

# 2024 Uniform Guidance Update

## **Sponsored Projects Accounting**



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# What is the Uniform Guidance?

- Rules and requirements for federal awards issued by the Office of Management and Budget (OMB).
  - To reduce the administrative burden
  - To mitigate the risk of misuse of federal funds
- Link to the UG
  - <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1>



# Key Changes in the 2024 Uniform Guidance

- Increased the Single Audit threshold from \$750,000 to \$1 million.
- Increased capitalization threshold from \$5,000 to \$10,000
- Increased threshold from \$5,000 to \$10,000 regarding the requirement in [200.314\(a\)](#) to retain/sell unused supplies.
  - Note: CU will continue to use the \$5,000 threshold for both equipment and supplies.



# Key Changes in the 2024 Uniform Guidance

- Modified Total Direct Costs – increased definitional threshold for up to \$50,000 (previously \$25,000) of each subaward.
  - **Thresholds cannot increase until the F&A rate is renegotiated.**
  - Modified Total Direct Costs (MTDC) is the base to which indirect costs rates are applied. MTDC includes direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$50,000 of each subaward.

# Subpart D – Post Federal Award Requirements

- Section [200.303](#) – Internal Controls
  - [200.303\(e\)](#) added a requirement that a recipient/subrecipient take “reasonable cybersecurity and other measures to safeguard information including protected personally identifiable information (PII) and other types of information.” OMB did not provide a relevant framework for “cybersecurity and other measures,” leaving it to the Federal agencies to consider providing more specific guidance on the topic, as appropriate.



# Subpart D – Post Federal Award Requirements

- Section [200.333](#) – Fixed Amount Subawards
  - Increased the threshold for fixed amount subawards from the previous simplified acquisition threshold (\$250,000) to \$500,000.



# Subpart E – Cost Principles

- Section [200.407](#) – Prior Written Approval
  - Removal of nine categories:
    - **200.201 Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts: paragraph**
    - **200.311 Real Property**
    - **200.313 Equipment (Note: 200.439 Equipment and Other Capital Expenditures still requires Prior Written Approval)**
    - **200.413 Direct costs**
    - **200.438 Entertainment costs**
    - **200.454 Memberships, subscriptions, professional activity costs, paragraph (c)**
    - **200.456 Participant support costs**
    - **200.467 Selling and marketing costs**
    - **200.470 Taxes (including Value Added Tax)**



# Subpart E – Cost Principles

- Section [200.414](#) – Indirect Costs
  - [200.414\(f\)](#) **De minimis rate.** Recipients and subrecipients that do not have a current Federal negotiated indirect cost rate (including provisional rate) may elect to charge a de minimis rate of up to 15 percent of modified total direct costs (MTDC).





# Subpart E – Cost Principles

- Section [200.415](#) – Required Certifications
  - [200.415\(b\)](#) added requirements for subrecipients to certify to the pass-through entity whenever applying for funds, requesting payment, and submitting reports: “I certify to the best of my knowledge and belief that the information provided herein is true, complete, and accurate. I am aware that the provision of false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative consequences including, but not limited to violations of U.S. Code Title 18, Sections 2, 1001, 1343 and Title 31, Sections 3729-3730 and 3801-3812.” Applies to all tiers of subrecipients.

# Uniform Guidance updates effective October 1, 2024

- Existing awards starting before October 1, 2024
  - Federal agencies may apply the 2024 revisions to any amendments issued on or after October 1, 2024.

# Resources

- [COGR](#) 2 CFR 200 "Uniform Guidance" Resource Page
  - <https://www.cogr.edu/2-cfr-200-uniform-guidance-resource-page-0>
- Office of Management and Budget (OMB), Final Updates to the Uniform Guidance, Redlined Version:
  - <https://www.cfo.gov/assets/files/2%20CFR%20Revisions%202024%20Redline.pdf>

