

**Major Changes in the Uniform Guidance Affecting
 Proposal Budgets, Project Direct Costs, and Project Management**

The Office of Management and Budget (OMB) has combined many federal circulars into a single guidance document (known as Uniform Guidance, or 2 CFR 200) that can be used by all agencies. These new regulations are effective December 26, 2014.

<p>Subrecipient Monitoring</p>	<p>Increased monitoring of subrecipients is required, including pre-proposal subrecipient commitment and approval, and post-award expenditure tracking.</p> <p>PIs must advise their OVPR research or contract officer early in the proposal development process if a subagreement will be awarded to another organization and its PI to play a significant role in the proposed project. The relevant OVPR research or contract officer will work with the PI and proposed subrecipient(s) to complete a <i>Subrecipient Commitment Form</i> PRIOR to proposal submission to complete the following: (a) determine eligibility of the organization to serve as a subrecipient on the project, (b) submit required documents and certifications to WMU, (c) verify approval to participate as a subrecipient from the organization’s Authorized Official, and (d) meet any other pre-award conditions associated with the project.</p> <p>Subsequently, if an award is made by the sponsor, the OVPR research contract administrator will work directly with the proposed subrecipient to complete the award agreement.</p> <p>During the project’s implementation, WMU’s PI and his/her department will work with the Grants and Contracts Office to approve expenditures and monitor the subrecipient’s performance.</p>
<p>Charging Administrative/Clerical And Programmatic Salary Costs</p> <p>Applicable Uniform Guidance (UG) Sections: 200.413 200.430</p>	<p>Administrative and clerical salaries (in certain circumstances) AND programmatic salary costs can be included on competitive proposal budgets.</p> <p>Administrative and Clerical Salaries</p> <p>In general, administrative and clerical salaries should still not be direct charged, but the rules governing “major project or activity” exceptions have been dropped and replaced by the following criteria, all of which must be met:</p> <ol style="list-style-type: none"> 1. Administrative or clerical services are integral* to a project or activity; 2. Individuals involved can be specifically identified with the project or activity; 3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and 4. The costs are not also recovered as indirect costs. <p>If all of these requirements are met, PIs/departments should add a new justification statement to proposals to facilitate the required agency approval.</p> <p>*WMU interpretation: (1) the services are essential, vital, or fundamental to the project or activity; AND (2) a minimum of 15% FTE is budgeted in the grant’s budget year or there are documented special circumstances.</p> <p>Programmatic Salary Costs</p> <p>Costs related to protocol development and maintenance, managing substances/chemicals, managing and securing project-specific data, and coordination of research subjects are allowable direct costs when they are “contributing and directly related to work under an agreement.” Thus, these programmatic costs may be direct charged using the same underlying requirements as other types of direct costs, and are not subject to the extra approval requirements required of administrative and clerical costs. They are still subject to all regular costing requirements (e.g., allocability, reasonableness, allowable by terms of the award, incurred within award period).</p>

<p>Participant Support Costs</p> <p>Applicable UG Sections: 200.75 200.456</p>	<p>Participant support costs can be included for agency approval on competitive proposal budgets.</p> <p>After UG implementation, participant support costs (see 200.75) are allowable with agency prior approval. This includes stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects. Participant support costs are not routinely allowed on research projects but can be charged if the project includes an education or outreach component and the agency approves such costs.</p> <p>These costs should be explicitly listed in the proposal budget or approved by the funding agency after the award has been made.</p>
<p>Computing Devices (Under \$5,000 Unit Cost)</p> <p>Applicable UG Sections: 200.33 200.48 200.89 200.439 200.453c</p>	<p>Computing devices can be included on competitive proposal budgets.</p> <p>Computing devices under \$5,000/unit may be direct charged to the project or activity under the following circumstances:</p> <ul style="list-style-type: none"> ▪ The machines are essential* and allocable to the project in that they are necessary to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or “peripherals”) for printing, transmitting and receiving, or storing electronic information. ▪ The project does not have reasonable access to other devices or equipment that can achieve the same purpose; devices may not be purchased for reasons of convenience or preference. ▪ Items costing more than \$5,000 per unit are considered equipment and follow federal equipment rules regarding when they can be direct charged. (See 200.33, 200.48, 200.89, 200.439) <p>* PIs are responsible for determining whether or not the device is “essential” and to what extent the cost of the device is allocable to the sponsored project. PIs and departments should maintain documentation that describes how the proposed computing device meets the above requirements.</p>
<p>Visa Costs</p> <p>Applicable UG Section: 200.463D</p>	<p>Short-term, travel visa costs can be included on competitive proposal budgets.</p> <p>Since short-term visas are issued for a specific period and purpose, they can be clearly identified as directly connected to work performed on a Federal award and can be directly charged. They must be critical and necessary (directly benefit) the project and be allowable by the agency. Typically, these visas allow employees and students to engage in field research or attend meetings in foreign locations, or allow foreign visitors to visit the University in support of the project. Long-term visa costs, such as those that enable employment at the University (for example “J” and “H1B” visas) are not allowable as direct charges.</p>
<p>F&A on Subawards</p> <p>Applicable UG Section: 200.331</p>	<p>The subrecipient’s negotiated F&A rate or an alternative rate as described below must be used for all subawards included in competitive proposals.</p> <p>If a federal program has a published statutory F&A cap, that rate must be used both by WMU and all of its subrecipients. For all other federal programs, if a subrecipient has a federally negotiated F&A rate, it must be used. If the entity does not have a negotiated F&A rate, a 10% de minimus F&A rate must be used instead. PIs may not negotiate lower rates with their subrecipients. There is no change to WMU’s recovery of its own F&A – this remains limited to receiving our F&A on the first \$25K of each subaward.</p>
<p>Fixed Price Rate Subawards</p> <p>Applicable UG Section: 200.332</p>	<p>Agency prior approval is required to enter into fixed price subawards, which may not exceed \$150K.</p> <p>Agency prior approval is required to enter into a fixed price subaward rather than a cost-reimbursement subaward, and the total value of each fixed price subaward may not exceed \$150K. To expedite agency approval, PIs should add a new justification statement to proposals contemplating a fixed price subaward. A statement is not needed for other subawards.</p>