

11000.00 | CSU Sponsored Programs ICSUAM Policy Announcement – Uniform Guidance Addendum

Effective Date: 12/26/2014 | **Revised Date:** 5/19/2016

The policies in ICSUAM Section 11000 are all subject to revision as a result of the implementation of the Federal Government's Uniform Guidance, Code of Federal Regulations, Title 2, Section 200 (2 CFR 200) – effective December 26, 2014. A team of CSU subject matter experts are reviewing and updating current policies related to the administration of sponsored programs in the CSU. Policy revisions will be published as they become available.

While policies are under review/revision, university departments and auxiliary organizations responsible for the administration of federally funded awards (not applicable to Student Financial Aid awards) will be required to follow the new regulations, as applicable, under 2 CFR 200. Federal regulations should be applied as follows:

Awards Subject to 2 CFR 200:

1. All federal awards awarded on or after December 26, 2014.
2. All subawards issued from a prime federal award dated on or after December 26, 2014.
3. Awards issued prior to December 26, 2014 with new funding added on or after December 26, 2014, in accordance with federal agency award modification.

Awards Subject to OMB Circulars A-21, A-110 and A-133:

1. Awards issued prior to December 26, 2014, unless awarding Federal agency notifies recipients that the new guidance is effective on awards issued prior to December 26, 2014 (see #3 above).

Exceptions:

1. The Uniform Guidance Audit Section (2 CFR 200, Subpart F) was implemented with the fiscal year beginning July 1, 2015.
2. Procurement Standards Sections (2 CFR 200, Subpart D .317-.326) Update – from [Federal Register 2015-22074](#).
 - a. Effective date: September 10, 2015
 - b. Implementation date: For all non-Federal entities, there is a two-year grace period for implementation of the procurement standards in 2 CFR 200.317 through 200.326.
 - c. Grantees are not required to follow the Uniform Guidance Procurement Standards (2 CFR 200,.317-.326) until the end of two full fiscal years following the implementation date of December 26, 2014 – which means the effective date for compliance with the updated procurement standards for the CSU will be July 1, 2017.

Policy Updates and Notifications

Updates and notifications will be published below until revised policies are posted.

Procurement Standards

All campuses will continue to follow the Procurement Standards required under OMB Circular A-110 (Subpart C, Sections 40-48) on federally funded awards from December 26, 2014 through June 30, 2017. If a CSU campus or auxiliary organization chooses to implement the new Procurement Standards applicable to federal awards under 2 CFR 200 prior to July 1, 2017, they will update their policies and procedures accordingly.

Effort Reporting

While the systemwide Effort Reporting Policy (11003.06) is under review, sponsored programs offices should continue to follow their current OMB Circular A-21 compliant policies related to effort reporting and certification until updated effort reporting guidance or policy is available – or the campus sponsored programs office updates its local policy in accordance with 2 CFR 200.430.

**Office of the Executive Vice Chancellor
Business and Finance**

Approved: May 19, 2016

Resources and Reference Materials

Useful Guidelines

Related Principles

Sound Business Practices

Laws, State Codes, Regulations and Mandates

- Federal Government's Uniform Guidance, Code of Federal Regulations, Title 2, Section 200 ([2 CFR 200](#)), including the Uniform Guidance Audit Section ([Subpart F](#)) and the Procurement Standards Sections ([Subpart D .318-.326](#))
- OMB Circular A-110 ([Subpart C, Sections 40-48](#)) – https://www.whitehouse.gov/omb/circulars_a110#40
- [ICSUAM Policy Section 11000 Sponsored Programs Administration](#)

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