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 will become effective December 26, 2014.

### CHARGING ADMINISTRATIVE/Clerical and PROGRAMMATIC SALARY COSTS

<table>
<thead>
<tr>
<th>Applicable Uniform Guidance (UG) Sections:</th>
<th>Administrative and clerical salaries (in certain circumstances) AND programmatic salary costs can be included on competitive proposal budgets.</th>
</tr>
</thead>
<tbody>
<tr>
<td>200.413</td>
<td>Administrative and Clerical Salaries</td>
</tr>
<tr>
<td>200.430</td>
<td>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 and documented in the budget justification:</td>
</tr>
<tr>
<td></td>
<td>1. Administrative or clerical services are integral* to a project or activity;</td>
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<td></td>
<td>2. Individuals involved can be specifically identified with the project or activity;</td>
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<tr>
<td></td>
<td>3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and</td>
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<tr>
<td></td>
<td>4. The costs are not also recovered as indirect costs.</td>
</tr>
<tr>
<td></td>
<td>*TAMUS has determined that integral means: (1) the services are essential, vital, or fundamental to the project or activity; AND (2) a minimum of 20% FTE is budgeted in the grant’s budget year or there are documented special circumstances</td>
</tr>
<tr>
<td></td>
<td><strong>Programmatic Salary Costs</strong></td>
</tr>
<tr>
<td></td>
<td>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., allocable, reasonable, and allowable by terms of the award, and incurred within award period).</td>
</tr>
</tbody>
</table>

### COMPUTING DEVICES (UNDER $5,000 UNIT COST)

<table>
<thead>
<tr>
<th>Applicable UG Sections:</th>
<th>Computing devices can be included on competitive proposal budgets.</th>
</tr>
</thead>
<tbody>
<tr>
<td>200.33</td>
<td>Computing devices under $5,000/unit may be direct charged to the project or activity under the following circumstances:</td>
</tr>
<tr>
<td>200.48</td>
<td>• The devices 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.</td>
</tr>
<tr>
<td>200.89</td>
<td>• 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.</td>
</tr>
<tr>
<td>200.439</td>
<td>• Items costing more than $5,000 per unit are considered equipment and follow federal equipment rules for when they can be direct charged. (SEE 200.33, 200.48, 200.89, 200.439)</td>
</tr>
<tr>
<td>200.453C</td>
<td></td>
</tr>
</tbody>
</table>

[Additional information, recommended wording, and/or FAQs available by clicking the icon]
### Computing Devices

*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 should provide documentation in the budget justification section of the proposal that describes how the proposed computing device meets the above requirements.*

### Participant Support Costs

**Applicable UG Sections:**
- 200.75
- 200.456

**Participant support costs can be included for funding agency approval on competitive proposal budgets.**

After UG implementation, participant support costs (see 200.75) are allowable with funding 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.

These costs should be explicitly listed in the proposal budget or approved by the funding agency after the award has been made.

### Visa Costs

**Applicable UG Section:**
- 200.463D

**Short-term, travel visa costs can be included on competitive proposal budgets.**

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 considered allowable by the funding 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) and fees associated with expedited processing are not allowable as direct charges.

### F&A on Subawards

**Applicable UG Section:**
- 200.331

**The subrecipient’s negotiated F&A rate or an alternative rate as described below must be used for all subawards included in competitive proposals.**

If a federal program has a published statutory F&A cap, that rate must be used both by Texas A&M System 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 or agree to lower rates with their subrecipients. There is no change to TAMUS recovery of its own F&A – this remains limited to receiving our F&A on the first $25K of each subaward.

[Additional information, recommended wording, and/or FAQs available by clicking the icon]
### Uniform Guidance Implementation

#### Fixed Price/Rate Subawards

Federal agency prior approval is required to enter into fixed price/rate subawards, which may not exceed $150K.

Federal agency prior approval is required to enter into a fixed price/rate subaward rather than a cost-reimbursement subaward, and the total value of each fixed price/rate subaward may not exceed $150K. This will impact all federal and federal flow through fixed price subawards issued by TAMUS members, which are most commonly used for foreign subrecipients, and small businesses. To expedite federal agency approval, PIs/departments should document in the budget justification on proposals contemplating a fixed price/rate subaward. A statement is not needed for other subawards.

**Applicable UG Section:**

200.332

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#### Procurement

Changes in allowable procurement methods add additional requirements.

**Micro-purchase** procedure if purchase is $3,000 or less:
- If the price is considered reasonable, no quotations are required.
- Micro-purchases must, to the extent practicable, be distributed equitably among qualified suppliers.

**Small purchase** procedure if purchase is $3,001 and up to an institution’s competitive bid requirement threshold:

- Price or rate quotations must be obtained from an “adequate” number of qualified sources. “Adequate” is usually defined as at least three sources but must be more than one.
- Quotations do not require competitive bidding. Documentation of vendor’s price or rate can usually be obtained on vendor’s web site.
- Procurements from an institution’s strategic source contracts may meet this requirement.
- Documentation of the quotations must be maintained with the invoice and payment records.
- Procurements using a Payment Card will be effected.
- Sole source procedures can be applied to small purchases

The federal government has approved a grace period for implementation for one full fiscal year after the effective date of the Uniform Guidance. **Our implementation date will be September 1, 2016.**

**Applicable UG Section:**

200.319

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#### Closeout

**NSF & NIH Awards:**
- There is a 120 day closeout requirement.
- There is a new emphasis on submission of technical reports within 90 days.
- Cash draw accounts will close at the end of the 120 day closeout window.

**All Other Awards:**
Requirements submission of all financial, performance and other reports no later than 90 calendar days after the performance period end date.
- There is a 90 day closeout requirement.
- There is a new emphasis on submission of technical reports within the 90 day period.
- Cash draw accounts will close at the end of the 90 day closeout window.

**Applicable UG Section:**

200.343

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[Additional information, recommended wording, and/or FAQs available by clicking the icon]