Fred Hutch will continue to require that all Final progress, financial and other reports are due no later than 90 calendar days after the end date of the period of performance.
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