

December 23, 2014

To: Contract & Grant Officers
Extramural Funds Directors
UC Uniform Guidance Workgroup

Subject: Implementation of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Background

On December 26, 2013, the [White House Office of Management and Budget \(OMB\)](#) issued [Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards in the Federal Register](#). Effective December 26, 2014, this "Uniform Guidance" replaces the administrative, accounting, audit rules and principles currently promulgated in eight [OMB Circulars](#), including A-21, A-110, and A-133, and governs the administration of federal assistance awards at all institutions of higher education, including the University of California.

In January of this year, the Office of the President convened a [workgroup](#), comprising of representatives from all 10 campuses, the Division of Agriculture and Natural Resources, and UC Office of the President from several key functional areas affected by the Uniform Guidance.

The workgroup:

- Worked with our higher education colleagues, including the Council of Governmental Relations (COGR) and the Federal Demonstration Partnership (FDP), to provide input on the interpretation of Uniform Guidance rules
- Analyzed the changes in the Uniform Guidance against the requirements in the previous OMB Circulars (A-21, A-110 and A-133)
- Assessed the scope of the changes vis-à-vis UC policy and campus procedures
- Recommended actions needed at the systemwide and local levels to conform to Uniform Guidance implementation.

The workgroup's Assessment Report has been posted at the University's comprehensive Uniform Guidance web resource at <http://ucal.us/uniformguidance>.

Guidance

While many of the primary concerns of the higher education community and the UC workgroup have been clarified through on-going engagement with the government's Council on Financial Assistance Reform (COFAR), we anticipate that additional questions and issues will arise as

grantees begin moving forward under the new rules. In addition, few federal agencies have yet to release their own Uniform Guidance implementation plans. The COFAR intends that the Uniform Guidance will be implemented by the federal agencies in a consistent manner. However, it is likely that the university will need to provide additional clarification and official interpretation of federal agency implementation of the Uniform Guidance in the coming year.

1. Workgroup Assessment Report

The assessment report includes four appendix items that constitute the core of UC's initial guidance:

- Frequently Asked Questions (FAQ)
- UCOP Actions
- Campus Action
- What the PI Needs to Know

The FAQs and "What the PI Needs to Know" appendices are key guidance tools to assist the campuses. These appendices will evolve as the research community better understands the Uniform Guidance, and federal agencies provide their implementing regulations and guidance.

2. Uniform Guidance Supersedes Previously Promulgated University Policies

Given the scope of the changes made by the Uniform Guidance, some Presidential and campus policies and guidance have become obsolete and need to be revised.

Until such time as University policy and guidance is brought into conformance with the new federal rules, the Uniform Guidance will take precedence where it differs with University policy and/or guidance.

3. Deferment of Procurement Standards and Full Implementation of Uniform Guidance

The Uniform Guidance allows for campuses to defer implementing the new Procurement standards (§200.317- §200.326) until July 1, 2016. Similarly, campuses can elect to implement the Uniform Guidance for existing awards even if they were awarded prior to December 26, 2014. Campus must document their decision in an official procedure by the implementation date of December 26, 2014.

Please contact [RPAC](#) or [UCOP Costing Policy and Analysis](#) if you identify instances of inconsistency between current University policy and the Uniform Guidance.

Contacts

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A handwritten signature in black ink that reads "Wendy D Streit". The signature is written in a cursive style with a large, looped 'W' and 'S'.

Wendy D. Streit
Executive Director
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